

**TIMES NETWORK'S COMMENTS ON**

**THE CONSULTATION PAPER ON**

**"EASE OF DOING BUSINESS IN TELECOM AND BROADCASTING**  
**SECTOR"**

**ISSUED BY TELECOM REGULATORY AUTHORITY OF INDIA ON**  
**8<sup>TH</sup> DECEMBER, 2021**



**DATE OF SUBMISSION: FEBRUARY 9, 2022**

## **INTRODUCTION**

At the outset, we commend the initiative taken by the Telecom Regulatory Authority of India (TRAI/ Authority) in addressing concerns of stakeholders with respect to ease of doing business in the telecom and broadcasting sectors and sincerely look forward to implementation of much needed changes being carried out to the existing policy framework and processes applicable to these sectors to enable further growth of these sectors.

The telecom and broadcasting sectors are important constituents of the services sector in India and contribute around 10% of the GDP. Any major improvement in the ease of doing business in these sectors is expected to help in improving the India's rank in EoDB from the current 63<sup>rd</sup> position in the global ranking.

We are offering our comments related specifically to the broadcasting sector.

There are issues of unpredictable delays in obtaining clearances from the concerned authorities which act as a major bottleneck to carrying on business operations in an unhindered manner. These unforeseen time delays have an adverse impact on ease of doing business as it puts a question mark on subsequent business activities and impacts contractual obligations with other stakeholders in the value chain, not to mention the costs that would be incurred in keeping alive business interests while awaiting the statutory clearances.

The Authority had previously also floated a Consultation Paper on this subject relating the Broadcasting Sector on 31<sup>st</sup> July, 2017 wherein we had also offered our comments and thereafter after conducting the OHD with the stakeholders, TRAI had come out with its Recommendations on 26<sup>th</sup> February, 2018 which suggested various important measures for promoting Ease of Doing Business in the Broadcasting Sector. Similarly, the Authority had undertaken the consultation process on "The Issues involved in Uplinking and Downlinking of TV Channels in India" and issued a CP on the same on 17<sup>th</sup> December, 2017 and came out with its recommendations on 25<sup>th</sup> June, 2018. We had also submitted our comments and suggestions on this consultation as well.

There is a need to simplify the policy framework with respect to satellite television channels, particularly to ease the process involved in obtaining permissions and reduce the time taken to procure licenses.

The proposed new MIB Guidelines can look into various facets that how the processes can be simplified related to the broadcasting sector in view

of the changed scenarios. This will give further impetus to the broadcasting industry.

Our comments to each of the issues raised by the Authority in this consultation paper are captured below:

### **ISSUES FOR CONSULTATION**

**Q1. Whether the present system of licenses/permissions/registrations mentioned in para no. 2.40 or any other permissions granted by MIB, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:**

- a. Simple, online and well-defined processes**
- b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any**
- c. Precise and well-documented timelines along with the possibility of deemed approval**
- d. Well-defined and time bound query system in place**
- e. Seamless integration and approvals across various ministries/departments with the end-to-end online system**
- f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of license/permission/registration**

**Give your suggestions with justification for each license/permission/ registration separately with detailed reasons along with examples of best practices if any.**

### **Comments:-**

a. The processes should be well defined, simple and done through an end to end online system with no requirement of submission of physical papers. The processes relating to filing of applications, requisite documents, grant of approvals/ permissions needs to be carried out in a smooth, paperless/ online mode and in a time-bound manner.

The focus should be on decision making in a time bound manner. The process with clear and unambiguous timelines will result in giving the much needed respite to the industry and help the service providers to plan their businesses accordingly in a better manner. Since the

broadcasting industry involves high use of skilled manpower and deployment of high end technology, the clear and time-bound processes will help the existing as well as the new entrepreneurs immensely.

b. There should be a mechanism to upload the documents online, on a common platform which will also result in faster processing and obviate the need for making multiple sets of applications meant for various authorities.

c. Though deemed approval cannot be granted in most of the cases, however in some cases wherein the existing permission holder is seeking certain other permissions, the same could be granted through deemed approvals. For example – For live uplinking/ hiring of DSNG vans by already registered broadcaster, there should be only prior information and deemed approval should be the norm.

d. Once the application is duly filed in the system, there should be a system which deals with queries in an efficient manner and without taking much time. All queries from a department/agency should be raised at once, unless the query is arising from the response to earlier query.

e. There should be seamless integration and approvals across various ministries/departments with the end to end online system. The applicant should be initially registered with a login id and password and the applicant should be required to submit the basic KYC documents like the company related documents and Director's documents on the system. Once the registration is done, the applicant can apply for the required permission / approval. For a user, this should act as a single window. The system should enable the various authorities/ agencies to be connected through a secured path.

f. There should be well defined procedures with the list of documents required, clear timelines for grant of various permissions/ licenses / approvals etc. The timelines should cover all the authorities / agencies.

