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To,

Dr. Deepali Sharma,

Advisor (B&CS),
Telecom Regulatory Authority of India

Madam,

Subject:- Consultation Paper on Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services)

We are TRAI authorised CAG for Karnataka State.

We have attached our **counter comments** on the above consultation paper on selected comments/suggestions made by the other stakeholders for your consideration.

Thanking you,

Yours sincerely

Gopal Ratnam V
Secretary

Counter Comments

Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services)

The responses/comments to the Consultation Papers reveal that there is a fundamental difference on the regulatory approach to be adopted. Those are

1. The Internet Platform Ecosystem
2. The broadcasting Platform Ecosystem

From the consumer perspective it is clear that FAST/ALTD resembles Linear/Legacy Television in most aspects and is part of the same consideration set for decision making by consumer. Hence our suggestion to the regulator is to consider FAST/ALTD as the a part of the Broadcasting Platform Ecosystem with some important considerations which we will outline.

Consumer require the following;

- a) Affordable Access based on economic considerations
- b) Platform Openess to newer players
- c) Innovation of Content and Technology
- d) Accountability from the various players
- e) Transperency in policies and Prices
- f) Privacy Safeguards
- g) Protection against various harms

The regulatory framework should therefore:

preserve open internet innovation while imposing targeted consumer protection obligations proportionate to platform influence.

Based on the above, We strongly urge TRAI to formulate policies to regulate FAST/ALTD services with a new and appropriate framework.

We offer our counter comments to some of the responses/comments by grouping them into broad categories.

1. CCS is against complete deregulation, suggested among others by Industry bodies. Consumers of FAST/ALTD need regulation as the existing laws are insufficient and too

fragmentary in nature with gaps. As mentioned earlier FAST/ATLD resembles Linear Television for consumers and the harms encountered in the broadcasting sector are present to a large extent in the FAST/ALTD services. So there is a need regulatory framework with Privacy Safeguards, Grievance Redressal Obligations and Transparency Rules.

2. CCS is also against Full Legacy Broadcast Regulation. This is the position taken by the Broadcasters, MSOs and DPOs. This has led to and will lead to reduced innovation and increases in prices. So we would recommend for example a light touch regulation of Application Registration in India in an centralised registry instead of Licensing.

3. CCS is against the complete OEM immunity sought by some of the manufacturers. Such an approach will be make OEM the gatekeeper for Content and Advertising without any oversight or recourse for grievance redressal. The concept of complete neutrality claims are outdated and are also not followed diligently.

4. Some of the stakeholders have suggested self-regulation. Self regulation has not yielded benefits but has caused bottlenecks and weakened consumer rights. We would suggest that there be co-regulation, independent oversight, mandatory reporting and audit powers to ensure that consumer rights are protected.

CCS suggests that a new and appropriate regulatory framework be developed for the FAST/ATLD and propose an outline in 2 parts as under.

A. Regulatory Structure

Sl. No	Area	Suggestion
1	Entry	Registration, not heavy licensing
2	Accountability	Primary - Application Provider Secondary - Other Channel Players
3	OEM Role	Transparency and Obligations to Cooperate with regulations
4	Enforcement	Co-Regulation by the different players with Regulatory Oversight

B. Consumer Protection Obligations

There should be some mandatory provisions so that consumer rights are protected and if violated there should be pathways in local jurisdiction for quick, time-bound and fair redressal.

- i. There should be a grievance officer stationed in India
- ii. Complaint resolution should have quick and clear timelines
- iii. Child Protection Measures like Age based access and parental controls to ensure that there is no harm to children
- iv. There should be complete and clear accessibility norms
- v. Data Protection with opt-out and deletion rights.
- vi. Protection from misleading advertisements and also dark patterns in the Application
- vii. Algorithmic transparency to avoid potential harms like radicalisation and addiction.
- viii. No censorship by the players in the service chains, like App whitelisting by OEMs

Gopal Ratnam V
Secretary