

TIMES NETWORK'S COMMENTS

ON

**FORMULATION OF A REGULATORY FRAMEWORK FOR
APPLICATION-BASED LINEAR TELEVISION
DISTRIBUTION (ALTD) SERVICES (INCLUDING FREE AD-
SUPPORTED STREAMING TELEVISION (FAST) SERVICES)**



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INTRODUCTION:

At the outset, we welcome the consultation exercise undertaken by the Telecom Regulatory Authority of India (TRAI/ Authority), regarding formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming (FAST) Services).

It is pertinent to note that TRAI, w.e.f. 1st February 2019 implemented the New Regulatory Framework consisting of following regulations governing the broadcasting and cable industry: -

The Telecommunications (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017, as amended;

The Telecommunication (Broadcasting and Cable) Services (Eighth) (Addressable Systems) Tariff Order, 2017 as amended; and

The Telecommunications (Broadcasting and Cable) Services Standards of Quality of Service and Consumer Protection (Addressable Systems) Regulations, 2017, as amended.

(Collectively referred to as “Regulatory Framework for distribution of television channels”)

TRAI in its consultation paper has noted that FAST services/platforms are providing two sets of services, i.e., Linear Television channels and/or Value Added Services (On-demand content) to consumers over the Internet. TRAI has noted that the streaming of TV services on FAST channels is quite similar to traditional broadcasting but are operating without any regulatory oversight.

ALTD Services inter-alia perform the same function as traditional television distribution, namely the delivery of permitted linear television channels to consumers.

In India, ALTD/FAST services have experienced significant growth, driven by increased smart TV adoption, affordable internet access, shift in audience habits, and varied economic models, including free and differential pricing. Both revenue and user bases in digital space are expanding swiftly. However, this rapid expansion has also highlighted notable regulatory gaps and

competitive imbalances within the sector. The market shift from Pay to FAST has put revenues at risk for all stakeholders in the pay TV ecosystem.

The Regulatory framework for distribution of television channels presently does not encompass the Application based Linear Television Distribution (ALTD) including Free Ad-Supported Streaming Television (FAST) services which deliver television content via internet applications on smart TVs and similar devices.

As regards On-demand OTT services, they are fundamentally different from linear TV channels; they are user-selected, non-scheduled, and do not run as continuous linear streams, and therefore do not replicate traditional television viewing. However, these services may be considered for a fair, model revenue-share mechanism (e.g., an 80:20 split between the content owner and the platform).

A. KEY CHALLENGES DUE TO NON-REGULATION OF ALTD/FAST SERVICES

Set out below are key challenges arising from the absence of regulation for ALTD/FAST services:

(1) Regulatory Disparities

ALTD/FAST platforms provide linear TV much like the traditional broadcasters and stream scheduled programming through apps on smart TVs, yet they operate without the licensing, registration, or downlink permissions that the Cable Television Networks Act requires for cable, DTH, and IPTV. They can also circumvent the Programme and Advertising Codes, tariff rules, quality standards, and content-archiving obligations.

This regulatory mismatch is creating an uneven playing field in India's broadcasting ecosystem.

(2) Competitive Imbalance

ALTD/FAST undermines the market by offering the same content without comparable financial obligations, putting traditional platforms' revenues at risk. Pay channels sold to conventional operators on subscription terms are often made available free on FAST, effectively breaching price-parity principles. This is also distorting the Pay TV equilibrium by creating competitive pressure for Pay TV and premium content like sports also to turn free. For optimum monetization of any content, it is important that both subscription and advertisement revenues are available so that quality content and services are made available to the viewers in a cost effective manner.

Pay channels on cable/DTH at MRP appear free on FAST apps, cannibalizing subscriptions and forcing ARPU hikes that risk further churn. Due to non-parity, FAST can compromise the Pay TV ecosystem.

(3) Economic and Enforcement Concerns

ALTD/FAST platforms often control ad inventory through opaque revenue-sharing models, limiting broadcasters' visibility and control.

