

Comments of BBC Global News India Private Limited:

- 1. Do you agree with the definitions of 'commercial establishment', 'shop' and 'commercial subscriber' as given in para 1.23**

TRAI's effort to make the definitions so comprehensive is commendable however we suggest that the definition of 'commercial establishment' vis-à-vis the 'shop' be amended.

- 2. If the answer is in the negative, alternate definition with proper justification may be suggested**

We recommend that the definition of 'commercial establishment' should also include any workplace which carries on any business, trade or profession, employing more than 20 employees, since such establishments also run for private gains.

Pursuant to that, the definition of 'shop' will also need to be amended to refer workplace as a place employing less than 19 employee or else the contradiction between the definitions may appear.

- 3. Do you agree that further sub-categorization of the commercial subscribers into similarly placed groups may not be the way to proceed? In case the answer is in negative, please give details as to how the commercial subscribers can be further sub-categorized into similarly placed groups alongwith full justifications.**

We are in agreement with TRAI'S alternate view that it may not be practically feasible to work out a comprehensive list of similarly placed entities given various range of parameters of different entities. Therefore, further sub-categorization of the may not be the way to proceed since it does will become a bone of contention resulting in unnecessary litigation.

- 4. Which of the models discussed in para 1.27 above, should be prescribed for distribution of TV signals to the commercial subscribers? Please elaborate your response with justifications. Stakeholders may also suggest any other model with justifications**

We strongly recommend that only the broadcaster should be allowed to publish the rates of commercial tariff in the form of RIO since each channel is of different genre and has its own strength and the broadcaster should be in a position to receive appropriate value of its content.

- 5. In your view which of the 4 alternatives mentioned in para 1.28 above, should be followed? Please elaborate your response with justifications**

We are of the opinion that the tariff for commercial subscribers should be kept under total forbearance and should not be regulated at any time as HD TV channels and advertisement free channel's tariff. The same should be market driven. Drawing inference from our above-response under question 4, the content of the channel of Broadcaster will not only entitle the Broadcaster to appropriately price the channel but will also bring in healthy competition.