

PMSL/TRAI/Comments/2017  
January 30, 2018

To

The Advisor (B&CS)  
Telecom Regulatory Authority of India (TRAI)  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg (Old Minto) Road  
New Delhi-110 002

**Kind Attention:- Shri. S. K Singhal**

**Reference: - TRAI Consultation Paper No. 16/2017.**

Dear Sir,

We are thankful to TRAI for providing an opportunity to the stakeholders by seeking their feedback/comments on the issue raised in the Consultation Paper of TRAI regarding - "**Issues relating to Uplinking and Downlinking of Television Channels in India**".

On behalf of Planetcast Media Services Ltd. ("PMSL"), please find attached herewith our comments to the issues under heading - "**Issues relating to Uplinking and Downlinking of Television Channels in India**".

Hope you will find the same in order.

Thanking you,

Yours Truly,

For PLANETCAST MEDIA SERVICES LIMITED

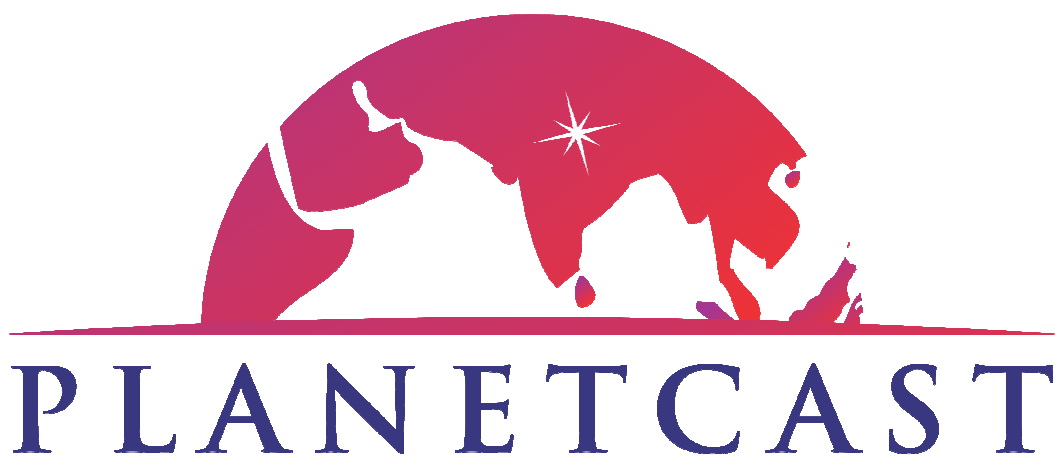
  
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**Point wise reply on Consultation Paper  
On  
“Issues relating to Uplinking and Downlinking of  
Television Channels in India”.**

Sl. No.	Issues	Comments
A.	<b>Definition of ‘News and Current Affairs channels’ and ‘Non-News and Current Affairs Channels’</b>	
4.1	<p>Is there any need to redefine “News and Current Affair TV channels”, and “Non-News and Current Affair TV Channels” more specifically? If yes, kindly suggest suitable definitions of “News and Current Affair TV channels”, and Non-News and Current Affair TV Channels” with justification.</p>	<p>The existing broad definition of News &amp; Non-News channel is sufficient and self-explanatory.</p> <p>However, in order to promote the much needed growth of TV Channels in regional/niche areas, we may have further sub-categorization as under :</p> <p>A) In <b>News &amp; Current Affairs</b> channels, we may have sub-category of <b>National</b> and <b>Regional</b> channels based on their distribution or some logical criteria other than language, given that many Indian states e.g., UP, MP, Uttarakhand, Bihar, Rajasthan, HP, Delhi have Hindi as a language in their regional / niche channels.</p> <p>B) In <b>Non-News &amp; Current Affairs</b> channels, we may have further sub-categorization for <b>niche and public welfare areas</b> like agriculture, religious/spiritual, health /wellness, medical, education, weather, sports etc. as per genre.</p> <p><b>Justification:</b></p> <p>India is a large and multi-lingual country, having 22 scheduled languages, dialect apart. Given that people like to see and hear content in their own mother-tongue, there is a huge potential and need for growth of regional channels in the country.</p> <p>Even considering the population vis-a-vis the number of languages used in India compared to other developed countries (e.g. US, France) and the glaring absence of channels in various critical genres like weather, agriculture, education, medical, health/wellness etc., there is a huge potential and need in India for growth of channels in the niche and public welfare areas.</p>