(4) Content Quality

Heavy reliance on ad sales only, limits the quality of content on FAST. Premium content needs subscription revenue in addition to advertisement revenue to meet the high cost of content, but due to cord cutting and unregulated free services, it has become a hindrance for Pay channels and Premium Content to find entry in viewers' homes.

(5) Consumer Protection Needs

With no standardized grievance redressal, users grievances may remain unaddressed—especially when platforms operate from overseas, making enforcement and dispute resolution difficult and enabling regulatory arbitrage.

(6) Current Gatekeeping Concerns

TV manufacturers and OS gatekeepers pre-install FAST apps, controlling channel selection, EPG placement, and ad inventory with unclear standards that may prioritize their content. Broadcasters face opaque tech fees and arbitrary blackouts, lowering content value as CTV becomes more dominant.

(7) Unregulated Local News Channels:

Due to this regulatory gap, there is a proliferation of unregulated local news channels, which is beginning to adversely affect traditional, regulated networks. This trend also raises public-interest concerns, as news and current-affairs content is disseminated without adequate checks and balances and stringent editorial controls. Such channels often operate without sufficient compliance, creating unfair competition and undermining content quality and may disseminate unverified news stories.

(8) Carriage-Like Commercial Asks

Broadcasters pay DPOs carriage fees for placement, EPG slots, and capacity etc. ALTD as DPOs could seek similar demands, plus tech/integration fees, raising broadcaster costs for platforms. There is a Carriage Fee risk as eventually, the OEMs and Aggregators may also start the Carriage fee model. A prominent OEM is already doing the same with smaller and new channels.

(9) Ad Revenue Share

Ad Revenue share models are increasingly becoming titled in favour of platforms due to absence of regulatory norms and growing dominance of few big techs. The broadcasters are not adequately being compensated for their content.

In view of the above challenges and issues, it is imperative that the ALTD/FAST services are brought under the regulatory ambit, as discussed below:

B. NEED AND RATIONALE FOR A REGULATORY FRAMEWORK

There should be regulatory and commercial parity for any services which looks, feels and acts like a TV service. The delivery pipe (internet vs satellite) should not be allowed to dictate the value of the content. A level playing field in the broadcasting ecosystem should be ensured.

There appears to be a structural undercutting of pay tv by free digital distribution. The regulatory arbitrage should be removed by bringing distribution of tv channels through digital mediums under the regulatory ambit. Greater transparency in ad-revenue sharing and monetization is also needed to protect broadcasters' control over their content.

The regulation of ALTD/FAST services is required to ensure responsible growth and to have a level field with the traditional television services. With the right regulatory framework, India can leverage the potential of ALTD/FAST channels while protecting stakeholders' interests and upholding standards.

Regulating ALTD/ FAST channels is essential to ensure fair competition, compliance with content norms, and adequate consumer safeguards in a fast-growing segment. The framework should align ALTD/FAST services with traditional TV platforms and close current regulatory gaps.

Hence, it is important that we adapt a technology neutral, platform agnostic approach which focuses on the nature of the service (distribution of linear television channels) rather than the delivery medium. There can be slight adaptations for the different platforms according to their nature. This will

ensure regulatory clarity, parity and consistency across platforms, while preventing regulatory ambiguity as technologies evolve.

The proposed regulatory framework must be formulated keeping in mind the following:

(1) Creation Side:

On the creation side, the ecosystem can be broadly grouped into two categories of entities:

- a. **Entities already permitted by the Ministry of Information & Broadcasting (MIB) to operate news and/or non-news television channels.**

Such entities hold permission after meeting prescribed eligibility requirements (including security clearance, FDI norms, management control, board composition, minimum net worth requirement, a commercial presence in India, grievance-redressal mechanisms etc.,).

Such entities should be permitted to offer their existing services without any further regulatory process. For launching new digital only services, just an intimation on MIB broadcast seva portal should be sufficient.

