



सत्यमेव जयते

भारतीय दूरसंचार विनियामक प्राधिकरण
TELECOM REGULATORY AUTHORITY OF INDIA
भारत सरकार /Government of India



F.No.21-1/2017-B&CS

Dated: 29th March 2019

To

Secretary,
Ministry of Information and Broadcasting,
A Wing, Shastri Bhawan
New Delhi-110001

Subject: TRAI's response to the back reference received from Ministry of Information and Broadcasting on TRAI Recommendations titled, 'Ease of doing Business in Broadcasting Sector' dated 26th February 2018 - regrading

Kind Attention: - Shri Vikram Sahay, Joint Secretary (P&A)

Kindly refer to MIB Letter No. 1401/02/2018-TV(I)(Part)/24 dated 19/11/2018 and TRAI letter dated 21-1/2017-B&CS dated 12/11/2018 on the above subject.

2. The Authority has duly examined the response and the comments from the Ministry of Information and Broadcasting (MIB) vide their letter no. 1401/02/2018-TV(I)(Part)/24 dated 19/11/2018. The Authority has reconsidered the issues keeping in consideration the following:

- Reasons and background provided by MIB;
- Comments/ counter-comments of stakeholders during consultative process;
- Analysis carried out while making the recommendations;
- The reasons enunciated by the ministry; and
- The coherent re-analysis of all the aspects together.

3. Pursuant to the said re-analysis, the issue-wise response of the Authority is enclosed as Annexure-I.

4. In keeping with practice, a copy of this letter, along with the response, is being placed on the website of TRAI www.trai.gov.in

This letter is issued with the approval of the Authority.

Anil Kumar Bhardwaj
29/3/2019
(Anil Kumar Bhardwaj)
Advisor (B&CS)

Encl: As above

Subject: - Issue wise response to the back-reference dated 19/11/2018 of MIB on “Ease of doing Business in Broadcasting Sector”.

ISSUE 1: Para 4.1 of the Recommendations

A. TRAI Recommendations:

‘The Authority recommends that the process of granting permission for uplinking of satellite TV channels from India should be streamlined by removing redundant processes, reengineer necessary processes and making them efficient using ICT.’

B. MIB Views:

The Ministry agrees with the recommendations that steps are to be taken to implement “Ease of Doing Business”.

C. Analysis & TRAI Response:

MIB has accepted the recommendations.

ISSUE 2: Para 4.2 of the Recommendations

A. TRAI Recommendations:

‘The Authority recommends that the process of granting permission and registration for downlinking of satellite channels should be streamlined in such a way that:

- a) the channels having permission for uplinking from India require registration only; and
- b) the channels being uplinked from outside India require permission as well as registration.’

B. MIB Views:

(a) & (b): In the Uplinking and Downlinking Guidelines of December 2007, there is no provision for “registration” for private satellite TV channels. The Guidelines only provide for “permission”.

Even channels that are only uplinked from India are presently subjected to clearances from MHA, DoS and examination by empanelled CA. Such channels use the services of Indian teleports and Indian satellites which

are permitted by MIB and DoS respectively. There could be a possibility that these channels may broadcast content antithetical to Indian interests in the country of downlinking. It could lead to an undesirable situation wherein our permitted infrastructure is being used to broadcast content unsuitable to Indian interest. Hence it is necessary to know the antecedents of the only uplinking company as well.

Hence, this recommendation is not agreeable to MIB.

