



उपभोक्ताओं के अधिकारों का सजग प्रहरी
उपभोक्ता मार्गदर्शन समिति 'उमस' जोधपुर
उपभोक्ता भवन सेक्टर 9 व 12 के मध्य एच.पी.बिल्डिंग के पास
चौपासनी हाउसिंग बोर्ड जोधपुर 8 राजस्थान



उपभोक्ता संगठन समूह के रूप में भारतीय दूरसंचार विनियामक प्राधिकरण [TRAI] नई दिल्ली से पंजीबद्ध
उपभोक्ता संगठन समूह के रूप में पेट्रोलियम एवं प्राकृतिक गैस विनियामक बोर्ड [PNGRB] नई दिल्ली से पंजीबद्ध
भारतीय मानक ब्यूरो नई दिल्ली द्वारा उपभोक्ता संगठन के रूप में राज्य स्तरीय पंजीबद्ध [BIS]

Letter No. 1655/2017

Dt.27 Aug.2017

Resp. Prof.M.Kasim,
Advisor [B&CS]-III
TRAI New Delhi.

Sub- Comments on Consultation paper of Ease of Doing Business in Broadcasting Sector.

Resp. Sir,

In above cited subject we send our comments on **Ease of Doing Business in Broadcasting Sector.** For kind your perusal .

Q1. Is there a need for simplification of policy framework to boost growth of satellite TV industry? If yes, what changes do you suggest in present policy framework relating to satellite TV channels and why? Give your comments with justification?

Comments: - The policy framework relating to satellite TV channels needs some simplification such as

- (i) A single Window Application System may deploy
- (ii) the complete process should online
- (iii) One Nodal agency may fix to do all permissions from different Ministry /Departments.
- (iv) The Multi stage process of application may start parallel which one independent of each other. E.g. MHA Security clearance & application process at MIB may start simultaneously.
- (v) A single / region wise common online platform may design by TRAI / MIB to do the day to day business processes.

- (vi) To Boost growth of Satellite TV industry initially for 3 year some relaxation may given to new player as compared to existing player.
- (vii) The different stages estimated time period may be fixing by all involved agencies in policy framework.

Q2. Is there a need in present policy framework relating to seeking permission for making changes in the name, logo, language, format, etc. related to an operational satellite TV channel? If so, what changes do you suggest and why? Give your comments with justification?

Comments: - It may be done on demand basis in stipulated time period.

Q3. Do you agree with some of the stakeholders comment at preconsultation stage that Annual Renewal process of TV channels needs simplification? Give your comments with justification?

Comments: - Yes, I am agree with the stakeholder comment at preconsultation stage that Annual renewal process of TV channels needs simplification. The preparatory work for Annual Renewal may start in Advance of One month. A Discount may offer in Annual renewal license fees if Annual renewal done in advance. The Policy framework should clear the impact of annual renewal not done in time (If Annual renewal not done in time some penalty may impose).

Q4. Do you agree with stakeholders' comments that coordination with multiple agencies/ Government departments related to starting and operating of a TV channel can be simplified? If so, what should be the mechanism and framework for such single window system? Give your comments with justification?

Comments: - Yes, I agree. A Online robust Single window System may Design by TRAI/MIB , which can be access by all the agencies which will be involve in the clearance process. Here the complete process may be time bound.

Q5. Is present framework of seeking permission for temporary uplinking of live coverage of events of national importance including sports events is complicated and restrictive? If yes, what changes do you suggest and why? Give your suggestions with justification.

Comments: - The present framework of seeking permission may be done on Tatkal Basis (E.g. Tatkal Passport) & the existing player may consider on priority basis or subject approval may grant.

Q6. Do you feel the need to simplify policy framework for seeking permission/license for starting and running of following services–

- (i) Teleport services**
- (ii) DTH service**

If yes, what changes do you suggest so that process of grant of permission/license can be simplified and expedited? Give your comments with justification.

Comments: - The policy framework for seeking permission/ license can be more simplified through the Single Windows System with Fix time frame .

Q7. As per your understanding, why open sky policy for Ku band has not been adopted when it is permitted for ‘C’ band? What changes do you suggest to simplify hiring of Ku band transponders for provision of DTH/HITS services? Give your comments with justification.

Comments: - ISRO may involve in this scenario to support DTH/HITS operators for hiring of transponders from domestic / foreign satellites.

Q8. What are the operational issues and bottlenecks in the current policy framework related to –

- (i) Teleport services**
- (ii) DTH service**

How these issues can be simplified and expedited? Give your comments with justification.

Comments: - *TRAI may provide* a common solution to all DTH service provider for operational process .

It will help Govt. as well as end users.

Q9. What are the specific issues affecting ease of doing business in cable TV sector? What modifications are required to be made in the extant framework to address these issues? Give your comments with justification.

Comments: - Cable TV sector need to support by providing band width on concessional rates after digitization.

Q10. Is there a need to increase validity of LCO registration from one year? In your view, what should be the validity of LCO registration? Give your comments with justification.

Comments: - LCO registration validity may increase from 1 year to 5 year for long term business plans. The registration process may online & should centralize. Every year registration may regular if the complete process may online by postal dept. The registration may complete before one month in advance. The registration didn't perform on time then late fees may impose. LCO may ask to submitted data on Quarterly basis to get updated information about his working.

Q11. What are the issues in the extant policy guidelines that are affecting the ease of doing business in FM sector? What changes and modifications are required to address these issues? Give your comments with justification.

Comments: - The Private FM sector may allow NEWS with supervision / control of Govt. Initially for 3 year annual renewal fee may waive off.

Q12. Is there a need to streamline the process of assignment of frequency by WPC and clearances from NOCC to enhance ease of doing business? What changes do you suggest and why?

Comments: - The Nodal Agency of Single Window may support to get the clearances from WPC & NOCC in stipulated time frame.

Q13. What are the reasons for delay for allocation of frequencies by WPC? What changes do you suggest to streamline the process? Give your comments with justification.

Comments: - The Six month windows system is hurdle here. It may work on whenever on demand basis & the process should complete through single Window in stipulated time frame.

Q14. What are the key issues affecting the indigenous manufacturing of various broadcasting equipments and systems. How these issues can be addressed?

Comments: - The Proprietary issues affecting this. The STB Manufacturing & maintenance may consider through Make in India. The New Design protocol may standardized according to Indian broadcasting sector demand.

Q15. Is there any other issue which will be relevant to ease of doing business in broadcasting sector? Give your suggestions with justification.

Comments: - The Cable TV sector should offer online subscription method in view of Digital India. For transparency & supervision this platform may provided by TRAI/MIB through a registration process. All Kind of TV platforms may put here. End Customer may pick & choose services from here.

The availability of Broadcasting services still a challenge. Through a PIN Code or Geography location the service provider details may available for end Consumer.

Q16. Are there any issues in conducting trial projects to assess suitability of a new technology in broadcasting sector? Give your comments with justification.

Comments: - The trial project of a new technology initially may done by Govt. on PPP model & after outcome of this may offer to other stake holders.

Q17. What should the policy framework and process for consideration and approval of such trial projects?

Comments: - Govt. may offer some Aid grant for pilot project & waive off the fesses.

Q18. Stakeholders may also provide their comments with justification on any other issue relevant to the present consultation paper.

Comments: - May learn from Telecom sector, the broadcasting sector must timely standardized in terms of regulation , customer services etc.

Thanks.

Your sincerely,




[Liyakat Ali]
Secretary.