

To,
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**COMMENTS ON CONSULTATION PAPER ON “ISSUES RELATED TO
ADVERTISEMENTS IN TV CHANNELS” OF TRAI**

We at VOICE as part of our advocacy initiative in Telecommunications continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks. We also publish a magazine “CONSUMER VOICE” for consumer empowerment. As registered CAG with TRAI we are in forefront of providing inputs to TRAI related to consumer concerns and interests.

In continuation of these efforts from VOICE, we hereby submit our comments on “ISSUES RELATED TO ADVERTISEMENTS IN TV CHANNELS” as under-

Before we at VOICE give our comments we would like to submit that apart from commercial and self advertisement there is a third kind of advertisement increasingly resorted to recently namely paid promotions like main leads coming on a channel and talking of their film or TV program OR the characters of the program promoting a product/service film/TV program OR commentator promoting a product/service on display during an event. This not only eats into the program space of a viewer but government revenue is also misappropriated.

- i. **The limits for the duration of the advertisements shall be regulated on a clock hour basis i.e. the prescribed limits shall be enforced on clock hour basis.**

VOICE COMMENT: Yes, this is acceptable parameter.

- ii. **No FTA channel shall carry advertisements exceeding 12 minutes in a clock hour. For pay channels, this limit shall be 6 minutes.**

VOICE COMMENT: Advertisement for 12 minutes per hour **inclusive of self promotion** for FTA channels is acceptable but for pay channels ideally only self promotions should be allowed as the consumer is actually paying for the program he specifically wants to watch. Hence, as a compromise a maximum of 5 minutes per hour of advertisement including self promotion may be allowed.

iii. The 12 minutes of advertisements will not be in more than 4 sessions in one hour. In other words, there will be continuous airing of the TV show for at least 12 minutes each. Not more than three advertisement breaks shall be allowed during telecast of a movie with the minimum gap of 30 minutes between consecutive advertisement breaks.

VOICE COMMENT: 4 sessions per hour is acceptable but max advertisement time for any session also should be specified. This is to ensure that last session of previous hour and first session of subsequent hour is not combined to make for a unusually long advertisement break. We suggest maximum advertisement session should not exceed 5 minutes per hour for FTA channels and 2.5 minutes for paid channels.

iv. In case of sporting events being telecast live, the advertisements shall only be carried during the interruptions in the sporting action e.g. half time in football or hockey match, lunch/ drinks break in cricket matches, game/set change in case of lawn tennis etc.

VOICE COMMENT: Accepted subject to VOICE comments at the beginning. Guiding principle is non-intrusion.

v. There shall only be full screen advertisements. Part screen advertisements will not be permitted. Drop down advertisements will also not be permitted.

VOICE COMMENT: Accepted.

vi. In so far as News and Current Affairs channels are concerned, they are allowed to run not more than two scrolls at the bottom of the screen and occupying not more than 10% of the screen space for carrying non-commercial scrolls, tickers etc.

VOICE COMMENT: Accepted.

vii. The audio level of the advertisements shall not be higher than the audio level of the programme.

VOICE COMMENT: Yes, including the accompanying music and signature music / jingle etc.

Hemant Upadhyay

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Advisor IT & Telecom
VOICE