

COMMENTS

ON

Consultation paper dated 18th October 2024 on Regulatory Framework for Ground Based Broadcasters.

BY

SITI NETWORKS LIMITED



Date: 7th November 2024

To,

Shri Deepak Sharma,

Advisor (B&CS),

Telecom Regulatory Authority of India,

4th Floor, Tower F, World Trade Centre,

Nauroji Nagar, Safdarjung Enclave,

New Delhi - 110029

Subject: Response to the Consultation paper dated 18th October 2024 on Regulatory Framework for Ground Based Broadcasters.

Dear Sir,

This is with reference to our reply to the input for preparing consultation paper we are thankful for noting our comments in the captioned consultation papers and sought the response with respect to various issues as mentioned in the present Consultation Paper.

In this regard, we hereby submit our views and inputs for your kind perusal please.

Q.1 For the purpose of regulatory framework for ground-based broadcasters, do you agree with the draft definition for broadcaster, programme, Satellite-based broadcasting and Ground based broadcasting given below? If not, please suggest alternative definitions. Please elaborate your response with full justification.

“broadcaster” means a person or a group of persons, or body corporate, or any organization or body who, after having obtained, in its name, authorization from the Central Government for its channels, is providing programming services;”

“programme” means any television broadcast and includes-

- i) exhibition of films, features, dramas, advertisements and serials;***
- ii) News & current affairs, Non-news & current affairs, educational content***
- iii) any audio or visual or audio-visual live performance or presentation, and the expression “programming service” shall be construed; accordingly,”***

“Satellite-based Broadcasting” means providing programming services using satellite-based communication medium for delivering channels to the distributors of television channels.”

“Ground-Based Broadcasting” means providing programming services using terrestrial communication medium for delivering channels to the distributors of television channels.”

Our Response:

1. Before giving our input, we would like to mention that as rightly observed by the Authority that
 - a. the difference between SBB, PS and GBB as follows :
 - i. SBB and GBB
 1. The broadcaster using satellite-based communication medium has been termed herein as SBB and that using terrestrial communication medium has been termed herein as GBB.
 2. That means the only difference between SBB & GBB is delivery/distribution of content/channel else everything remains the same. SBB distributes the channel via Satellite while GBB distributes the channel through terrestrial medium.
 - ii. PS & GBB
 1. The difference between platform services (PS) and ground-based TV channels is - a PS channel having the legal rights to broadcast the content, the responsibility thereof and the ad-revenue received therefrom belongs to the DPO on whose network the PS channel is being carried.
 2. Whereas for a GBB channel even though it is retransmitted on the same DPO's network, the rights for the content, responsibility thereof and the ad-revenues therefrom belong to the channel owner i.e. the ground-based broadcaster and not the DPO.
 3. Further, a PS channel can only be distributed to DPO's own subscribers. In contrast, the GBB, is not confined to any one TV distribution network. Its programs/channels may be simultaneously broadcast/transmitted to multiple DPOs for further retransmission.
2. In addition, it is mentioned in para 2.20 of present CP that –
 - a. “It is imperative that an exhaustive definition of broadcaster, satellite-based broadcasting, ground-based broadcasting, scope of service and the service area for them be provided for under the Regulatory framework intending to govern the ground-based broadcaster.
 - b. Further, it is important to consider whether any distinction is required to be made between the broadcasters using satellite medium and terrestrial medium for delivery of content to DPOs the regulatory framework.
 - c. Also, whether the definition of broadcaster may be required to be broadened to make it independent of communication medium used for delivery of content to DPOs by broadcasters i.e. all communications mediums may be allowed.

3. Besides this, we would like to refer to the recommendation dated 19th November 2014 issued by TRAI which stated that GBBs are :
 - a. akin to the traditional broadcast channels but with a strong local focus.
 - b. generally, been referred to as 'local-channels' and the producers of such channels have been described as "local-channel operators". In reality they are ground-based broadcasters.
 - c. are carried on more than one DPO network simultaneously, like traditional TV channels.

4. We should also keep in mind
 - a. The logical conclusion of this is as there other channels carried on by the DPO through their ground cable network such as satellite-based, Doordarshan channels, PS should not be deemed as PS; they are a class apart and the ground-based channel
 - b. In effect, BGG are also broadcasters.
 - c. There are several channels carried on the cable TV networks that are IP based channels, which should be referred to as ground-based channels.