- b. **Other entities that are operating, or propose to operate, ALTD/FAST services.**

These entities should be required to obtain registration from the MIB by meeting eligibility conditions comparable to those applicable for the uplinking and downlinking of television channels including security clearance, FDI norms, management control, board composition, networth requirement, commercial presence in India, grievance-redressal mechanism etc.

2. Carrier Side

On the carrier side, fair, transparent, and non-discriminatory regulations should apply for ALTD/FAST platforms, and they can also be grouped into two categories as follows;

- a. **The Broadcaster owned and operated ALTD/FAST platforms.**

They shall be permitted by way of simple registration process by filing application with details to operate as ALTD/FAST platforms on the broadcast seva portal of MIB and the registration shall be granted without additional requirements since these entities are permission holders and already meet and qualify the required eligibility conditions.

b. Other entities that are operating, or propose to operate, ALTD/FAST platforms.

These entities should be required to obtain registration from the MIB by meeting eligibility conditions comparable to those applicable for the uplinking and downlinking of television channels including security clearance, FDI norms, management control, board composition, networth requirement, commercial presence in India, grievance-redressal mechanism etc.

C. BENEFITS OF THE REGULATORY ECOSYSTEM

- (1) Mandating open, non-discriminatory terms would empower broadcasters, curb monopolistic tech fees, and prevent service erosion. This supports parity without stifling FAST growth.

Implementing consistent Programme and Advertising Codes for digital linear services such as FAST channels establishes uniform content standards across all platforms, effectively addressing a significant regulatory gap in India.

(2) Parity Benefits

Pricing parity is essential to safeguard pay-TV ARPU in India, where unregulated "free" FAST substitutes accelerate cord-cutting and subscriber erosion. Without it, broadcasters face revenue squeezes from arbitrage.

TRAI regulation enforcing fees for pay content on FAST would stabilize ARPU, slow cord-cutting, and sustain ecosystem investments amid 20-22 million CTV households. Balanced pricing prevents "free ride" while enabling FAST growth.

(3) Transparent Ad-revenue share:

The Ad revenue share should be defined in the regulations. For example, a 20% platform commission may be stipulated for the distribution network/ALTD platform whereas 80% revenue share should accrue to the content owner or broadcaster.

D. AUDIENCE MEASUREMENT & CONTENT SECURITY:

- (1)The integration of FAST channels into standardized, audited systems such as BARC India is essential for establishing credible, industry-wide metrics in

place of opaque, platform-specific data. This approach enhances transparency and promotes equitable value attribution within India's television industry.

(2) Current Measurement Challenges

FAST platforms currently depend on proprietary metrics derived from smart TVs or applications, which lack independent validation and are not readily comparable to traditional television measurement standards. In contrast, BARC utilizes watermarking technology and BAR-O-meters across approximately 60,000 panel homes for audience measurement.

(3) Advantages of Audited Systems

As a joint industry body comprising broadcasters, advertisers, and agencies, BARC provides neutrality and supports efficient advertising expenditures and content strategy decisions for 210 million TV households. Standardized cross-platform data helps consolidate fragmented viewership, thereby increasing advertiser trust compared to isolated platform statistics.

(4) Content Security

As high-value FAST content increasingly demands robust security, incorporating DRM solutions alongside watermarking or fingerprinting technologies to deter piracy and satisfy licensing obligations, becomes essential.

E. PRECAUTIONS TO BE TAKEN AND THE NEED FOR A BALANCED APPROACH

(1) Compliance Costs

While a regulatory framework is welcomed, it should be ensured that the licensing fees should not be increased and there are no restrictions on broadcasters undertaking their own controlled digital-linear services. The Broadcaster owned and operated platforms should be given deemed registration. The broadcaster shall be free to transmit its own content on its own network in addition to offering third party content on fair, transparent and non-discriminatory terms.

It should be ensured that there is no Gatekeeper tax risk as the OEMs/aggregators could demand exclusivity/discounts in view of their dominating position. The regulation should limit discriminatory listing/tech fees.