B.	Net-worth of eligible companies.	
4.2	<p>Should net-worth requirement of the applicant company for granting uplinking permission, and/ or downlinking permission be increased? If yes, how much should it be? Please elaborate with appropriate justification.</p>	<p>The existing net-worth requirements are already quite higher than actually required or spent by the broadcasters. Therefore, the net-worth requirement should be reviewed, reduced and rationalized according to the actual requirement for the particular classification / genre.</p> <p>TRAI may, therefore, like to recommend a substantially <b>reduced net-worth requirement for channels in regional space as well as certain public welfare genre</b> (e.g. agriculture, health/wellness, medical, education, weather etc.) where Government may like to promote certain public welfare services.</p> <p><b>Justification:</b></p> <p>It is important to note that although the broadcasting is a capital intensive business but in actual fact this <b>capital investment</b> (e.g. for Uplinking / downlinking infrastructure, transponder charges, spectrum usage charges, network establishment etc. including technology upgrades) is mostly <b>made by the commercial teleport service provider(s)</b> from where these broadcasters are availing these services. Even, the marketing and distribution services are also outsourced by the broadcaster to various agencies which provide such services. Therefore, the broadcasters are actually neither required to make that much of capital investment nor even need that much of prescribed net-worth.</p> <p>Further, considering the alternative modes of distributing a channel, the net-worth requirement of satellite television channels need to be substantially reduced given that people can start / run their channels on <b>unregulated social media platforms</b> like you-tube, face-book, Instagram etc. with hardly any capital investment but earning huge revenue through subscription and advertisement.</p>

		<p><b>Benefits:</b></p> <p>Thus, a lower net-worth requirement would:</p> <ul style="list-style-type: none"> <li>• Encourage first generation / new entrepreneurs / creative people to enter into this sector;</li> <li>• Promote growth of local, regional and niche channels;</li> <li>• Increase competition and <b>lower prices</b> of the channel <b>for end customers</b>;</li> <li>• Discourage diversion of business opportunities to outside India and <b>save precious foreign exchange</b>;</li> <li>• Ease in new licences will <b>deter trading / sub-leasing of existing licences</b>; and</li> <li>• <b>Create employment opportunities</b>, revenue and taxes for the overall <b>economic growth</b> of the country.</li> </ul>
4.3	<p>Should there be different net-worth requirements for uplinking of News and non-News channels? Give your suggestions with justification?</p>	<p>A) (i) Considering the point 4.2.(iii), MI&amp;B may, at the most, keep the existing guidelines regarding net- worth criteria for “NEWS &amp; CURRENT AFFAIRS TV CHANNEL” at INR 20 Crores for <b>National (say PAN INDIA) News channel</b>.</p> <p>(ii) However, MI&amp;B should revisit the existing requirement and substantially reduce the net-worth criteria for “NEWS &amp; CURRENT AFFAIRS TV CHANNEL” to say INR 5 Crore, for companies which plan for state wise/local/<b>regional News Channel</b>. e.g., news channel for UP, MP, Uttarakhand, Bihar, Rajasthan, HP, Delhi etc.</p> <p>B) i) Similarly, in case of Non-News Channel as well, MI&amp;B may, at the most, keep the existing guidelines regarding net-worth criteria for “NON-NEWS &amp; CURRENT AFFAIRS TV CHANNEL” at INR 5 Crores for <b>National Level Non-News Channel</b>.</p> <p>ii) However, MI&amp;B should revisit the existing requirement and substantially</p>