The need for various licenses/permissions/approvals as being done presently is required and should be continued as non-regulation of any facet may adversely impact the broadcasting sector.

Some of the changes that we propose in this regard for the Authority's consideration are summarized below:

### **Online mechanism using a Single Window:**

The present policy framework involves multiple clearances at different levels within the same Ministry as well as between several Ministries within the Government. Be it security clearances or technical clearances,

applicants today have to approach several authorities before permission or approval is granted with respect to their TV channels. As pointed out by the Authority, the internal processes that involve interaction within and between ministry departments are at present done manually. This makes the entire process cumbersome and extremely time consuming. With the changing face of technology and advancement in doing business, it is imperative that critical processes and clearances such as the MHA, WPC and NOCC permissions be automated and aligned through an online mechanism which will not only save considerable time but will also go a long way in improving efficiencies in reviewing applications and granting the necessary approvals/clearances.

We appreciate the Ministry's effort in launching the 'Broadcast Seva' portal to facilitate online payments and tracking of applications. However, the Broadcast Seva portal should be upgraded to make it an end to end platform for all kinds of processing. The same should be extended to facilitate online processing and approval of permissions across various departments and Ministries. At present the portal is wrought with teething issues, which need to be urgently addressed and resolved and made to function in a more user friendly manner.

Promoting online processes for clearances and approvals will go a long way in easing the burden of the current mechanism and will save a lot of time, money and will also help in removal of uncertainties in the whole process, hereby benefiting the broadcasters and their business interests.

In order to promote growth in this sector it is important to ease the hardships faced by the stakeholders at multiple levels.

An online mechanism will not only address this issue but will also facilitate efficient systems of database management for the Ministries. Today, stakeholders submit voluminous information and data pertaining to their business and management while seeking approvals and clearances from the authorities. This is done every time a new application is made, which can be easily avoided.

An online mechanism will help make available such key information at the disposal of the concerned authorities and will ease the burden of repeated and lengthy information submission by stakeholders.

Online payment facility can be integrated into the overall system so that there is no delay in making payments and as such approvals are not put on hold for such delays.

### **Forfeiture of PBG on non-operationalization of the channel**

In terms of the current policy framework, the MIB has stipulated the roll-out obligation for operationalization of TV channels within a period of one year from the date of permission. Performance Bank Guarantee (PBG) of Rs. 1 crore is to be submitted by applicants in case of non-news channels and a PBG of Rs. 2 crore in case of news channels at the time of issuance of the final uplink/ downlink permission towards the roll out obligation. In the event of failure of the broadcaster to operationalize the channel within the period of one year, the permission is, immediately on the expiry of one year, cancelled and the PBG is forfeited. This stipulation is a double whammy for the broadcaster. On the one hand, the broadcaster incurs huge financial losses due to the failure to launch the TV channel as projected, and on the other hand, the permission granted, subject to operationalization, is cancelled without any opportunity whatsoever for the broadcaster to seek redressal or extension of time for the same, even after penalty is levied.

Broadcasters face challenges on multiple fronts and almost always these challenges are due to extraneous circumstances and the broadcasters have very little control over the situation or its consequences.

Payment of PBG upfront itself is a huge liability and a harsh enough deterrent against non-operationalization of the channel within the stipulated one year period. However, in the event of failure to roll out the channel within one year due to business challenges and extraneous circumstances, the PBG submitted by the broadcaster is forfeited without further recourse. It is our submission that to encourage ease of doing business in this sector, the threat of financial loss such as forfeiture of PBG, must be relooked at, to make it more stakeholder friendly. We suggest that a 6 month extension should be granted to broadcasters who fail to operationalize the channel within the stipulated period of one year, subject to the payment of a nominal penalty. The forfeiture of the PBG may be invoked in the event the broadcaster fails to launch the channel even after the extended period of 6 months, without affording any further opportunity.

This suggestion, if implemented, will avoid imposition of both consequences at one go, while still maintaining the sanctity of the roll-out condition, and will also give a fair and equitable opportunity to the broadcaster to deal with the situation and the extraneous circumstances.