In view of above, we suggest the definition as follows

5. Definition of 'Broadcaster'

- a. We agreed to the definition of "Broadcaster as suggested in Consultation paper with certain minor modification. Which are as follows :

"Broadcaster" means a person or a group of persons, or body corporate, or any organization or body who, after having obtained, in its name, authorization from the Central Government for its channels, is providing programming services **only to the licensed Distribution Platform Owners (DPOs) and includes their authorized distribution agents;**"

- b. We also are amenable to the definition of Program with slight modification as follows :

"programme" means any television broadcast and includes-

- i) *exhibition of films (be it feature films, commercial films or documentary films), features, drama, advertisement and serials;*
- ii) *News & current affairs, non-news & current affairs, educational and any kind of content of other genres.*
- iii) *any audio or visual or audio-visual live performance or presentation or recoding thereof.*

and the expression "programming service" shall be construed; accordingly,"

- c. In the Definition of Satellite based broadcasting – certain words suggested to be added at end and the final definition should as follows:

“Satellite-based Broadcasting” means providing programming services using satellite-based communication medium for delivering channels to the distributors of television channels and the expression “Satellite-based channel” shall be construed accordingly.,

- d. Since this consultation paper is focused on GBB, we need to have a clear definition of GBB, which we suggest as follows along with explanations :

“Ground based Broadcasters means the Broadcaster providing programming services on ground based channel using terrestrial communication medium for delivering channels to the licensed Distribution Platform owners (DPO), which shall not include PS channel however would include IP based channel.

(Explanation :

- (i) The rights and responsibility for the content, and the ad revenues from Ground Based Channel shall belong to the channel owner i.e. the ground-based broadcaster, however ground-based broadcaster may allow to share the advertisement revenue with DPO, if commercially agreed.
- (ii) *GB Channels are non-exclusive to any particular platform and be simultaneously transmitted to multiple DPOs for further retransmission.*
- e. In addition, we need to incorporate the definition of “Terrestrial” as follows:
“Terrestrial” means distribution of Channels through earth route (whether below or on the earth and not through satellites, which shall inter-alia include Channels distributed through IP mode also.

Q. 2. Should there be any distinction between ground-based broadcasters (GBB) and satellite-based broadcasters (SBBs)? If so, what aspects/criteria should define such distinction? Please provide detailed justification for your response.

OUR RESPONSE :

The **Broadcasters (whether SBB or GBB)** produce and own the rights to the programming content of the channels largely and **follow the same processes** to create these channels, however the **only difference is mode of transmission**. As rightly mentioned in Consultation paper, SBBs transmit the channels through satellite while the GBB through terrestrial mode.

In view of above, the definition be defined accordingly and beside that we would like to state that:

- GBB being a new scenario should be regulated with light touch, and commercial terms may be put under forbearance.
- A Simple licensing and registration process as compared to SBB be introduced.
- Reasonable entry barrier such as net-worth etc. need to be imposed, so that only serious players can enter into this.
- All the provisions as applicable regulations to SBB (such as signing of Interconnection agreement, must carry, must provide, fixation of MRP, non-discrimination etc.) be applied mutatis mutandis to GBBs.

Non applicability of Regulation on GBB would lead to creating a big loophole in the system, as those traditional broadcasters/SBB who do not want to follow or want to circumvent the regulations, will shift to GBB mode. This will create havoc and lots of confusion, as some of the broadcasters are under the regime of regulations and others are under forbearance, which means the channels which are under forbearance may have different pricing and the channels under regime would have different pricing, while the channel would be the same. In addition, GBB may enter into fix fee deal for the similar channel, while broadcaster under regulatory regime would be charging the fee on the basis of subscriber base. Likewise, there would be many more issues would arise and would make the situation a total mess.

- A ground-based broadcaster, like a satellite-based broadcaster, can also be vertically integrated with a DPO
- GBB being similar to traditional satellite-based channels should also have the same genres of channel, and the carrying of advertisements and the ad-revenue accrues to the channel owner.

Q.3. Under the scope of GBBs, should all terrestrial transmission medium(s) (excluding satellite communication) such as fiber, broadband, cloud, etc be permitted? If not, please provide detailed justification for your response.