		<p>reduce the net-worth criteria for “Non-NEWS &amp; CURRENT AFFAIRS TV CHANNEL” to say INR 2 Crores for state wise/local /<b>regional TV channel</b> in non-news or <b>special genre</b> to be promoted.</p> <p><b>Justification:</b></p> <ul style="list-style-type: none"> <li>• Reduced capital investment.</li> <li>• Lower distribution cost.</li> <li>• Limited manpower / resources.</li> </ul>
<b>C.</b>	<b>Processing fee for application</b>	
4.4	<p>Is there any need to increase the amount of non-refundable processing fee to be deposited by the applicant company along with each application for seeking permission under uplinking guidelines, and downlinking guidelines?, What should be the amount of non-refundable processing fee? Please elaborate with justification.</p>	<p>In order to promote requisite growth of the sector, it may be desirable to <b>not increase but retain the existing nonrefundable processing fees.</b></p> <p><b>Justification:</b></p> <p>However, the cost and time of processing should be reduced with the <b>use of technology and online processing</b> of application.</p> <p>Further, with the promotion and <b>growth of channels in regional and specific genre</b>, there will be increase in the number of channels, which will in turn increase the revenue to the Government.</p>
<b>D.</b>	<b>Grant of license / permission for Satellite TV Channels</b>	
4.5	<p>Whether auction of satellite TV channels as a complete package similar to FM Radio channels is feasible? If yes, then kindly suggest the approach.</p>	<p>No. <b>Auction of satellite TV channels is neither feasible nor desirable</b> for the following reasons:</p> <p><b>Justification:</b></p> <p><b>FM broadcasting</b> is a <b>terrestrial</b> form of broadcasting whereby the maximum number of FM radio <b>channels</b> which can operate in given geographical area are <b>limited</b> by the limited bandwidth spectrum (each channel requiring 800 KHz out of total 88 MHz to 108 MHz), transmitted power and height of transmitter antenna hence requiring geographical area-wise auction of the FM Radio Channels using <b>spectrum/resources</b></p>

		<p><b>exclusively owned by the government.</b></p> <p>In case of satellite communication, the <b>satellite beams</b> cover the <b>large footprint</b> and the same set of <b>frequencies are reused</b> to communicate with the different satellites placed at different positions in the geo-synchronous orbit (regulated by International Telecommunication Union - ITU) thereby allowing the <b>repeat allocation</b> of same set of frequencies to another satellite which may be <b>Indian or foreign satellite not owned by the Govt.</b> of India. The central Govt. can auction only those resources which are fully under its own control.</p> <p>Also <b>broadcast media</b> is a powerful purveyor of ideas of values not only providing entertainment but also <b>disseminating information, education and empowerment</b> of people. Hence, <b>flexible and liberal licensing</b> will help and promote the larger objective of public welfare programs than mere focus on gathering auction revenue.</p>
4.6	<p>Is it technically feasible to auction individual legs of satellite TV broadcasting i.e. uplinking space spectrum, satellite transponder capacity, and downlinking space spectrum? Kindly explain in detail.</p>	<p>Auction of individual legs of satellite TV broadcasting may also <b>not be technically feasible</b> as this requires coordinated use for successful broadcasting of TV channel.</p> <p>Further, the <b>option of Uplinking from outside India</b> and <b>use of satellite transponder capacity on foreign satellites</b> may restrict the plausible gains from auction of these resources.</p> <p>Further, requirement of mandatory uplinking from Indian soil to Indian Satellite may not only cause <b>scarcity of satellite transponder</b> and restrict the growth of the broadcasting sector but it also may not be desirable in a globalized economic world.</p>