C. Analysis: Following is noted:

- i. The Uplinking and Downlinking policy as per separate Policy circulars issued on 5th December 2011 are currently in vogue. The present Policy guidelines for downlinking of TV channels dated 5th December 2011 enunciates permission and registration¹. As per the current process, MIB forwards all the applications seeking permission to:
 - a. MHA for security clearance
 - b. Chartered Accountant (empanelled at MIB) for verifying Net-worth
 - c. Department of Revenue for verifying/ examining whether the applicant has exclusive marketing and distribution rights for the channel etc.
- ii. As per the downlinking policy guidelines, the companies, who have been granted permission for uplinking of TV channels from India, are automatically permitted for seeking permission for registration of channels for downlinking in India. The guidelines do not clearly define the scenarios that require either permission or registration. The broadcaster seeks for approvals from MIB for downlinking of TV Channels in India in the following scenarios:
 - a. Satellite channel uplinks in India & downlinks in India
In this scenario, at the time of applying for uplinking itself MIB may seek necessary information for registration for downlinking as well. If the applicant approaches for downlinking later, a clear provision may specify that such applicant require registration only.

¹ Registration means, non-duplication of processes like approval from MHA, DOS etc.

b. Satellite Channel seeking only Downlinking permission in India:

Such satellite channel that uplink from outside India and want to cater to Indian audience, therefore require only downlinking permission. In this case, the broadcasters' application requires the complete processing of permission including seeking of clearances from MHA, DoS etc.

- iii. Further, vide para 4.5(iii) of letter no. 1403/36/2017-TV(I)/50 dated 22/01/2019 as a back-reference on the issue relating to Uplinking and Downlinking of TV channels in India, MIB has intimated that "as per the uplinking and downlinking guidelines permission is granted for both uplinking and downlinking simultaneously, hence making the downlinking permission co-terminous with uplinking permission and for the channels which are uplinked from outside India needs permission as well as registration, are already being granted by the Ministry.
- iv. Now in the light of letter from MIB as par para iii, these measures are already adopted by the Ministry. Thus, the Ministry has now implemented the TRAI recommendation.

D. TRAI Response

It appears that MIB has accepted and implemented the recommendation made by the Authority.

MIB may consider to suitably amend the guidelines/ process to ensure that stakeholders' have clarity on the issue.

ISSUE 3: Para 4.3 of the Recommendations

A. TRAI Recommendations

- (a) The recommendations made by the Authority are to the Government of India and not for a specific ministry. MIB may therefore, take-up the recommendations with all the concerned departments accordingly.
- (b) Initially, MHA should take the decision on security clearance to an applicant company and its key personnel within a period of 60 days. Also, in case of any change in key personnel, MHA should take the decision within a period of 60 days.

- (c) Validity period of security clearance granted to a company should be equal to the permission/license period granted to that company for broadcasting services. The Government in any case reserve the right to withdraw security clearance at any point of time.
- (d) The security clearance granted to the key personnel of a company should remain valid for 10 years.
- (e) In cases where an existing broadcasting company, having valid security clearance, is seeking permissions for additional satellite TV channels, the process seeking fresh security clearance from MHA should be done away with.

B. MIB Views

- (a) to (d) Security clearances are issued by MHA as per their own Guidelines.

C. Analysis

- i) Every Ministry prepares and publishes a citizen charter specifying the timelines for various services. In case of services that require inter-ministerial approval, it is important to have a timeline-based framework.
- ii) The Authority acknowledges the necessity of seeking security clearance in case of a new entity (company or any other form of business organization), i.e. when such clearance is sought for the first time.
- iii) It is in the purview of MHA to assess and grant security clearance to the broadcasting company and its executives. However, once security clearance is granted to a company, re-seeking of security clearance for the same company on application(s) for additional channels is undue repetition. Such re-seeking may be necessary only in those cases where management/ directors of the company have changed.
- iv) The period of grant of security clearance should be co-terminus with that of grant of permission/ licence, provided that there is no change of ownership/ directors/ key-personnel of the company. The Government may revoke the security clearance granted to a

company and its key executives whenever there is any adverse observation by any concerned agency.