(2) Authorisation framework under the Telecommunications Act is not suitable for broadcasting services

The broadcasting services are distinct from the telecommunication services, hence TRAI's reference to bringing the regulatory regime for broadcasting services including ALTD/FAST is not relevant. Broadcasting services cannot be assumed to be a subset of telecommunication services and cannot be clubbed with the telecommunication services. Hence, the regulatory framework to be formulated for ALTD/FAST shall be strictly outside the scope of Telecommunications Act and shall be governed by MIB on lines of Uplink and Downlink Guidelines framework.

(3) Flexibility to allow innovation and growth

Having discussed the need for a regulatory framework, it is also important that the growth of an emerging medium should not be stifled or curtailed. Hence, certain precautions and exemptions should be considered and permitted.

Importantly, from a forward-looking perspective, the regulatory framework does not constrain broadcaster-led innovation in digital linear and FAST. Overly prescriptive licensing, pricing, or interconnection requirements may limit broadcasters' ability to:

- Launch and scale FAST channels quickly, especially for niche or experimental content
- Design flexible digital business models (ad-supported, premium, hybrid offerings)
- Optimise content windowing and repurposing strategies across TV, OTT, and FAST
- Retain control over distribution decisions and platform partnerships

In essence, while supporting parity in cases of clear substitutability, the framework should explicitly preserve room for experimentation and innovation in broadcaster-led digital distribution.

(4) Already Permitted Broadcasting Entities should be provided exemptions and should not be subject to additional requirements

Broadcasters already permitted by the Ministry of Information & Broadcasting (MIB) to operate news and/or non-news channels should be granted **“deemed approval”** to make their existing and upcoming ALTD/FAST channels available on such platforms. Existing permitted broadcasters are already security-cleared and meet stringent eligibility conditions prescribed by the MIB in terms of networth requirement, management control, standards and practices for content, FDI norms, commercial presence in India, grievance-

redressal mechanism etc. Accordingly, they should be allowed to stream their channels on emerging media and to launch new services without additional approvals or formalities. Such permitted broadcasters should not be required to obtain separate permissions for the following:

1. Permitted broadcasters should be allowed to stream their **existing linear TV channels on ALTD/FAST** without any separate permission or prior intimation. In effect, all permitted news and non-news channels should be “Deemed permitted” to distribute their content through ALTD/FAST.
2. Permitted Broadcasters should be free to launch **digital-only variants of their permitted channels** (e.g., a different language or format) without any additional permission. An advance intimation may be filed with the MIB on the Broadcast Seva portal.
3. Permitted broadcasters should be allowed to launch **new digital only channels** without prior permission, subject only to prior intimation to the MIB through the Broadcast Seva portal. However, if a permitted non-news broadcaster proposes to launch a news digital stream, it should obtain specific registration for such stream.

4. Broadcaster owned and operated Network:

The broadcasters in certain cases have their own platform/apps/websites that stream their channels/content on digital. Since the MIB permitted broadcasters have already fulfilled the the stringent eligibility criteria, they shall be allowed to operate without additional requirements or a mandatory intermediary layer. A simple registration with MIB should be prescribed for permitted broadcasters to operate as ALTD/FAST services. Such networks must be allowed to stream their own content and third-party content. In case of third-party content, the same should be on fair, non-discriminatory and transparent terms.

With the above premise, we are providing our responses to the issues posed in the consultation paper.

F. ISSUES FOR CONSULTATION:

Q1- What should be the appropriate definition and scope of Applicationbased Linear Television Distribution Services, i.e., ‘ALTD Services’, in the Indian broadcasting context, taking into account terminologies available internationally? Stakeholders are requested to provide their comments with detailed justification.

TN Comments:

Definition of Linear Television Channel

A Linear Television Channel means a channel, which has been granted permission for downlinking by the Central Government under the policy guidelines and the “television channel”, shall mean wherein the content is transmitted in real time according to a predefined schedule and received by the viewers simultaneously as it being broadcast.