4.7	Is it feasible to auction satellite TV channels without restricting the use of foreign satellites, and uplinking of signals of TV channels from foreign soil? Kindly suggest detailed methodology.	<p>Auction of satellite TV channels without restricting the uplinking from foreign soil and without use of foreign satellites is <b>not feasible</b> since the same are not owned by the government.</p> <p>Further, in order to promote shifting of Uplinking from foreign soil to India, and discouraging people to shift from India to foreign soil, it is <b>not desirable</b> to auction satellite TV channels.</p>
4.8	Is it advisable to restrict use of foreign satellites for satellite TV Broadcasting or uplinking of satellite TV channels, to be downlinked in India, from foreign soil?	<p>It is not advisable to restrict use of foreign satellite TV broadcasting or uplinking of TV channels to be downlinked to India from foreign soil since the requirement of mandatory Uplinking to Indian satellite may cause scarcity of Indian satellite transponder and restrict the growth of broadcasting sector.</p> <p>It may be worth mentioning that the domestic satellite service provider does not have sufficient satellite capacity to fulfill the requirement of broadcasting industry.</p> <p>Also there is a need for satellites with higher power and wider footprint for global distribution.</p>
4.9	Can there be better way to grant license for TV satellite channel then what is presently followed? Give your comments with justification?	<p>Complete process of Grant of license should be made ‘online’.</p> <p>There should be clearly defined time lines <b>and common platform (i.e. common online portal)</b> for every process.</p> <p>For example - MHA (Ministry of Home Affairs), DOS (Department of Space), and BECIL (CA) should be given fixed time lines to respond and provide their comments on common portal.</p> <p>Responsibility to be fixed at all the levels.</p> <p><b>Justification:</b></p> <p>This will reduce processing cost, infuse transparency, encourage more channels (particularly in regional and niche areas) and thereby increase Govt. revenue, employment, foreign exchange, taxes and economic growth.</p>



E.	Entry Fee and License fee	
4.10	<p>If it is decided to continue granting of licenses for satellite TV channels on administrative basis, as is the case presently, what should be the entry fee for grant of license for uplinking of TV channels from India, downlinking of TV channels uplinked from India, and downlinking of foreign TV channels? Please suggest the fee amount for each case separately with appropriate justification.</p>	<p>A) It is recommended to continue with the existing “NIL” Entry Fees for TV channels uplinked/downlinked from India and</p> <p>B) Also continue with the existing permission fees (of Rs. 10 lakhs) for downlinking of foreign TV channels.</p> <p><b>Justification:</b></p> <ul style="list-style-type: none"> <li>i) Any levy of entry fee will increase the cost of Uplinking TV channels from India, and accordingly may divert some business of Uplinking of TV channels to outside India, especially for those channels which are uplinked from India and downlinked outside India.</li> <li>ii) This may adversely affect the revenue of the teleport operators and in turn the cost to broadcasters and the end consumer.</li> <li>iii) Incentive for Uplinking from India may also encourage development of content for such channels and employment in India.</li> <li>iv) This will also encourage turnaround services being offered from Indian soil to Foreign Channels downlinked outside India.</li> <li>v) It will also enable satellite TV Channels to compete with <b>unregulated social media platforms</b> like you-tube, face-book, Instagram etc. where one could start a channel or distribute content with hardly any capital investment but earning huge revenue through subscription and advertisement.</li> </ul>
4.11	<p>What should be the license fees structure, i.e. fixed, variable, or semi-variable, for uplinking and</p>	<p>A) It is not desirable to have variable / semi-variable license fee considering:</p> <ul style="list-style-type: none"> <li>i) The need for support and growth of</li> </ul>

