

PMSL/TRAI/Comments/EoDB/2022
February 8, 2022

To

Advisor (B&CS),
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
J.L.Nehru Marg, Old Minto Road,
New Delhi - 110002.

Kind Attention:- Shri Anil Kumar Bhardwaj.

Ref : TRAI Consultation Paper No. 9/2021

Dear Sir,

We are thankful to TRAI for providing an opportunity to the stakeholders by seeking their feedback / comments on the “Ease of Doing Business in Telecom and Broadcasting Sector”.

On behalf of Planetcast Media Services Ltd. (“PMSL”), please find attached herewith our comments to the questions under heading - “Ease of Doing Business in Telecom and Broadcasting Sector”.

Hope you will find the same in order.

Thanking you,

Yours faithfully,

For PLANETCAST MEDIA SERVICES LTD.



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Point wise reply on Consultation Paper
On
“Ease of Doing Business in Telecom and Broadcasting Sector”

S. No.	TRAI Questionnaire	Response/Comments
Q1.	<p>Whether the present system of licenses/permissions/registrations mentioned in para no. 2.40 or any other permissions granted by MIB, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:</p> <p>a. Simple, online and well-defined processes.</p> <p>b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any.</p> <p>c. Precise and well-documented timelines along with the possibility of deemed approval.</p> <p>d. Well-defined and time bound query system in place.</p> <p>e. Seamless integration and approvals across various ministries/departments with the end-to-end online system.</p> <p>f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of license/permission/registration</p>	<p><u>Uplinking of TV channels</u></p> <p><i>Net-worth requirement to be reviewed</i></p> <ol style="list-style-type: none"> 1) MI&B may retain the existing guidelines regarding net- worth criteria for "NEWS & CURRENT AFFAIRS TV CHANNEL" at INR 20 Crores for the company which plans for National Level News channel (Say PAN INDIA – HINDI or ENGLISH). 2) However, MI&B may/should revisit the existing guidelines and reduce the net-worth criteria for "NEWS & CURRENT AFFAIRS TV CHANNEL" below INR 20 Crores to say INR 5 Crores, for companies, which plan for regional/state wise TV channel (for example – ORIYA, KANNADA, BENGALI, TELUGU etc.) since a company which plans for News channel at regional level actually does not require that much of huge net-worth to start/run their channel(s). 3) Non-News channels net worth requirement to be reviewed. Need to be reduced to say Rs.2.50Cr. Sports & Entertainment channels to be given priority over news channels. 4) With the reduction of NET Worth, then lot of new TV channels