OUR RESPONSE :

In our opinion, **all terrestrial transmission medium(s) (excluding satellite communication) such as fibre, broadband, cloud, etc be permitted under the scope of GBBs.**

We are of the opinion that limiting the scope of distribution will not only hamper the technological advancement in the scope of GBBs but will keep the GBBs in olden era and defeat the purpose and keep them away from the competition and deprived them from competitive advantage.

Hence, for the future growth and technical advancement of the broadcasting industry, it is suggested that transmission should be permitted through all terrestrial medium(s), without restriction.

Q.4. Whether GBBs should be permitted/authorised to provide services in two separate categories i.e. (i) at State level, and (ii) at National level? If State level category for GBB are considered, then should such State level GBB may be allowed to obtain separate permissions/ authorisations in more than one State or there may be some ceiling on number of State-wise permissions/authorisations beyond which national level permission/authorisation must be obtained?

OUR RESPONSE :

Before submitting our response we would like to consider various factors such as recommendation dated 19th November 2014 issued by TRAI, wherein it was mentioned that GBBs are :

- a. akin to the traditional broadcast channels but **with a strong local focus. (2.1)**
- b. *They have generally been referred to as ‘local-channels’ and the producers of such channels have been described as ‘local-channel operators’. In reality they are ground-based broadcasters. These channels offer a variety of content such as local news and information; regional movies and music; religious content, etc. The ground-based broadcaster channels are an integral part of most cable TV networks...” (2.1 (d))*
- c. **They are**
 - i. *by and large cater to the local information needs of cable TV subscribers.*
 - ii. *on cable TV networks, generally provide movies, music related programs, local community-based programs, local information and current affairs, etc...” (1.8)*
- d. In India today are a mixed lot. Some have a very limited reach of a few thousand viewers in a single district while others offer their channels to multiple national-level MSOs thereby achieving a viewership of more than a few million spanning several States in India.
- e. The smaller reach of various GBBs needs to be factored in by calibrating their obligations, such as on fees and net worth requirements, on a *pro rata* basis so that the largest pan-India ground-based broadcaster faces the same regulatory obligations as a satellite-based broadcaster.
- f. The appropriate metric to calibrate the obligations *should be based upon* the regional, social and linguistic diversity of India. One possible metric that can be considered is the number of states in which a ground-based broadcaster’s channel is present.
 - i. Given that about 90% of India’s population lives in about 15 most populous states, presence of a ground-based broadcasters’ channel in 15 states in India may be taken to be equivalent to a pan-India presence.
 - ii. The States that are members of the North Eastern Council (NEC) may be considered to be equivalent to one State, for this purpose. Consequently, any

ground-based broadcaster distributing his channel in only one state will have regulatory obligations no more than 1/15th (say 7%) of that presently imposed on a satellite-based broadcaster *pro rata*.

- iii. While there are weaknesses in this approach, the results offer a fair and equitable outcome.

Based upon above, it is reorganized that GB Channels predominantly deliver local content that is different from traditional channels. This is because these channels typically focus on a specific geographic area, and tailor their content to the unique interests, events, and issues relevant to the consumers of such particular geographical area. Ground-based channels are often more in touch with local events, which make them a trusted source for news, weather updates, school closures, community events, and other local information. This local focus helps them stand out from national or global media, which may not cover local topics in as much depth.

The Authority itself has recognized that that GBBs operate in a local area and that GB channels are distinguished by their strong local focus, and the said content caters the demand and are of more interest to localized residents. This deep sub-niche or categorization focus on micro-demographics thereby providing an essential service that resonates more deeply with the local viewers, which differentiates clearly with other players.

It is rightly observed by the Authority in the Consultation paper, that the service areas or reach of GB channels is substantially smaller comparing to regional or national channels, this is because of their focus on local content. And GB channels serve a significantly smaller community, sometimes even just a few thousand viewers within a district or specific localities. Their focus on niche topics and community-specific content, which are not only creating interest but also valuable to audiences of particular region and may not be of interest of or resonate to the outsiders. It is to be noted that this local content is the USP of GB channel which fulfils the specific needs of such Sub-demographic focused audience group, therefore the demand of GB local channels may be limited.

We therefore are of the opinion that they should be registered at STATE Level.