- v) In case of any change of Management/ Directors/ Key Executives, a new security clearance is necessary and therefore should be continued.
- vi) Besides, there are cases of existing broadcasters seeking permission for additional TV Channels. In such cases there is no merit in seeking the security clearance again except in cases referred to in para v.
- vii) Further, vide para 4.5(iv) of letter no. 1403/36/2017-TV(I)/50 dated 22/01/2019 as a back-reference on the issue relating to Uplinking and Downlinking of TV channels in India, MIB has intimated that it agreed with the recommendation in principle as Ministry of Home affairs is taking various steps to ensure that, in practice, the process gets completed within 60 days on an average.

D. TRAI Response

In view of the analysis as above, TRAI reiterates its earlier recommendations.

ISSUE 4: Para 4.4 of the Recommendations

A. TRAI Recommendations

- (a) DoS should take the decision on clearance for satellite use for broadcasting services within a period of 60 days.
- (b) In cases where a broadcasting company is seeking permissions for uplinking of new satellite TV channels to the already cleared satellites, the process of seeking fresh clearance from DoS should be done away with.

B. MIB Views

- (a) DoS gives clearance as per its own policy.
- (b) MIB will refer to DoS for its comments.

C. Analysis

- a. The recommendations made by the Authority are to the Government of India and not for a specific ministry. MIB may therefore, take-up

the recommendations with all the concerned departments accordingly.

- b. Every Ministry prepares and publishes a citizen charter specifying the timelines for various services. In case of services that require inter-ministerial approval, it is important to have a timeline-based framework.

D. TRAI Response

MIB is yet to take decision on the matter. TRAI reiterates its recommendations.

ISSUE 5: Para 4.5 of the Recommendations

A. TRAI Recommendations

- (a) A self-declaration, in a prescribed format, stating that the applicant company meets net-worth requirements, as specified under the policy guidelines, should be taken from the applicant company at the time of submitting the application. This declaration should be supported with duly audited financial statements of the company.
- (b) The requirement of examining net worth, ownership details, shareholding pattern and its effect on net worth etc., by the empanelled CA should be done away with.
- (c) A self-declaration, in a prescribed format, stating that the applicant company complies with clause 1.3 and 1.4 of the downlinking policy guidelines should be taken from the applicant company at the time of submitting the application.
- (d) The requirement of examining the compliance of clause 1.3 and 1.4 of the downlinking policy guidelines by Department of Revenue (DoR) should be done away with.
- (e) A condition should be added in the procedure of granting permission that if the information provided by a company is found incorrect or incomplete at any stage during the entire permission period, the permission would become void ab-initio

B. MIB Views

(a) & (b) The purpose of prescribing a minimum net-worth for companies to run news or non-news channels is to ensure that the entity is financially strong enough to be able to express its views/news/creative content free from the external pressure. Therefore, a correct assessment of the net-worth of the entity is necessary. MIB now relies on the latest declaration made by the entity in the Ministry of Corporate Affairs' MCA 21 Portal as per the provisions of the Companies Act.

Further, for news channels, as per extant guidelines, MIB needs to ensure that 51% single Indian ownership is maintained. It is also necessary to ensure that FDI ownership limits are followed. Further companies have given incorrect/inflated information about their net-worth.

Therefore, expert examination by Chartered Accountant is required. Recommendations at 4.5 (a) & (b) are not accepted.

(c) & (d) As per clause 1.3 and 1.4 of the downlinking guidelines, the applications for downlinking are forward to DoR which in turn examines whether the agreement between the applicant (downlinking) company and the channel owner (in case the two are different entities) contains suitable stipulation to enable the applicant to conclude agreements on advertising, subscription revenue and programme content. This is done to ensure that the applicant company duly falls in the taxation framework and that there is no tax evasion.

(f) MIB agrees with 4.5 (e) subject to our views on (a) to (d) above.

