



RSM/COAI/2016/045

11th March 2016

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Pr. Advisor (B&CS)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi 110 002

**Sub. : COAI's Response to TRAI Consultation Paper on
Tariff issues related to TV Services**

Dear Sir,

At the outset, we thank the Hon'ble authority for providing us an opportunity to submit our views on this consultation paper.

In the past, on many occasions, TRAI has recognized that there is a growing convergence between the telecommunications and broadcasting sector, and it is critical that the regulatory regime for both sectors are in consonance and aligned to the maximum extent possible. A common policy covering both the sectors would result in more efficient use of existing resources and benefit the consumers in the form of affordable services.

Currently, the convergence between the telecom and broadcasting network is happening on all fronts, i.e. carriage infrastructure, services as well as the end user devices. For example, broadcasters have started offering content/channels and even Live Programs over telecommunication service provider networks to the end customers on multiple devices like smart phones, tablet, smart TVs, etc. in addition to the conventional DTH and cable networks.

The UASL/CMTS/UL agreement specifically permitted the delivery of video content over telecom networks and therefore, many broadcasters are already delivering their content over the telecommunication network.

Telecommunication (Broadcasting and Cable Services) Interconnection Regulation, 2004 and its subsequent amendments provide for a regulatory framework for provisioning of content to the distribution platform on a non-discriminatory basis on the principle of 'must provide'.

Since the broadcasters are also increasingly distributing the content through the network of TSPs, it would be appropriate that the principle of 'must provide' and 'signals on a non-discriminatory' basis should also be extended for arrangement between Broadcasters and



TSPs. This is essential to maintain a level playing field between competing technologies by establishing the same regulatory regime. Such a provision would also be necessary to maintain net neutrality from the outset in this new and emerging business model.

In the light of the above submissions, we request the Hon'ble Authority to make suitable provisions in the regulation enabling TSPs to get the content on the above-mentioned principles from broadcasters, which would facilitate & enhance the convergence between the TSPs and the Broadcasters.

Thanking you,

Yours faithfully,

A handwritten signature in black ink that reads 'Rajan S. Mathews'.

Rajan S. Mathews
Director General
COAI