	<p>downlinking of satellite TV channels? Please elaborate if any other license fee structure is proposed, with appropriate justification.</p>	<p>the broadcasting sector (particularly in regional and public welfare areas),</p> <p>ii) Experience of various disputes and litigation in telecom and other sectors having variable / semi-variable license fee, despite having given an elaborate definition of Revenue / AGR and computation formula etc.</p> <p>B) Therefore, MIB may, at the most, continue with the existing structure of fixed license fee in order to promote the growth of broadcasting industry and facilitate increased employment, saving of foreign exchange, higher revenue / govt. taxes and overall economic growth of the country.</p> <p>i) This will also encourage turnaround services being offered from Indian soil to Foreign Channels downlinked outside India.</p> <p>ii) It will also enable satellite TV Channels to compete with <b>unregulated social media platforms</b> like you-tube, face-book, Instagram etc. where one could start a channel or distribute content with hardly any capital investment but earning huge revenue through subscription and advertisement.</p> <p>C) However, we may retain the existing structure of license fees for downlinking of foreign TV channels.</p>
4.12	<p>If the variable license fee structure is proposed, then what should be rate of license fee for TV channels uplinked from India and TV channels uplinked from abroad, and what should be the definition of AGR?</p>	<p>As explained above in para 4.11, it is not desirable to have variable license fee at all either for TV Channels uplinked from India or TV Channels uplinked from abroad.</p>

4.13	If the semi-variable license fee structure is proposed, then what should be the minimum amount of license fee per annum for domestic channels (uplinked and downlinked in India), uplink only channels, and downlinking of foreign channels (uplinked from abroad)?	As explained above in para 4.11, It is not desirable to have semi-variable license fee at all either for TV Channels uplinked from India or TV Channels uplinked from abroad.
4.14	If the fixed license fee structure is proposed, then what should be the license fee per annum for domestic channels, uplink only channels, and downlinking of foreign channels?	As referred above in para 4.11, MIB may, at the most, continue with the existing structure of fixed license fee in order to promote the growth of broadcasting industry and facilitate increased employment, saving of foreign exchange, higher revenue / govt. taxes and overall economic growth in line with the spirit of national leadership.
4.15	What should be the periodicity for payment of the license fee to the Government? Please support your answer with justification.	Annual, as currently existing.
4.16	What should be the periodicity for review of the entry fee and license fee rates?	After 10 years.
<b>F.</b>	<b>Encryption of TV channels</b>	
4.17	Should all TV channels, i.e. pay as well as FTA satellite TV channels, be broadcasted through satellite in encrypted mode? Please elaborate your response with justification.	<p>Given the precarious condition particularly of small broadcasters, it is not desirable to impose mandatory encryption of FTA satellite TV channels because;</p> <ul style="list-style-type: none"> <li>- It would require supply of IRDs thereby requiring huge capital investment.</li> <li>- Execution of interconnect agreement thereby increasing the cost of distribution of FTA channels for broadcasters,</li> <li>- It may also affect the investment in the Uplinking sector.</li> </ul>

<b>G.</b>	<b>Operationalisation of TV channel</b>	
4.18	Is there a need to define the term “operationalization of TV channel” in the uplinking guidelines, and downlinking guidelines? If yes, please suggest a suitable definition of “operationalization of TV channel” for the purpose of the uplinking guidelines, and the downlinking guidelines separately.	TV Channel may be considered as operational after: <ul style="list-style-type: none"> <li>i) It has obtained all the regulatory permissions such as MI&amp;B, WPC &amp; NOCC.</li> <li>ii) Starts regular broadcasting its content from the permitted Teleport, and remains continuously in operation after start of such transmission.</li> <li>iii) EMMC (unit of MI&amp;B) reports to the Ministry regarding availability and monitoring of the content of the channel; and</li> <li>iv) Is reported as operational in the monthly report submitted by the permitted teleport to the Ministry.</li> </ul>
4.19	Maximum how many days period may be permitted for interruption in transmission or distribution of a TV channel due to any reason, other than the force-majeure conditions, after which, such interruption may invite penal action? What could be suggested penal actions to ensure continuity of services after obtaining license for satellite TV channel?	May continue with the current uplinking/downlinking guidelines of Ministry of Information & Broadcasting.
<b>H.</b>	<b>Transfer of License.</b>	
4.20	Whether the existing provisions for transfer of license/permission for a TV channel under uplinking guidelines, and downlinking guidelines are adequate? If no, please	Yes, the existing provisions for transfer of license/permission for a TV channel under uplinking guidelines and downlinking guidelines are adequate.