The defining feature of a linear channel is continuous and realtime transmission for all the viewers.

Definition of ALTD

Application based Linear Television Distribution (ALTD) Services should be defined as services that distribute linear television channels to consumers through applications or web based platforms over the internet while retaining the original definition of the Linear Television Channel.

ALTD can have two sections, Free and Pay, based on the model chosen by the Broadcasters.

Q2- The ‘ALTD Services’ ecosystem involves multiple entities, including application providers, television equipment manufacturers, operating system providers, broadcasters, content providers, content aggregators and other technology or solution providers. However, the application provider appears to play a central role in the distribution of linear television channels across various business models. In this context, should the Application Provider be designated as the primary stakeholder responsible for obtaining authorisation for the provisioning of ‘ALTD Services’?

- a. If yes, please provide detailed justification and supporting reasons.
- b. If not, please identify the appropriate stakeholder(s) who should be responsible for obtaining such authorisation, along with rationale.

TN COMMENTS:

The Application Provider should be designated as the primary stakeholder responsible for obtaining registration for the provisioning of ALTD Services.

The Application Provider aggregates the linear TV channels, manages application interface, provides EPG, distributes the channel. It holds the right to onboard and take off the content. The responsibility of regulatory compliances should lie with the application provider and he should be

accountable for anti piracy, content security and consumer protection among other conditions.

The other entities such as television manufacturers, operating system providers and broadcasters play important but supporting roles in the ecosystem, but cannot be designated as the primary registration holders, as they do not directly provide the ALTD service to consumers.

This approach provides regulatory clarity, ensures single-point accountability, and enables effective oversight and enforcement.

Q3. What should be the terms and conditions including fees or charges for the grant of service authorisation to the application providers provisioning ‘ALTD Services’ in India, under the ‘Television Channel Distribution Services’ as recommended in Annexure II of the ‘Authorisation Recommendations dated 21st February 2025’? Stakeholders are requested to provide their detailed comments covering, though not limited to, the following conditions:

- a. Service Area
- b. Validity Period
- c. Eligibility Conditions
- d. Minimum Net Worth
- e. Processing Fee
- f. Entry Fee
- g. Bank Guarantee
- h. Authorisation Fee
- i. Security Deposit
- j. Roll Out Obligations
- k. Any other terms and conditions

Further, what terms and conditions / obligations should be put in place for foreign entities providing ‘ALTD Services’ in India?

TN COMMENTS:

The regulatory framework should be proportionate, technology neutral and designed to encourage flexibility to existing entities which are already permitted.

For foreign entities, there should be a mandate that they operate through an Indian subsidiary or authorised Indian entity and should be subject Indian jurisdiction. Further, the similar process as applicable for uplink and downlink of televisions channels shall be made applicable to such entities including the FDI policy, shareholding, management control etc.

Data localisation and content compliance obligations should apply, as per Indian laws.

The broadcasters, already permitted by MIB shall be exempted from any further requirements for their owned and operated ALTD/FAST networks except simple registration on broadcast seva portal as suggested above.

Q4. What should be the common terms and conditions applicable for the authorised entities provisioning ‘ALTD Services’ in India, under the ‘Television Channel Distribution Services’ as recommended in Part I of Annexure III of the ‘Authorisation Recommendations dated 21st February 2025’? Stakeholders are requested to provide their detailed comments on the following conditions:

- a. Renewal of Authorisation
- b. Renewal Fee
- c. Equity Holding and Management Control
- d. Restriction on crossholding of equity shares / capital contribution between
 - i. TV broadcasters and application providers provisioning ALTD services
 - ii. Application providers provisioning ALTD services and other DSPs
- e. Transfer / Surrender of Service Authorisation
- f. Sharing of Infrastructure
- g. Any other terms and conditions

TN COMMENTS:

As stated above, we do not recommend an authorisation framework under the Telecommunications Act for broadcasting services, as broadcasting cannot be treated as a subset of telecommunications. Broadcasting is primarily content-driven, grounded in human creativity, whereas telecommunications is a technology-led conduit for connectivity. While technological convergence is emerging in the distribution layer, it should not dilute the core nature of broadcasting as a content service.

