



COUNTER COMMENTS
BY
DEN NETWORKS LIMITED
ON THE CONSULTATION
PAPER
“ON THE CONSULTATION
PAPER ON ISSUES RELATED
TO PLACING OF TELEVISION
CHANNEL ON LANDING
PAGE”



At the outset, we at **DEN NETWORKS LIMITED** (DEN) once again wish to express our sincere gratitude to the Telecom Regulatory Authority of India (the Authority) for its support, cooperation in the establishment and growth of Broadcasting & Cable TV industry in India and also resolving various issues, which have arisen from time to time.

We specially thank the Authority for providing us an opportunity to submit our counter comments to comments received from various stakeholders on the same.

We have gone through the comments published on the website of the Authority which included public and private Broadcasters, Consumer Organizations, MSO and Associations etc. For sake brevity, we are responding to major issues at one go without going in individual comments.

Counter Comments

- We have come across comments of few stakeholders agreeing with proposition that placing of TV channel on landing page influences the TRP ratings. We would once again like to point out that none of stakeholders have relied on any conclusive study or reports which even hints or suggests that placing of TV channels results in influencing the TRP ratings and they are only speculating at their whims. We also understand from the comments of Broadcasting Audience Research Council (BARC) that the methodology of recording TRP ratings was arrived as per international standards and both Ministry of Information & Broadcasting and the Authority was kept in loop from the beginning. In fact, BARC is also of the view that Landing page only improves opportunity to view and sampling by consumers and the viewership is affected by number of viewers and time spent on the channel. Thus, arriving at conclusion that placing of landing channels influences TRP rating is unfounded and speculative. It is also pertinent to note that some of the stake holders who agree proposition that placing of TV channel on landing page influences the TRP ratings themselves do placement agreement with DPOs for placing their channels.
- We would also take this opportunity to point out that even the public Broadcaster is of the opinion that placing of TV channels whose ratings are published by rating agency should not be allowed whereas Public Broadcaster distribution platform itself have been running satellite TV channel as their first channel whose ratings are published by rating agency for long time now. So public broadcaster itself having its first channel whose ratings are published.

- Few stakeholders has also raised an issue with respect to inconvenience caused to viewers due to landing page which only a notion as the customer moves to its choice of channel with help of remote. Further, it would be relevant to mention herein that the Distributor's business model to monetize from landing is of similar nature as the broadcasters earn from advertisements. If the landing page is inconvenience to customers where they can easily move to choice of channels with help of remote whereas they are at more inconvenience while watching a program or movie and have to watch unwanted long advertisements. The Authority shall be open to both sides while recognizing the right to business.

- We would like to point that placing of TV channel at landing LCN is nothing but showcasing of TV channel where the consumer can make an informed decision whether to watch the TV channel or move to its choice of channel. It is very similar to what shopkeeper does it with products while showcasing the same at his store.

In light of the aforesaid, it is respectfully submitted that Authority should not regulate landing LCN at this stage keeping in mind the interest of all the stakeholders and orderly growth of the industry.

To conclude our submissions, we once again express our deepest gratitude to the Authority for taking up an exhaustive exercise. Further, we request the Authority to consider our comments/suggestions made above.

In case of any queries or clarification required by the Authority, we further request the Authority to contact Mr. Ashish Yadav -Deputy General Manager - Legal - ashish.yadav@denonline.in DEN Networks Limited.