## **Self-Certification**

One of the factors that add to the time spent on seeking regulatory approvals under the current policy framework is the requirement for attestation of certain documents i.e. affidavits and undertakings that form part of the application. We are of the view that service providers, in any sector, are better equipped with know-how about their business and therefore self-certification of documents must be explored as against third party certification. Submissions before government and other regulatory bodies, including the Authority itself are now being self-certified by the applicants and therefore the process requirements in this space must also take this into consideration. A simple self-certification system will enable reduction in transaction costs, speed up information sharing, procedures and formalities and, as a result, will significantly increase the rate of regulatory approvals. The main advantage of self-certification is that it will help reduce administrative costs and transaction time and can truly strengthen the call of ease of doing business in India. Thus, for MIB approvals and applications, self-certification on company's letter head should be promoted in various affidavits/undertakings in place of attestation by notary public on stamp papers.

## **Offences & Penalties**

The current policies that govern satellite TV channels and their related license conditions prescribe penalties that are far too stringent and not always commensurate with the offences they are levied against. For instance, ban of a TV channel for a fixed period of time, if found to be violative of the prescribed guidelines is a very harsh stipulation and will have an adverse impact on the business operations of the channel. The five-strike clause as laid down in the policy guidelines that govern the uplink and downlink permissions granted to broadcasters does not clarify the mitigating circumstances or the process that would be followed before the penalty of revocation of license is levied on the channel. It is also not clear how the five instances of violation will be considered or the nature of offence to qualify for a violation instance.

We request that these provisions on offences and penalties are reviewed afresh and greater emphasis is laid on self-regulation. It is well known that the broadcasting sector, whether the news or the non-news genre has adhered to self-regulation guidelines laid down by bodies such as NBA, IBF and ASCI and the framework has found favour with the MIB on many occasions. As a step, all instances of violation, specifically related to content carried on TV channels must be referred to the independent redressal bodies set up under the aegis of the NBA, IBF and ASCI.

On the basis of recommendations made by NBA, IBF and ASCI, as the case maybe, extreme cases of violations can be looked at by the MIB from a penal action perspective. A suitable framework in this regard with clearly laid down responsibilities must be considered as a measure to boost growth and independence of the broadcasting sector.

## **Mergers & Acquisitions**

Today the extant guidelines that govern the broadcasting sector do not encourage corporate actions such as mergers and acquisitions, specifically within the sector. We have already made detailed submissions before the Authority as far as cross media ownership and restrictions are concerned. Vertical Integration within the broadcasting sector should be encouraged with necessary safeguards. However, corporate actions such as M&A are essential for the growth and expansion of businesses and must be permitted even within the broadcasting space.

Specific guidelines and rules govern M&A and any fear of hindrance to competition or abuse of any dominant position by an entity would be adequately addressed under Competition laws. The Indian Competition law framework is already equipped to deal with issues affecting competition across sectors, including the Media and Entertainment sector. Therefore, concerns of consolidation, dominance or monopoly that may arise as a result of such mergers can be adequately addressed under the existing competition law framework.

The intent of the existing policy guidelines aims to permit only those transactions that are approved under the Companies Act through a court approved process and are effected between group or associate companies. This stipulation effectively discourages M&A within the sector i.e. between non-related or non-group entities in the broadcasting sector.

We firmly believe that M&A deals are integral to any business restructuring exercise, whether in media or other sectors. M&A allows businesses to expand their business and augment capabilities to deliver a wider range of products and services. Business integration also gives fair value for players who wish to realize or opt out of competition. We urge the Authority to review the existing policy guidelines from this perspective and bring out changes that encourage and promote M&A within the broadcasting space.

While we are of the view that the current framework as regards permissions for change in name, logo, language, etc of satellite TV channels is robust and adequate, we suggest that the process be clearly laid out with fixed time frames for obtaining approvals. For instance, applications seeking approval of change in logo, with no change in name



of the channel can be taken on record by way of an intimation as against specific approvals. This will ease the pressure on broadcasters who for business objectives seek these changes and they will be better equipped in planning their timelines accordingly.

We support the view that the approval process as it stands today needs a review but do feel that complete relaxation of these norms may result in deteriorating the ecosystem of the broadcasting space and hurt the established players going forward. The need of the day therefore is to have clear processes in place with definitive timelines so that valuable time and the overall purpose of seeking such changes does not get lost in the entire journey.

The process of Annual Renewal of Permission has to be simplified. We also note that vide notification dated November 11, 2016 the MIB has in fact done away with the annual renewal of permission. However, the MIB has also discontinued the issuance of Renewal Certificates. It is important that the renewal certificates are continued to be issued by the MIB along with the receipt of payment giving details of the channel and the period for which the fee is paid. This process can be facilitated through the 'Broadcast Seva' portal as part of the overall online automation process, as suggested in our submissions above.

