

Fwd: Comments for submission

Bhupendra Singh <srobcs2@traf.gov.in>

Wed, 15 Oct 2025 1:07:45 PM +0530

To "Ajay Kumar"<interconnect-bcs@traf.gov.in>

===== Forwarded message =====

From: Sapna Sharma <jtadv-bcs@traf.gov.in>

To: "Bhupendra Singh"<srobcs2@traf.gov.in>, "Sanyatjeet Pawde" <s.pawde@traf.gov.in>

Date: Tue, 14 Oct 2025 12:38:01 +0530

Subject: Fwd: Comments for submission

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For n/a pl.

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From: Bhagwani Kaintura <kainturabhagwani@gmail.com>

To: <advbcs-2@traf.gov.in>, <jtadv-bcs@traf.gov.in>

Date: Sun, 12 Oct 2025 22:42:15 +0530

Subject: Comments for submission

===== Forwarded message =====

Please find attached for your kind consideration.

Br

Bhagwani Kaintura

1 Attachment(s)

comments from bhagwani.pdf

71 KB

Submission:

Currently, there are around 912 channels permitted to be either downlinked, uplinked or both, of which 333 are declared as pay channels. Of these, nearly 321 channels over 96% are priced below ₹19, clearly with the sole intent of making them eligible for inclusion in bouquets. Even HD channels are strategically priced below this threshold to ensure their bundling.

Notably, there has been no upward revision in à la carte rates beyond ₹19 since 2017, while bouquet rates and compositions have been frequently altered, in many cases annually or even more often. This clearly demonstrates the absence of genuine à la carte intent among broadcasters.

Whether before or after digitization, à la carte has never been a realistic or consumer-friendly option. Broadcasters and Distributors continue to push pre-curated bouquets through a skewed pricing strategy, effectively denying subscribers the ability to make true individual viewing choices.

The repeated claim that broadcasters “know what consumers want” is fundamentally misplaced. The so-called viewership data relied upon by both broadcasters and Distributors reflects pushed channels, not those voluntarily chosen by viewers.

Consequently, the entire distribution and pricing framework rests on distorted consumer metrics, used to justify bundling and to inflate subscription costs.

As a result, consumers recognizing the absence of real choice or value, are increasingly migrating either to OTT platforms for quality content or to DD Free Dish as a low-cost alternative. It no longer makes commercial or rational sense for consumers to pay for bouquets containing pay channels that are neither chosen nor valuable.

Most pay broadcasters derive the majority of their revenue from advertisements, making their monetization model indistinguishable from that of free-to-air broadcasters. Accordingly, all advertisement-driven channels, irrespective of genre/classification, should be made free-to-view across all platforms.

Further, there cannot be any disparity in treatment across platforms when identical, advertisement-laden content is delivered. The cost to subscribers must be uniform, irrespective of the delivery platform. Moreover, the practice of broadcasters paying Prasar Bharati for placement on DD Free Dish further exposes their true commercial motive not to promote public access, but to maximize advertisement reach and visibility.

Consumers, meanwhile, already bear the equipment and infrastructure cost of accessing television services, whether via DD Free Dish or private DPOs. Hence, differential

treatment of DD Free Dish viewers and DPO subscribers is unjustified, arbitrary and discriminatory.

While the proposed amendment to the regulatory framework primarily seeks to address audit-related issues between Broadcasters and Distributors, there is an urgent need for a comprehensive review from the consumer's standpoint. Even after more than a decade of digitization, the intended consumer benefits remain unrealized.