C. Analysis

i) The assessment of net-worth and ownership details of an applicant, for obtaining the permissions as enunciated in the guidelines is duly recognised. The purpose of the Ease of Doing Business exercise is to identify the source of authenticated information and to avoid duplicate processes. In case an applicant submits any statutory compliance with any government/agency then the same document should suffice without necessitating a re-verification.

ii) Herein applicants being a registered company/LLP are enjoined by 'The Companies Act 2013', 'The Limited Liability Partnership Act 2008' and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to file balance sheet, shareholding structure and ownership details. Such balance sheets and statutory documents are certified by the

company directors and the auditors (Chartered Accountants). Running the same document (submitted by the applicant) through verification by another empanelled Chartered Accountant is only a repetitive check and does not add value.

- iii) Further, even if there are some more information (that are not available in statutory compliance documents), is necessary then MIB may design and notify the same as mandatory annexure to the application. Such form/format can contain due and binding undertaking by the applicant and also have the certification/verification by the Company Auditors/Chartered Accountant.
- iv) Any Chartered accountant (CA) is a registered professional and subject to the disciplinary scrutiny and authority of Institute of Chartered Accountant of India (ICAI)/National Financial Regulatory Authority (NFRA). Therefore, once a CA has certified any information, the extant statutory provisions should be considered as sufficient that the information certified by such professional is genuine.
- v) Further, the undertaking by applicant can contain specifically that, “I undertake that all information submitted is correct and duly certified. In the event any information submitted hereunder is found to be incorrect, the permission/ license granted will be considered invalid”.
- vi) As well as a similar undertaking may be designed for para 1.3 & para 1.4 of the downlinking guidelines, which is presently being referred to Department of Revenue (DOR)
- vii) MIB may further add that any permission, obtained on the basis of incorrect information, will be treated as ‘void ab-initio’ and will be the responsibility of the applicant

D. TRAI Response

In view of the analysis as above, TRAI reiterates its earlier recommendations.

ISSUE 6: Para 4.6 of the Recommendations

A. TRAI Recommendations

The Authority recommends that procedure recommended for granting permission for uplinking of satellite TV channels should be mutatis-mutandis made applicable to grant permission for teleport services also.

B. MIB Views

MIB agrees with 4.6 subject to MIB's views as given at 4.5 (a) to (d).

C. Analysis

- i) The procedure to grant the permission for teleport operations is similar to the procedure followed to grant permission for uplinking of TV channels. The detailed analysis of the TRAI recommendation is similar to that provided on para 4.5 (Issue 5).
- ii) The procedure for grant of permissions for teleport operations should also be similar as in case of permission for granting uplinking of TV Channels.

D. TRAI Response

In view of the analysis as above, TRAI reiterates its earlier recommendations in full.

ISSUE 7: Para 4.7 of the Recommendations

A. TRAI Recommendations

- (a) Initially, MHA should take the decision on security clearance to an applicant company seeking license for DTH services and its key personnel within a period of 60 days. Also, in case of any change in key personnel, MHA should take the decision within a period of 60 days
- (b) DoS should take the decision on clearance for satellite use for DTH services within a period of 60 days

B. MIB Views

- (a) Security clearances are issued by MHA as per their own Guideline.
- (b) Department of Space provides clearance as per its own policy.

C. Analysis

- a. The recommendations made by the Authority are to the Government of India and not for a specific ministry. MIB may therefore, take-up the recommendations with all the concerned departments accordingly.
- b. Every Ministry prepares and publishes a citizen charter specifying the timelines for various services. In case of services that require inter-ministerial approval, it is important to have a timeline-based framework.
- c. Further, vide para 4.5(iv) of letter no. 1403/36/2017-TV(I)/50 dated 22/01/2019 as back-reference on the issue relating to Uplinking and Downlinking of TV channels in India, MIB has intimated that it agreed with the recommendation in principle as Ministry of Home affairs is taking various steps to ensure that, in practice, the process gets completed within 60 days on an average.
- d. Besides, the matter may also be pursued with DoS to ensure the process on clearance for satellite use for DTH services also gets completed within 60 days.

D. TRAI Response

In view of the analysis as above, TRAI reiterates its earlier recommendations.