Yes, we are of the strong view that a single window mechanism will go a long way in easing the coordination process between departments and Ministries, as highlighted earlier in our response. In addition to removing the manual submission method adopted by the Ministry, the entire process of seeking information, approvals, payments and coordination between and within different departments and Ministries must be automated as an online mechanism. This will save huge amounts of time and will ease the entire process of seeking permissions for operating a TV channel.

Especially in broadcast services, the present system of WPC permission for TV channels should be done away with and replaced with a simple intimation & reporting requirement. Presently WPC issues a teleports license to the teleports with certain capacity. Once a channel is added/deleted/renamed, there is a requirement for the teleports to obtain WPC permission for addition/deletion/renaming of the channel. This is a very time consuming process and such pre-approval from WPC is unnecessary considering that there is already an approval from the MIB. This can be replaced by a periodic MIS to be sent by teleports giving the information on the TV channels uplinked by the teleports. Similarly seeking prior uplink permission from NOCC for TV channels uplink should be done away with by replacing it with Intimation & Reporting system.

In addition, the uplink permission from WPC and NOCC may be entirely done away with for applications seeking change of name of TV channels. In case of endorsement of name change, a simple intimation by the teleport operator to WPC and NOCC should suffice and in the case of a new channel endorsement, the present system can be continued since the WPC and NOCC regulate and prescribe the minimum bandwidth requirement for SD/HD channels. However, efficient delegation of powers must be done within the concerned Ministries to fasten the approval process. Also, in view of technological advancements in compression technologies, the WPC should lower the minimum data rate for HD channels from the present data rate of 8mbps under MPEG4.

As suggested earlier in this submission, the Authority must consider an effective online mechanism to also facilitate approvals for temporary uplinking of live coverage of events of national importance, including sports and significant events in the media and entertainment sector. Non-News broadcasters also play a vital role in disseminating important information and awareness by way of such broadcasts and since these are event based, timeliness is of utmost importance. Huge investments are made in acquiring the broadcast rights of such events and broadcasters face immense hardships when permissions are unduly delayed. Further, the Ministry must seriously consider delegating such approvals to identified departments within its framework to ensure a time bound and dedicated approval method.

## **Q2 to Q8**

We have no specific comments.

**Q9. Whether the present system of licenses/clearances/certificates mentioned in para no. 3.94 or any other permissions granted by WPC, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:**

- a. Simple, online and well-defined processes**
- b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any**
- c. Precise and well-documented timelines along with the possibility of deemed approval**
- d. Well-defined and time bound query system in place**

**e. Seamless integration and approvals across various ministries/departments with the end-to-end online system**

**f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of license/clearance/certificate**

**Give your suggestions with justification for each license/clearance/certificate separately with detailed reasons along with examples of best practices if any.**

**Comments:**

As suggested earlier in this submission with regards to endorsement of TV channel names, there should be no need to take specific approval. WPC Wireless Operating License, once issued should have provision for filing of online addition/ deletion / modification of TV channels and the same should be system driven. For example, in a certain capacity which is already approved by WPC, if 10 SD channels are allowed, then the WPC should allow the teleport operator to add/delete/modify the channel details as per the business requirements. The only requirement should be that the teleport operator fills these complete details online by uploading necessary documents and the deemed approval is granted, subject to verification of the documents by WPC within 15 days of the filing. This kind of process while ensuring the regulatory compliance will not burden the business entity.

**Q10. Whether the present system of permission/approval mentioned in para no. 3.101 or any other permissions granted by NOCC, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:**

**a. Simple, online and well-defined processes**

**b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any**

**c. Precise and well-documented timelines along with the possibility of deemed approval**

**d. Well-defined and time bound query system in place**

**e. Seamless integration and approvals across various ministries/departments with the end-to-end online system**

**f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of permission/approval**

**Give your suggestions with justification for each permission/approval separately with detailed reasons along with examples of best practices if any.**

**Comments:**

As suggested earlier in this submission with regards to endorsement of TV channel names, there should be no need to take specific approval from NOCC. The NOCC should issue uplink permission to the teleport operator/DSNG operator and there should be provision for filing of online addition/ deletion / modification of TV channels and the same should be system driven. For example, in a certain capacity which is already approved by NOCC, if 10 SD channels are given uplink permission, then the NOCC should allow the teleport operator to add/delete/modify the channel details as per the business requirements. The only requirement should be that the teleport operator fills these complete details online by uploading necessary documents and the deemed approval is granted, subject to verification of the documents by NOCC within 5 days of the filing. This kind of process, while ensuring the regulatory compliance, will not burden the business entity with additional compliances and there will be time-bound permissions/ approvals.