		<p>in various regions/ NICHE areas may come into existence.</p> <ol style="list-style-type: none">5) The net worth should be seen at the time of application / permission only.6) Professional competencies of the channel applicant and the type of management to be evaluated along with background and security clearance of the applicants.7) Complete process of MI&B Application should be online.8) Process needs to be online not just application but its approval process with a specified timeline, not more than 45-60 days.9) Online report to be available regarding the progress of the application in various dept. vide MHA, DOS and BECIL (CA) to have fixed time lines to respond and to provide expected date of clearances. <p><u>Downlinking of TV channels</u></p> <ol style="list-style-type: none">1) Complete process of MI&B Application should be online along with approval.2) There needs to be clear defined time lines and common window (i.e. common online portal) for the process
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		<ol style="list-style-type: none">3) For example - MHA (Ministry of Home Affairs), DOS (Department of Space), DOR (Department of Revenue) and BECIL (CA) needs to have fixed time lines to respond and provide their clearances.4) Downlinking and distribution is strategic / importance and have larger social and security issues. This needs to be allowed only for teleports and with similar eligibility criteria. The downlinking company needs to operate a teleport. This will enable smooth migration of the channel Uplinking from India.5) The distribution proof for each channels to be shown in minimum cities, town and villages to be strictly monitored and certified by the distributors or channel owner to ensure that the channel is meant for various territories and purposes.6) In order to ensure requisite regulation/control and adequate arrangement for automated Compliance Recording and Monitoring facilities, downlinking permission should be allowed only to the licensed teleports, who have requisite infrastructure and experience in the field of downlinking, distribution and compliance monitoring/logging of the channels.7) This will enable MI&B to have a better management of the TV
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		<p>channel, which are uplinked from overseas & downlinked / distributed in India.</p> <p>8) TV channels, particularly non-news, who have received the DOWNLINKING Permission in India, should provide a clear Schedule for shifting Uplinking of their TV channels in India. (Say within 3 years).</p> <p>9) This will ensure bringing in all the revenue these channels are earning under the ambit of Indian Tax as income deemed to have accrued in India.</p> <p>10) There should be an increase in FDI in news agency to 100%, so that service providers can also come in the system to provide wider services sharing the common infrastructure particularly in news/event gathering.</p> <p><u>Teleport Services</u></p> <p>1) Complete process of MI&B Application should be online.</p> <p>2) There should be clear defined time lines and common window (i.e. common online portal) for every process.</p> <p>3) For example - MHA (Ministry of Home Affairs), DOS (Department of Space), and BECIL (CA) should be given fixed time lines to respond and provide clearances.</p>
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		<ol style="list-style-type: none">4) Net worth requirements should be increased to a minimum of INR 25 CRORES for the Setting up of the Teleports, as setting up of complete infrastructure of Teleport is high capital intensive. Being a professional service (b2b) it requires lot of investments to provide robust infrastructure and reliable/world class services to the Broadcasters, such as 1:1 (hot Standby Equipment's), reliable/stable power supply system, safe and carefully calibrated RF system, state-of-art auto-track antenna system, precision air- conditioning system and generator etc. besides trained & experienced manpower, looking at the criticality of the technical operations and safety of the satellites involved.5) Teleport permission need to be given for the premises and thereafter it should be only endorsement of additional teleport6) List of Approved / Co-ordinated satellites to be made available by DOS / ISRO and these should have auto - approvals. Only the satellites not coordinated should be referred to ISRO/DOS for their comments / approval.7) MHA approval should have specific time lines, like in all other countries. This needs to be correlated with passport and several other online records. The process time needs to be completed in one or maximum two days in the era of Digital India. It May be Aadhaar based.
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<p>Q2.</p>	<p>Whether the present system of licenses/permissions/registrations mentioned in para no. 3.81 or any other permissions granted by DoT, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:</p> <p>a. Simple, online and well-defined processes</p> <p>b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any</p> <p>c. Precise and well-documented timelines along with the possibility of deemed approval</p>	<p>Endorsement / De-endorsement of TV Channels in approved carriers are cumbersome and difficult.</p> <p>1) The endorsement / de-endorsement process needs to be simplified and should be the responsibility of Teleports (Bandwidth Lessors). There needs to be an online, time bound process. Once the teleport operator owns the bandwidth, the utilization needs to be only intimated monthly.</p> <p>2) There is no provision of endorsements / de endorsements of the TV channels in the WPC operating License for the HITS & DTH service. This needs to be implemented for Teleport Operators.</p>

<p>d. Well-defined and time bound query system in place</p> <p>e. Seamless integration and approvals across various ministries/departments with the end-to-end online system</p> <p>f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of license/permission/registration</p>	<p>3) WPC Wing processing time needs to be commensurate with the international standards.</p> <p>IFMC Services - Endorsement / De-endorsement of Vessels / Aircrafts in approved carrier / Hub Operating License are cumbersome and difficult.</p> <p>1) The endorsement / de-endorsement process needs to be simplified and should be the responsibility of IFMC Providers. There is a need for online process for the same, and it should be time bound process e.g. such endorsements should be processed and issued in 4-6 Hours.</p> <p>Although WPC endorsement is widely believed to be an official requirement, there has not been any public explanation of the reasons for this rule. In fact, we believe the rule may be somewhat outdated and not needed given the advances in technology and the complexity of today's maritime operations. Our analysis is based on the following considerations:</p> <ul style="list-style-type: none"> • Vessels that are enroute to other destinations enter Indian waters for a very short duration. • Vessels change their routes at short notice. • Vessels transiting through Indian waters, which is a critical path for global sea-routes, number in the tens of thousands each year.
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		<p>For the above reasons, keeping a track of the communications devices onboard may not be an easy task, comparable to attempting to track the different brands and models of cellphones in use at a specific time and location today.</p> <p>DOT/WPC could also take immediate steps to simplify as well as formalize the endorsement process, by adopting the following measures:</p> <ul style="list-style-type: none"> • Issue an official notification; • Allow online application for WPC Endorsement; • Approve applications and issue endorsement in 4-6 hours from submission, beyond which the endorsement would be deemed to have been granted. • Restrict WPC endorsements to Indian-Flagged vessels, since foreign-flagged vessels, as noted above, are already compliant; • Issue WPC Endorsement for a particular vessel for a period that is equal to the term of the license of the IFMC Service Provider.
<p>Q3.</p>	<p>What are the issues being faced in the existing processes of granting registration to IP-I providers? Identify and suggest measures to address the same.</p>	<p>PMSL has no comments on this issue.</p>
<p>Q4.</p>	<p>What measures should be taken to promote small and medium telecom infrastructure providers with ownership of the network created by them for maintaining the quality of services?</p>	<p>PMSL has no comments on this issue.</p>

