

CLEAR MEDIA (INDIA) PRIVATE LIMITED

Registered Office: B/15-18, Commerce Centre, 2nd Floor, 78, Tardeo Road, Mumbai 400034
Corporate Office: Prasar Bharati Tower Aperture, All India Radio, Mall Road, New Delhi – 110054

March 23, 2023

To,
Shri Anil Kumar Bhardwaj
Advisor (B&CS)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
New Delhi – 110 002

Subject: Counter-Comments by Clear Media (India) Pvt Ltd.

1. The Delinkage of the Annual License Fee (“ALF”) from the Non Refundable Entry Fee (“NOTEF”):

(i). There seems to be a general consensus that the present formula linking the ALF to the NOTEF needs to be done away with.

(ii). The de-linkage may please be re-considered from 01.04.2015 for reasons mentioned in the Stakeholder’s comments.

2. News & Current Affairs:

Some participants in the Consultation Process have proposed various new checks and balances. In the opinion of this Stakeholder, there are already existing safeguards both within the Phase-III GOPA Agreement and other laws of India which kick-in for any content that is broadcast which is violative of those laws.

News Radio comes under the broader umbrella of “Talk-Radio” in the markets which have had privately owned radio stations for decades. Talk-Radio is a well-developed genre and, in some markets, almost half of all advertising on radio stations in on such Talk-Radio formatted radio stations.

Extensive restrictions and rules will make News & Current Affairs a non-starter. Lifting the ban on News & Current affairs will attract more serious and more senior citizens to listen to FM Radio stations.

Programming Teams of Talk-Radio stations will also be able to connect with more local issues which can be broadcast in public interest without being constantly concerned about crossing the fine-line between News Programming and General Talk.

Talk-Radio will likely expand the market for radio advertising just like TV channels such as Aaj Tak, CNBC-TV 18, Astha Channel etc expanded the market for television advertising.

By expanding the choice of programming available to the public, the advertising community will also be able to target audiences with more specific ads, e.g Insurance and Banking ads on a Talk-Radio station focused on Financial Markets.

3. FM Antennas in Mobile Handsets:

This Stakeholder does not possess the technical expertise to provide any counter-comment on the point.

4. Other Issues:

HT Media and Next Radio have commented on the issue of mandatory co-location of FM Radio Antennas. Since the sale of Analog receivers has now dropped to zero, the need for co-location should simply be done away with. A quick survey done on e-commerce sites and of electronic stores shows that all FM Radio Receivers sold in the market are digital only. Therefore, the issue of poor-quality receiver sets or analog sets getting low-fidelity or mixed signals or garbled signals is eliminated. Therefore, there is no need for co-location. Also, FM Radio listening is mostly confined to cars which also have only digital receivers. Why then burden the private FM Radio Industry with compulsory co-location of FM Antennas in this day and age?

For Clear Media (India) Pvt Ltd,

Raj Kumar

General Manager.