EBG Federation's Response to TRAI Pre-Consultation paper on Ease of Doing Business in the Broadcasting Sector

EBG Federation wishes to express its appreciation of the Regulators continuous consultations to involve all stakeholders in all processes and deliberations in technological nation building. Encouraged by TRAI's commitment to further engage stakeholders on this important matter, EBG respectfully submits the following comments on TRAI's current Consultation

The possibility to use the UHF band for mobile communications provides a rare opportunity for providing cost efficient wireless solutions for high data-rates. Using frequencies below 1 GHz will also allow for cost efficient coverage by mobile systems giving the unique opportunity to provide mobile broadband to rural areas affordable to all and thus assisting in reducing the digital divide.

EBG would like to submit a brief view on the subject as follows:-

DIGITAL TERRESTRIAL BROADCASTING

Broadcasting is taking huge strides in outreach to customers through new developments globally. In India , the Satellite based DTH and Cable TV service have reached a position of being the dominant players in the market with a continuously growing market share. DTH players have also started to offer TV channels on alternate devices such as Smartphones & Tablets.

With modernisation/digitisation of Cable TV, two way service is possible, comprising High Speed fixed Broadband and Broadcasting.

With deployment of LTE – A (Advanced) and LTE-Broadcast technologies as well as deployment of 700mhz band in the near future, we would be seeing more broadcast services along with that of Broadband using conventional IMT services

Furthermore, Internet TV is going to take off with proliferation of internet and WiFi services.

Meanwhile, in the face of all this progressive change, there is only one public broadcaster in India, who uses terrestrial broadcasting technologies. Though the technology used is analog today, the broadcaster is in the process of migrating to digital technology. While advocating the need and several

advantages of Digital Terrestrial Technologies over that of other Multiple broadcasting distribution platforms, one must bear in mind that: -

- Popularityof Terrestrial Broadcasting platforms in India are on the wane with the advent of Cable TV & Satellite (DTH) platforms.
- The drop in market share is so significant that from almost 100% share about 15 years back, the broadcaster's share in terrestrial broadcasting has dropped to barely 6%.
- A majority of the remaining connections are restricted to rural & remote areas only where either Cable or DTH is yet to reach.
- In fact, the public broadcaster himself has been forced to switch over to DTH(Satellite) platform to compensate for the loss of subscribers on the terrestrial platform.

In the light of the declining interest and market share of terrestrial broadcasting, is the issue of precious spectrum being held captive by the public broadcaster in UHF band IV (470-585Mhz) and UHF Band V (582-698Mhz).

This is approx. 230Mhz of spectrum in a band which has excellent signal propagation characteristics thereby making it ideal for deep in-building penetration in dense urban areas besides providing cost effective coverage to remote and rural areas.

The band characteristics lend themselves to providing ubiquitous and cost effective mobilebroadband and has been marked for IMT applications in future. This is also in sync with the NFAP-2011 guidelines which projects these bands for availability for the purpose of fixed, mobile & broadcasting services in India.

Thus, EBG is of the view that there is need to permit Digital Terrestrial broadcasters to also offer broadband services in the precious UHF band and that the policies should be so shaped to allow this to happen smoothly and ubiquitously for rapid proliferation of broadband services to all parts of the country.