

**Dear Sir,**

With reference to the TRAI's "Consultation Paper on Regulatory Framework for Platform Services" dated 23 June 2014. We have attached our comments on the Consultation Paper.

Also Find below the details of our Private Local Cable Channel : Rcn tv

Channel Address: RCN TV,  
G-2 Natchathira regent,  
O.A Ramasamy street,  
Erode.

**Thanks & Regards,**

M.Bhashker & M.Sasikumar

Ph: M.Bhashker – 9865182929  
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**1. Do you agree with the following definition for Platform Services (PS)?  
If not, please suggest an alternative definition:**

"Platform services (PS) are program transmitted by Distribution Platform Operators (DPOs) exclusively to their own subscribers and does not include Doordarshan channels and TV channels permitted under downlinking guidelines"

Yes, We do agree.

**2. Kindly provide comments on the following aspects related to programs to be permitted on PS channels:**

**1. PS channels cannot transmit/ include**

**2.1.1 Any news and/or current affairs programs,**

**2.1.2 Coverage of political events of any nature,**

**2.1.3 Any program that is/ has been transmitted by any Doordarshan channels or TV channels permitted under uplinking/ downlinking guidelines, including serials and reality shows,**

Need Clarification regarding the above-mentioned point. What if a production company of a serial, which has been telecasted in any private satellite channel, has now decided to give the rights to telecast the same serial to a third party? Shall that be telecasted in a PS?

**2.1.4 International, National and State level sport events/ tournament/ games like IPL, Ranji trophy, etc.**

**2. PS channels can transmit/ include**

**2.2.1 Movie/ Video on demand**

**2.2.2 Interactive games,**

**2.2.3 Coverage of local cultural events and festivals, traffic, weather, educational/ academic programs (such as coaching classes), information regarding examinations, results, admissions, career counseling, availability of employment opportunities, job placement.**

Shall a PS of a different locality telecast important festivals and events famous and taking place in other regions or states?

**2.2.4 Public announcements pertaining to civic amenities like electricity, water supply, natural calamities, health alerts etc. as provided by the local administration.**

**2.2.5 Information pertaining to sporting events excluding live coverage.**

**2.2.6 Live coverage of sporting events of local nature i.e. sport events played by district level (or below) teams and where no broadcasting rights are required.**

**3. What should be periodicity of review to ensure that the PS is not trespassing into the domain of regular TV broadcasters?**

Once an authority has laid out a set of programmes, the PS would be in a state to strictly follow the same. Since the matter of review itself is out of question. If such review is compulsory then it can be done once in 90 days.

**4. Should it be mandatory for all DPOs to be registered as Companies under the Companies Act to be allowed to operate PS? If not, how to ensure uniform legal status for all DPOs?**

Yes we do agree with this.

**5. Views, if any, on FDI limits?**

As such FDI limit is not an issue for discussion pertaining to a PS. Since the PS itself is a very small-scale business and also the program list allowed and not allowed makes everything clear.

**6. Should there be any minimum net-worth requirement for offering PS channels? If yes, then what should it be?**

PS is actually a very small level of business with operational areas including just Taluks and within corporation limits. If this aspect of Minimum net worth comes into this scenario, then the business will go out of existence. So minimum net worth requirement is not required for PS channels.

**7. Do you agree that PS channels should also be subjected to same security clearances/ conditions, as applicable for private satellite TV channels?**

Since the list of programs to be telecasted in PS has already been laid down under consultation no.2. And since sensitive matters such as current affairs and news does not come in the program list of PS. And also when reviews are been done periodically, there is no requirement for security clearance as such.

**8. For the PS channels to be registered with MIB through an online process, what should be the period of validity of registration and annual fee per channel?**

Online registration for PS channels can be done for a validity period of 5 years. Annual fees shall be anywhere around Rs.10000 to Rs.25000 annually based on the territory limits depending upon if the PS is operating in Taluks, municipality, corporation and districts.

**9. What is your proposal for renewal of permission?**

Renewal proposal shall be done 90 days before the expiry of the validity period for an extension of 5 more years.

**10. Should there be any limits in terms of geographical area for PS channels? If yes what should be these limits.**

If geographical limits have to be imposed on PS, then the limit shall be to the extent of that particular district.

**11. Should there be a limit on the number of PS channels which can be operated by a DPO? If yes, then what should be the limit?**

Yes there should be a limit on the number on PS channels. The limit shall be 10 for a DPO.

