BIF RESPONSE TO TRAI CP ON ISSUES RELATED TO DIGITAL TERRESTRIAL BROADCASTING IN INDIA

Q1: Do you perceive the need for introduction of Digital terrestrial transmission in multiple broadcasting distribution platforms? Please provide your comments with justification.

BIF RESPONSE

Global Trends show that Digital Terrestrial Transmission occupies almost 25% of the Total number of Digital TV Households today. Between 2010-15, out of approx. 600Mn households which acquired Digital TV broadcast capabilities, almost 25% chose Digital Terrestrial Transmission. Even Free-to-Air Digital Terrestrial Transmission households have trebled since 2010. All this indicates that Digital Terrestrial Transmission is quite popular world over.

However in India, unlike in other countries, there is only one public broadcaster who uses terrestrial broadcasting technologies. Though the technology used is analog today, the broadcaster is in the process of migrating to digital technology. While advocating the need and several advantages of Digital Terrestrial Technologies over that of other Multiple broadcasting distribution platforms , one must bear in mind that

a) Popularity of Terrestrial Broadcasting platforms in India are on the wane with the advent of Cable TV & Satellite (DTH) platforms . The drop in market share is so significant that from almost 100% share about 15 years back, the broadcaster's share in terrestrial broadcasting has dropped to barely 6%. A majority of the remaining connections are restricted to rural & remote areas only where either Cable or DTH is yet to reach. In fact , the public broadcaster himself has been forced to switch over to DTH(Satellite) platform to compensate for the loss of subscribers on the terrestrial platform.

b) Associated with the declining interest and market share of terrestrial broadcasting is the issue of precious spectrum being held captive by the public broadcaster in UHF band IV (470-585Mhz) and UHF Band V (582-698Mhz). With the declining market share and subscriber interest in terrestrial broadcasting and ascending market share of alternative technologies viz. Satellite (DTH) & Cable TV and given the fact that almost 250Mhz of spectrum in a band which has excellent signal propagation characteristics thereby making it ideal for deep in-building penetration in dense urban areas besides providing cost effective coverage to remote and rural areas, there is a clear case for a serious re-think as to whether the market is interested in the migration to digital terrestrial broadcasting and also for the govt to invest any furthur into making the sole 'monopoly' i.e. the public broadcaster go

down this path with expectation of little or no returns. Also the band characteristics lends itself to providing ubiquitous and cost effective mobile broadband and has been marked for IMT applications in future. This is also in sync with the NFAP-2011 guidelines which projects these bands for availability for the purpose of fixed , mobile & broadcasting services in India.

Thus, BIF is of the discerning view **that there is no need to introduce Digital Terrestrial broadcasting in India due to the following reasons**

a) Declining market share of terrestrial broadcasting in India

b) Lack of market demand

c) Availability of Migration path available only with the Public Broadcaster which is an inefficient monolith and is not geared up to deliver cost effective services in a competitive market place

d) The Public Broadcaster maybe asked to release all of the 250 Mhz or a sizeable chunk of it for more effective use for IMT applications which will help in mass deployment of cost effective ubiquitous broadband services and fulfill the objectives of Digital India

e) This would lead to frittering away of precious public resources and a huge drainage on the public exchequer with little or no returns.

Q.2 If yes, what should be the appropriate strategy for DTT implementation across the country? Please provide your comments with justification.

BIF RESPONSE

NOT APPLICABLE as Answer to Q1 was NO

Q.3 Should digital terrestrial television broadcasting be opened for participation by the private players? Please provide your comments with justification.

BIF RESPONSE

As mentioned in previous paras, there is practically no demand and no takers for this technology or service. Neither there is any enthusiasm amongst the customers in the market nor are there any enterprises/entrepreneurs who are interested in offering this technology/service. Also the device and equipment ecosystem just does not exist for this technology/service today to ensure scalability and price points which are likely to result in market penetration.

The world of broadcasting is changing rapidly. In India , the Satellite based DTH and Cable TV service are the dominant players in the market with continuously growing market share. So much so, the DTH players have started to offer TV channels on other devices viz. Smartphones & Tablets .

With modernisation/digitisation of Cable TV , they are now ready to offer two way service . This includes High Speed fixed Broadband along with Broadcasting as well.

Also, with the deployment of LTE -A (Advanced) and LTE-Broadcast technologies and also deployment of 700mhz band in the near future, we shall see more broadcast services alongwith that of Broadband using conventional IMT services

With Internet proliferation happening in the country and with gradual reach of ubiquitous and reliable Wifi service everywhere, Internet TV is going to be more and more popular. Also downloading of live video streams & TV channels via Apps and Platforms on the Internet is going to be the way forward

It is in this overall context, that one considers this overall exercise as quite futile of ushering in a technology which apparently does not command any market presence today .

BIF in summary wishes to state that neither should this service be permitted to the public broadcaster but also to any private sector players.

Q.4 Which model or a combination thereof for Digital terrestrial transmission will be most suitable in Indian context? Please furnish your comments with justification.

BIF RESPONSE

As explained previously, BIF feels that it is a futile exercise to push for DTT in India .

Q.5 What should be the approach for implementing DTT network (MFN/SFN/Hybrid)? Please furnish your comments with justification

BIF RESPONSE

NOT APPLICABLE

Q.6 What should be the criteria for arriving at optimum size of DTT multiplex at any location? Please furnish your comments with justification.

BIF RESPONSE

NOT APPLICABLE

Q.7 How many digital multiplex per DTT operator should be planned for metro, major cities, urban and rural areas and why? Please furnish your comments with justification.

BIF RESPONSE

NOT APPLICABLE

Q.8 What should be most appropriate frequency band as per National Frequency Allocation Plan 2011 for implementation of Digital terrestrial transmission including mobile TV? Give your comments with justification.

BIF RESPONSE

Mobile TV as mentioned before would probably come up using a combination of bands which will include the UHF band IV & V also.

Q.9 Should spectrum be exclusively earmarked for roll out of DTT services? If so, what should be the quantum considering the broadcasting sector requirement in totality?

BIF RESPONSE

As explained earlier, BIF is not in favour of DTT services and hence would like the entire band to be released for possible IMT applications , post the closure of the Analog terrestrial service by the public broadcaster.

Q.10 What should be the roadmap for digitization of terrestrial TV network in the country? Please provide your comments with justification.

BIF RESPONSE

NOT APPLICABLE

Q.11 What should be the Analog Switch off date(s) for the terrestrial TV channels in context with the suggested roadmap for DTT implementation? Please provide your comments with justification.

BIF RESPONSE

Due to declining market share of terrestrial TV and due to continuous drainage on precious national resources, it is of paramount importance that the analog service be switched off at the earliest possible date as that can be easily substituted with Cable or Satellite . This will also enable release of the precious 230Mhz of UHF Band for alternative and more productive commercial use.

Q.12 Stakeholders may also provide their comments on any other issue relevant to the present consultation paper?

BIF RESPONSE

No Comments