



**FICCI's Submission on TRAI Consultation Paper -
'Promoting Local Manufacturing in the Television Broadcasting Sector'**

We would like to express our gratitude to the Telecom Regulatory Authority of India (TRAI) for giving us the opportunity to submit comments on the consultation paper on 'Promoting Local Manufacturing in the Television Broadcasting Sector', released on 22 December 2021. The Authority has outlined the unique opportunity available to local manufacturers to contribute to the Indian Broadcasting sector. The consultation paper is a welcome step towards the right direction.

TRAI has rightly described the hardware equipment deployed for distribution. Some of these are common even when it comes to a broadcaster such as the headend and transmission equipment. A list of equipment necessary for the purpose of up linking broadcast signals which are usually procured by any broadcaster are as under:

Equipment Name	Equipment Type	Use	Manufacturer Name	Country of Manufacture	Approx. Qty. used in one channel	Other Manufacturer details if any
Encoder	Baseband	Teleport/ Lease line/DSN G	Ericsson/Me diakind	Poland/Malay sia	17	Harmonic

Decoder	Baseband	Teleport/ Lease line/DSN G	Ericsson/Mediakind	Poland/Malaysia	30	Harmonic
Modulator	IF	Teleport	Newtec	USA	6	Ericsson
Multiplexer	Compression	Teleport	Mediakind	Poland/Malaysia	4	NA
CAS Server	Encryption	Teleport	Irdeto	Netherlands/Germany	2	NA
Live U Transmitter	Streaming	Live/Feed Operation through Mobile Internet data	Live U	Israel	16	NA
TVU Transmitter	Streaming	Live/Feed Operation through Mobile Internet data	TVU Networks	China	18	NA
HPA	RF Uplink	Teleport	CPI	USA	2	NA
SSPA	RF Uplink	VSAT	CPI	Canada	1	NA
Antenna & its Sub system	RF (Uplink/Downlink)	Teleport	GD Satcom	USA	1	NA
UP Converter	RF Uplink	Teleport	Comtech	USA	6	GD Satcom
Spectrum Analyzer	Monitoring	Teleport/DSNG	Anritsu	USA	2	NA
STB	Decoder	For Distributi on at MSO/DTH	Homecast	China		Coship
LNB	Downlink	Satellite downlink	Norsat	Japan/China/ Korea	20	Gardiner

Requirement for focused action

There is hardly any market for local manufacturing of the broadcasting equipment. Thus, this should be a focus area. The idea is to promote manufacturing which can keep pace with evolving technologies and meet global standards when it comes to equipment quality and backend and backup services.

Demand for the manufacturing of television broadcasting in India

There is adequate opportunity, market, and demand for manufacturing of TV broadcasting equipment like Headend, Back Haul transmission, etc in the country.

In our view, Indian manufacturers lack adequate capabilities to meet the broadcasting equipment demand of Indian Cable TV Sector and there are hardly any manufacturers of compression, radio frequency, CAS, etc. It would therefore be advisable to invite foreign manufacturers who can collaborate with Indian partners subject to sharing of technical know-how and availing suitable 'Make in India' benefits. These may include tax related concessions, guaranteed employment opportunities and overall contribution to the economy and growth in GDP.

Reasons for the limited market share of local manufacturers

Some of the reasons for limited market share are the lack of capacity, lack of technical know-how, equipment manufacturing, lack of subsidies & procurement not being cost effective. To promote adequate competition, we must encourage more manufacturers to come and compete. The domestic market should be encouraged to have tie ups with global partners and market leaders.

Measures for the local manufacturing sector to capture a greater market share

The local manufacturers need to have the technical know-how and ability to keep pace with rapidly evolving technologies. The creation of SEZs and manufacturing hubs must be promoted. We must promote R&D hubs which can ensure that quality standards and

technological advancements are adequately met. Obsolete technologies should be discontinued at the earliest possible time. The equipment which they manufacture has to be future ready and must be permitted to be manufactured/produced on the pre-condition that the same can be achieved. In the absence thereof the indigenously manufactured equipment not only become outdated but also add up to the e-waste causing environmental and health concerns.

Lastly, the components including semi-conductors required for the purpose of manufacture must also be made available at low cost and should be tax friendly including customs related exemptions in the event of imports. The permission to permit and promote the local manufacturing must also factor in the life cycle of different types of equipment and take into account the procurement frequencies. To start with, it should commence from low hanging fruits or such equipment which can easily be replaced and serviced, and which may involve a lesser technical know-how/technology transfer in terms of its usage.

Measures to enable local manufacturers to compete in global market for television broadcast equipment

TRAI has rightly noted and quoted from the 25th Report 2020-21 of Standing Committee on IT that “...*Indian firms are not competitive with foreign firms on account of pricing and quality..*”. It therefore needs to be appreciated that any proposal which promotes indigenous manufacturer of broadcasting equipment must meet both the requirements of “*quality and pricing*”. The quality of the equipment that is meant to operate at least for duration of the permission (10 years or more) has to be world class and fault free. A Broadcaster cannot afford to have any flaw or glitch during the up linking of the signals and it is the essence of its service that the viewing experience of the customer is not compromised in any manner. The equipment provider is also required to be equipped with a world-class service backup, maintenance, fault repair abilities and should be able to provide equipment with backup measures that can ensure error free and fault free transmission of up linking of signals. Any proposal which does not address and promote indigenous manufacture

without addressing and taking care of these aspects, would only be counter-productive and would not meet the desired objectives.

It is also important to learn lessons from the past and to gain from the experiences especially from the point when digitization was announced and directed to be implemented in a time bound manner. Many of the DPOs who took the initiative ended up with sub-standard STBs and suffered from technical glitches. In other words, any proposal or mandate which promotes local manufacturing must first ensure that the same is able to meet the global standards and compete with them. The objective should be not only to cater to needs of local market but to be the 'preferred choice' of the global customers.