

Malar Publications Ltd

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migration from Phase-II to Phase-III. However, we differ with the methodology of arriving NOTEF. The proposed NOTEF is arrived with the base price equivalent to the highest bidding amount of the region. Considering the different dynamics prevailing in each city within a State, clubbing more states in one region is incorrect. For example, Calicut of Kerala and Tuticorin of Tamil Nadu are C category stations under Phase-II operations. But, the potential of Tuticorin is not even 10% of Calicut. Hence, it will not be fair to have the highest bid of a category in a region as the base price. Instead, highest bid of a particular category within that State may be considered as the base price of the category. In the event of no successful bid in a particular category in a state, highest bid of that particular category in that region may be considered as base price.

Alternatively, we propose the following plan:

Having the average of all successful bids received under Phase-II in that particular city and an escalation of 30% to that can be the NOTEF. Using this method, we, Malar Publications Ltd will end up paying 145% of our Phase-II OTEF. Escalation can be stretched to even 50%, which will result us to pay 175% of our Phase-II OTEF.

Proposing the formula with the highest bid as the base, would severely penalize the operators, who had wisely bid during Phase-II auctions.

Once the migration fee is fixed, Individual Stations which doesn't have any dues to MIB, Prasar Bharati and WPC should be allowed to migrate.

We hope that our views as stated above are considered favorably by your good offices.

Thank you
Yours Truly

For Malar Publications Ltd
Hello FM



Rajeev Nambiar
Chief Executive Office