

Subject: Response to Consultation Paper on *Pre-Consultation Paper Inputs for Formulation of “National Broadcasting Policy”*

To,
TRAI

Dear Sir,
Please find my response below on pre-consultation paper

Q1. Stakeholders are requested to provide their comments on the possible structure and content for National Broadcasting Policy, clearly outlining the specifics along with the justification. The comments may explicitly include the following titles/heads:

- Preamble
- Vision
- Mission
- Objectives:
 - Goals
 - Strategies

There are no comments for this section.

Q2. Stakeholders may provide specific comments and suggestions for identifying objectives, goals and strategies for National Broadcasting Policy including the following aspects:

i. Public Service Broadcasting

- a) Requirement, Relevance and Review
- b) Support and Validation
- c) Content Priority
- d) Mandatory Sharing of television programmes
- e) Enhance global reach

There are no comments for this section.

ii. Policy and Regulation

- a) Satellite Broadcasting
- b) Terrestrial television Broadcasting
- c) Radio Broadcasting
- d) Print media
- e) Digital Media

Digital media is fast becoming the most prominent choice of consumers and it is only expected to grow exponentially becoming far bigger than b,c&d above while satellite broadcasting catches up as the next growth area. Therefore, there is higher emphasis needed for Digital Media.

Digital broadcasting business models are now adopting new commercial models (SVOD- Subscription Video On Demand, AVOD- Advertising Video On Demand, FAST- Free Ad-supported Streaming television). As these products evolve, there is a need to delve into consumer side, net neutrality impact and any possible regulations.

While it is too early to call out any regulation impact due to these models, NBP can consider taking these areas as scope for any future considerations.

iii. Promotion of Local Content

Digital media utilizes new-age technology and the speed of the content spread is very fast due to network effect. Therefore, there will be guardrails required at a content level to ensure it is fair and aligned to Bharat's constitutional values.

iv. Piracy and Content Security

This is a very important area since there are not only threat from cyber-attack & frauds but also cyber warfare which global anti-social elements are adopting. There is a need to establish a framework for Piracy and Content Security including evaluation of the right cloud platforms as mentioned in the paper. Here, I would like to highlight that cloud adoption is changing to a new landscape where movement of systems is not going towards 'Cloud-first' but more towards being 'secure Cloud-smart'. This includes elements of evaluating any needs of a sovereign, private or public cloud, etc depending on nature of content being broadcasting or published across medium.

v. Technology innovation & Standardization

In order to capitalize of any forward-looking technologies and business models, it is important to include Bharat's growing start-up ecosystem. Therefore, I will also recommend to add Start-ups while formulating the policies. While many of their ideas look revolutionary, it is important to capitalize on this innovative talent pool. *Establishing a broadcasting Standard Development Organization as an autonomous body with effective participation of the government, industry, R&D centres, service providers, **start-ups** and academia*

vi. Convergence

There are no comments for this section.

vii. Specific Regulatory Authority for Broadcasting

Given the way telecom and media convergence is growing, opting for a separate broadcasting regulator may not be the best path forward. Telecom and Media is now interlocking more closely than ever with these services being run by same parent companies in most of the cases. Moreover, these services will adopt more of the digital platforms than ever. For example, we can expect to see more streaming music, podcast subscribers than radio ones. Therefore, any regulations in this space need to be carved looking at a holistic linkage.

Creating another regulator will only lead to more complexity, bureaucracy and longer decision-making timelines. While I understand from recent 5G ecosystem consultant paper that TRAI has been conducting joint committee of regulators (JCOR) with other regulators, the level of convergence already being seen here is very different than with other industries.

The only area for a separate regulator in this space could be for data censorship, moderation and policies.

viii. Robust grievance redressal mechanism

No comments

ix. Role of Broadcasting during Disaster

No comments

x. Audience Measurement System:

No comments

xi. Social Goals

We can re-consider first point “Assuring gender diversity in workplace” and rename it as “Assuring diversity in workplace”. Diversity in today’s world is more than gender inclusion, it is equally important to provide avenues for inclusion of other diverse society members - handicapped, autistic, physically-abled, dyslexic, etc
We should explore focus for another large section of society- Senior citizens.
-Content for Senior citizens and find ways to include them in the content creation for sharing their knowledge & wisdom.

xii. Environmental Responsibility

No comments

xiii. Animation, Visual Effects, Gaming and Comics (AVGC) segment

Detailed comments may please be provided.

Any other issue

No comments

Q3. Stakeholders may also suggest any other issues which should be considered for formulation of National Broadcasting Policy, along with detailed justification.

There are three industries which have been referenced in the paper- Education, agriculture and health.

Education and agriculture are two industries which have onboarded power of digital platforms and forming partnerships with media and broadcasting players for expanding their presence to end users. However, convergence of healthcare with media and broadcasting has yet to take shape. National broadcasting policy can look at bringing elements for these industries convergence.

Paper has highlighted an important point that “social or behavioral changes viewing patterns and viewers way of consuming entertainment” and it is good that we are considering these important pattern changes.

Thank you for launching this collaboration exercise

Priyank Chandra

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Disclaimer: Views expressed are my personal opinion