

Prasar Bharati's Comments on Draft Amendments to Telecommunication (Broadcasting and Cable Services) Interconnection (Digital Addressable Cable Television Systems) Regulations, 2012.

Post phase-wise digitization of cable, it has been observed that most MSOs are complying with "Must Carry" regulation with regard to DD channels in letter, rather than in spirit. The placement of DD channels by most MSOs is random, haphazard, inconsistent and follows no logic, with the result that the Public Service Broadcaster's channels are 'lost' in the maze of channel listings.

The price is ultimately paid by the viewer, who is unable to consistently locate and view Doordarshan's offerings. This is despite the convenience offered by menu-driven Electronic Programme Guide (EPG) that is a cornerstone of digitally addressable cable system.

Additionally, it has been observed that when DD channels are made available, they are dismissed to a remote corner, rather than being grouped in the Genre-based categories/sub-categories based on their content, i.e. News-English, News-Hindi, Entertainment/General, Sports, etc. As a result, when a viewer scans the Channels of a particular Genre, he/she gets to sample all or most privately owned commercial channels, but is denied the offerings of India's Public Service Broadcaster. This places the entire DD network in an unfairly disadvantaged position, and that adversely affects the very objective of public service broadcasting.

Therefore, in order to ensure that objectives of public service broadcasting are met, and viewers have easy, straight-forward and trouble-free access to Doordarshan channels (as much as they have to other private channels), it is imperative that necessary, corrective action be taken with regard to placement of DD channels in channel listings of MSOs, and that this be implemented by incorporating appropriate regulation.

The following steps are recommended for inclusion in the proposed Second Amendment to protect and serve the wider objective of public service broadcasting:

1. All public service broadcasting channels shall compulsorily be placed under that respective Genre/Sub-genre that Prasar Bharati justifiably feels it should be, and not at the subjective discretion of the service provider.
2. If the format of category/sub-category being followed by MSO does not match with the Genre/Sub-genre of a DD channel, the channel should be placed in that category that Prasar Bharati feels its channel rightfully belongs to.
3. DD channels shall be placed at the top of their respective Genre/Sub-genre, and assigned channel numbers accordingly for public convenience. For instance, an MSO assigning 100 to 199 to GEC channels shall compulsorily assign 100 and 101 to DD National and DD Bharati channels. Similarly, DD News, LSTV and

RSTV channels shall be assigned first three channel numbers of the sequence being used for News category.

4. The numbering system followed for DD channels must be consistent and uniform across all MSOs. Thus DD National should be available as Channel No. 100 on all cable platforms, if that is the number assigned to it.
5. All MSOs shall necessarily use professional/broadcast quality decoders (Integrated Receiver Decoders) and other modulating equipment for each channel of the public service broadcaster (and not commercial grade equipment), in order to ensure consistent quality of audio and video.
6. All MSOs shall ensure prominent display of EPGs of all channels provided by Prasar Bharati.

N.B. Consistent placement of public service broadcasters across all cable and satellite distribution systems is an accepted and established norm globally. In the UK, for instance, BBC-One and BBC-Two are available at channel numbers 101 & 102 respectively, across all major DTH services (like FREESAT¹ and SKY-UK²), as well as Cable TV networks (like VIRGIN MEDIA³ and SMALLWORLD CABLE⁴). Similarly ITV is available at channel number 103, and Channel 4 is slotted at 104 across all these platforms.

¹ <http://www.freesat.co.uk>

² <http://tv.sky.com>

³ <http://tv.virginmedia.com>

⁴ <http://smallworldcable.com>

Placement of Public Service Broadcasters on major DTH and Cable TV networks in UK

BROADCASTER	PLATFORM			
	Freesat (DTH)	Sky-UK (DTH)	Virgin Media (Cable)	Smallworld Cable
BBC One	101	101	101	101
BBC Two	102	102	102	102
ITV	103	103	103	103
Channel 4	104	104	104	104

BBC One is the flagship television channel of British Broadcasting Corporation, Britain's public service broadcaster. Its main responsibility is to provide impartial public service broadcasting in the UK, the Channel Islands, and the Isle of Man.

BBC Two is the second television channel operated by the British Broadcasting Corporation in the UK, Isle of Man and Channel Islands. It is funded by the television licence, and is therefore commercial-free.

ITV is a commercial public service TV network in the UK. It is a network of television channels that operate regional television services as well as share programmes between each other to be displayed on the entire network.

Channel 4 is a British public-service television broadcaster which, although largely commercially self-funded, is ultimately publicly owned. The channel was established to provide a fourth television service to the UK in addition to the television licence-funded BBC's two services and the single commercial broadcasting network, ITV.