ISSUE 8: Para 4.8 of the Recommendations

A. TRAI Recommendations

- (a) WPC should allocate the spectrum for commercial satellite usage as and when there is a demand for same from service providers in a time bound manner.
- (b) The WOL should be valid for a period equivalent to service license/permission period.
- (c) The service providers should continue to pay requisite fees to WPC on annual basis; and the same should be paid at last 60 days before the due date to ensure continuity of the license.

- (d) A condition should be prescribed in the WOL that any delay in payment of requisite fee shall lead to penalties and cancellation of the applicable license.

B. MIB Views

- (a) According to WPC, DoT, at present, spectrum is being allotted administratively to satellite based service along with other terrestrial services on interim basis through administrative order issued periodically for a period of three months at a time. A proposal for policy decision on allotment of spectrum for all types of services including satellite-based services is under consideration within department.
- (b) to (d): MIB agrees in principle. According to WPC, DoT, the Wireless Operating License (WOL) is issued annually since the fee is charged annually. The license can only remain valid for the period for which the fee is paid. If the fee for the complete period is paid upfront the license can remain valid upto the validity of service license. Accordingly, the above recommendations may be accepted, subject to the condition that the complete license fee is paid up front.

C. Analysis

- i) MIB is yet to take decision on para (a)
- ii) MIB has agreed with the recommendation on para (b) to (d)

D. TRAI Response

The Authority reiterates its recommendations for para (a) also.

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ISSUE 9: Para 4.9 of the Recommendations

A. TRAI Recommendations

- (a) MIB should setup an integrated online portal for broadcasters, teleport operators, and distributors of TV channels (DTH operators/HITS operator/MSOs) which should facilitate the filing of applications, processing in MIB, DoS and DoT, tracking of status of applications, payments, frequency allocations, endorsements, permissions, licenses, registrations, and renewals with common database. Preferably, this portal

- should be integrated with other e-Governances systems like Bharatkosh portal, e-Office application etc. Access to the portal should be provided to the Authority also for information and analysis.
- (b) The integrated online portal should be developed as early as possible, within a period of 1 year from the date of acceptance of these recommendations.
 - (c) In case of permissions/licenses where security clearance of the company from MHA or satellite clearance from DoS or both are required, normally the decision to grant permission should be taken by MIB in consultation with MHA and DoS within 3 Months from the date of application.
 - (d) In case of permissions, where security and satellite clearances are not required, normally decision to grant permission should be taken by MIB within 45 Days from the date of application.
 - (e) WPC should take the decision on grant of WOL including allocation of frequency within a period of 60 days.
 - (f) The decision to grant permission for operationalising the services, including time taken by MIB, WPC, DoS, MHA and NOCC for issuing permissions, should be completed within 6 months period in case of uplinking of channels by a new company/teleport/DTH licenses.

B. MIB Views

- (a)& (b): This Ministry has already launched 'BroadcastSeva' portal for broadcasting services purpose. The portal is being further refined on continuous basis keeping in view the various requirements of the Broadcasters and other users as well as that of this Ministry. User-Id and Password has been provided to TRAI for viewing BroadcastSeva Portal.
- (c) & (d) In principle, this Ministry agrees to give permissions in a time-bound manner.
- (e) MIB agrees as WPC has accepted it.
- (f) In principle, this Ministry agrees to give permissions in a time-bound manner.