<p>Q5.</p>	<p>Please provide your response with suggestions to improve the present system of operations and maintenance of the undersea cable network in respect of:</p> <p>a. What procedure should be followed to facilitate O&M agencies for smooth operations and maintenance of undersea cables/cable networks and restoration of faults within a definite timeline?</p> <p>b. What additional support is needed in terms of import and export of equipment, measurement tools and accessories etc., vessel conversion and various other clearances for expediting repair and operations of submarine cables by ship/vessel at cable landing station within Indian maritime zones?</p>	<p>PMSL has no comments on this issue.</p>
<p>Q6.</p>	<p>Please suggest changes needed to simplify the following clearance/ permit procedures by various Government Authorities:</p> <p>a. In-transit permits b. Pre-repair permits c. Post-repair permits</p>	<p>1. Facility for immediate issuance of WPC license through Saral Sanchar portal on or before arrival of the goods to avoid warehousing of the shipment or to avoid any delay in project execution in absence of WPC license and other regulatory approvals.</p> <p style="text-align: center;">or</p>

		<p>2. Customs allow release of shipment on declaration basis that Importer will submit the WPC licence within stipulated time to customs against BOE, followed by DOT / MEITY notification addressing to CBEC and other stakeholders.</p> <p>2# Pre/Post Repair cases does not require any WPC license.</p>
<p>Q7.</p>	<p>Please provide your response with proper justification to improve the present system of EMF radiation compliance in terms of:</p> <p>a. Relevance of EMF radiation audit and its impact for quick roll out of the network</p> <p>b. Measures to safeguard public interest and building confidence in public against propaganda of hazardous EMF radiations in field</p> <p>c. Issues being faced in the existing processes related to the self-certification, audit and penalty scheme of EMF radiation compliance process on Tarang Sanchar portal.</p>	<p>PMSL has no comments on this issue.</p>
<p>Q8.</p>	<p>What mechanism do you think should be followed in DoT to facilitate investors in exploring possibilities of business opportunities in the field of telecom? Provide your comments with justifications. Also, provide best international practices and adoption of new technologies for various processes and suggested</p>	<p>1) All the Policies and Definitions of DOT & its License Agreements should be crystal clear so that there are no after thoughts or Doubts in the Mind of Investor.</p> <p>2) DOT should have clear policy and there should be an acceptance of AGR based on revenues from relevant business Only.</p>

	<p>process flow that could be adopted for further facilitating ease of doing business in India.</p>	
<p>Q9.</p>	<p>Whether the present system of licenses/clearances/certificates mentioned in para no. 3.94 or any other permissions granted by WPC, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:</p> <p>a. Simple, online and well-defined processes</p> <p>b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any</p> <p>c. Precise and well-documented timelines along with the possibility of deemed approval</p> <p>d. Well-defined and time bound query system in place</p> <p>e. Seamless integration and approvals across various ministries/departments with the end-to-end online system</p>	<ol style="list-style-type: none"> 1) Being a critical and sometime emergent requirement, WPC Wing should preferably be opened throughout the year and should have online approval process. In many countries, this approval takes 15 minutes to maximum 7 days. 2) WPC wing processing time needs to be rationalized / reduced in line with the International standards / practices. Else, WPC approval for endorsement / de-endorsements should be made simpler and online. 3) Further, to reduce cost and ensure faster approval, various approvals e.g. LOI, frequency assignment / AIP, Import license, Final OL, including NOCC approvals be made online with a stipulated timeline. 4) The use of bandwidth for SD / HD, 4K, UHD etc. should be deregulated and the onus be left to the technology and the teleport operator / broadcaster. They should be allowed to take their own call According to their Business plans. <p>As per current rule, there is a minimum requirement of 8 mbps data rate for uplinking of a HD TV channel.</p>



