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Subject: Consultation on the policy framework for the mobile TV service in India.

BITCOM INDIA Response to TRAI's Consultation Paper No. 9 / 2007 PARAWISE COMMENTS ARE GIVEN HEREUNDER

Q.1. whether the technology for mobile television service should be regulated or whether it should be left to the service provider?

Response: Mobile TV is a new field in the digital TV domain. Quite a few technologies are being tried out for delivery of television content to Handsets worldwide. Many of them are at the field trial stage. Though a trend is visible, it is not at present clear which of these will prove themselves. In view of this, it may not be desirable to regulate the 'Technology for Mobile TV'; instead it should be left to the Service provider to decide on the appropriate technology. This will enable the best technology to be adopted with out any bias – bias may happen in case of Regulation. This will also provide incentive for introduction of 'Newer and More efficient' technologies by the Service providers from time to time.

As an example it can be mentioned that India currently has cellular-mobile handsets based on both GSM and CDMA technologies and soon EVDO and HSPA based devices will be deployed with the introduction of 3G. Hence it is extremely important that choice of any specific technology does not impact and limit the vibrant competition already existing in the market, thereby affecting the growth of mobile telephony in the country.

Q2.. If the technology is to be regulated, then please indicate which technology should be chosen and why. Please give reasons in support of your answer.

Response: Does not arise as Regulation is not recommended.

Q.3. what will be the frequency requirement for different broadcast technological standards for terrestrial and satellite mobile television transmission in India?

Response: At present Min of I&B allows downlink of 270 channels, but Mobile TV offering need not cover all the channels. The maximum no. of channels could be 75 and this will meet demands of most of the users. Frequency requirements could be as follows:

Terrestrial: - Three channels of 8 MHz will carry about 75 Channels and one spare 8 MHz channel could be kept as a reserve... Since for proper frequency planning at least five frequencies are to be considered, the total BW requirement could be 160 MHz.

The Spectrum allocations made to Public Broadcaster should be reviewed and the 4 Channels can be earmarked location wise for Mobile TV operation by reallocation of spectrum. .

Q.4. which route would be preferable for mobile TV transmission – dedicated terrestrial transmission route or the satellite route? Should the mobile TV operator be free to decide the appropriate route for transmission?

Response: It should be left to the Mobile TV operator to decide the appropriate route for transmission. The operator should be allowed to decide on the different routes for different areas depending on various factors. In other words an operator may decide on Terrestrial route for certain areas and Satellite route for certain other areas or a combination in certain areas. Satellite media may have its own complementary terrestrial component.

Q.5. how should the spectrum requirements for analogue/ Digital/ Mobile TV terrestrial broadcasting be accommodated in the frequency bands of operation? Should mobile TV be earmarked some limited assignment in these broadcasting bands, leaving the rest for analog and digital terrestrial transmission?

Response: The present allocations to the Public Broadcaster should be thoroughly reviewed. The surplus unused spectrum should be allocated to different services including Mobile TV. Digital terrestrial Television, introduced in the country a few years ago has not become popular and it is unlikely that there will be any change in its popularity in the coming years. It is unlikely that viewers will procure costly STBs for Viewing Channels which are available in the cable offering in the Urban / Semi Urban areas. In the Rural areas where Cable distribution is not available DTH is becoming popular as the viewer can have access to a large no. of channels with a STB as compared to DTT offering which will be a small fraction of this. The public broadcaster should be allotted a limited no. of channels for meeting their minimum obligations and the remaining spectrum should be freed. Also their plans for introduction of DTT should be reviewed and appropriate recommendations made with regard to spectrum allocation for DTT. DTT should be entirely given to Pvt operators as there will be market led commercial approach and there will not be large scale wastage of Public funds and like other TV channels, they will become popular.

It is also possible that Mobile TV operators may choose to start entirely separate channels for Mobile TV apart from the regular TV channels after repurposing the content. Mobile TV and DTT should be given the entire UHF Band IV and V after freeing it from the public broadcaster.

Q.6. In the case of terrestrial transmission route, how many channels of 8 MHz should be blocked for mobile TV services for initial and future demand of the services as there are nearly 270 TV channels permitted under down linking guidelines by Ministry of Information and broadcasting?

Response: Explained under serial no.3

Q.7. Whether Digital Terrestrial Transmission should be given priority for the spectrum assignment over mobile TV, particularly in view of the fact that the Mobile TV all over the world is essentially at a trial stage.

Response: This has been dealt under point no. 5.

Priority of the Public broadcaster for DTT, should be reviewed. Mobile TV should be given its due importance, as it is an upcoming Technology and has good likelihood of becoming popular. DTT, on the other hand, failed to impress the viewers and at present there are no takers for this service. Even the Mobile TV service offered from this platform in Delhi has failed to succeed in the market place due to its unpopular content. So the expansion of DTT services in the country, if at all should be done judiciously and preferably through private participation. Unlike some other countries like U.K. where there is almost an equal share among DTT, Cable and DTH of viewers; in our country it is predominantly Cable. DTH is just becoming popular but DTT has no takers. The public broadcaster should give a serious thought before investing huge sum of money in implementing DTT in the country. DTT should be left only to Pvt. Players for a market driven growth.

Q.8. whether the frequency allocation for the mobile TV should be made based on the Single Frequency network (SFN) topology for the entire service area or it should follow Multi Frequency Network (MFN) approach.

Response: Option should be available for making both allocations- SFN as well as MFN- depending on different factors like- local, regional and national coverage etc.

Q.9. whether frequency spectrum should be assigned through a market led approach – auctions and roll out obligation or should there be a utilization fee?

Response: spectrum assignment should be through market led approach.

Q.10. what should be the eligibility conditions for grant of license for mobile television services?

Response: Any Major Mobile operator/ Broadcaster desirous of starting Mobile TV service should be given an opportunity provided he can outline his arrangements for

signal transmission and content aggregation and his sources for content generation, acquisition etc. and satisfy about its viability. However a separate company should be formed for looking after the Mobile TV services so that the separate rules framed can be applied to this company without any mix-up or confusion.

Q.11. whether net worth requirements should be laid down for participation in licensing process for mobile television services?

Response: Net worth requirements as outlined for licensing during 2nd Phase FM privatization can be applied.

Q.12. what should be the limit for FDI and portfolio investment for mobile television service providers?

Response: FDI limit could be 74% as in case of telecom services due to emerging convergence of services.

Q.13. what should be the tenure of license for the mobile television service providers?

Response: Tenure of license should be 15 years. This is on the consideration that the Mobile TV is a new technology and is yet to be tried in the market and it will help the operators to recover the investments made and exploit the selected technology to the fullest extent.

Q.14. what should be the license fee to be imposed on the mobile television service providers?

Response: One time entry fee with an annual revenue share as adopted for Phase II FM radio privatization- may be suitable.

Q.15. Whether in view of the high capital investment and risk associated with the establishment of mobile television service, a revenue share system would be more appropriate?

Response: As Mobile TV is a new field with new technologies and the popularity of this service is yet to be proved, a revenue share system as outlined for Phase II FM radio privatization -may be appropriate.

Q.16. Whether any Bank Guarantee should be specified for licensing of the mobile television service providers. If yes, then what should be the amount of such bank guarantee? The basis for arriving at the amount should also be indicated.

Response: Bank guarantee on the pattern of phase II fm radio privatization- may be followed

Q.17. Whether the licenses for mobile television service should be given on national/ regional/ city basis?

. **Response:** All the three types of licenses- citywide; regional and national can be given.
