

07 June 2022

By Email

The Advisor (B&CS)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan (next to Zakir Hussain College)
Jawaharlal Nehru Marg, New Delhi- 110002

Kind Attn: Shri Anil Kumar Bhardwaj, Advisor (B&CS)

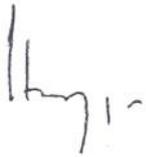
Subject: Tata Play's comments on TRAI's Consultation Paper dated 12 April 2022 on 'Issues Relating to Media Ownership'

Dear Sir,

We thank you for the opportunity to express our views on the above captioned Consultation Paper. Tata Play's response to the same is enclosed for your ready reference.

Thanking you.

Yours sincerely,



Harit Nagpal
Managing Director and CEO

Enclosed: As above

TATA PLAY'S COMMENTS DATED 07 JUNE 2022 TO TRAI'S CONSULTATION PAPER DATED 12 APRIL 2022 ON 'ISSUES RELATING TO MEDIA OWNERSHIP'

No Cross Media Restrictions Required:

- No Cross Media restrictions must be imposed on Broadcasting and Distribution sector.
- Any such restriction only stifles growth of the sector.
- Also, such restrictions work against convergence and economies of scale.
- Undue restrictions on a sector impedes investments, which will be detrimental to the sector to realize its full potential.
- While countries such as USA and UK, after seeing the repercussions of the restrictions, have moved away from Cross Media ownership restriction, India while competing with world economies, must taking the cue and remove all such restrictions and let the industry realize its true potential.

Level Playing Field:

- Restrictions on consolidation including 'vertical integration' within a media segment have been placed in the DTH sector, but there are no such restrictions on MSOs, LCOs, Broadcasters and OTT platforms.
- We are of the view that there should be no restriction on Cross Media Ownership, however, if TRAI/MIB still continue to impose such restrictions, it should be made applicable to all and not just on one part of the distribution industry, and in the event of it not being accepted by the Government or Courts for any one sector, it should stand automatically removed for all sectors.
- If no restrictions are imposed on others, to bring a level playing field, Cross Media restriction on DTH sector should also be removed.

Adequate Media Ownership policy already in place:

- TRAI has already given its recommendations on disqualifying certain entities from entering into Broadcasting and Distribution sector.
- Control of media by political entities, religious bodies, urban and local Panchayat Raj bodies, Central Government Ministries and Departments, State Government Departments or their surrogate organizations are already not permitted.
- However, no steps have been taken to make the recommendations effective.
- Therefore, no restrictions on private sector are required to be imposed.
- In any event despite restrictions, most companies have managed a work around them, and only some companies comply with it to their disadvantage.

Broadcasters running OTT platforms:

- In this era of convergence and rapid technological advances, Broadcasters today are running their own OTT platforms and there are no Cross-Holding restrictions on them, therefore giving them commercial leverage over Platforms with such restrictions.

Specialised Laws and Regulatory Agencies:

- There are specialised laws and sectorial regulations governing the issue, which take care of mergers, acquisitions and competition.
- There are agencies like Securities Exchange Board of India (SEBI), Competition Commission of India (CCI) which keep a watch.
- There is therefore no need to further monitor Cross Media ownership as too many monitoring agencies will come in the way of ease of doing business.

Tata Play Ltd. (formerly known as Tata Sky Ltd.)

Registered Office: Unit 301 to 305, 3rd Floor, Windsor, Off C.S.T. Road, Kalina, Santacruz (East), Mumbai - 400098, India.

Tel.: +91-22-66133000, CIN: U92120MH2001PLC130365, E-mail: contact@tataplay.com, Website: www.tataplay.com

Consumer: Best to check Competition:

- Given this background and prevalent market conditions, the media ownership restrictions still have no place in today's dynamics of industry.
- Consumers today are well informed and have options not just amongst different distribution operators but also amongst different distribution platforms (LCO, MSO, HTS, DTH and OTT platforms).
- If the prices soar or there are malpractices due to integration of companies, vertically or horizontally, then consumers being well informed, have freedom of choice and enough access to change the viewing operator/platform. That is the true check of any competition.

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