C. Analysis &TRAI Response

MIB has agreed with the recommendation

ISSUE 10: Para 4.10 of the Recommendations

A. TRAI Recommendations

- (a) The Application for change in the logo, name, language and format of a channel should be processed through the proposed integrated online portal to take the decision on the same.
- (b) MIB should maintain an updated database of all channels in the proposed integrated online portal and the same should be accessible to all the regulating and monitoring agencies namely MIB, TRAI, DoS, MHA, WPC and NOCC.
- (c) When the accessibility of an online updated database of channels will be ensured, the permission of WPC and NOCC, for change in name, logo, or language of a channel, would become superfluous. Accordingly, the procedure for seeking such permission should be discontinued.
- (d) If a request for change in name, logo or language of a Channel is made within one year from the last such change, then MIB may carry out detailed examination. In such cases, MIB should take decision on request for change in name, logo or language of a channel within a period of 30 days from the date of receipt of application along with the prescribed changes (if any).
- (e) In all other cases, the proposed changes in the logo, name or language of a channels should be taken on record online after payment of the prescribed charges (if any).
- (f) The necessary permissions for effecting the change in format of a channel should be granted within 60 days after receipt of the application and payment of the prescribed changes (if any). It includes the time taken by MIB, WPC and NOCC.

B. MIB Views

- (a) This Ministry has already launched “BroadcastSeva” Portal for broadcasting services purpose. The portal is being further refined/developed keeping in view the requirement of this Ministry as well as that of the Broadcasters and other users. The applications for change of name and logo, language and format is already being taken online. Shortly, processing will also become online.

(b) Updated database of channels, teleports etc. are already being maintained in MIB's official website and BroadcastSeva Portal. Portal can be accessed by all monitoring and regulatory agencies. MIB is more than willing to offer its BroadcastSeva Portal to other monitoring and regulating agencies. We have held discussions with WPC and MHA. It is understood that WPC and MHA are making their own online platforms. However, MIB will cooperate with MHA and WPC in their platforms.

(c) For change in name and logo and language, presently no permission is required from WPC or NOCC.

(d) This Ministry does not agree with the recommendation as requests for change of name, age etc. are examined from various angles.

(e) Granting permissions for changes of name, logo or language requires detailed examination on account of trademark verification, violation of other acts and other relevant aspects. Hence, this recommendation is not agreeable. Further, payments of all charges are made online now.

(f) In principle, this Ministry agrees to give permissions in a time-bound manner. For effecting change in format, no reference is made to WPC or NOCC.

C. Analysis

i) The logo and name of the channel are subject to trade-mark registration. Any violation of trade-mark etc. is subject to the provisions of trade-mark act. As the Trade-marks are maintained at the national/international trade-mark registry, the verification process involves expert knowledge of trade-mark law and processes. Therefore, it is absolutely necessary that the applicant remains legally and fully responsible for trade-mark compliance.

ii) At present, the guidelines/application process for the change of Logo/name etc. is not specified. Presently MIB is processing the same as per its memorandum/order dated 13/12/2017 and 20/12/2017. The said memorandums/orders do not contain specific conditions that an applicant requires to comply with.

iii) Further, the recommendations by TRAI do take care of contentious requests by providing for examination/ scrutiny of any application that seeks change of Logo/name with one year of its permission/launch/previous change. Change of logo or name can be genuine business

requirement/decision of the broadcaster and any delay in processing can be detrimental to legitimate business interest.

iv) In another reference dated 11/06/2018, MIB has referred related issues for consideration and recommendations of TRAI. TRAI has sought further details against the said reference vide letter no. 23-3/2014-B&CS dated 04/10/2018. Reply of same is awaited.

v) The purpose of ease of doing business exercise remains to create transparent processes and to remove subjectivity. It will be expedient for MIB to specify and list 'various angles' explicitly and remove ambiguity from Logo/name change approval process, leaving final responsibility of compliance with the applicant through appropriate undertaking(s).

D. TRAI Response

In view of the analysis as above, TRAI reiterates its earlier recommendations.

ISSUE 11: Para 4.11 of the Recommendations

A. TRAI Recommendations

(a) For the event to be uplinked for viewing in India, if:

- (i) The applicant company has agreement with the existing broadcaster(s) and teleport operator; and
- (ii) The applicant company propose to use the pre-approved DSNG and space spectrum for temporary uplinking of live event; and
- (iii) The broadcaster(s) undertake to comply with the Program and advertisement Code;

then the registration of the necessary details by the applicant company along with the requisite documents and payment of requisite fee through the proposed integrated online portal should be sufficient.