<p>f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of license/clearance/certificate</p>	<p>5) In the current scenario WPC Wing takes around 180-240 days for processing of any new application pertaining to setting up of new Teleport / additional carrier / new satellite /IFMC / NEW VSAT NETWORK / New DSNG network etc. WPC wing should issue all the approvals online such as LOI, Frequency Assignment / AIP, Import License, Final Operating License along with all the necessary NOCC approvals and within a shorter time span such as 15 - 20 days.</p> <p>6) WPC approval / endorsement to be online and need not take more than few hours / days. This need for complete simplification of process.</p> <p>7) In the current scenario WPC Wing takes around 30-40 days for processing of normal application pertaining to TV channel endorsement, satellite change, frequency change of channel, name change of channel etc.</p> <p>8) Endorsement / De-endorsements of TV channels should be the responsibility of Teleport operator and need to be informed through an alternative updation of utilization data by the teleport operator online. OR WPC Wing should process such cases within stipulated timelines, i.e. maximum one working day.</p>
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<p>Q10.</p>	<p>Whether the present system of permission/ approval mentioned in para no. 3.101 or any other permissions granted by NOCC, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:</p> <p>a. Simple, online and well-defined processes</p> <p>b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any</p> <p>c. Precise and well-documented timelines along with the possibility of deemed approval</p> <p>d. Well-defined and time bound query system in place</p> <p>e. Seamless integration and approvals across various ministries/ departments with the end-to-end online system</p> <p>f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of permission/approval</p>	<p>1) As per current rule, there is a minimum requirement of 8 mbps data rate for uplinking of a HD TV channel.</p> <p>NOCC, Ministry of Communications should allow users to uplink HD TV channel with more flexible data rate (say 6 mbps or less) to have optimal utilization of satellite resource and provision for improved compression technologies.</p> <p>2) NOCC / WPC permission application needs to be one online process and should not take more than few hours.</p> <p>3) Companies have to undertake MPVT – NOCC Test every time, they change DSNG vans due to wear & tear of vehicle.</p> <p>DSNG vans testing is not desirable as the antenna type approval should be given by NOCC to specific vendors in order to maintain quality of transmission. The current mechanism need to be reviewed and testing of each vehicle needs to stopped forthwith.</p> <p>4) Companies need to VISIT NOCC twice, once for taking carrier plan approvals & second time for taking final uplinking permission.</p> <p>The NOCC tests/visit etc. needs to be avoided in order to have timely availability of the much needed infrastructure. It should be in line with International standards which generally take 15 minutes to may be few hours. Online application and approval system / single window clearance needs to be in place.</p>
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<p>Q11.</p>	<p>Whether the present system of permissions/ approvals mentioned in para no. 3.107 or any other permissions granted by TEC, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:</p> <p>a. Simple, online and well-defined processes.</p> <p>b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any.</p> <p>c. Precise and well-documented timelines along with the possibility of deemed approval.</p> <p>d. Well-defined and time bound query system in place.</p> <p>e. Seamless integration and approvals across various ministries/ departments with the end-to-end online system.</p> <p>f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of permission/approval.</p>	<p>PMSL has no comments on this issue.</p>