The common terms and conditions applicable to Television Channel Distribution Services should also apply to ALTD Services, with adaptations for application-based delivery.

ALTD application providers should ensure that all linear television channels distributed on their platform hold valid permission/registration/intimation with the Ministry of Information & Broadcasting (MIB).

The broadcasters, already permitted by MIB shall be exempted from any further requirements for their owned and operated ALTD/FAST networks.

Q5. What should be the specific terms and conditions applicable for the authorised entities provisioning ‘ALTD Services’ in India, under the ‘Television Channel Distribution Services’ as recommended in Part II of Annexure III of the ‘Authorisation Recommendations dated 21st February 2025’? Stakeholders are requested to provide their detailed comments on the following conditions:

- a. Reservation of operational channel capacity by vertically integrated entities
- b. Platform Services (PS) offered by application providers provisioning ALTD services
- c. Monitoring and inspection of facilities
- d. Supply of information to Central Government / TRAI
- e. Contravention of terms and conditions of authorisation
- f. Any other terms and conditions

Further, whether the mandatory sharing of sports broadcasting signals with Prasar Bharati and the compulsory transmission of certain channels, as mandated for DTH, HITS and IPTV services, should be made applicable to the application providers provisioning ‘ALTD Services’.

TN COMMENTS:

Since there is no capacity constraint, there should not be any reservations of operational channel capacity. Subject to techno-commercial feasibility, ALTD service providers should be open to carry all the channels permitted/registered by the MIB provided the same is requested by the broadcasters.

The specific terms and conditions applicable to authorised/permitted ALTD Services should address operational, regulatory and compliance aspects relevant to application-based distribution of linear television channels. However, for the broadcasters already permitted by MIB, there shall be no further requirements.

The specific terms and conditions should be proportionate, technology neutral and aligned with the application-based nature of the service.

Q6. What type of assurance or certification mechanism should be prescribed for television manufacturers and operating system providers to ensure that

applications provisioning ALTD services (whether preintegrated with television sets or made available for download through application stores or web platforms) are duly authorised by MIB?

TN COMMENTS:

Television manufacturers and operating system providers should be required to ensure that applications provisioning ALTD Services made available on their platforms are duly authorised/permited by MIB under the applicable broadcasting framework to be formulated.

An appropriate assurance or certification mechanism should be prescribed, which may include a Self declaration by the manufacturer or operating system provider.

Q7. What kind of assurance mechanisms should be instituted to ensure that the application providers authorised for provisioning ALTD services carry only those channels which are authorised / permitted by MIB for distribution in India? What kind of penalty / disincentive / deterrent should be instituted for noncompliance?

TN COMMENTS:

Authorised/Permitted ALTD application providers should be required to carry only those channels that hold valid permission/ registration/ deemed permission from the Ministry of Information and Broadcasting (MIB) or have registered their digital only streams/channels under the intimation mechanism, as proposed above under MIB Broadcast Seva portal.

Application providers should implement appropriate internal mechanisms, including:

- Verification of channel permissions/registrations prior to onboarding.
- Periodic review and validation of channels made available on the platform
- Prompt removal or disabling of any channel found to be noncompliant.
- Deterrence mechanism should be prescribed for noncompliance depending on the nature and severity of the violation.

Q8. Whether there is a need to prescribe any specific terms and conditions for value added services offered by ALTD service providers? If yes, what should be the terms and conditions?

TN COMMENTS:

Value added services should be clearly distinguished from linear television channels. The terms and conditions should ensure transparency in presentation, access and usage of such services, and should not dilute compliance obligations applicable to linear television distribution.

