

Response to consultation Paper

On

Regulatory Framework For Platform Services

Dated 23<sup>rd</sup> June 2014

This is with reference to summary of issues for consultation . Our comments are as follows

Issue No 1. We would suggest a more accurate definitions of Platform services

Program service is a package of multimedia content which is transmitted either over wirelines or wirelessly with a predetermined, predeceased schedule / periodicity on a regular basis with prior approval of an appropriate authority as declared by the Govt. of India, Ministry of Information and Broadcasting. The service has to be registered with the appropriate authority as a platform service prior to its transmission over wire line or wirelessly under an appropriate genre and / category depending upon the kind and type of the content to be transmitted The platform services can be transmitted only by registered / licensees / authorized individuals / organizations and distribution platform operators (DPOs).

Issue No 2. The Government of India has so far allowed self regulation by the Newspaper publishers, printers and has not interfered with the content for the sake of freedom of speech, expression of thoughts guaranteed under the constitution. Abuse of this freedom is checked by the press counsel of India There is a need for a similar body as a ' content regulator' for electronic and digital media with more teeth than press council of India to check misuse and abuse of this freedom Instead of including certain categories of multimedia content in PS Channels and exclude some other type of content will not resolve the problem. We therefore suggests that self regulation by those who are permitted to transmit the program services will be better but they have to be made conscious of their responsibilities to adhere strictly to the guidelines, programming codes already in place for broadcasters which could be further modified , revised from time to time. Violations if any should be dealt with strict and severe penalties.

Issue No3. There should be no problem if the platform service operators transgress into the type and kind of content which is broadcast by regular TV broadcasters.

Issue No4. Yes everyone who operates a program service must be registered with appropriate authority as declared by GOI.

Issue No 5. It should be the same as that of normal Broadcaster.

Issue No 6. There should be no requirement of a minimum net worth

Issue No 7. Yes agreed

Issue No 8. Yes online registration process should be in place and the period of validity of the registration should be 5 years renewable . The annual fees per channel should be just nominal and shall not be the source of revenue for the GOI

Issue No 9. It should be simple and should not be refused unless there are valid reasons to be declared transparently

Issue 10. There should be no geographical limits.

Issue 11. Not more than 5 program channels be permitted.

Issue No 12. (1) Our comments are as follows

(12.1) Yes

(12.2) We disagree and would like full freedom for interconnections and retransmissions should be allowed.

(12.3) Yes

Issue No 13. The same obligations and restrictions need to be applied on DPO's , individuals, organizations who want to offer Program services as are provided for broadcasters.

Issue No 14. There should be no retransmission of already transmitted content as a platform service program by every one.

Issue No 15.No comments

Issue No 16. Yes

Issue No 17. No comments.

Issue No 18. Twelve Weeks

Issue No 19. Shall be brought up during the open house discussions.

Dear Sirs,

Please find attached herewith our suggestions and comments on the consultation paper dated 23rd June 2014

Naseem Ahmad

Managing Partner

Naseem & Associates

Member Executive Council BIF

+91 9811225585