

To,  
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**VOICE Comments on Distribution of TV Channels from Broadcasters to Platform Operators:**

Since there are only 4 aggregators controlling about 73% of the channels broadcasted obviously has created an monopolistic market situation leading to following adverse impact on the stakeholders due to their restrictive trade practices -

**BROADCASTERS:** Restrict reach of the broadcasters to their audience

**MSOs:** Undue disadvantage in negotiation resulting into accepting unfavorable conditions like unwanted packaging of channels

**LCOs:** Forced to offer/sell unwanted channels to subscribers because of unfavorable bundling of channels

**CONSUMERS:** Forced to subscribe to unwanted channels because channels are available in only pre-defined bundles as per the aggregator.

The purpose of present regulation is to address all the above issues and ensure that a competitive market place is available for all stakeholders and monopolies are eliminated.

**To achieve this objective in addition to the proposed amendments VOICE suggests-**

- 1. Find a way to ensure that there are at least 10 such aggregators and no broadcaster should have the right to refuse offering its channels to any aggregator.**
- 2. No broadcaster, promoters of broadcasting entities or persons/organizations exercising substantive direct/indirect control over broadcasting entities should be allowed to promote/manage or exercise substantive control over an aggregator. It is observed that these aggregators are controlled by broadcasters directly or indirectly which may also be a method of passing on substantial/disproportionate revenue to aggregators specially in public limited broadcasting companies.**
- 3. In no circumstances aggregator should be allowed to bundle channels of two broadcasters together i.e. each bundle/bouquets should contain channels from only one broadcaster.**

- 4. All FTA channels should be available as a bundle for every broadcaster which can be offered to a subscriber for the minimum subscription charge prescribed by TRAI.**
- 5. Ultimately every consumer should have the option of subscribing channels in any combination including only a single channel if he so desires.**

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