

SureWaves Observations, Comments Suggestions Submitted to TRAI

In Response to Consultation Paper No. 07/2014 Dated 23rd June, 2014 On “Regulatory Framework for Platform Services”

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Contact:

Mr. Mandar Patwardhan

Business Head- Media Network

+91 – 99205 52085

mandar@surewaves.com

Mr. Rajendra Kumar Khare

Chairman and Managing Director

+91 – 99860 23455

raj@surewaves.com

3rd Floor | Ashok Chambers | 6th Cross Koramangala | Srinivagulu | 25 Intermediate Ring Road |
Bangalore – 560 047 | India

www.surewaves.com

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1. Introduction

TRAI through its Consultation Paper No. 07/2014 dated 23rd June 2014 has invited comments / suggestions from various stakeholders on a range of specific issues for establishing a regulatory framework for Platform Services.

SureWaves MediaTech (SureWaves) is a next generation technology and media Company based in India and has built industry leading solutions for television industry through its innovative technology platform called the **SureWaves Media Grid** – An integrated Ad Aggregation, Content Delivery, Network Management, Media Planning & Reporting Platform that leverages the latest advances in cloud computing for unlimited scalability and performance.

In one of the biggest technology led initiatives in the country, SureWaves has established the SureWaves Spot TV Network which enables national advertisers to advertise in more than 450 cable and satellite TV channels across India that are connected to SureWaves Media Grid – which allows centralized access to multiple Cable TV and Niche Regional Satellite TV channels, filter them on a market by market basis, check on available inventories, and schedule the commercials. The grid also provides proof of play reports almost in real-time for each of the spots across all channels with time stamps and maintains a video archival of the commercial breaks for up to 90 days for subsequent monitoring. SureWaves Media Grid works in conjunction with edge devices called '**SureWaves MediaStation**' that reside in respective TV channel studios. SureWaves Patented Technology also supports live monitoring as well as deferred monitoring of content being aired on each of the channels connected to SureWaves MediaGrid.

SureWaves is supported by Technology Development Board, Government of India and by leading global Venture Capital Funds that include Accel Partners, Canaan Partners and India Innovation Fund.

SureWaves has been honored with the '**Best Innovative Technology**' award at 5th BCS Ratna Awards in 2014 which is a platform for Broadcasters, MSOs, DTH stakeholders, Technology and Content Providers. Company has also won the '**Breakthrough Product Innovation in R&D**' at 'The Innovation Practitioners Summit 2014' which is a formal recognition forum steered by All India Management Association (AIMA), recognizing India's leading Breakthrough Innovations & Innovators in Manufacturing, Marketing, R&D and HR.

SureWaves welcomes the initiative of MIB and TRAI to bring out a Consultation Paper for establishing a regulatory framework for Platform Services offered by Distribution Platform Operators (DPOs). This document summarises SureWaves observations, comments and suggestions on the specific issues identified for consultation in the TRAI Consultation Paper.

2. Responses to Issues for Consultation by TRAI

In this section we have provided our Observations, Comments and Suggestions against each of the issues for consultation identified by TRAI in its Consultation Paper. The specific issue is listed in **blue color** with the specific reference number as in TRAI Consultation Paper and our observations / comments and suggestions are listed below each of the issues.

1. Do you agree with the following definition for Platform Services (PS)? If not, please suggest an alternative definition:

“Platform services (PS) are programs transmitted by Distribution Platform Operators (DPOs) exclusively to their own subscribers and does not include Doordarshan channels and TV channels permitted under downlinking guidelines.”

SureWaves Observations, Comments and Suggestions

- a. The technology for distribution of Television channel programs and the eco-system for creation of content have evolved greatly over a period of time. In view of the same, we would like to suggest the following alternative definition for Platform Services (PS):

“Platform services (PS) are programs that are produced by Distribution Platform Operators (DPOs) at their Head-ends in their own studios that are co-located at their Head-ends or are delivered at the Head-ends of DPOs by independent television program producers by means other than downlinking from a satellite for further transmission by DPOs to their own subscribers or to the subscribers of other DPOs through a suitable interconnect arrangement and does not include Doordarshan channels and TV channels permitted under downlinking guidelines.”

