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7th November 2023

To,

Sri. Shri Anil Kumar Bhardwaj,
Advisor (B&CS),
Telecom Regulatory Authority of India

Sir,

Subject:- Comments on Pre-Consultation Paper on Inputs for Formulation of “National Broadcasting Policy”

We are a registered CAG of TRAI covering the state of Karnataka.

We are pleased to attach our comments/suggestions on the subject matter for your consideration.

Thanking you,
Yours Sincerely

GOPAL RATNAM V
Secretary
Consumer Care Society
M:8618226492

ISSUES FOR PRE-CONSULTATION

Q1. Stakeholders are requested to provide their comments on the possible structure and content for National Broadcasting Policy, clearly outlining the specifics along with the justification. The comments may explicitly include the following titles/heads:

- Preamble
- Vision
- Mission
- Objectives:
 - o Goals
 - o Strategies

The stakeholders are requested that against each suggested objective, possible goals and the strategies may be explicitly provided.

Preamble: With the largest population in the world having a wide diversity in various aspects like language, sub-culture, customs, income, impacted by global organisations and aspiring to become a leading economic and cultural power in the future, India stands at an important threshold in the area of broadcasting. Broadcasting has an impact on various spheres of citizens' and consumers lives - Social, Cultural, Economical, in addition to impacting on the Security and Integrity of the country. Hence, it is necessary to have policies and programs that lead to the establishment of an ecosystem that nurtures the growth of an innovative and vibrant sector that would enable Indian companies that are capable of developing content for both the domestic and global market, leading to social development and economic growth with the preservation of Cultural heritage and respecting cultural diversity.

Vision: A broadcasting industry that produces content of global standards for the Indian and World markets.

Mission: The development of a supportive ecosystem that would enable Indian businesses to cater to the world markets including domestic through enabling policies for development of human resources and provision of financial resources with appropriate safeguards for intellectual property rights and cultural values.

Objectives:

Goals

- 1. Indian Businesses with Global Reach - GO GLOBAL**
- 2. Content based on Indian Values and Traditions - BE INDIAN**
- 3. Ecosystem for Innovation - BRING CHANGE**

Q2. Stakeholders may provide specific comments and suggestions for identifying objectives, goals and strategies for National Broadcasting Policy including the following aspects:

i. Public Service Broadcasting

a) Requirement, Relevance and Review

- b) Support and Validation
 - c) Content Priority
 - d) Mandatory Sharing of television programmes
 - e) Enhance global reach
 - ii. Policy and Regulation
 - a) Satellite Broadcasting
 - b) Terrestrial television Broadcasting
 - c) Radio Broadcasting
 - d) Print media
 - e) Digital Media
 - iii. Promotion of Local Content
 - iv. Piracy and Content Security
 - v. Technology innovation & Standardization
 - vi. Convergence
 - vii. Specific Regulatory Authority for Broadcasting
 - viii. Robust grievance redressal mechanism
 - ix. Role of Broadcasting during Disaster
 - x. Audience Measurement System:
 - xi. Social Goals
 - xii. Environmental Responsibility
 - xiii. Animation, Visual Effects, Gaming and Comics (AVGC) segment
- Detailed comments may please be provided. Any other issue

i) Public Service Broadcasting (PSB).

Public Service Broadcasting is an important part of the sector to achieve the objectives of the Broadcast Policy. These are the Social Development and Cultural Heritage Preservation. With the influx of foreign-based Broadcasters and Platforms, the PSB is highly relevant now, as there is an impact on the cultural heritage and traditions. Further, with a large section of the population having low financial resources with no discretionary spending, the affordability of Broadcast media is difficult, as private businesses would naturally focus on financial feasibility and profitability. With the Indian diaspora spread all over the world, PSB should be able to provide Indian Content with the Indian Values across the globe.

For all the issues listed in the consultation paper under PSB, we need to have appropriate policies to be formulated.

- a) PSB as mentioned earlier, has become increasingly relevant.
- b) Adequate support is needed for PSB to achieve the objectives of affordability and development of innovative content for domestic and foreign markets.
- c) Content that safeguards and promotes cultural heritage within the country and across the world should have priority. Further, content that enriches the culture should be encouraged. Here there should be policy guidelines that provide access to programs that also reflect different sub-cultures across the country.

d) Programs/Content that have a wide domestic audience but are not accessible or affordable to them should be mandatory made available to the PSB through a fair method.

e) PSB should actively explore markets around the world to promote content that expresses Indian values, attitudes, opinions etc.

ii) Policy and Regulation (P & R).

There should be a separate authority to comprehensively regulate the Information and Entertainment (I & E) sector of the ICE industry. This could be a vertical within TRAI. This is necessary because there is significant cross-holdings by businesses and there is competition among the various media for consumers. This would enable the regulator to look at issues in a holistic way. So our suggestions cover all these media. Policies should be formulated based on these principles

- ◆ Indian human resources and talent are nurtured.
- ◆ Indian culture and Indian values are safeguarded and developed
- ◆ Resources augmentation for Indian Businesses to go global
- ◆ Swift and Satisfactory resolutions of the Consumers' issues.

iii. Promotion of Local Content

There is an urgent need to promote local content which protects Indian Values and Culture and uses local talent. To achieve this objective, centres of excellence located in different parts of the country have to be set-up by both Government and Private parties.

iv. Piracy and Content Security

Existing institutions have to be strengthened and their ambit should be broadened to handle newer threats caused by AI.

vii. Specific Regulatory Authority for Broadcasting

We strongly see a need for a specific regulatory authority covering the Information and Entertainment (I & B) sector, while being a part of TRAI. A Separate vertical.

viii. Robust grievance redressal mechanism

Currently, there are multiple agencies with different procedures operating in separate geographies. This scenario causes confusion, delays and, many a times, with the issues not being resolved to the satisfaction of the consumers/subscribers/viewers. It is essential that the following mechanism be adopted.

- ◆ Single Online Grievance Portal
- ◆ Policy covering all consumer issues of privacy, payment, etc
- ◆ Time bound
- ◆ Multi-level, with the active involvement of consumer organisations at the second level.

x. Audience Measurement System:

Again, this issue is handled by different media. Furthermore, there have been multiple agencies in different media, like Print, resulting in further confusion and conflict. Also there has been accusations of malafide intentions and dis-honest practices. It is

necessary that with any advertiser interested in accurate and reliable data for their advertising programs, it is imperative that there be an apex body that clearly has divisions for different media. These divisions would be staffed with technical persons with expertise in that media. The apex body would be a single nodal agency responsible for the audience measurement with representation from different stakeholders, including consumers through reputed consumer organisations.

Q3. Stakeholders may also suggest any other issues which should be considered for formulation of National Broadcasting Policy, along with detailed justification.

We strongly suggest that TRAI hold a face-to face consultative meeting in cities across India to solicit the views of the different stakeholders and also provide opportunities for the different stakeholders to discuss. We also urge TRAI to involve consumer organisations more as this sector is consumer oriented.

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