(b) For the events to be uplinked for viewing outside India, if:

- (i) The applicant company has the agreement with the existing teleport operator; and
- (ii) It proposes to use the pre-approved DSNG and space spectrum for temporary uplinking of live event;

then the registration of the necessary details by the applicant company along with the requisite documents and payment of requisite fee through the proposed integrated online portal should be sufficient.

- (c) In other cases, the existing process needs to be automated using proposed integrated online portal to improve efficiency.

B. MIB Views

- (a) & (b) These recommendations need to be deliberated upon further before a decision is arrived at by this Ministry.

C. Analysis & TRAI Response

MIB is yet to take decision on the matter. However, TRAI reiterates its recommendation.

ISSUE 12: Para 4.12 of the Recommendations

A. TRAI Recommendations

The Authority recommends that payment of annual permission fee as per the extant policy guidelines should be done through proposed integrated online portal. The periodicity of the renewal of licenses should continue to be on annual basis.

B. MIB Views

The annual permission fee is paid through Bharatkosh and BroadcastSeva Portals. Monitoring is also done through the Portals. This payment itself is deemed as annual renewal for the channel and no specific approvals are being given by the Ministry nowadays.

C. Analysis & TRAI Response

MIB has agreed with the recommendation

ISSUE 13: Para 4.13 of the Recommendations

A. TRAI Recommendations

The Authority recommends that the issue of open sky policy for Ku band frequencies may be taken up by MIB in INSAT Coordination Committee (ICC) meeting and the same should be adopted.

B. MIB Views

The recommendation needs to be deliberated upon further and discussed with relevant agencies.

C. Analysis & TRAI Response

MIB is yet to take decision on the matter. TRAI reiterates its recommendations.

ISSUE 14: Para 4.14 of the Recommendations

A. TRAI Recommendations

- (a) The registration of LCO and its renewal should be carried out through online portal. Further, the period of registration for LCO should be increased to 5 years.
- (b) MIB should take necessary steps to frame Right of Way Rules under the Cable TV Act.

B. MIB Views

- (a) The Ministry accepts this recommendation. It has received the in-principle approval of HMIB. MIB is in process of preparing software for LCO registration.
- (b) Right of ways have been framed and sent to the State Governments.

C. Analysis & TRAI Response

MIB has agreed with the recommendation.

ISSUE 15: Para 4.15 of the Recommendations

A. TRAI Recommendations

- (a) The Government should contemplate creating a Centre of Excellence exclusively for broadcasting services. This centre should study technical, economic and social aspect of broadcasting ecosystem.

- (b) The Government should consider issuing a comprehensive policy guideline to promote research and manufacturing of hardware and software for broadcasting services.

B. MIB Views

- (a) This is a very good suggestion. This Ministry is in agreement with this recommendation.
- (b) This Ministry agrees with this recommendation and would take steps in this regard in consultation with MEITY.

C. Analysis & TRAI Response

MIB has agreed with the recommendation.

ISSUE 16: Para 4.16 of the Recommendations

A. TRAI Recommendations

- (a) The Government should design a separate policy framework for grant of permission to conduct trials/testing by existing as well as new service providers.
- (b) WPC should allocate specific frequency slots for trials/experimental purpose.
- (c) Depending on the nature of the trials and the time required for their completion, two types of licenses should be issued, one for the short term for a period for 3 months extendable up to 6 months and the other for the long term issued for 2 years extendable up to 3 years, on case to case basis.

B. MIB Views

- (a) to (c) This is an innovative recommendation. Ministry will discuss this with other stakeholders. However, according to WPC, DoT, the issue regarding “Experimental Licenses” and their validity period was also a part of another TRAI Recommendation on “Ease of Doing Telecom Business” dated 30.11.2017. This TRAI recommendation is under consideration of the DoT.

C. Analysis & TRAI Response

MIB is yet to take decision on the matter. TRAI reiterates its recommendations.