- b. In support of above definition, we are sharing our observations and comments on Technology for Distribution of Television Programs, Content Eco-system for Television Channels, Perspective of Indian Television Market in the Global Context, and the Technology Advancements for Monitoring of PS Channels as a pre-ambule which will also help to provide the context and rationale for our responses to other issues listed by TRAI for consultation.

Technology for Distribution of Television Programs

- c. We would like to submit that satellite is only one of the transmission media used between the studios of the television channel producers and the Head-ends of the DPOs and has no direct correlation to the quality of a TV channel. With the

advancement of technology, Optical Fiber Communication Links (OFC Links) have become a very important transmission media, which can be used to transmit programs between the studios of the television channel producers and the Head-ends of the DPOs. DPOs in turn distribute such programs on a particular transmission frequency or a particular transmission packet within a multiplexed bundle of programs to the Households of their subscribers.

- d. Many independent TV channel producers now prefer to deliver their programs to Head-ends of DPOs through optical fiber links, as they are a very cost-efficient and reliable alternative for transmitting high quality programs as compared to the option of delivering their programs through satellite uplinking / downlinking.
- e. Many DPOs produce their own programs in their own studios that are co-located at their Head-ends. DPOs distribute their own programs also to their own subscribers and in some cases to subscribers of other affiliated DPOs through a suitable interconnect arrangement between them.
- f. Many cable DPOs now have operations across multiple states within the country and thereby own several Head-ends directly or have a joint ownership in the Head-ends operated by their JV partners. In most cases, DPOs interconnect their own Head-ends and their JV Head-ends by fiber optic links. Hence, it has become quite a standard practice for the DPOs to leverage the fiber link technology and transmit programs over the optical fiber link across their head-ends.
- g. Several OFC Networks are now operational in India and services are being offered by private telecom operators as well as public operators like RailTel and PowerGrid Corporation of India. OFC Networks being created by RailTel, PowerGrid Corporation of India are now being made available to TSPs (telecom service providers), ISPs and Cable TV Operators in all parts of the country on a non-discriminatory basis.
- h. Government of India has also undertaken to set up National Optical Fiber Network (NOFN) to connect all cities / towns / villages of India over optical fiber network using state of the art technologies such as GPON (Gigabit Passive Optical Network) that brings fiber cabling and signals to homes using a point-to-multipoint connection scheme which allows a single fiber to serve multiple premises.
- i. It can be anticipated that many more Television Channel producers in future will increasingly begin to use the OFC links to transmit their programs to the Head-ends of DPOs. Especially, many regional satellite channels that produce programs, which cater to audiences in smaller parts of the country, will find it more attractive to use the OFC links instead of using the option of satellite uplinking / downlinking.
- j. It can also be anticipated that post digitization, when the channel

carriage capacity of DPOs would increase substantially, many new Television Channels will come up in future which would cater to regional and local interest and would be delivered to DPO Head-ends over the OFC links.

- k. Looking at examples in other countries, it may be interesting to note that the largest news channel service in the world CNN (Cable News Network) was started in US as a Cable Channel and has grown to become the premier news channel not only in the country of its origin but also in many countries in the world. Similarly, Discovery, Disney, HBO, Showtime, Cinemax are examples of leading Cable Channels in USA which top the popularity charts and have also found a way into the local television eco-system of other countries.

