

Comments received w.r.t. OHD

November 30, 2012

To
The Secretary
Telecom Regulatory Authority Of India
New Delhi – 110002

Dear Sir,

Re: STANDARDS OF QUALITY OF SERVICE (DURATION OF
ADVERTISEMENTS IN TELEVISION CHANNELS)
(AMENDMENT) REGULATIONS, 2012
(---- OF 2012)

The following submissions are made on behalf of M/s. Associated Broadcasting Co. P. Ltd. operating the following Regional News Channels.

TV9 Telugu	– Andhra Pradesh
TV9 Karnataka	– Karnataka
TV9 Gujarat	– Gujarat
TV9 Maharashtra	– Maharashtra
TV1	– Andhra Pradesh
News9	– Karnataka

Free-to-Air News channels like ours depend heavily only on advertising revenue. Being a regional news channel we also depend on small advertisements from the local market apart from the national advertisements. Although we do not have subscription revenue we still have to pay huge carriage fees.

Therefore we submit the following to the Authority without prejudice to what has been submitted by the industry bodies such as IBF/NBA and other broadcasters.

1. Full Screen Advertisements:

Apart from the up to 12 minutes per clock hour for commercial advertisements up to three minutes per clock hour only for self-promotions be allowed.

2. Part-screen advertisements/Drop-down advertisement:

Rule 7(10) of the Cable Television Networks Rules, 1994, mandates that “All advertisement should be clearly distinguishable from the programme and should not in any manner interfere with the programme viz., use of lower part of screen to carry captions, static or moving alongside the programme.”

Part-Screen/Drop-Down advertisements similar to the classified advertisements in newspapers, carried on news channels are clearly separated and distinguishable from the content of the programme and do not interfere in any manner with the content ensuring that it does not come in the way of the viewing experience of the viewers.

Part Screen advertisements are a low cost and an affordable means of advertising on TV channels for Individuals/Small and Medium scale enterprises/Govt Departments/etc. Such advertisers not only save on the making charges for full screen advertisements but also save on time to broadcast the message.

A ban on the part screen advertisements would be a disproportionately excessive measure as it would not only wipe out a source of revenue for News channels, particularly for the regional news channels but also deprive the Individuals/Small and Medium scale enterprises/Govt Departments/etc. of an affordable and a quick option of advertising on TV channels.

We therefore, submit that the TV channels, particularly the News Channels be allowed to carry part screen advertisements as long as they are clearly distinguishable and do not interfere with the content/programme.

Clifford Pereira
Director
Associated Broadcasting Co. P. Ltd.