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To
Wasi Ahmad,
Advisor (B&CS) **Telecom Regulatory Authority of India**Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi – 110 002

Subject:

Standards of Quality of Service (Duration of Advertisements in Television Channels)

(Amendment) Regulations, 2012

Dear Sir,

We would like to applaud TRAI and the Ministry of Information and Broadcasting for taking firm steps towards digitisation. At this stage we are of the strong view that all efforts should be devoted to making digitalisation a success. We believe that to introduce any rules towards advertising will distract the industry.

The industry depends heavily on advertising revenue for sustenance. The phase of digitisation will carry with it uncertainty in terms of subscription revenue and the cost base of carriage fee. Till such time that the upheaval settles down, we recommend that no regulations are put in force for advertising.

The industry already has mechanisms in place through the BCCC. The regulators are in constant conversation with both IBF and NBA. Within this governance ecosystem, it is highly likely that broadcasters will use restraint and follow sensible norms for adverting. The viewer is at the heart of the industry and the ultimate decision maker for which channels /programmes he wants to view. Regulation of time spent on advertisements should be left to market forces. Channels having a blatant disregard of viewer interest will anyway not succeed and we also believe that the reporting requirements are onerous and unlikely to add value.

Thanking you.

Yours faithfully,

For BBC World (India) Pvt. Ltd.

Director Finance and Operations