Content Eco-system for Television Channels

- l. As far as the content eco-system for television is concerned, it has also evolved to a very large extent. More often than not, content for television is now being produced by independent content production houses. These content production houses operate under different business models. Some of these are outlined below:
 - m. Some of the programs are tailor-made by content production houses on orders of a specific Television Channels and are licensed to them for a lifetime and the respective Television Channel owns exclusive rights over the content. It is however; free to license the transmission rights to another Television Channel or another medium such as the online video channels on the Internet.
 - n. Many programs are made independently by the Content Production Houses and are licensed to specific television channels for a specific period of time only, usually for the first run of the program. This helps them to recover some part of the costs of the production though they may not be able to recover the costs completely. After the first run or the elapse of the specific period of license, the Content Production House is free to license the transmission rights to one or multiple Television Channels (on Satellite or on the Cable) and also on alternate delivery modes such as the Internet. This is typically known as Syndicated Content and provides the Content Production House the means for further recovering their costs and earning higher returns.
 - o. The content may also be adapted by the Content Production House for multiple languages and licensed to different language Television channels within India or outside India.
 - p. In some cases, the Content Production House do not license the content for upfront payment and instead license the content to Television Channels on barter for some commercial airtime for advertisements.
 - q. Now-a-days very high quality content for television is also being

produced by independent content makers (e.g. short film makers) and some times they find it difficult to license the content to television channels for a fee. They sometimes license such content to multiple Television channels in return for a share of the advertising revenue earned by the Television Channel.

- r. In most countries, syndicated content is the biggest source of content for most of the Cable Television Channels and is also the biggest source of revenue for content makers.
- s. In view of the above, it may be appreciated that PS channels can be a big consumer of the syndicated content in India and can serve the dual purpose of encouraging the Content Production Houses on one hand and meeting the content consumption needs of their specific audiences.

Perspective of Indian Television Market in the Global Context

- t. We also wish to highlight that, India is a very large and a very diverse country and the context of local channels needs to be interpreted in a global perspective. Just to underline the point, it may be interesting to note that there are only five countries in the world (viz. China, India, USA, Indonesia and Brazil) that have a larger population than the state of Uttar Pradesh which alone has a population of ~200M. Another data point to note is that while there are 10 states in India with a population of more than 50M, there are only 25 countries in the world that have a population of 50M or higher. Further, only 50 countries in the world have a population that is larger than the city of Delhi.
- u. We also wish to submit that television, which is the largest media in India, has a penetration into only about 65% households in the country. A vast population, or 1 in every 3 citizens in the country does not have access to any form of media. Access to television media for every citizen in the country needs to be a national priority to drive the agenda of all round inclusive growth. Proposal for setting up 'Kisan TV', which was announced in the recent budget, shows the direction of Government of India's thinking and the way in which local broadcast television media can be put to good use.
- v. Keeping the above in view, it may be appreciated that in order to serve the needs of the diverse population and communities in India, there is a need for many more Television channels in India that can serve the needs of the diverse population and communities in different geographies, and quality TV channels would need to be distributed to DPOs over the fiber links rather than through satellite uplinking / downlinking which is not only expensive but there may not be sufficient satellite bandwidth available to accommodate these channels.
- w. So far, only the channels that are delivered to DPOs through downlinking from satellite have been registered and regulated in the country. It is a welcome move on part of TRAI to regulate the

PS channels, which will increasingly become the backbone for delivery of television programs to diverse audiences across the country.

- x. Until recently, it was possible to centrally monitor only the TV channels that were delivered through downlinking from satellite as these signals could be received anywhere in the country. It was difficult to centrally monitor the PS channels of Cable and Terrestrial DPOs as their signals were delivered only within their geographic area and they could not be seen in a central location within the country. Fortunately, the technology has advanced and enables ways to monitor the PS channels, which paves the way for TRAI to come up with an effective regulatory framework.
- y. It is extremely important and critical that there is a formal regulatory mechanism for registering of PS channels and the PS channels are encouraged to deliver quality programming of all genres to meet the need of the diverse audiences and communities and no programming restrictions are imposed on them vis-à-vis the TV programs that are delivered to DPOs through satellite uplinking / downlinking.

2. Kindly provide comments on the following aspects related to programs to be permitted on PS channels:

PS channels cannot transmit/ include

2.1.1 Any news and/or current affairs programs,

SureWaves Observations, Comments and Suggestions

- a. PS Channels should be allowed to transmit news and/or current affairs program as long as they have obtained the necessary registrations with MIB and meet the FDI norms as applicable to private satellite channels using downlinking facility.