However, if 60% of the content of the local channel is comprised of generalized content not confining to or related to the local or region of a particular state, and the presence of the said local channel is in minimum 10 states (1/3 of total states of the country) in such a case they can be allowed to register at National Level. In addition, the SBB may also plan to distribute the channel via terrestrial mode, in such a case they should be allowed to register at National level but subject to relevant regulations and conditions.

Q.5. An SBB pays a cumulative annual permission fee of Rs. 7 lakhs (Rs. 2 lakhs for uplinking + Rs. 5 lakhs for downlinking) per channel. Whether GBB should be mandated to pay the same amount of annual fee of Rs. 7 lakh per channel? If not, what should be the annual fee for GBBs? Please provide detailed justification for your response.

OUR RESPONSE

Considering the issues mentioned above, it is recognized that GBBs are generally small-scale broadcasters or cable operators, and their operations are limited to regional and hence their income level is also much less than the SBBs or national broadcasters. The audience reach, revenue potential, and market presence, of GBBs are very limited. In addition, the technical and financial capabilities and structure of GBBs are very basic due to their limited revenue earnings, as the revenue from their advertisement are from local advertiser who also in turn have limited operational area. Due to above reasons, they have limited resources to invest in advanced technology and infrastructure and operate with minimal equipment and financial capital.

It is also correctly observed by the Authority in the consultation paper that a teleport hub helps broadcasters to send their TV channels to satellites, from where they are further transmitted to distribution platforms. However, for GBB, up-linking of a channel is not required for which provision of teleport/ teleport hub is necessary, instead a GBB may use its computer/server to directly deliver content through terrestrial transmission medium to DPOs. Hence imposing the fee on GBB would be unreasonable.

As GBBs operate with limited financial capacity and minimal revenue generation compared to larger broadcasters, hence imposing annual fee on them or any recurring fees would place an undue financial burden on them and hamper their operation. In such a case a reasonable one-time registration/license fee may be considered.

In such a case only a one-time registration/ License fee to be charged from GBB. On the other hand, if any existing SBB starts distributing GB Channel, or if the turnover of GBB is more than two crores, they should be charged annual fee, this will help smaller GBB to compete with the SBB or bigger GBB, and will create a broadcasting environment.

Q6. Provisions for teleport/teleport hub exists in the uplinking/ downlinking Guidelines 2022 for broadcaster using satellite communication. Whether similar provisions are required in relation to any hub/gateway that may be required to be set up for distribution of TV channels by GBBs? If so, what should be the corresponding provisions? Please elaborate with justification.

OUR RESPONSE

In our opinion, there is no need to impose any similar conditions on GBBs only a light touch regulation be applied. Only minimum applicable provisions of IT Act be applied.

Q7. If a GBB is permitted to operate at State level, then what should the regulatory provisions for a GBB operating at State level which include:

- a) Processing Fee**
- b) Annual Fee**
- c) Net worth Requirement**

- d) Performance Bank Guarantee (PBG)
- e) Other regulatory provisions

Q8. Whether the extant Tariff Order, Interconnection Regulation and Quality of Service Regulation may be applied mutatis mutandis to GBB? Please explicitly indicate, if any modifications are required in the said Tariff Order, Interconnection Regulation or Quality of service Regulation for GBBs.

Q9. (a) The extant interconnection regulation provides for “Must Carry” and “Must Provide” regime. In case of GBB, whether the same regime should be made applicable?

(b) Normally, the cost of bandwidth / any other additional cost involved should be borne by both the parties based on a mutual agreement. However, in case the broadcaster and DPO fail to reach an agreement on costs involved, then in such a situation, since the ‘Must carry’ provision is exercised by the broadcaster, therefore they should bear the cost of bandwidth between broadcasters and DPOs/ any additional cost and similarly, since the ‘Must provide’ provision is exercised by DPO, therefore DPO should bear bandwidth cost/ any additional cost involved. Do you agree with the above approach? If not, who should bear the cost in both the cases? Please provide detailed justification for your response.

OUR RESPONSE

As stated above that GBB being a new scenario should be regulated with light touch, and commercial terms may be put under forbearance and hence a Simple licensing and registration process as compared to SBB be introduced. In addition, a Reasonable entry barrier such as net-worth etc. need not to be imposed, so that only serious players can enter into this.

