

Response on Reliance Broadcast Network Limited on TRAI's Consultation Paper "Distribution of TV Channels from Broadcasters to Platform Operators" dated 6.8.2013

1. **Reliance Big Broadcasting Private Limited ("Broadcaster") is pleased to respond to the TRAI's consultation on Distribution of TV Channels from Broadcasters to Platform Operators.**
2. Over the last few years, there is a complete dominance of few broadcasters who have become very stronger as they have started collaborating by aggregating their channels and marketing under few entities called aggregators. The large disparity in the bargaining power of aggregators and various platform operators has further widened with aggregators representing more than one broadcaster.
3. The Aggregators create bouquets of TV channels from different broadcasters and offer them to the DTH operators and MSOs. As these bouquets contains main popular content of all major broadcasters, DTH operators and MSOs give preference to such bouquet and as a result of which young channels like us does not find any takers. The concentration of market power is evident from the fact that 73% of the total pay TV market available today is controlled by the top four aggregators. Almost complete popular content is part of offerings from these 4 aggregators. The prevailing market structure has led to serious market distortions of market power.
4. The proposed Regulation to impose restriction on Aggregators that they cannot bundle TV channels of more than one broadcaster is absolute necessary. This stipulation would ensure that aggregators do not make bouquet of channels without even considering feasibility of its carriage on the distribution platforms. Due to irrational offerings at wholesale level, platform operators are also burdened to prepare bouquets with mix of channels which consumers want to watch with the undesirable channels. Consumers are also burdened due to irrational bundling by aggregators.
5. This further result in bundling of channels. Most popular channels are bundled with least popular channels, and the DTH Operators and MSOs are forced to take unpopular channels along with the popular channels, as the survival without popular channels is a challenge.
6. The proposed regulations, would address the problem of disparity in the bargaining power of aggregators and various platform operators to some extent and open doors for young channel like us with rich content to be carried on by the platform operators.



7. In view of the above, it is requested that TRAI should come with a regulations which restricts the consolidation of the major channels in hands of few large aggregators. This will increase the competition amongst the broadcasters and would also provide fair opportunity to consumers to take channels which only they desire to watch.
8. **In view of the above, we request the Authority (TRAI) to urgently notify draft Regulation so that the aggregators would not be able to bundle TV channels from more than one broadcaster.**