2.1.2 Coverage of political events of any nature,

SureWaves Observations, Comments and Suggestions

- a. Guidelines for political events as applicable to PS channels should be similar to the guidelines applicable for private satellite channels using downlinking facility
- b. In countries like USA, local PS channels are utilized very actively as a preferred platform for political communication before the elections. It is stipulated by the regulatory authorities that local PS channels need to provide paid airtime to all candidates of political parties on a non-

discriminatory basis. If such a provision were implemented in India also, it would provide a very effective means of communication with the voters in respective regions before the elections and would strengthen the foundation of democracy in India. This will also drive the need to increase television penetration in India closer to 100% of Households, which will have the biggest impact on the economic development of the country through better awareness about Government programs and skilling of the nation for means of livelihood.

2.1.3 Any program that is/ has been transmitted by any Doordarshan channels or TV channels permitted under uplinking/ downlinking guidelines, including serials and reality shows,

SureWaves Observations, Comments and Suggestions

- a. PS Channels should be allowed to transmit any program for which they have obtained the necessary rights from the respective content owners.
- b. As explained in the pre-amble above, in most parts of the world, content eco-system has evolved greatly and most content is now owned by independent Content Production Houses and one of the most important business models for them is to license their content to multiple TV channels, a.k.a. Syndicated Content. Cable Television Channels are the biggest platforms for delivery of syndicated content and thus fulfill the needs of content owners to better monetize their content and while the PS Television Channels can better serve the media consumption needs of their audiences by licensing the right kind of content.
- c. It is extremely important and critical that PS channels are encouraged to deliver quality programming of all genres to meet the need of the diverse audiences and communities and no discrimination or programming restrictions are imposed on them vis-à-vis the TV programs that are delivered to DPOs through satellite uplinking / downlinking.

2.1.4 International, National and State level sport events/ tournament/ games like IPL, Ranji trophy, etc.

SureWaves Observations, Comments and Suggestions

Same response as for 2.1.3 above.

2. PS channels can transmit/ include

2.2.1 Movie/ Video on demand

2.2.2 Interactive games,

2.2.3 Coverage of local cultural events and festivals, traffic, weather, educational/ academic programs (such as coaching classes), information regarding examinations, results, admissions, career counseling, availability of employment opportunities, job placement.

2.2.4 Public announcements pertaining to civic amenities like electricity, water supply, natural calamities, health alerts etc. as provided by the local administration.

2.2.5 Information pertaining to sporting events excluding live coverage.

2.2.6 Live coverage of sporting events of local nature i.e. sport events played by district level (or below) teams and where no broadcasting rights are required.

SureWaves Observations, Comments and Suggestions

- a. All types of content as listed in paras 2.2.1 to 2.2.6 should be allowed in addition to the types of content as listed in paras 2.1.1 to 2.1.4 as long as the PS channels have acquired the contents rights and have the necessary registration with MIB as per guidelines proposed to be issued by TRAI.
- b. We would also like to suggest that Government of India might patronize PS channels in a big way for programs such as 'Kisan TV' and other Government communications in local languages and in locally relevant context by buying airtime slots on PS Channels to transmit these programs. This will allow the Government to use the available infrastructure for airing such awareness programs in a cost efficient manner and will also allow a source of revenue for the PS channels and ensure their economic viability.
- c. It is extremely important and critical that PS channels are encouraged to deliver quality programming of all genres to meet the need of the diverse audiences and communities and no discrimination or programming restrictions are imposed on them vis-à-vis the TV programs that are delivered to DPOs through satellite uplinking / downlinking.

3. What should be periodicity of review to ensure that the PS is not

trespassing into the domain of regular TV broadcasters?

SureWaves Observations, Comments and Suggestions

- a. As explained above, PS channels should be considered as regular TV channels on par with any private satellite channels using the downlinking facility, as long as they have obtained the necessary registration from MIB.
4. Should it be mandatory for all DPOs to be registered as Companies under the Companies Act to be allowed to operate PS? If not, how to ensure uniform legal status for all DPOs?

