

R.B Sahajpal

Counter Comments

TRAI CP dated 20211222

Introduction:

The following may kindly be noted from CP:

1.This consultation paper is mainly covering issues related to promotion of local manufacturing in television broadcasting sector.

2.This consultation **focuses** on television broadcasting through cable, DTH, HITS and IPTV. There are few other transmission mechanisms that may enable broadcast for wider usage

Legal & Regulatory Frame Work:

3.The Legal Framework, Regulatory Framework came later than the service as “1.1.6 The Central Government, vide a notification dated 9th January 2004, decided to entrust regulatory functions relating to the broadcasting and cable TV sector to the Telecom Regulatory Authority of India (TRAI/the Authority)”.

4.”TRAI has enabled proactive regulations that establish a level playing field and transparency. The transparent regime has engendered all round growth in the sector.”(page7CP).

5.”1.2.1 Since inception, the Authority has followed a light-touch regulatory approach, focusing on sustained growth for the sector.” (page8CP).

Convergence:

6.“with the increasing industry shift to convergence, the IPTV segment is likely to see significant growth in days to come.”(Page8CP)

NPE:

7.”3.4.2 The main objectives of NPE2012 include net-zero import by 2020”

8.”3.5.3 The key themes in the NPE, 2019, are the development of a component manufacturing ecosystem, fiscal incentives for the ESDM sector, promoting research and development (R&D), etc. The policy offers an all-encompassing yet high-level outline of the Government’s idea to support the electronics manufacturing industry.”

ISSUES FOR CONSULTATION

Q1. What is your assessment in respect of local manufacturing in the television broadcast sector of India? Is there requirement for a focused action in promoting local manufacturing in the television broadcast sector? Please elaborate.

Q2. Do you think there is an adequate opportunity, market, and/or demand for the manufacturing of television broadcasting (headend, back haul transmission, CPE and others) equipment in India? Please provide your comments with supporting inputs and data. What are specific requirements of special interfaces and features needed in transmission equipment used in Television broadcasting sector? Elaborate with respect to specific equipment like headend interface equipment and CPE/STB.

Q3(a). Do Indian manufacturers have adequate capabilities to meet the broadcasting (headend, transmission, CPE and others) equipment demand of the Indian cable television sector?

Q3(b). If yes, then what new measures, if any, are required for the local manufacturing sector to capture a greater market share

Q3(c). If your answer to Q3(a) is negative, then please comment what measures can enable local Industry to consider manufacturing of equipment for broadcasting (headend, transmission, CPE and others) segment? Please provide supporting inputs with relevant details.

Q4. What are the reasons for the limited market share of local STBs? Do the local manufacturers face any entry/exit barriers such as, but not limited to cost competitiveness, and/or technology-related issues? Please elaborate with supporting inputs.

Q5. What measures do you suggest for improving the competitiveness of local manufacturers? Please elaborate your comments with supporting inputs and data.

Q6. What other measures can be taken to encourage the adoption/usage of domestically produced STBs and other Consumer Premises Equipment among the distribution platform operators?

Q7. MeitY supported development of local CAS, which has been available for more than two years. What further measures, if any, should be undertaken to enable increase the market share of local STBs, that are designed in India, running on Indian CAS and made in India? Please elaborate with reasoning.

Q8(a). As per the estimates, yearly broadcasting imports in India amount to more than USD 20 billion. Do you think this market size reflects high potential for local manufacturers for broadcast equipment?

Q8(b) If yes, why the television broadcast sector is still dependent on imports for deployment in networks? Please elaborate.

Q9(a). Looking beyond local markets, can Indian industry gear itself to export television broadcast equipment for export markets?

Q9(b). If yes, what specific measures may be required to enable local manufacturers to compete in global market for television broadcast equipment? Please elaborate with relevant figures and inputs.

Q10. Is there potential for promoting local manufacturing of all types of broadcasting equipment more specific to television broadcasting equipment, e.g. head-end, transmission, CPE etc. or at this stage the industry should focus on specific segment like Customer Premises Equipment / Set-Top Box? Please specify the segment (if any) and support your answer with relevant market size in terms of value and volume.

Q11(a). Do the existing policy measures and fiscal initiatives adequately address the needs of the Indian Television Broadcast manufacturing sector?

Q11(b). If yes, please provide supporting note(s) to your answer.

Q11(c). If the answer to Q11(a) is negative, what policy measures are required to boost local electronics manufacturing in the television broadcasting equipment sector? Please provide details in terms of short-term and long-term objectives.

Q12. Should the government extend the PLI scheme to the television broadcasting sector? Which equipment deployed in the television broadcast network should be covered under the PLI scheme? Please elaborate with supporting note(s).

Q13. There is a need to have a standard understanding of the scope of 'local manufacturing' amongst all the stakeholders to bring uniformity in the consultation. What should be the scope and definition of 'local manufacturing' in the lines of manufacturing vis-à-vis assemblage of the television broadcasting equipment and their core components?

Q14. Will a stronger R&D ecosystem enable the growth of local broadcast manufacturing sector? If yes, please suggest steps to promote and incentivize R&D undertaken in India to build domestic capability in television broadcast equipment manufacturing.

Q15. In view of the concerns raised about Free Trade Agreements (FTAs) affecting the cost competitiveness of the local products, what policy measures do you suggest to address this issue? Please elaborate with supporting note(s).
Q16(a). Do you think that there is a cost disparity due to additional expense on infrastructure vis-à-vis competing nations that adds to disadvantage for local manufacturers?

Q16(b). If yes, please elaborate along with supporting inputs and item wise comparison, such as with reference to availability of power, labour, land, strong supply chain and logistics, etc.

Q 17. Please list (item-wise) the cost disadvantages that an Indian manufacturer faces vis-à-vis its international competitors. Please quantify such disadvantages in percentage terms to enable broad estimation.

Ans. Q1.-Q17. No specific comments.

