

To,
Mr. Prof M. Kasim
Advisor (B&CS)-III
Telecom regulatory Authority of India
New Delhi

20th July, 2016

**Ref: Consultation Paper on Issues related to Digital Terrestrial Broadcasting in India
dated 24th June, 2016.**


Dear Sir,

We would like to enclose herewith our response on the above captioned Consultation Paper for your consideration and records.

Thanking you,

Yours faithfully

for **Videocon d2h Limited**



Shivendra Krishna Singh
Head-Regulatory & Compliance

Encl: A/a

Videocon d2h Limited

(Formerly Bharat Business Channel Limited)

Uplink Centre: Plot No, 1 D, Udyog Vihar Industrial Area, Surajpur, Greater Noida,
Dist Gautam Budh Nagar - 201 306. ☎ +91-0120 614 1000 📠 +91-0120 614 1250

Corporate Office: 1st Floor, Techweb Centre, New Link Road, Near Mega Mall,
Oshiwara, Mumbai - 400 102. ☎ +91-22 42 555 000 📠 +91-22 42 555 050

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CIN : UQ2100MH2002PLC137947

Q.1 Do you perceive the need for introduction of Digital terrestrial transmission in multiple broadcasting distribution platforms? Please provide your comments with justification.

Q.2 If yes, what should be the appropriate strategy for DTT implementation across the country? Please provide your comments with justification.

Q.3 Should digital terrestrial television broadcasting be opened for participation by the private players? Please provide your comments with justification.

Q.4 Which model or a combination thereof for Digital terrestrial transmission will be most suitable in Indian context? Please furnish your comments with justification.

Q.5 What should be the approach for implementing DTT network(MFN/SFN/Hybrid)? Please furnish your comments with justification.

Q.6 What should be the criteria for arriving at optimum size of DTT multiplex at any location? Please furnish your comments with justification.

Q.7 How many digital multiplex per DTT operator should be planned for metro, major cities, urban and rural areas and why? Please furnish your comments with justification.

Q.8 What should be most appropriate frequency band as per National Frequency Allocation Plan 2011 for implementation of Digital terrestrial transmission including mobile TV? Give your comments with justification.

Q.9 Should spectrum be exclusively earmarked for roll out of DTT services? If so, what should be the quantum considering the broadcasting sector requirement in totality?

Q.10 What should be the roadmap for digitization of terrestrial TV network in the country? Please provide your comments with justification.

Q.11 What should be the Analog Switch off date(s) for the terrestrial TV channels in context with the suggested roadmap for DTT implementation? Please provide your comments with justification.

Q.12 Stakeholders may also provide their comments on any other issue relevant to the present consultation paper?

RESPONSE:-

At the outset we would like to compliment the Authority for bringing out broadcasting industry related consultation papers on numerous issues from time to time in order to efficaciously addressing them in the interest of the end consumer which is paramount.

We would like to state that in the absence of clarity as to whether the Ministry of Information and Broadcasting, Government of India would mandate carriage of DD mandatory regional channels on DTT or not as this will consume currently available

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CIN : U02100MH2002PL0127017

bandwidth to a large extent. We are not sure and clear as to how much bandwidth would be available for commercial usage, if currently mandatory and/or other DD channels are made mandatory in future.

Similarly, DD direct which is FTA, currently carries about 59 channels and it is proposing to expand these channels to 250 channels in near future. This service provided by DD free dish is free to all consumers across the country. In case of DTT service is or becomes chargeable then it would in direct competition with DD free dish. On the other hand private participants in DTT will have to be chargeable basis for its commercial sustainability. It will thus become unviable due to competition with DD free dish.

Further we would like to state that as the Authority is well aware about its recommendations and comments related to Mobile TV issues which were shared with Ministry of Information and Broadcasting vide its letter dated 14th April 2010 are pending for consideration with the Ministry. Since many issues therein are directly related with many aspects of the current consultation paper, it will not be ideal if any further exercise on the captioned consultation paper is done.

We would further like to state that unless and until the DTT services including that of DD free dish, go pay in the open market, private players would never be encouraged to enter the scene since if such DTT services are mandated to be offered free by all players there will be no competition amongst them at all.

We would therefore like to state that since such a scenario does not make any business proposition we would urge the Authority to revisit this critical aspect of the captioned consultation paper.

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