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To: traicable@yahoo.co.in

Sent: Monday, 26 August 2013 10:54 AM

Subject: Comments on Consultation Paper on Distribution of TV channels from broadcasters to platform operators

Dear Mr. Ahmad,

Please consider the comments below as personal and individual, and not the official view of Kotak.

One aspect the consultation paper seems to have missed is small broadcasters and potential for aggregator services to smaller broadcasters. Broadcasters with 1-5 channels also exist in the market and I do not believe aggregator services (creation of one bouquet of channels from multiple such broadcasters) would be against the spirit of this exercise at all, but seems to be disallowed by the recommendations being made in this consultation paper. In fact, in light of the Cable Monopoly consultations being conducted by TRAI, such aggregator services may be considered an absolute must as a counter to the bargaining power of large, dominant MSOs in certain markets. In essential, while in agreement with the gist of the consultation paper, we do not believe that the recommendations should completely take away the flexibility of multiple small broadcasters to come together and create bouquets. We believe such multi-broadcaster bouquets can be allowed with a maximum limit of channels, say 10 channels. The small broadcasters can come together to combine their channels in such bouquets. The truly large broadcasters (Star, Zee, Sun, TV18 all have more than 20 channels) will likely not avail of these options since their individual channel bouquets already have >10 channels. At least, the opportunity to piggybank weaker channels on the back of strong channels would be limited.

Regards,

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