February 12th, 2018

To,

The Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi – 110 002

Kind Attention: Shri Sanjeev Banzal, Advisor (CA&IT)

Reference: Consultation Paper on making ICT accessible for persons with
                      disabilities (the "**Consultation Paper**")

Dear Sir,

This is in reference to the Consultation Paper issued by TRAI on making ICT accessible for
persons with disabilities dated December 20, 2017. We welcome TRAI's initiative on seeking
comments from all stakeholders on making ICT accessible for persons with disabilities.

We have set forth our responses on behalf of TV18 Broadcast Limited ("**TV18**") and its
affiliates against each of the questions raised by the TRAI in the Consultation Paper and
would request the TRAI to take on record our responses enclosed hereunder.

Our responses hereunder are without prejudice to any rights available to us under law or
equity.

Truly yours,
For **TV18 Broadcast Limited**

Authorised Signatory

Encl: As stated above

**INITIAL RESPONSES TO TRAI CONSULTATION PAPER
ON
MAKING ICT ACCESSIBLE FOR PERSONS WITH DISABILITIES**

Q1. Which are the disabilities, with specific accessibility requirement, other than those mentioned in para 2.3 of the Consultation Paper that require consideration for preparing a framework?

Response: We are of the view that most common disabilities have been covered by the TRAI consultation paper on making ICT accessible for persons with disabilities. TRAI may consider expanding other specified "*Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995*" and "*National Trust for welfare of Person with Autism, Cerebral Palsy, Mental Retardation and Multiple Disabilities Act, 1999*" such as autism, cerebral palsy, low-vision, and loco-motor disability including muscular dystrophy.

Broadcasting content, inherently as a medium is accessible to most of the people with disabilities as it involves visuals and sound for the visually impaired, while hearing impaired could understand the content, if they are trained on reading lip-sync content.

In this context, we would like to reiterate that the Ministry for Information and Broadcasting has already constituted a sub-group, which is in the process of framing Accessibility Standards for Television Channels, focusing on closed captioning. Hence, we are of the view that TRAI defer its current consultation process and revisit once the sub-group concludes framing the standards.

Q2. Apart from the challenges enumerated in para 2.3 of the Consultation Paper, what other challenges do PwDs face while accessing telecommunication and broadcasting services?

Response: We are of the view the challenges arise out of the lack of distribution equipment and consumer premise equipment, including remote control systems that have voice recognition, and touch-screen.

Q3: In your opinion, what are the reasons for the desired benefits of ICT (telecom and broadcasting) not reaching the PwDs despite several policy measures and scheme being implemented?

Response: We are of the view that enabling content accessible to people with disabilities will help improve the divergence of audience and provide information to those who are unable to access broadcasting content. TRAI, itself, has cited the last Census 2011, wherein India had about 26.8 million people with disabilities. Apart from the benefits to the beneficiaries, the

move would also enable in creating an inclusive society and also open up markets for specialised equipment and devices.

Q4: What additional or corrective measures can be taken by the Government to enable better access to telecommunication and broadcasting services and devices to PwDs? Please give a rationale for your response.

Response: We are of the view that TRAI's consultation paper has adequately covered the issues. As of for the measures, TRAI should look at a wider consultation after the MIB Sub-Group formulates its standards, and include distributors and equipment makers. Also, broadcasters should be enabled to roll-out any recommendation/ standards/ suggestions in a phased manner with a specific sunset period of say 5 years.

Q5: Apart from the measures suggested by ITU, what additional measures can be taken by the TSPs and equipment vendors/suppliers and other stakeholders to address the challenges faced by PwDs while accessing telecom and broadcasting services?

Response: We are of the view that the biggest challenge is the readiness of content distributors such as Multi-System Operators/ Local Cable Operators, as well as availability of equipment at the distribution front such as head-ends that allow accessibility and devices at consumer end, such as set-top-boxes and remote controls.

Q6. What are the areas where collaboration between various stakeholders would be useful and how?

Response: We are of the view that collaboration is needed between the distribution platforms', equipment vendors and device manufacturers on one side. On the other side, broadcasters' face a potential challenges in enabling accessible content with regard to third-party procured/ commissioned content both from domestic and foreign providers, as well as library / archived content, which would increase the operational costs for the broadcasters. TRAI, in our view, should suggest a centralised government funding, in part or in full, to help fund the costs for both broadcasters, distribution platforms, equipment and devices makers, and content producers.

Q7. Should the Government/TRAI direct the telecom and broadcasting service providers to provide information pertaining to billing, usage, pricing and contracts in the form accessible to PwDs? Please provide a rationale for your response.