	<p>suggest additional terms and conditions under which transfer of license/permission for a TV channel under uplinking guidelines, and downlinking guidelines may also be permitted? Please elaborate your responses with justification.</p>	
4.21	<p>Should there be a lock in period for transfer of license/ permission for uplinking, or downlinking of a TV channel? If yes, please suggest a suitable time period for lock in period. Please elaborate your response with justification.</p>	<p>No, there should not be any lock in period for transfer of license/permission for uplinking, or downlinking of a TV Channel.</p> <p>TRAI may recommend the continuation of existing “Transfer of permission of Television channels” rule stipulated in current guidelines of Ministry of Information &amp; Broadcasting.</p>
4.22	<p>Should the lock in period be applicable for first transfer after the grant of license/permission or should it be applicable for subsequent transfers of license/ permission also?</p>	<p>Please refer to Para 4.21 above.</p>
4.23	<p>What additional checks should be introduced in the uplinking, and downlinking permission/ license conditions to ensure that licensees are not able to sub-lease or trade the license? Please suggest the list of activities which are required to be performed by Licensee Company of a satellite TV channel and can’t be outsourced to any other entity to prevent hawking, trading or subleasing of licenses.</p>	<p>Please refer to Para 4.21 above.</p>

<b>I.</b>	<b>Meaning of a teleport</b>	
4.24	Whether specific definition of a teleport is required to be incorporated in the policy guidelines? If yes, then what should be the appropriate definition? Please elaborate responses with justification.	<p>TELEPORT- is a center providing interconnections between different forms of telecommunications, especially one which links satellites to ground-based communications.</p> <p>In other words, Teleport is capable of Uplinking large number of satellite TV channels. Therefore, any facility capable of Uplinking a large number of TV channels on multiple satellites should be termed as “Uplinking Hub – Teleport”.</p> <p>Single teleport able to uplink on multiple co-located satellites should also fall in the definition of a Teleport.</p>
<b>J.</b>	<b>Entry fee, Processing fee, and License fee for teleport license</b>	
4.25	Is there any need to increase the amount of non-refundable processing fee to be paid by the applicant company along with each application for teleport license? If yes, what should be the amount of non-refundable processing fee? Please elaborate with justification.	<p>No. The existing processing fees should not be increased.</p> <p>Justification:</p> <ul style="list-style-type: none"> <li>• It will promote the growth of broadcasting industry and facilitate increased employment, saving of foreign exchange, higher revenue / govt. taxes and economic growth of the country</li> <li>• Cost of processing may be reduced by online processing of application.</li> </ul>
4.26	Should entry fee be levied for grant of license to set up teleport? If yes, what should be the entry fee amount? Please give appropriate justification for your response.	<p>No. It is recommended to continue with “NIL” entry fees for teleport.</p> <p>Justification:</p> <ul style="list-style-type: none"> <li>• It will promote the growth of broadcasting industry and facilitate increased employment, saving of foreign exchange, higher revenue / govt. taxes and economic growth of the country</li> <li>• Cost of processing may be reduced by making the online processing of application.</li> </ul>

4.27	What should be the license fee structure for teleports licensees? Should it be fixed, variable or semi-variable? Please elaborate if any other license fee methodology is proposed, with appropriate justification.	It is not desirable to have variable / semi-variable license fee considering the experience and litigation in telecom and other sectors despite having an elaborate definition of Revenue / AGR.  <b>Justification:</b> <ul style="list-style-type: none"> <li>• Therefore, MIB may, at the most, continue with the existing structure of fixed license fee in order to promote the growth of broadcasting industry and facilitate increased employment, saving of foreign exchange, higher revenue / govt. taxes and economic growth of the country.</li> <li>• This will also encourage turnaround services being offered from Indian soil to Foreign Channels downlinked outside India.</li> </ul>
4.28	What should be the rate of such license fee? Please give appropriate justification for your response.	Please refer to Para 4.27 above.
4.29	What should be the periodicity for payment of the license fee to the Government? Please support your answer with justification.	<b>Annual - as existing</b>
4.30	What should be the periodicity for revision of the entry fee, and license fees rate for the teleports licensees?	<b>After 10 years</b>
<b>K.</b>	<b>Restriction on the number of teleports</b>	
4.31	Whether there is a need to restrict the number of teleports in India? If yes, then how the optimum number of teleports can be decided? Please elaborate your responses with justification.	There is no need to restrict the number of teleports but regulate the existing teleports operators  <b>Justification:</b> <ul style="list-style-type: none"> <li>• A few leading commercial teleports having multiple platforms and multi-location teleports with robust infrastructure provide</li> </ul>

