



भारतीय प्रौद्योगिकी एवं उद्यमी विकास संस्थान
INDIAN INSTITUTE OF TECHNOLOGY & ENTREPRENEUR DEVELOPMENT (IITED)
(AN INSTITUTE OF RESEARCH, ACTION FOR DEVELOPMENT)
ISO 9001: 2018 CERTIFIED ORGANISATION
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Ref.D-1022/TRA/2025-26

Date 04/10/25

To,
Dr. Deepali Sharma,
Advisor (B&CS)
Telecom Regulatory Authority of India
New Delhi.

Subject: - Regarding sending suggestions/comments on the draft Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Seventh Amendment) Regulations, 2025.

Sir/Mam

In accordance with the above subject, the Institute has forwarded the following suggestions/comments to you for final action.

Format for stakeholders' response on amendments required in Interconnection Regulation 2017 in view of Infrastructure guidelines issued by MIB.

S no	Regulation number of the existing Interconnection Regulation 2017/New Regulation number proposed in the Interconnection Regulations 2017 (1)	Provisions of the existing Regulation (2)	Amendment/ new provision(s) suggested by the stakeholder (3)	Reasons/ full justification for the proposed amendment (4)
1	Q1. Should provision of Regulation 15(1) be retained or should it be removed in the Interconnection Regulation 2017? I.case you are of the opinion that provisions of Regulation 15(1) should be retained then A-Should it continue in its present form or do they need any modifications? B-In case you are of the opinion that modifications are required in Regulation		There is no need to amend it, it should be kept as before.	There is no need to amend it, it should be kept as before.
2.	Q2. Should small DPOs be exempted from causing audit of their systems every calendar year, under Regulation 15(1) of Interconnection Regulation?		There should be no exemption.	There should be no exemption.



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3.	Q3. As per the existing Interconnection Regulation, all the distributors of television channels have been mandated to cause audit of their system once in a calendar year. Should the existing provision of "calendar year" be continued or "financial year" may be specified in place of calendar year? Please justify your answer with proper reasoning.		The existing provision should be continued.	The existing provision should be continued.
4.	Q4. As per the existing Interconnection Regulation, the annual audit caused by DPO under regulation 15 (1), shall be scheduled in such a manner that there is a gap of at-least six months between the audits of two consecutive calendar years and there should not be a gap of more than 18 months between audits of two consecutive calendar years. i) The DPOs may be mandated to complete annual audit of their systems by 30th September every year. ii) In cases, where a broadcaster is not satisfied with the audit report received under regulation 15(1), broadcaster may cause audit of the DPO under Regulation 15(2) and such audit shall be completed latest by 31st December. iii) In case DPO does not complete the mandatory annual audit of their systems by 30th September in a year, broadcaster may cause audit of the DPO under Regulation 15(2) from 1st October to 31st December year. This shall not absolve DPO from causing mandatory audit of that year by 30th September and render the non-complaint DPO liable for action by TRAI as per the provisions of Interconnection Regulation 2017?		I agree with the provisions made in question number 4.	I agree with the provisions made in question number 4.



Yours Sincerely

Kanishka Verma

(Kanishka Verma)
National Coordinator