SureWaves Observations, Comments and Suggestions

- a. It would help if any entity that is running a TV channel were registered as a Company. Especially in view of the new Companies Act 2013, which allows One Person Companies also to be created. This would bring greater level of accountability and awareness about the entities that are running a TV channel.
- b. The above would also provide a uniform legal status for all entities that run TV channels and would position them for better recognition and support from the Syndicated Content Production Houses and Leading Advertisers.
5. Views, if any, on FDI limits?

SureWaves Observations, Comments and Suggestions

- a. Norms for FDI limits should be kept same for all TV channels. If the FDI limit for the satellite channels is kept at 26% or 49% for news and current affairs, similar limit should be applicable to any TV channel that wants to register itself for transmitting news and current affairs.
- b. DPOs with FDI up to 74% should be permitted to run non-news channels.
6. Should there be any minimum net-worth requirement for offering PS channels? If yes, then what should it be?

SureWaves Observations, Comments and Suggestions

- a. The spectrum usage and transmission expenses over satellite channels are quite high (typically, 15-20L per month per channel). The rationale for stipulating a minimum net worth for Companies using downlinking facility could perhaps have been kept at the level of Rs. 5 Cr for first channel and Rs. 2.5 Cr for the additional channel so that there is reasonable financial capability to pay for such expenses. However, in case of DPOs,

they already own the cable or DTH medium and hence there are no additional satellite usage expenses involved. It would be best to not introduce any minimum net worth norms for existing registered / permitted DPOs.

7. Do you agree that PS channels should also be subjected to same security clearances/ conditions, as applicable for private satellite TV channels?

SureWaves Observations, Comments and Suggestions

- a. Security clearances similar to private satellite TV channels should be applicable to all TV channels before they are registered. For existing PS channels, a reasonable period of time should be allowed to obtain the security clearance and the registrations.
 - b. Obtaining a security clearance would also boost the confidence of the Government Bodies and rest of the eco-system players to patronize the PS channels.
8. For the PS channels to be registered with MIB through an online process, what should be the period of validity of registration and annual fee per channel?

SureWaves Observations, Comments and Suggestions

- a. As outlined in the Consultation paper, it would be a good idea for MIB to introduce a centralized online system for registration. This would be in line with the e-governance policy of Govt. of India and will ease the process.
- b. As outlined in the Consultation Paper, annual fee for private satellite channels uplinked from India is Rs. 5 Lakh per channel per annum and for private satellite channels uplinked from abroad is Rs. 15 Lakhs per channel per annum. On payment of this fee, the channel is allowed to distribute through out the country.
- c. Also, channels seeking permission to downlink from channels uplinked from abroad need to pay a permission fee of Rs. 10 Lakhs per annum at the time of grant of initial permission.
- d. The registration fee for PS channels could be determined based on the geographical area for which the channel is requesting the permission. It is suggested that annual fee could be kept as follows:

For PS Channels for which Programs are delivered from a source in India

Geographical Area of Operation for the PS Channel	Annual Fee Per Annum Per Channel
Transmission anywhere in India	Rs. 5 Lakh
Transmission anywhere within a state	Rs. 50,000 per state
Transmission within a district	Rs. 5,000 per district

For PS Channels for which Programs are delivered from abroad

Geographical Area of Operation for the PS Channel	Annual Fee Per Annum Per Channel
Transmission anywhere in India	Rs. 15 Lakh
Transmission anywhere within a state	Rs. 150,000 per state
Transmission within a district	Rs. 15,000 per district

Initial Permission Fee For PS Channels for which Programs are delivered from abroad

Geographical Area of Operation for the PS Channel	Initial Permission Fee Per Channel
Transmission anywhere in India	Rs. 10 Lakh
Transmission anywhere within a state	Rs. 100,000 per state
Transmission within a district	Rs. 10,000 per district

Note:

- i. For transmission in multiple states, the fee can be multiplied. For transmission in more than 10 states, national permission could be sought.