		<p>much needed reliable services (despite various infrastructure challenges) for this critical operations which will greatly boost the media and entertainment business in India.</p> <ul style="list-style-type: none"> <li>• Out of 87 teleports, a small number of teleports are actually operational (only 3 – 4 are commercial teleports and rest being captive). This clearly indicates the limited business opportunities due to limited number of TV channels.</li> <li>• This will also eliminate non-serious teleport operators who may have been involved in some unregulated / undesirable activities.</li> <li>• Restricting number of captive teleports will encourage broadcasters to use commercial teleports resulting in optimum utilization of teleport infrastructure and satellite resources with economies of scale and efficient operations.</li> </ul>
4.32	Whether any restriction on the number of teleports will adversely affect the availability or rates of uplinking facilities for TV channels in India?	No. Given the underutilization of existing teleport infrastructure, there is already abundant availability of resources/ teleport facility.
<b>L.</b>	<b>Location of teleports</b>	
4.33	What should be the criteria, if any, for selecting location of teleports? Should some specific areas be identified for Teleport Parks? Please elaborate your responses with justification.	<p>Making of specific teleport parks may not be desirable and the location should be left to the business requirement and SACFA clearance.</p> <p><b>Justification:</b></p> <ul style="list-style-type: none"> <li>• Teleport is an installation of capital intensive heavy earth station with SACFA clearance not capable of easily shifting.</li> <li>• Already there is sufficient capacity available which needs to be optimally utilized.</li> <li>• Quite often the location is driven by business and technical requirements which may not be in consonance with the</li> </ul>



		proposed teleport parks.
<b>M.</b>	<b>Optimum use of existing teleport infrastructure.</b>	
4.34	Please suggest the ways for the optimal use of existing infrastructure relating to Teleports.	Restricting number of fresh teleport operators will encourage broadcasters to use existing commercial teleports resulting in optimum utilization of teleport infrastructure, satellite resource, economies of scale and efficient operations.
<b>N.</b>	<b>Unauthorised Uplink by Teleport Operator.</b>	
4.35	What specific technological and regulatory measures should be adopted to detect, and stop uplink of signals of non-permitted TV channels by any teleport licensee? Please elaborate your responses with details of solution suggested.	<p><b>Vigilant centralized monitoring system capable of downlinking the signal from all satellites in MCPC and SCPC mode with auto detection, identification and comparison from the approved plan and parameters.</b></p> <p><b>If the signal is on MCPC platform and after identifying the non-permitted channel, concerned authority must issue the show-cause notice to the concerned TV channel &amp; Teleport;</b></p> <p><b>If the transmission is on SCPC mode.</b></p> <p><b>(a) Centralized monitoring system must interfere with the modulated signal to interfere and block the signal reception and further identify the source location.</b></p> <p><b>(b) To identify the source geographical position, centralized monitoring system must be equipped with hardware cum software based intelligence system to identify the source geo co-ordinates/location.</b></p> <p><b>All the teleport operators must be advised to follow the stipulated norm and any violation of law should attract not only financial penalty but also temporary suspension of all services from violator/ Teleport operator.</b></p>

