

Comments on Consultation Paper
on
Issue relating to Uplinking and Downlinking
of
Television Channels in India

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Submitted by
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Introduction

Skyline Tele Media Services Limited, a Company incorporated under Companies Act, 1956 in the year 2007 having registered office at 352, Aggarwal Plaza, Plot No.8, Kondli, New Delhi-110096 and having its Corporate office at FC-23, Sector 16A, Film City, Noida-201301, U.P. The Company has setup its own teleport Service in Noida. The Company has got permission for setting up of Teleport from Ministry of Information and Broadcasting, Government of India (MIB) in the year of 2009 for a period of 10 years.



Issues for Consultation

The Company as a permission holder of teleport service hereby submitting point wise comments on following categories as given in the consultation paper:

- (a) Meaning of a teleport;
- (b) Entry Fee, Processing fee, and License fee for teleport license;
- (c) Restriction on the number of teleports;
- (d) Location of Teleports;



A. Meaning of a Teleport

(a) Whether specific definition of a teleport is required to be incorporated in the policy guidelines? If yes, then what should be the appropriate definition? Please elaborate responses with justification.

Comment: The existing policy guidelines do not contain specific definition of teleport. It only says that for uplinking of TV channels it is required to set up uplinking hub/teleport. Due to absence of definition there remains possibility of confusion regarding the operation of teleport. As per our view there is a need to define the meaning of the teleport in the policy guidelines.

B. Entry fee, Processing fee, and License fee for teleport license

(a) Is there any need to increase the amount of non-refundable processing fee to be paid by the applicant company along with each application for teleport license? If yes, what should be the amount of non-refundable processing fee? Please elaborate with justification.

Comment: As per the applicable policy guidelines dated 5.12.2011 a company is required to pay Rs. Ten thousand per teleport as non-refundable processing fee for establishing a teleport. The processing fee is charged to cover the costs involved in processing the application.

There is no need to increase the amount of non-refundable processing fee to be paid by the applicant company with each application for teleport license. It should remain the same. Online processing of application will reduce the cost as well as reduce timelines in granting license.



As per Company view, instead of increasing the processing fee, with the use of technology, the costs involved in processing of application could be reduced due to online processing of applications which may reduce both cost and the time for grant of teleport license.

(b) Should entry fee be levied for grant of license to set up teleport? If yes, what should be the entry fee amount? Please give appropriate justification for your response.

Comment: An entry fee is levied to identify serious players in a regulated business. Our view is that a company that setting up of teleport requires substantial investment in the physical infrastructure. Any delay in compliance of rollout obligations, could result in forfeiting the PBG of Rs. 25 Lakhs as prescribed under existing policy for each teleport, and therefore this requirement in itself is sufficient to ensure that only serious players obtain the license for setting up of teleport. Further, prescribing an entry fee for new teleport licenses may go against the objective of making India a teleport hub for international channels. Export of such satellite communication services would not only help in earning foreign exchange but also generating employment.

Therefore, there is no need to levied entry fee for grant of teleport license. Introduction of entry fee will hamper the growth of the broadcast industry and this may impact prices and affect end use customer.

C. Restriction on the number of teleports

(a) Whether there is a need to restrict the number of teleports in India? If yes, then how the optimum number of teleports can be decided? Please elaborate your responses with justification.



Comment: At present there is no restriction on grant of license for setting up the teleports for uplink of signals of satellite TV channels. Further, maximum number of channels which can be uplinked from a teleport depends upon the quantum of transponder capacity available for uplinking on a particular satellite. Therefore, the uplinking of satellite TV channels can grow without corresponding increase in number of teleports.

As per our view, placing a cap on the number of teleports for uplinking of TV channels may restrict the new player from entering into teleport services and force broadcasters to use uplinking facilities from abroad. Such an outcome may thwart employment generation, and affect foreign exchange inflows, which is not desirable. As per Company's view there is no need to impose such kind of restriction in teleport.

D. Location of teleports

(a) What should be the criteria, if any, for selecting location of teleports? Should some specific areas be identified for Teleport Parks? Please elaborate your responses with justification.

Comment: Presently, there is no restriction on location for setting up a teleport subject to site clearance by SACFA. Teleports can be set up at any part of the country after obtaining license/ permission and security clearance. As we know, a teleport operates in the C-Band of spectrum and use 5925 - 6425 MHz range of frequencies for uplink of signals of TV channels to the satellite.

As per Company's view it should be left to the teleport operator to decide the location as per its business plan, and obtain the site clearance on case to case basis from WPC wing of DoT.

