

COMMENTS TO TRAI CONSULTATION PAPER ON REGULATORY  
FRAMEWORK FOR PLATFORM SERVICES

Made by Tamilnadu Progressive Consumer Centre, Chennai

We, the consumer organization from Tamil Nadu submitting our comments to your Consultation Paper on Regulatory Framework for Platform Services on larger public interest.

The present consultation paper on Regulatory Framework for Platform Services will definitely push the cable industry to boom in the technology aspect as well as financial aspect.

As a consumer, the need of local channels provided by the Cable Operator /DPO, and the information/content of the programme will also create a better environment to attract the subscribers on various issues. It is submitted that, as the Local channels report/ transmit cultural events, local festivals, traffic, weather, hospitals in the particular area, entertainment, school functions, results, movie, and music etc., it is very handy for the larger public.

One can know the details of the all requirement available in their area more rapidly. Therefore, the consumption of time for searching the need is very less and also one can sit and watch from his house of the functions, festivals, so that, reduce the traffic, crime rate in the festivals, functions.

In the emerging Cable TV industry, it is well established fact that, the content of the programmes, which create awareness among the public about the happenings in the society and in the particular geographical area. The central government launched a series of economic and social reforms, which the process has been pursued consistently by all subsequent administrations.

Hence, the Local channels is the easiest source of information about the particular area and by watching local NEWS, the consumer get updated with the things going around them.

Therefore, We believe that the objective of assuring the consumer the best value for his money can be achieved and achieving affordability for the

consumer by providing local channels without any hindrance and we feel that the Authority to consider our suggestions.

**1. Do you agree with the following definition for Platform Services (PS)?**

**If not, please suggest an alternative definition:**

*For want of legal knowledge, we don't comment on this.*

**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,**

*News and current affairs can be included to get updated about the neighbourhood. So News and Current Affairs of all kind is required.*

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

*Political events also to be included to know about the competence of the political parties of the area*

**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,**

*Agreed. No comments*

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

*Ranji Trophy may be included in the platform services*

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

**2.2.1 Movie/ Video on demand**

*Agreed*

**2.2.2 Interactive games,**

*Agreed*

**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.**

*Agreed*

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

*Agreed*

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

*Agreed*

**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.**

*Agreed.*

However, NEWS, current affairs and political events of the area also included for the benefit of the consumer.

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

*5 years may be given.*

**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?**

No. it is not need be mandatory as, some of them are individual and small entity.

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

No comments

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

*May be calculated according to the area and its revenue.*

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

*No Comments*

**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?**

*10 years, Annual fees shall be as less as possible. Because an increase in Annual fees will have an increase in Advertisement charges. The advertiser would try to recover the money from consumer and the consumer is affected indirectly.*

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

*Online services*

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

*To have a more concentrated neighborhood, the area may be limited to Taluk or a municipality limits.*

**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?**

*5 TO 7 Channels can be allowed.*

**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;**

**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**

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

*No Comments*

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

*No comments*

**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?**

*May be permitted to retransmit FM radio channels*

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

*A voluntary consumer organization and any government body may be appointed for monitoring the PS Channel.*

**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.**

*If there is any violation of the terms and conditions, then an committee for investigation of the such violation may be appointed and if necessitate, the license,/registration may be suspended or cancelled. The Committee shall include a voluntary consumer organization.*

**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?**

*3 months*

**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.**

*No comments*