Besides that, provisions of applicable regulations to SBB (such as signing of Interconnection agreement, must carry, must provide etc.) be applied mutatis mutandis to GBBs.

i) Processing and Annual Fee :

As stated above that GBBs operate with limited financial resources and only essential revenue generation compared to larger broadcasters, hence imposing annual fee on them or any recurring fees would place an undue financial burden on them and hamper their operation. In such a case no Processing Fee and Annual Fee, be imposed and only a reasonable one-time registration/license fee may be considered.

ii) Net worth requirement & Performance Bank Guarantee (PBG) :

The Net worth requirement for Ground based broadcasters should be there, so that only serious players could enter into this business.

Further, we opine that imposition of requirements bank guarantees on GBBs, who have small-scale and hyper-local content and have limited financial resources to meet such requirements, imposing such kind of condition will not be suitable for their limited operational and economic resources and will create a burden on them. Hence, we suggest that a reasonable requirement of Net worth be imposed, but there should not be any provision for imposing PBG.

iii) Other regulatory provisions

a. It is suggested all the provisions of the Regulations as applicable to SBB should be applied to GBB, for the reasons mentioned hereinabove.

b. Signing of Interconnection Agreements : Signing of agreement would give clarity of the terms between the GBB & DPO and would demonstrate that the terms are non-discriminatory. Execution of the Agreement would reduce the disputes also and would bring transparency.

c. Must Provide: In our opinion, “Must Provide” clause should compulsorily be there as mentioned in the existing Interconnection Regulation due to following reasons:

- i. In the Absence of “Must Provide” clause would lead to arbitrary denial of providing the GB channels to the seeker.
- ii. In case any Ground Based channel is owned by one MSO and the same channel becomes very popular, then the owner MSO may refuse or avoid providing the channel to its competing MSO. The consequence of which would be not having a level playing field. Secondly the LCOs would shift from the MSO to the MSOs having those GBB channels.
- iii. This would create an imbalance on the ground. While sharing ground-based channels with all MSOs would create parity.
- iv. However, if it is not feasible for GBB to provide the said GB channels in certain areas due to technical or other constraints, the same may be denied on the same terms as mentioned in the existing regulation.
- v. In the absence of “Must Provide” this would lead to Monopoly.
- vi. Denial of GB Channels would have the effect of Exclusivity, which is the basic difference between PS & GB Channels.

Further we would like to mention that in order to maximize the reach of GB channels, they should be required to distribute non-exclusively to all DPOs. Hence, “Must Provide” provision and non-exclusive distribution provisions

should be there to avoid monopoly practices and promote the growth of the GB Channel.

- vii. In view of above, we suggest that “Must Provide” clause should be there in the regulations on non-discriminatory basis **subject to availability of facility and resources to make the channel available within the said state**. They should be given a right to deny, which should be similar to the provisions mentioned in Interconnection Regulations.

- b. MUST Carry :
 - i. Must Carry clause would give parity for the GBB on the platforms of MSOs,
 - ii. This clause should be on the same lines of existing regulations, as giving right of refusal on the terms as mentioned in the regulations.
 - iii. **Must carry should be subject to availability of space and resources to make the channel available within the said state** and GB channels not to be counted in the 5% cap of the total channel carrying capacity of the MSO.

- c. We would like to further mention that non applicability of Regulation on GBB would lead to creating a big loophole in the system, as those traditional broadcasters who do not want to follow or want to get out of regulations, will shift to GBB mode. This will create havoc and lots of confusion, as some of the broadcasters are under the regime of regulations and others are under forbearance, which means the channels which are under forbearance may have different pricing and the channels under regime would have different pricing, while the channel would be the same. In addition, GBB may have enter into fix fee deal for the similar channel, while broadcaster under regulatory regime would be charging the fee on the basis of subscriber base. Likewise, there would be many more issues (not being mentioned here for the same of brevity) would arise and would make the situation a total mess.

- d. A ground-based broadcaster, like a satellite-based broadcaster, can also be vertically integrated with a DPO

- e. Cost of Bandwidth : In our opinion, the cost of bandwidth / any other additional cost related to producing of GB Channel and taking the said channel to DPO should be borne by GBB, however the cost of bandwidth for distribution the channel from DPO network to LCO/customer be borne by DPO.

- f. The MRP is to be determined by GBBs and the channel be available on non-discriminatory price.

