

Malar Publications Pvt Ltd

Hello FM, AR Complex, 88, Periyar EVR High Road, Chennai - 600 084. India
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1 November 2019

To
Mr V K Agarwal,
TRAI,
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi - 110 002

Dear Sir,

We have examined the TRAI Consultation Paper No-17/2019 on the Reserve Price for Auction of FM Radio Stations dated 16th October 2019. Attached please find our response to your various questions.

We would also like to bring to the attention of all concerned, the following-

1. D Category in Tamil Nadu, we wanted to aggressively pitch if the Reserve Price is in the range of Rs 30-45 Lakhs. The proposed NOTEF as per the Consultation Paper which is at Rs 1.5 Crores is totally unviable.
2. Out of the 11 D Category Stations available for auction in Tamil Nadu, only Nagerkovil, Thanjavur, Karur & Dindigul have scope for utilizing 50-60 % of Prime Time inventory, while the rest of the D Category Stations will be much below 40% of Prime Time utilization. The average utilization across time band will be about 20-25%.
3. We notice that the Phase III Batch 2 stations auctioned in Tamil Nadu namely Erode, Salem & Vellore, the NOTEF was Rs. 7.02 Crores, while the revised recommended NOTEF is at Rs. 4.23Crores. It is presumed that we as a successful bidder and in operation of these C category stations, will benefit from the revised NOTEF/ Price Discovery.
4. After being in operation since July 2018 as regards Phase III Batch 2 stations, Vellore as a C category station definitely doesn't qualify to be pegged as a C Category station as business opportunities are not even halve of Erode & Salem. It is requested if the NOTEF paid for Vellore can be further reduced, even lesser than the revised NOTEF proposed.

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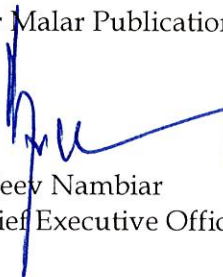
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It is also humbly requested that Radio being a level playing field, those operators in business from Phase I period, co-exist and transmit from established CTI.

We hope our concerns would be addressed.

Thank you
Yours Truly

For Malar Publications Pvt Ltd.


Rajeev Nambiar
Chief Executive Officer