<p>Q12.</p>	<p>What measures should be taken to ensure that there is no duplicity in standards or in testing at BIS, WPC, NCCS, and TEC? Which agency is more appropriate for carrying out various testing approvals? Provide your reply with justification.</p>	<p>PMSL has no comments on this issue.</p>
<p>Q13.</p>	<p>Whether the present system of getting fresh and additional space segment capacity on Indian and foreign satellites for various services mentioned in para no. 4.15 or any other new service from DOS, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of</p> <p>a. Simple, online and well-defined processes.</p> <p>b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any.</p> <p>c. Precise and well-documented timelines along with the possibility of deemed approval.</p> <p>d. Well-defined and time bound query system in place.</p>	<p>1) Satellite BW should be pre-approved, when leased out to the users. i.e. when DOS allocates any satellite BW to the users, the said BW should be pre-approved by the various agencies such as NOCC, WPC etc. so that the user can use the BW immediately after the allocation.</p> <p>2) If it is not possible then DOS should Charge the users / applicants from the day of actual use of the BW after taking all the requisite approvals.</p> <p>This should be applicable for the foreign satellites also. For satellite bandwidth trading, tax rules needs to be rationalized (withholding tax etc).</p> <p>3) DOS / ISRO insists for 6 Months security Deposit (3 Months Cash Deposit & 3 Months Bank Guarantee) besides advance billing/ payment for a typical satellite contract.</p>

	<p>e. Seamless integration and approvals across various ministries/ departments with the end-to-end online system.</p> <p>f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of space segment capacity.</p>	<p>4) There should be no Deposit from the users, or if at all Deposit is mandatory / essential for the satellite contract then it should be in the form of Bank Guarantee only. [maximum monthly deposits]</p> <p>5) In terms of existing policy of DOS, companies have to pay INSAT Capacity Reservation Deposit (ICRD) @ INR 50,000/- per MHz which will be further adjusted in the billing, Infact, There should be no charge from the Companies towards ICRD, however, there can be penalty for not utilizing any reserved bandwidth except in case of technology obsolesce or company exiting out of business.</p>
<p>Q14.</p>	<p>Whether the existing procedures to acquire a license for providing satellite-based services in the existing framework is convenient, fast, and end-to-end online for the applicants? If not, what other measures are required to simplify the various processes to enable ease of doing business in India for satellite-based services? Give details along with justification.</p>	<p><u>Single window. Satellite bandwidth should be pre-approved.</u></p> <p>1) There should be online filing of application for INSAT capacity reservation / allocation for these services i.e. TELEPORT/TV Uplinking, SNG/DSNG & VSAT.</p> <p>2) There should be no charge from the Companies towards ICRD, however, there can be penalty for not utilizing any reserved bandwidth except in case of technology obsolesce or company exiting out of business.</p> <p>3) List of approved / co-ordinated satellites to be made available by DOS / ISRO and any application on these satellites should have automatic approvals.</p>

		<p>4) Only the satellites not coordinated should be referred to DOS /ISRO for their comments / approval.</p> <p>5) Satellite BW should be pre - approved, when leased out to the users. i.e. when DOS allocates any satellite BW to the users, the said BW should be pre - approved by the various agencies such as MIB, DOT, NOCC, WPC etc. so that the user can use the BW immediately after the allocation.</p> <p>This will ensure faster / efficient utilization (of bandwidth) and payment to ISRO for their bandwidth.</p> <p>Else DOS should charge the users/ applicants from the day of actual use of the BW after getting all the requisite approvals.</p> <p>6) There should be online filing of application for INSAT capacity reservation / allocation for these services i.e. Teleport / TV uplinking, SNG/DSNG & VSAT. This will not only facilitate ease and efficiency in application / processing but will also help environment protection by saving numerous pages of hardcopies.</p> <p>7) There should be no security deposits from the users towards booking / allocation of the satellite capacity. However, for due compliance by users and protection of ISRO's interests, there</p>
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		<p>may be provision for BANK GUARANTEES say monthly deposits, in line with the industry and international practices.</p> <p>8) DOS should make long term contracts with clear pricing policies to avoid retrospective increases which causes undue stress both on the broadcasters and the service providers, besides difficulties in tax and other compliances.</p> <p>9) There should be open sky policy for all the satellite requirements in India. However, for regulation and level playing field, DOS may explore providing for a CEILING PRICE (in equivalent INR) for bandwidth on various foreign satellites available in India.</p>
<p>Q15.</p>	<p>Whether the present system of permissions/registrations mentioned in para no. 5.10 or any other permissions granted by MeitY along with BIS, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:</p> <p>a. Simple, online and well-defined processes</p> <p>b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any.</p> <p>c. Precise and well-documented timelines along with the possibility of deemed approval.</p>	<p>PMSL has no comments on this issue.</p>