- ii. For transmission in multiple districts, the fee can be multiplied. For transmission in more than 10 districts, state level permission could be sought.

9. What is your proposal for renewal of permission?

SureWaves Observations, Comments and Suggestions

- a. As outlined in the Consultation Paper, for PS channels also, the validity for initial registration can be for 10 years and renewal of permission could be granted for further period of 10 years as in the case of private satellite channels.

10. Should there be any limits in terms of geographical area for PS channels? If yes what should be these limits.

SureWaves Observations, Comments and Suggestions

- b. Geographical limit should be linked to the annual registration fee being paid per channel by the respective Company. Annual Registration Fee schedule for district / state / national level operation has been suggested above in response to consultation issues in para (8)

11. Should there be a limit on the number of PS channels, which can be operated by a DPO? If yes, then what should be the limit?

SureWaves Observations, Comments and Suggestions

- a. It should be the Government's priority that the interests of the local community are being served by transmission of locally relevant content. Typically, the practice followed by many countries is to mandate or encourage the local affiliate / Cable MSOs or the Terrestrial Service Provider to take onus for local programming and transmit the relevant content to their subscribers.
- b. Hence, TRAI may want to consider stipulating at least one locally relevant channel to be transmitted by the concerned Cable / Terrestrial DPO.
- c. It may be noted that post digitization cable DPOs will be able to carry upwards of 500 TV channels on their network. Hence, there should be no upper limit on the number of PS channels that the DPO can run as long as they are able to service the 'Must Carry' requirements as stipulated by TRAI and applicable to private satellite channels using the downlinking facility.

12. Do you have any comments on the following obligations/ restrictions on DPOs:

12.1. Non-transferability of registration for PS without prior approval of MIB;

SureWaves Observations, Comments and Suggestions

- a. Change of control through mergers and buyouts is quite a regular phenomenon amongst the Cable DPOs. Transfer of registration should typically be obtained within a reasonable period of the change of control (say within 1 month) and the permission should normally not be denied if the change of control is to an existing registered DPO.

12.2. Prohibition from interconnecting with other distribution networks for re-transmission of PS i.e. cannot share or allow the re-transmission of the PS channel to another DPO; and

- a. Any PS channel should be allowed to interconnect with other distribution network as long as it has a valid registration to operate within the respective geographic area (i.e. Districts / States / or All India registration).

12.3. Compliance with the Programme & Advertisement Code and TRAI's Regulations pertaining to QoS and complaint redressal.

SureWaves Observations, Comments and Suggestions

- a. Compliance with Program and Advertisement Code could be made applicable to PS channels also.
- b. TRAI should allow the PS channels to carry a reasonable level of banner advertisements (say one banner advertisement for up to 20 minutes per hour) as banner advertisements are an important source of revenue for some very local PS channels.
- c. Regulations pertaining to QoS and complaint redressal for PS channel could also be defined by TRAI and made applicable.

13. What other obligations/ restrictions need to be imposed on DPOs for offering PS?

14. Should DPO be permitted to re-transmit already permitted and operational FM radio channels under suitable arrangement with FM operator? If yes, then should there be any restrictions including on the number of FM radio channels that may be re-transmitted by a DPO?

SureWaves Observations, Comments and Suggestions

- a. DPO should be permitted to re-transmit already permitted and operational FM radio channels within the same geographic area in which the respective FM radio channel is allowed to operate as long

as they have obtained the re-transmission rights from the FM operator under a mutually agreed arrangement.

- b. There should be no limit on the number of FM channels that may be retransmitted by a DPO.

15. Please suggest the mechanism for monitoring of PS channel.

SureWaves Observations, Comments and Suggestions

- a. Since the PS channels are also serving the purpose of public viewing, it is logical to apply similar norms of monitoring of content as are applicable for private satellite channels.
- b. With the advancements in technology, it is now possible to centrally monitor the low-resolution version of the content of PS channels in real-time over the Internet through web-based interfaces. Low-resolution content is considered adequate for the purpose of monitoring.
- c. Similarly, using appropriate devices, it is also possible to maintain the record of the 24x7 programs of the PS channels in low resolution and make it available for central monitoring over the Internet through web-based interfaces to representatives of MIB or any other Government Agency as and when required.

