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Cc: "V.K. Aggarwal" <jtadvbcs-1@traigov.in>
Sent: Tuesday, September 26, 2023 11:52:20 AM
Subject: BROADCASTING under National Broadcast Policy

Dear Sir,

Our comments relate to Q2 (ii) of the Consultation Paper regarding National Broadcasting Policy.

1. All satellite Television channels get license to operate from MIB and are required to uplink and downlink their signals through satellite. This system has been in existence since early 1990s. It entails hiring of transponder space on Indian or foreign satellites to beam down signals from satellite to a Cable operator, who then transmits these signals to individual homes.
2. Almost 90% of the channels approximately, **hire foreign satellites causing huge outflow of foreign exchange.**
3. India does not have the capacity to uplink and downlink about 1000 private TV channels.
4. Times have changed and technology has advanced. For example, PTC Network does not hire a satellite transponder anymore to transmit signals to Dish DTH in USA. We utilise dedicated fibre or now high speed broadband connection.
5. Even cloud playouts are a reality now and players like AMAGI are offering "Upload from anywhere" and "download anywhere" solutions worldwide. Content is uplinked and stored in cloud-based storage and directly played out from the cloud. A decoder box is provided to the transmission platform which then transmits signals to individual homes.
6. It is both cost effective and efficient.
7. The Government should **change the uplinking and downlinking policy to allow signals upload/download through internet/P2P Fiber connections/cloud playouts.**
8. Whatever penalties are levied on deviating from MIB guidelines of content can also be applied to this internet based delivery.
9. In place of supplying decoders, hiring expensive satellite transponders etc, TV channels can supply their signals through cheaper decoders to cable operators/DTH platforms with whom they have signal delivery arrangement.
10. It can apply to both FTA and PAY channels. The signals are safe and secure through P2P/IP protocols.
11. **This will help free up expensive satellite space for use of army and government purposes.** Those who wish to utilise satellites can continue to utilise it.
12. **Even BARC ratings system will not be affected as the signals will be using the stream from MASTER PLAYOUT with watermarking already existing.**

Already TV channels are streaming their channels through above-mentioned methods on OTT platforms and other forms of digital media. The GoI just needs to modify uplinking/downlinking clauses and the system can be implemented easily.

Best Regards

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