	<p>d. Well-defined and time bound query system in place.</p> <p>e. Seamless integration and approvals across various ministries/ departments with the end-to-end online system.</p> <p>f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of permission/registration.</p>	
<p>Q16.</p>	<p>What are the issues being faced by various service providers in seeking stable and committed quality power supply connections from power DISCOMS? For statewide operations whether it is feasible to get power supply in time bound manner for various locations from a single-window contact or has to be made region-wise. What measures do you suggest to improve the same?</p>	<p>PMSL has no comments on this issue.</p>
<p>Q17.</p>	<p>Whether the extant mechanism of reporting and filing at the SARAS portal and the offices of Controller of Communication Accounts (CCA) simple and user-friendly? If not, what measures are required to make it simple, transparent, and robust? Justify your comments.</p>	<p>1) Currently, we are not able to make payment of WPC through in SARAS portal and we are making payment through Bharat Kosh Portal. It is ease to make payment both LF and WPC through SARAS.</p>

		2) We are submitting all documents in SARAS portal as well as Hardcopy to CCA office, as instructed by CCA office. Submission of hardcopy may be eliminated in the era of Digital India.
Q18.	Whether any issues are being faced by the telecom service providers during declaration and verification of documents for deduction claimed from the Gross Revenue and special audits of revenue? If yes, provide your comments with the reasons thereof.	DOT should have clear policy and there should be an acceptance of AGR based on revenues from relevant business Only.
Q19.	What improvements do you suggest in the various extant audit processes conducted by DoT LSAs? How the process of the Customer Acquisition Form (CAF) audit can be further simplified? Provide your comments with justifications.	PMSL has no Comments on this.
Q20.	What measures are required to be taken to simplify the various submissions/filings made by teleport operators, DTH operators, MSOs, and other stakeholders at MIB? Provide your detailed reply with justifications.	<ol style="list-style-type: none"> 1. All the applications to be ONLINE and processed in time bound manner. 2. Complete process of Regulatory Permissions should be made online to reduce cost and faster processing. 3. Even the approval process of application be made online with specified timeline, for timely disposal.
Q21.	TRAI seeks multiple reports through its multiple divisions at predefined frequency intervals. Reports	PMSL has no comments on this issue.

	submitted by operators are examined and for non-compliances, show cause notices are issued and financial disincentives are imposed, wherever applicable. Do you think there is a need to improve reporting and compliance system in TRAI? Please elaborate your response with justifications.	
Q22.	Identify those redundant items which require deletions and at the same time the items that need to be included in the reporting and regulatory compliance systems due to the technological advancements. Suggest such changes with due justifications.	Complete process of furnishing of regulatory compliance should be online on a single/common portal of the regulators.
Q23.	What kind of IT-based reports and compliance submission processes do you suggest in TRAI? Provide your comments.	PMSL has no comments on this issue.
Q24.	Are there any other issues in the present system of licenses/ permissions/registrations granted by MIB/DoT/WPC/NOCC/TEC/DOS/MeitY/MoP that can be identified as relevant from the perspective of ease of doing business in the telecom and broadcasting sector? If yes, provide a list of those processes and suggest ways for their improvement.	We refer to the new TEC IR "STANDARD FOR INTERFACE REQUIREMENTS TEC 42012:2021" of March'2021 vide which the earlier requirements for pre-specified, specific bit rate requirements for all technologies have been done away with. We have also been given to understand that during the interactions of TEC Experts with stakeholders, TEC has maintained that the said IR has been approved by all concerned Government bodies including those from the

		<p>Department of Space, Department of Telecom & Ministry of Information & Broadcasting.</p> <p>In view of the foregoing, we request DOT to formally issue a notification or circular for the removal of the minimum bandwidth requirement and compression standard for HDTV Channel and SDTV Channel as well.</p> <p>Further, given the multiple departments involved in the broadcasting sector such as MIB, DOS, WPC and NOCC stakeholders are of the considered view that in addition to the "Standard for Interface Requirements TEC 42012:2021" WPC shall issue a notification or an office memorandum confirming that with immediate effect the bandwidth limits no longer apply.</p> <p>In the spirit of Ease of Doing business, such formal instructions to DOT/WPC/NOCC will help expedite processing of new applications as well as amendment to the existing licenses without considering any pre-fixed bandwidth requirements.</p>
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