Q10. In case a SBB wishes to switch to terrestrial-based communication medium to deliver its channels to DPOs, what should be the regulatory framework, in such a scenario?

OUR RESPONSE

As stated above, the purpose of GBB is distribution of hyper-local content to the audience of a particular region, while SBB is for the purpose of PAN India. Though there is a different niche for both the channels, as GBB would be catering to the need of local viewers, while SBB for Pan India. This being a major difference between both SBB & GBB may not clash the market and may not affect the areas of each other in our opinion. However, GBB Broadcaster who are at national level may face competition from SBB. This situation is similar to the competition between a small level and other satellite channel.

If the existing regulations continued to be applicable for both SBB & GBB, it may not affect the industry scenario to a great extent. Hence they should be Regulation Neutral. Rather it would reduce the cost of SBB, as their infrastructure and operational cost would reduce, which should be utilised to reduce the price of channels for the benefit of viewers.

Q.11. In case a GBB wishes to switch to satellite-based communication medium to deliver its channels to DPOs, what should be the regulatory framework, in such a scenario?

OUR RESPONSE

In case a GBB wishes to switch to satellite-based communication medium to deliver its channels to DPOs, then in our opinion, they should be treated as SBB and all the applicable provisions of SBB broadcasting rules and regulations should be applied to those GBBs.

Q.12. In case a broadcaster (SBB/GBB) wishes to use both satellite and terrestrial transmission technology to provide their channels to the DPOs, what should be the regulatory provisions for such broadcaster(s)? Should they require separate permissions and pay additional annual permission fees, processing fees, etc. for the above scenarios? Please provide detailed justification for your response.

OUR RESPONSE

Our response would be same as mentioned in question 10.

Q.13. What should be the Regulatory Framework/Guidelines for Ground based broadcasters vis-à-vis 'Guidelines for Uplinking and Downlinking of Satellite Television Channels in India, 2022'? Please provide detailed justification for your response.

Response:

As GBBs transmit the channel for retransmission to subscribers at the headend of the DPO terrestrially and not require any satellite for uplinking / downlinking the channels. It is only SBB who has to uplink and downlink the channel, hence there cannot be any comparison between two of them.

We suggest the on SBB, the Guidelines for Uplinking and Downlinking of Satellite Television Channels in India, 2022 be applied and on GBB relevant provisions of Cable TV Act and respective Interconnect, Tariff and QoS regulations prescribed by TRAI be applied mutatis mutandis.

However,

- Registration process may be similar through Broadcast Seva Portal, GBB should apply for registration to MIB and MIB should allow the registration subject to the eligibility, however they should be given opportunity of being heard before rejection.
- The Registration/license should be valid for 10 years
- There should be one time fee as mentioned above.
- GBB should be sending appropriate reports to MIB and TRAI.

This would provide a well-defined, uniform and consistent regulatory framework for GBBs which would ensure level playing field.

Q.14. Whether the existing provisions contained in the uplinking/downlinking guidelines 2022, excluding the provisions related to satellite communications, be made applicable to ground-based broadcaster or do they need any modifications? In case you are of the opinion that modifications are required in existing uplinking/downlinking guidelines 2022, then please provide your comments with reasons thereof on amendments [including any additional restriction(s)/condition(s)] required for Ground based broadcasters.

Response:

There is no comparison between SBB & GBB and all the provisions of Uplinking and Downlinking Guidelines are mostly applicable to usage of satellite technology which is not applicable to GBB. Hence, none of the provisions of the Guidelines should apply to GBBs.

Q.15. Stakeholders may also like to provide their comments on any other issue relevant to the present consultation along with justification.

Response:

Since there is no regulation on OTT functions, we find that some of the OTT players are distributing the content as GBB. In addition, some platforms are collecting the same content (As being shown live on linear channel) and distribute the said content as GBB. This is creating an unbalance, discrimination and non-level playing field in the industry. As the cable distribution industry are bleeding and this kind of scenario would lead to pre-mature death of cable distribution business.

We, therefore, respectfully request Honourable Authority to kindly address this issue by looking into above issues and also form Guidelines for OTT Platforms, which are acting similar to a GBB or DPO.

We again thank you for the opportunity given to us for submitting our response. We continue to cooperate with the Authority in all respect.

Thanking You

Yours Sincerely

for Siti Networks Limited

Girish Buttan

Head-Legal and Regulatory compliance