

## CONSUMER CARE SOCIETY®

(Formerly Banashankari Consumer Protection Society)

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(Regd.under Karnataka Societies Regn. Act. 1960)

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10 October 2007

Telecommunication Regulatory Authority of India

New Delhi

Dear Sir,

**Subject: TRAI C. P. No 9/2007 on issues relating to mobile television service**

We congratulate TRAI on putting on public domain a comprehensive paper summarizing world trends on this rather new subject. We wish an Annex on our own Doordarshan's experience could have added value. If TRAI can give us an opportunity to participate in any TRAI OHD on this topic, it would add further value to our knowledge.

Our comments on issues for consultation are below: Issues are in italics and our comments are in standard font.

- 1. Whether the technology for mobile television service should be regulated or whether it should be left to the service provider.*

As we at a very initial stage, it is better not to regulate but leave the choice to the service provider. He can decide what is best for him depending on world trends, technology collaboration, business forecast etc.

- 2. If the technology is to be regulated, then please indicate which technology should be chosen and why. Please give reasons in support of your answer.*

At the present state of various developing technologies it is not desirable to choose any one particularly as it will complicate matters later.

- 3. What will be the frequency requirement for different broadcast technological standards for terrestrial and satellite mobile television transmission in India?*

As a general rule technology requiring minimum transmission band width is to be preferred.

4. *Which route would be preferable for mobile TV transmission – dedicated terrestrial transmission route or the satellite route? Should the mobile TV operator be free to decide the appropriate route for transmission?*

Going by the present wide use of reception of FM channels by hand-held mobile telephones, it appears that – dedicated terrestrial transmission route will be better than the satellite route for reasons of simplicity of the hand held equipment.

5. *How should the spectrum requirements for analogue/ Digital/ Mobile TV terrestrial broadcasting be accommodated in the frequency bands of operation? Should mobile TV be earmarked some limited assignment in these broadcasting bands, leaving the rest for analog and digital terrestrial transmission?*

Earmarking a frequency band at present for a service which is at an experimental stage world wide seems avoidable. Situation can be reviewed when needed.

6. *In the case of terrestrial transmission route, how many channels of 8 MHz should be blocked for mobile TV services for initial and future demand of the services as there are nearly 270 TV channels permitted under down-linking guidelines by Ministry of Information and broadcasting?*

No Comments (NC)

7. *Whether Digital Terrestrial Transmission should be given priority for the spectrum assignment over mobile TV, particularly in view of the fact that the Mobile TV all over the world is essentially at a trial stage.*

NC

8. *Whether the frequency allocation for the mobile TV should be made based on the Single Frequency network (SFN) topology for the entire service area or it should follow Multi Frequency Network (MFN) approach.*

NC

9. *Whether frequency spectrum should be assigned through a market led approach – auctions and roll out obligation or should there be a utilization fee?*

Auction and roll out is better to discourage frequency hoarding.

10. *What should be the eligibility conditions for grant of license for mobile television services?*

NC

*11. Whether net worth requirements should be laid down for participation in licensing process for mobile television services? If yes, what should be the net worth requirements for participation in licensing process for mobile television services?*

NC

*12. What should be the limit for FDI and portfolio investment for mobile television service providers?*

NC

*13. What should be the tenure of license for the mobile television service providers?*

Five years seems a good via media for any new service/technology to mature and get good commercial and technology experience

*14. What should be the license fee to be imposed on the mobile television service providers?*

NC

*15. Whether in view of the high capital investment and risk associated with the establishment of mobile television service, a revenue share system would be more appropriate?*

NC

*16. Whether any Bank Guarantee should be specified for licensing of the mobile television service providers. If yes, then what should be the amount of such bank guarantee? The basis for arriving at the amount should also be indicated.*

NC

*17. Whether the licenses for mobile television service should be given on national regional/ city basis.*

If mobile TV is to take off, then cities will be first option due to affordability of the Customers, cost of hand helds and usage charges and as a commercial proposition. We are not even now sure if FM sound broadcasts are available at non- urban areas. In puts from Doordarshan who have already some experience would give some valuable ideas.

Regards

G S Gundu Rao

For Consumer Care Society, Bangalore