

BBC Global News India Private Limited

Corporate Identity Number : U70109DL1998FTC096699

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BBC GLOBAL NEWS

BBC GLOBAL NEWS INDIA PRIVATE LIMITED RESPONSE TO CONSULTATION PAPER NO. 16/2007 ON ISSUE RELATING TO UPLINKING AND DOWNLINKING OF TELEVISION CHANNELS ISSUED BY TELECOM REGULATORY AUTHORITY OF INDIA

Re- Consultation Paper No. 16/2017

Dated- 19.12.2017

At the outset, we would like to thank the Telecom Regulatory Authority of India for bringing out the Consultation Paper on '*Issues relating to Uplinking and Downlinking of television channels in India*' and seeking views of stakeholders thereon.

We have summarized our views on various matters are under for your kind attention-

Fee structure (application fee, registration fee, annual fee etc.)

--Present fee structure is adequate;

--Substantial increase in fee will impact single channel broadcasters like BBC;

--If we are worried about serious play, we should look at International Media presence of the broadcaster also;

--Compliance cost will increase which is against government's objective of 'ease of doing business'.

Increase of net worth criteria

--Present limits are sufficient;

--Increase will impact small broadcasters;

--In case of global broadcaster, due weightage should be given to global financial strength;

--In case of downlinking, cost of content mainly vests with parent entity, as such Indian company does not have high Net Worth;

--Onus on MIB to ensure only serious players enter as they control the license regime.



The image shows a handwritten signature in blue ink over a circular purple stamp. The stamp contains the text 'BBC Global News India Private Limited' around the perimeter and 'New Delhi' in the center, with a small star at the bottom.

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Auctioning of TV channels like FM channels

- TV channels are inherently different from FM;
- There is no frequency in case of TV channels;
- Will adversely impact small broadcasters like BBC;
- Anti-competitive as will favor some big players.

Apart from above, we would also like to highlight some other issues which are currently being faced by the broadcasting sector.

Other Matters

- Process of approval of applications/ permissions should be fast tracked;
- Documents having acknowledgement of the Ministry are referred to as not received;
- There should be transparency regarding the status of application with timelines for completion and also, if any action is required from broadcaster;
- Applications should not be kept pending for more than 6 months, if there is no query outstanding from the applicant.