On-demand OTT services, they are fundamentally different from linear TV channels; they are user-selected, non-scheduled, and do not run as continuous linear streams, and therefore do not replicate traditional television viewing. However, these services may be considered for a fair, model revenue-share mechanism (e.g., an 80:20 split between the content owner and the platform).

Q9. Whether the broadcasters / content owners providing or intending to provide television channels on ALTD platforms operating in India be mandated to obtain authorisation either for:

* Satellitebased Broadcasting and / or

* Groundbased Broadcasting

along with its applicable terms and conditions, before entering into agreements with authorised entities provisioning ALTD services to consumers? If yes, provide reasons with justification.

TN COMMENTS:

Linear television channels distributed on ALTD platforms are functionally identical to channels distributed through traditional platforms and therefore should be subject to the similar regulatory framework and accountability framework (after necessary adaptations). Hence, the following process may be followed:

1. Permitted broadcasters should be allowed to stream their **existing linear TV channels on ALTD/FAST** without any separate permission or prior intimation. In effect, all permitted news and non-news channels should be “Deemed permitted” to distribute their content through ALTD/FAST.

2. Permitted Broadcasters should be free to launch **digital-only variants of their permitted channels** (e.g., a different language or format) without any additional permission. An advance intimation may be filed with the MIB on the Broadcast Seva portal.

3. Permitted broadcasters should be allowed to launch **new digital only channels** without prior permission, subject only to prior intimation to the MIB through the Broadcast Seva portal. However, if a permitted non-news broadcaster proposes to launch a news digital stream, it should obtain specific registration for such stream.

4. The broadcasters (not permitted by MIB)/ content owners providing or intending to provide television channels on ALTD platforms operating in India be mandated to obtain permission for Ground based broadcasting. There is no need for taking permission for satellite-based broadcasting if such channel is not intended to be broadcast over the satellite and only meant to be transmitted on digital.

The applicable terms and conditions for such registration should apply uniformly and similar to the one prescribed for uplinking and downlinking of TV channels by MIB.

This approach prevents regulatory arbitrage, ensures a level playing field across distribution platforms, and provides clarity to broadcasters, application providers, and regulators.

Uniform regulatory requirements also facilitate effective enforcement and monitoring of linear television services distributed over IP networks.

Q10. In view of the availability of the pay television channels on ALTD platforms, what pricing methodology should be adopted for price parity of television channels across these platforms? Please provide detailed justification for your response.

TN COMMENTS:

Pricing parity is essential to safeguard pay-TV ARPU in India, where unregulated "free" FAST substitutes accelerate cord-cutting and subscriber erosion. Without it, broadcasters face revenue squeezes from arbitrage.

Pay television channels should not be made available free of charge on ALTD platforms.

The pricing should be platform agnostic. TRAI should adopt platform neutral content pricing model to avoid confusion to the customer and level playing field to the distribution platforms.

Q11.What obligations are required to be specified for the authorised entities provisioning ALTD services, with respect to consumer protection and grievance redressal mechanism, considering the different modes of service access such as smart televisions, websites, mobile applications, etc.? Please provide comments with detailed justification.

TN COMMENTS:

ALTD application providers should implement technology-driven consumer protection and grievance-redressal mechanisms within their platforms.

The application provider should be the technically accountable entity, as it controls the application, content-delivery systems, user interface, and service availability.

ALTD application providers should maintain system logs and records covering:

- Service availability and uptime;
- Content accessibility; and
- Receipt, tracking, and resolution of consumer complaints.

The technical framework should support auditability and regulatory inspection to enable verification of compliance with consumer protection obligations.

Q12.With the revised guidelines now including multiple viewing platforms in audience measurement, stakeholders are requested to furnish their comments on the right methodology for integrating ALTD service data into the television ratings framework, as well as the proposed timelines for implementation, supported by detailed justifications.

TN COMMENTS:

The integration of FAST channels into standardized, audited systems such as BARC India is essential for establishing credible, industry-wide metrics in place of opaque, platform-specific data. This approach enhances transparency and promotes equitable value attribution within India's television industry.