O.	<u>Any other issue.</u>	
4.36	Stakeholders may also provide their comments on any other issue relevant to the present consultation.	<p><b>1. <u>TIMELINES</u></b></p> <p>i). Complete process of MI&amp;B application should be made online to reduce cost and faster processing.</p> <p>ii). Even the approval process of application be made online with specified timeline, for timely disposal.</p> <p>iii). To facilitate transparency and monitoring, online report may be made available on stage-wise progress of the application in various departments e.g. MHA, DOS &amp; BECIL (CA) to ensure fixed time lines to respond and provide expected date of clearances.</p> <p>iv). Current timelines are as follows:-</p> <p style="padding-left: 40px;">a) Permission from MI&amp;B for setting up Teleport - 8-10 Month.</p> <p style="padding-left: 40px;">b). Permission from WPC &amp; NOCC for operationalization of Teleport - 6-8 Months.</p> <p style="padding-left: 40px;">Which needs to be rationalized / reduced.</p> <p><b>2. <u>DOS - ISRO ISSUES</u></b></p> <p>i). 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>Only the satellites not coordinated should be referred to DOS /ISRO for their comments / approval.</p> <p>ii). 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 -</p>

		<p>approved by the various agencies such as MIB, 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>iii). Else DOS should charge the users/ applicants from the day of actual use of the BW after getting all the requisite approvals.</p> <p>iv). There should be online filing of application for INSAT capacity reservation / allocation for these services i.e. Teleport / TV uplinking, SNG/DSNG &amp; 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>v). There should be no deposits from the users towards booking / allocation of the satellite capacity. However, for due compliance by users and protection of ISRO's interests, there may be provision for BANK GUARANTEES say monthly deposits, in line with the industry and international practices.</p> <p>vi). 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>vii). 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>
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		<p><b>3. <u>WPC &amp; SPECTRUM RELATED ISSUES</u></b></p> <p>i). 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.</p> <p>ii). WPC wing processing time needs to be rationalized / reduced in line with the International standards / practices.</p> <p>iii). The process for endorsement / de-endorsement of TV Channels (by WPC) needs to be simplified and should be made the responsibility of Teleports. This should be made in line with HITS &amp; DTH Services where there is no provision / requirement of endorsement / de-endorsement by the WPC .</p> <p>iv). Else, WPC approval for endorsement / de-endorsements should be made simpler and online.</p> <p>v). 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.</p> <p>vi). Also the SACFA process timeline should be reduced.</p> <p>vii). 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> <p><b>4. <u>SNG - DSNG ISSUES</u></b></p> <p>i). Whenever, News channel / News Agency shuts down operations, all its ancillary</p>
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		<p>permissions such as SNG / DSNG / lease line etc. should also be cancelled / or terminated &amp; all the DSNG equipment's should be confiscated or destroyed by the agencies.</p> <p style="text-align: center;"><b>5. <u>INDIA AS TELEPORT HUB</u></b></p> <p><b>It has been aim of TRAI to make India TELEPORT INDUSTRY, the commercial hub for the "GLOBAL TURNAROUND" of the channels / content as India.</b></p> <p><b>Government of India should promote Teleport Industry and give infrastructure status to the same.</b></p> <p><b>i). Export of Teleport services should be allowed wherein a foreign customer can directly utilize services from a licensed teleport without establishing any local company.</b></p> <p><b>ii). To facilitate these kind of channels / Broadcasters the uplinking guidelines needs to be suitability amended. (Foreign companies may not like to make a local entity just to avail the uplinking and turnaround services from India).</b></p> <p><b>iii). Signal Turnaround services should be allowed through a simple proves of online application/ approval.</b></p> <p><b>6. Digital Terrestrial Television (DTT) Transmission:</b></p> <p><b>In order to provide specific contents for specific area, region, cities, villages through TV Channels, the Digital Terrestrial Television (DTT) medium should also be allowed to the private players. This will enable provision of local / regional TV Channels without crowding / congestion of internet and need for precious satellite resource.</b></p>
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