



5th April '2012

To,
Shri Wasi Ahmed
Advisor (B&CS)
Telecom Regulatory Authority of India
Mahangar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi - 110 002

Dear Sir,

Sub: Response to the Consultation Paper on "Issues Related to Advertisements in TV channels"

We are enclosing herewith our responses and comments on the above for your further process on the same.

Please feel free to contact us in case of any clarifications / further information

Thanking You,

Yours Faithfully,

For INDUSIND MEDIA & COMMUNICATIONS LTD.

A handwritten signature in black ink, appearing to read 'Subhashish Mazumdar', written over a horizontal line.

SUBHASHISH MAZUMDAR
(Authorized Signatory)

cc : Chairman, TRAI

With reference to TRAI's consultation paper on above, IMCL's comments/ responses are given below with regard to TRAI's proposal for the various stipulations on the regulation of advertisements in TV channels in India.

TRAI Proposal:

- i. The limits for the duration of the advertisements shall be regulated on a clock hour basis i.e. the prescribed limits shall be enforced on clock hour basis.
- ii. No FTA channel shall carry advertisements exceeding 12 minutes in a clock hour. For pay channels, this limit shall be 6 minutes.
- iii. The 12 minutes of advertisements will not be in more than 4 sessions in one hour. In other words, there will be continuous airing of the TV show for at least 12 minutes each. Not more than three advertisement breaks shall be allowed during telecast of a movie with the minimum gap of 30 minutes between consecutive advertisement breaks.

IMCL Response (for i, ii and iii):

In the Digital era, where a consumer has absolute choice in choosing any channel and paying accordingly, there is no need to regulate advertising time.

Advertisements help to subsidize the cost of the channel to the subscribers. It is up to the subscriber to opt to watch a channel with advertisements at a lower cost or pay premium to watch a channel without ads.

Broadcasters on the other hand will automatically regulate the ad time as too many ad breaks will drive away subscribers, thus affecting their resources

TRAI Proposal:

- iv. In case of sporting events being telecast live, the advertisements shall only be carried during the interruptions in the sporting action e.g. half time in football or hockey match, lunch/ drinks break in cricket matches, game/set change in case of lawn tennis etc.

IMCL Response:

We agree with this. Should be strictly adhered. All Sports channel are pay channels (except for DD Sports)

TRAI Proposal:

- v. There shall only be full screen advertisements. Part screen advertisements will not be permitted. Drop down advertisements will also not be permitted.



IMCL Response:
Agree with this

TRAI Proposal:

- vi. In so far as News and Current Affairs channels are concerned, they are allowed to run not more than two scrolls at the bottom of the screen and occupying not more than 10% of the screen space for carrying non-commercial scrolls, tickers etc.

IMCL Response:
Agree. It should be always for non commercial scrolls

TRAI Proposal:

- vii. The audio level of the advertisements shall not be higher than the audio level of the programme.

IMCL Response:
Agree. This needs a software application update at the Broadcaster's end. Also the Audio levels of all Broadcasters should be similar for a particular audio level setting