Response: Yes, we agree that information pertaining to billing, usage, pricing and contracts in the form accessible to PwDs. However, broadcasting is a Business-to-Business engagement for television companies, while the billing is done by the distribution platforms such as direct-

to-home providers, and local cable operators. Accordingly, distribution platforms should be mandated to provide information pertaining to billing, usage, pricing and contracts in a form that is accessible by PWDs.

Q8: Should the Government/TRAI mandate that the devices used for watching television provided through cable, satellite/DTH, fibre, etc. should be made accessible to PwDs?

Response: We are of the view that Government/ TRAI should work in creating standards that would spur innovation for devices, rather than mandating any rules. We reiterate that TRAI should defer any move until the MIB Sub-group formulates initial guidelines.

Q9. Should international accessibility standards be adopted for telecommunication and broadcasting services and devices in India? Please suggest steps required to ensure their adoption by the service providers/device manufacturers.

Response: We are of the view that TRAI should suggest accessibility standards in the Indian context, given the diverse nature of the country, consumers and the broadcasting industry. In this regard, TRAI could, however, look at international best practices as outlined in the *International Telecommunication Unions Digital Inclusion for People with Specific Needs.* (http://staging.itu.int/en/ITU-D/Digital-Inclusion/Pages/default.aspx)

Q10. What additional measures can be taken or technologies can be deployed by service providers or equipment manufactures to assist PwDs?

Response: No Comments.

Q11 Should device manufacturers be mandated to allow in their device's operating system those applications which are meant to assist PwDs? Please justify your response.

Response: No comments.

Q12. What measures can be taken in India so that emergency services are made more accessible for PwDs? Should the implementation of these measures by TSPs be made mandatory by the Government?

Response: No comments.

Q13. Should the device/handset manufacturer be mandated to manufacture at least one model of handsets for PwDs which is having accessibility features and which are compatible with assistive technology features such as hearing and visual aids including emergency buttons?

Response: No comments.

Q14. How should companies be encouraged to utilise their CSR funds for development of applications, devices and services for the PwDs? What kind of devices and applications can be envisaged/designed to make achieve ICT accessibility for PwDs?

Response: We are of the view that CSR funds as well as any costs incurred in creating / distributing accessible content, applications, devices, and services should be encouraged and incentivised by the government. However, it should be left to the companies to decide on how to spend their CSR funds.

Q15. Should any other funding mechanism for the development of applications, devices and services meant for the PwDs be considered? Please give a rationale for your response.

Response: We are of the view that TRAI could suggest a central funding mechanism by the government from Ministry for Information and Broadcasting, Department of Empowerment of Persons with Disabilities under Ministry for Social Justice and Empowerment, as well as CSIR, and Ministry of Science and Technology. Such a move will help fund in part of in full, and compensate for the increased operational costs in enabling content to be accessible.

Q16. How can effective campaigns be designed to create awareness about use of ICT accessibility tools? Can such campaigns be funded by CSR funds? If not, what other mechanisms can be used to fund such campaigns?

Response: We are of the view that the government through its agencies should run campaigns across media. Private broadcasters should be encouraged to run campaigns with an incentive offset on writing off the costs as direct expenses or CSR.

Q17. Should the Government incentivise the manufacturing and development of ICT tools and devices viz. tools for mobile accessibility, TV accessibility or for web accessibility for PwDs? Please give a rationale for your answer.

Response: We are of the view that TRAI could suggest a central funding mechanism by the government from Ministry for Information and Broadcasting, Department of Empowerment of Persons with Disabilities under Ministry for Social Justice and Empowerment, as well as CSIR, and Ministry of Science and Technology. Such a move will help fund in part orin full, and compensate for the increased operational costs in enabling content to be accessible. Such a move will help create wide-spread awareness, fund in part or in full, and compensate for the increased operational costs in enabling content to be accessible.

Q18. Please give inputs/suggestions/comments on any other issues which you feel are relevant to the subject matter.

Response: TRAI has in its paper cited that there are 26.8 million people with disabilities in India, as per Census 2011. Hence, there is a significant number of people for whom broadcasting services are still in accessible.

As for the current consultation paper, the authority should consider a phased implementation say in the next 5 years, with a threshold of 50% of programming. The implementation can begin with 10% of aired content and to be incrementally increased by 10% for every 12 months. These thresholds may be begun with recorded programming initially before moving into live programming such as news, and events. The same principle of phased rollout maybe adopted for closed captioning as well.

We also reiterate that TRAI revisit the consultation or defer the current process until MIB sub-group completes framing Accessibility Standards for Television Channels.

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