16. Do you agree that similar penal provisions as imposed on TV Broadcasters for violation of the terms and conditions of their permissions may also be imposed on PS? If not, please suggest alternative provisions.

SureWaves Observations, Comments and Suggestions

- a. Since the PS channels are also serving the purpose of public viewing, it is logical for TRAI to impose similar penal provisions for PS channels for violation of the terms and conditions of their permissions as are applicable for private satellite channels.

17. What amendments and additional terms & conditions are required in the existing registration/ guidelines/ permission/ license agreements w.r.t. DPOs for regulating the PS channels?

18. What should be the time limit that should be granted to DPOs for registration of the existing PS channels and bring them in conformity with the proposed regulatory framework once it is notified by MIB?

SureWaves Observations, Comments and Suggestions

- a. A period of 6 months may be considered reasonable for existing PS channels to apply for registration with MIB after the regulatory framework is notified and the online registration facility is made available by MIB.

- b. A period of 6 months may be considered reasonable for existing PS channels to upgrade their systems for purpose of monitoring after it is notified by MIB.
19. Stakeholders may also provide their comments on any other issue relevant to the present consultation including any changes required in the existing regulatory framework.

SureWaves Observations, Comments and Suggestions

- a. We wish to highlight one more scenario, in which a television channel downlinked from the satellite by a DPO can be partially substituted by localized content at the DPOs Head-end for a certain day-part. This can be seen as a hybrid case where a television channel being received by the household is a hybrid of private satellite TV channel and a PS channel. TRAI should consider such hybrid channels also within the scope of the regulatory framework being defined. Especially, monitoring of such channels needs to be relooked at.
- b. In fact in countries like USA, hybrid channels are the norm where the local affiliate of a Network Channel (which is downlinked from satellite) is aired for about 6-8 hours in a day and for the rest of the time the local affiliate (equivalent of a DPO) is permitted to air its own locally generated or syndicated content for the rest of the day-part.
- c. PS channels and their growth should be looked at a major opportunity by Government of India to increase the penetration of television households and reach the larger population in India through the high engagement media of television. Increased reach of media will ultimately result in greater economic development through inclusive growth opportunities made possible through increased awareness of environment, health and fundamental issues of skilling and livelihood.
- d. Another aspect to consider is opportunities for creation of direct employment. According to industry estimates, Television Industry already employs 1.8M people directly in the country. The growth of the PS channels and the syndicated content eco-system in the coming days post the era of digitization posts another major opportunity for direct employment creation.

3. Summary

With the latest advances in technology, television channels would be increasingly using alternate media such as OFC links to deliver their programs to DPOs instead of using the satellite for downlinking. OFC links not only support delivery of a large number of high quality broadcast programs but are also relatively more cost efficient for delivery of content to specific geographies as compared to satellite links. Thus geographically distributed PS channels which best meet the needs of a large and very diverse population in India are likely to become the mainstay for the television industry in the days to come.

Simultaneously, Content eco-system for television channels is now increasingly being driven by independent Content Production Houses and they not only provide the contents of all genres to private satellite TV channels but would also look up to PS channels for growth of syndicated content eco-system.

So far, regulatory framework exists in India only for the private satellite TV channels which use the downlinking facility. With the anticipated growth in the PS channels, there is a need to establish a similar regulatory framework for the PS channels to make them accountable and drive their growth. Technology advances now enable effective mechanisms for centralized monitoring of PS channels.

In response to TRAI consultation paper on the subject, SureWaves has shared its observations, comments and suggestions about the evolving television industry scenario and why it is important for MIB and TRAI to promote the growth of PS channels and enable them to deliver all genres of content while putting in place an effective mechanism for registering and monitoring of PS channels under a well defined regulatory framework.

SureWaves will be more than happy to provide further clarifications on the above and engage in further discussions with TRAI officials on the business and technology aspects related to above suggestions.