**12. Do you have any comments on the following obligations/ restrictions on DPOs:**

**12.1. Non-transferability of registration for PS without prior approval of MIB;**

Yes, We do agree.

**12.2. Prohibition from interconnecting with other distribution networks for re-transmission of PS i.e. cannot share or allow the re-transmission of the PS channel to another DPO; and**

This point is valid only when one DPO is existent under one area. Whereas if two or more DPO's are existent under a same area, PS operating in that same area cannot run channels under each DPO's Separately, Instead the PS has to inter link with all the DPO's existing under that same area. So in such a scenario, this point shall not prove right.

This point shall be altered in such a way that such interconnecting with other distribution networks for re-transmission of PS, shall not take place outside the boundary of a district. In case such re-transmission or interconnection is required for any reason, then required permission has to be obtained from MIB.

**12.3. Compliance with the Programme & Advertisement Code and TRAI's Regulations pertaining to QoS and complaint redressal.**

All Programme & Advertisement Code and TRAI's Regulation pertaining to QoS shall be complied with.

**13. What other obligations/ restrictions need to be imposed on DPOs for offering PS?**

DPO's need to give a particular period of notice (minimum of 21 days) Time to the respective PS, before withdrawing it's services either temporarily or permanently for any reason.

**14. Should DPO be permitted to re-transmit already permitted and operational FM radio channels under suitable arrangement with FM operator? If yes, then should there be any restrictions including on the number of FM radio channels that may be re-transmitted by a DPO?**

Bringing in re-transmission of FM channels under DPO is not advisable.

**15. Please suggest the mechanism for monitoring of PS channel.**

Since the PS is operational in a small area or region, it might be monitored in a district-wise or state-wise model.

**16. Do you agree that similar penal provisions as imposed on TV Broadcasters for violation of the terms and conditions of their permissions may also be imposed on PS? If not, please suggest alternative provisions.**

PS being a small-scale business and also since the current affairs and news category is excluded from PS, the implication of this issue would be of a much smaller level. If in case such violations take place, warnings may be given to the respective PS and on repeated violation suitable provisions might be drafted.

**17. What amendments and additional terms & conditions are required in the existing registration/ guidelines/ permission/ license agreements w.r.t.DPOs for regulating the PS channels?**

No comments

**18. What should be the time limit that should be granted to DPOs for registration of the existing PS channels and bring them in conformity with the proposed regulatory framework once it is notified by MIB?**

A period of 6 months would do well.

**19. Stakeholders may also provide their comments on any other issue relevant to the present consultation including any changes required in the existing regulatory framework.**

The concept and idea of giving an identity to these Local channels as PS and bringing them under a regulatory framework is welcomed. But such regulations should be drafted in such a way that this small-scale level of business is protected and it is been done in a regularized manner. It should be seen that all possible opportunities are given to this PS business to

improve them.

Also the emergence of these PS, have given an opportunity to the advertisers, who are owning a comparatively smaller scale of business and whose business is limited to a certain region alone. These PS offer them an opportunity and medium to advertise their products in an effective and economical manner.

These PS indeed play a significant role in taking important information's and announcements from various government bodies such as EB, School Information's, Collectorate Announcements, and Police Announcements right to the public in a very effective manner. These are been telecasted in the local channels (PS), which prove to be very useful for both the public and the government bodies as well.

Also regional festivals and events of utmost importance are been covered and telecasted in the PS, which makes the public view and enjoy all the regional events and keeps them up to date on the happenings of such events.

The concept of private local cable channels is in existence right from the introduction of cables. This is being operated as a small-scale business providing employment and livelihood to many people and families. There are around 25 PS (local channels) in a district depending upon the geographical area coverage. In a state the count of PS comes to around 1000. So directly and indirectly there are around 10000 to 20000 families who rely on this business of PS. So any rules, regulations and framework drafted might be done so, keeping in mind these people and their livelihood.

We have given all these comments on behalf of **Tamil Nadu Local Private Cable Channel Owners Welfare Association**. We strongly believe that these rules and regulatory framework to be drafted for regulating the PS channels will protect all the people associated with this business and help them in improving their business and their livelihood.

Name of the PLC : RCN TV

Channel Owned by: M.Bhashker & M.Sasikumar

Area of Operation : Erode

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