

RESPONSE BY SITI CABLE NETWORK LIMITED

With reference to

Consultation paper on Issues related to Digital Terrestrial Broadcasting in India

At the outset we would like to congratulate the Authority for the hard work and efforts being put in to streamline the Broadcasting and Cable TV Sector in the country. The Authority has put in sincere effort on various Consultation Papers, covering most of the aspect of the Sector in the recent times and has taken care the interest of all the stake holders. We hope that the Authority will keep this momentum and ensure the growth of this sector in the country.

Our response to the present consultation is as below;

Q1. Do you perceive the need for introduction of Digital terrestrial transmission in presence of multiple broadcasting distribution platforms? Please provide your comments with justification.

Response:

DTT is another digital delivery platform which competes with DTH / HITS/Cable/IPTV etc., however, DTT will occupy certain space in spectrum which is already scarce as the government intends to auction between 470 to 870 MHZ in near future for 4G services. This will further add to the scarcity of spectrum available to Cable TV sector as the DTT signal will also interfere with Cable signals in case both are transmitted on the same frequency. In any case, this will further create competition in an already crowded market which is linear in nature without any additional value added feature like broadband, hence, roll out of such technology and services can be avoided. Other than private players,

Government is also competing via free dish and terrestrial transmission for the same subscribers.

After the mandatory digitization, there are hardly any subscribers with TV sets in metros and other major cities who are not using either DTH or Cable or Free Dish. If a DTT platform is rolled out in these areas, it is unlikely that they will be able to move away subscribers from these platforms and may not be economically and operationally viable.

It is interesting to note over here that the mandatory digitization program of Government has not included terrestrial transmission of analogue signals by Doordarshan till date. This infrastructure is being maintained at the cost of Exchequer with virtually nil subscribers. Almost all the TV households have removed outdoor antennas from their houses in the metros and other cities yet tv transmitters continue to relay analogue signals. Doordarshan is also available through free dish which is an alternate delivery platform and can effectively satisfy the consumer requirements and on public broadcaster. Even if analogue transmission on terrestrial is stopped, subscribers can still be served via Free Dish all across the country wherein terrestrial transmission has limitation of area.

Q2. If yes, what should be the appropriate strategy for DTT implementation across the country? Please provide your comments with justification.

Response:

As explained above, DTT should not be implemented.

Q3. Should digital terrestrial television broadcasting be opened for participation by the private players? Please provide comments with justification.

Response:

If the Government still decides to move ahead on the idea, then Private players should be permitted. DTT is nothing but another digital delivery platform whereas other digital platforms have been permitted to private players, there should not be any bar on this particular platform also.

Q4. Which model or a combination thereof for Digital terrestrial transmission will be most suitable in Indian context? Please furnish your comments with justification.

Response:

Transmission Network Model and common transmission infrastructure (CTI Model) are best suitable for Indian environment. Since, there is a spectrum issue involved in DTT, any model where infrastructure is not shared will put a huge pressure on the available spectrum. Until & unless the services are shared, it will be neither viable nor possible, if, such services have to be opened up to all service players. However, if the services are shared then multiple players can compete with each other while using the same infrastructure which will be not only cost effective but also in the consumer interest.

Q5. What should be the approach for implementing DTT network (MFN/SFN/Hybrid)? Please furnish your comments with justification.

Response:

Since, DD has already planned for MFN mode, the same should be examined, however, in hilly or in accessible areas, SFN may also be considered.

Q6. What should be the criteria for arriving at optimum size of DTT multiplex at any location? Please furnish your comments with justification.

Response:

This should be as per the plan of service provider. In any case, it cannot be more than the available spectrum allocated for such services.

Q7. How many digital multiplex per DTT operator should be planned for metro, major cities, urban and rural areas and why? Please furnish your comments with justification.

Response:

One DTT transmitter of 8 MHz can provide 10 to 12 TV channels in SD format and 5 DTT transmitters will provide only 50-60 channels which in today's availability of other platforms who provide 500 channels may not be a suitable option for subscribers.

Q8. What should be most appropriate frequency band as per National Frequency Allocation Plan 2011 for implementation of Digital terrestrial transmission including mobile TV? Give your comments with justification.

Response:

We have already said that spectrum is scarce and no further spectrum should be allocated for DTT.

Q9. Should spectrum be exclusively earmarked for roll out of DTT services? If so, what should be the quantum considering the broadcasting sector requirement in totality?

Response:

N.A.

Q10. What should be the roadmap for digitization of terrestrial TV network in the country? Please provide your comments with justification.

Response:

Not required since plenty of other platforms are able to deliver and provide not only public broadcaster signal but other mandatory channels also along with commercial TV broadcast signals.

Q11. What should be the analog switch off date(s) for the terrestrial TV channels in context with the suggested roadmap for DTT implementation? Please provide your comments with justification.

Response:

Terrestrial channels can be switched off along with analogue sun set as per the mandatory digitization program which is underway without having any impact on any viewers since most of them have taken alternate viewing in view of mandatory digitization. In case, few subscribers have been left out, they can be educated and given either free dish or STBs from commercial platform for uninterrupted viewing. This can be advertised well and State Exchequer would be saving thousands of crores by stop running the service which is practically unused and unutilized by the majority population of the country.

Q12. Stakeholders may also provide their comments on any other issue relevant to the present consultation paper.

Response:

There are certain technologies which become redundant and irrelevant along with advancement in technology and passage of time. Analogue Terrestrial is one such technology which has become obsolete and should be scrapped and no effort should be made to replace the same by DTT, since, other competing technologies have already filled the gap and plenty of options are available to the subscriber by not only commercial set ups but public broadcasters too through free dish. Creating another platform or linear digital delivery can be avoided as the investment required for such platforms will be huge without any financial return.