Integration of ALTD Services into the television audience measurement framework should be based on verifiable and platform generated data.

ALTD application providers should share standardised and anonymised viewership data, including:

- Channel or stream identifiers.
- Session starts and end timestamps.

- Device type and operating system (non personalised)
- Application version and platform type.

The audience measurement methodology should rely on actual consumption data captured through playback events, rather than estimates or extrapolated figures.

Integration should be implemented in a phased manner, starting with platform level reporting and subsequently aligning with recognised television rating systems.

Common standards should be prescribed for data definitions, reporting formats and timelines, to ensure consistency and comparability across platforms

Q13. Under the revised guidelines, television distribution platforms and / or OTT platforms may publish periodic viewership data of broadcasters / channels they carry on their platforms and / or on their websites, without prior registration. In this context, stakeholders are invited to provide their comments on how such an enablement can be aligned with the proposed authorisation framework for application providers provisioning ALTD services, along with any related considerations.

TN COMMENTS:

ALTD application providers should ensure that any viewership data published by them is accurate, consistent, and based on verifiable data sources.

The regulatory framework should enable transparency in data publication, while ensuring that such disclosures do not conflict with recognised television audience measurement systems or applicable regulatory norms.

Q14. Considering the scenario wherein application providers provisioning ALTD services may adopt a hybrid business model offering free and / or paid services, stakeholder comments are invited on how such services should be subject to the regulatory framework, particularly with respect to tariff, interconnection and quality of service aspects.

TN COMMENTS:

Platform neutral compliance of regulatory framework should be mandated for the consumers with respect to tariff, interconnection and quality of service aspects with required adaptations.

Q15. Whether there are other issues (such as channel positioning on home screen, EPGs, revenue sharing, interconnection agreements including marketing and placement agreements, etc.), not specifically covered in this consultation paper, which may be relevant for consideration while formulating the regulatory framework for ALTD services? Stakeholders are also requested to share relevant international best practices or regulatory approaches, if any, along with appropriate justification.

TN COMMENTS:

Since ALTD services function similarly to traditional distribution platforms, the regulatory provisions applicable to DPOs—covering channel placement, EPG structure, interconnection, and commercial/placement arrangements—should also apply to ALTD platforms, with necessary adaptations, to ensure a level playing field for all stakeholders.

App-security requirements should be specified to curb piracy, and the audit framework should be strengthened to prevent revenue leakage. Landing-page provisions should remain subject to the applicable MIB policy.

G. KEY RECOMMENDATIONS:

- (1) Content regulation should remain minimal, but distribution rules must be clear and unambiguous. MIB-permitted broadcasters should receive deemed approval to distribute their channels on ALTD/FAST. The framework should also ensure a level playing field between linear TV channels and digital-only channels.
- (2) Pricing parity should be a core principle: pay channels on cable/DTH should not be offered free on digital-linear platforms, as this can cannibalise subscriptions and reduce ARPU.
- (3) Access to distribution should be fair, transparent, and non-discriminatory. The framework should address gatekeeping by device makers, OS platforms, and aggregators—including preferential placement, exclusivity, and excessive or non-transparent technology fees.
- (4) Audience measurement should move to a standardised, auditable system spanning TV and digital-linear services, with phased implementation.
- (5) Compliance for digital-linear services should be light-touch, especially for MIB-permitted broadcasters expanding digitally. The framework should support responsible innovation without constraining growth.

H. CONCLUSION:

ALTD/FAST platforms should be brought within the regulatory framework and permitted to carry only permitted/registered ALTD/FAST channels, ensuring regulatory oversight. At the same time, the traditional TV framework cannot be applied to digital services mutatis mutandis; appropriate adaptations will be required. The framework should keep content regulation minimal—relying primarily on self-regulation by registered entities—while ensuring distribution terms are fair, transparent, and non-discriminatory.

Thank you

Times Network