**Q 11 to 12**

We have no specific comments.

**Q13. Whether the present system of getting fresh and additional space segment capacity on Indian and foreign satellites for various services mentioned in para no. 4.15 or any other new service from DOS, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:**

**a. Simple, online and well-defined processes**

- b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any**
- c. Precise and well-documented timelines along with the possibility of deemed approval**
- d. Well-defined and time bound query system in place**
- e. Seamless integration and approvals across various ministries/ departments with the end-to-end online system**
- f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of space segment capacity**

**Give your suggestions with justification for allocation of space segment capacity for each service separately with detailed reasons along with examples of best practices if any.**

**Comments:**

First of all, the policy related to space capacity should be clear and unambiguous. Though the Uplinking Guidelines clearly mention that a channel will be allowed to be uplinked using the space capacity on either Indian or foreign satellite, however in practice, the policy is not clear and the DOS in the first place raises objection on any hiring of the satellite bandwidth from a foreign satellite. The lack of clarity forces the applicants to go for only short term arrangement for capacity hiring.

The policy should be clear and unambiguous and should be for a longer period of time.

The broadcasters use satellites for uplinking the signals of their channels to reach various DPO platforms. As ISRO satellites are not readily available or not available with sufficient capacity, many of the Indian broadcasters use foreign satellites in addition to INSAT/GSAT satellites. Further, the broadcasters, in order to reach the targeted footprints in overseas markets have to select a satellite based on its geographical reach. Hence, the satellite policy should be clear and the "Open Sky Policy" should be used in letter and spirit.

We suggest the following –

- a) It is suggested that the validity of the permission/approval issued by DoS for use of satellite and transponder be same as the uplink and downlink permission for TV channel issued by MIB. The Uplink Downlink permission issued by MIB is valid for a period of 10 years

whereas the validity of the DoS permission/approval is valid for 3 years.

- b) Foreign satellites are permitted to provide services only after the same have been coordinated with ISRO. MIB could thus obtain list of such Foreign Satellites from DoS that are approved/coordinated with ISRO, and the list of such Foreign Satellites could be made available on MIB's website and any application on these satellites should have automatic approvals. Broadcasters could then be aware on the list of permitted Foreign Satellites, and avail services only from such permitted Foreign Satellites for uplinking of signals. The specific frequency on which the channel is to be uplinked is in any event filed and approved by the WPC.
- c) Satellite Bandwidth (BW) should be pre - approved, when leased out to the users. i.e. when DOS allocates any satellite BW to the users, the said BW should be pre - approved by the various agencies such as MIB, NOCC, WPC etc. so that the user can use the BW immediately after the allocation. This will ensure faster / efficient utilization (of bandwidth).
- d) Else DOS should charge the users/ applicants from the day of actual use of the BW after getting all the requisite approvals by granting a reasonable period of say 3 months for such approval.
- e) When a new ISRO satellite is being marketed, which is owned and operated by the Government of India, they too follow the same methodology of charging end user, whereas the other departments concerned in granting final approvals, namely, MIB, WPC and NOCC, which are also the wings of the Government of India, do not follow this methodology.
- f) There should be online filing of application for INSAT capacity reservation / allocation for these services i.e. Teleport / TV uplinking, SNG/DSNG & VSAT.
- g) There should be no deposits from the users towards booking / allocation of the satellite capacity. However, for due compliance by users and protection of ISRO's interests, there may be provision for BANK GUARANTEES say monthly deposits, in line with the industry and international best practices.
- h) Forex Remittance authorizations could be made available for the entire period of the contract between the approved Satellite Service Provider and the Broadcasters. The contract between the Broadcaster and the Satellite Provider is anyways submitted to the MIB as part of the original application from the Broadcaster. However, the Broadcasters could continue to file the details of the foreign remittances made for transponder charges on a yearly basis. RBI has already given general permission for payments to foreign satellites for Uplinking services subject to MIB approval. This requirement of MIB approval should be done away with since such payments are current account payments made in the normal course of business through Authorized Dealers.

**Some other related issues are given as below:**

- a) The satellites have a definite life after expiry of which the satellite operator provides a fall back / replacement satellite on the same location or co-located orbital position.

*It is therefore recommended that the fall back / replacement satellite on the same / co-located orbital position should have an automatic approval from all regulatory authorities to provide a smooth and uninterrupted service to broadcasters.*

Once a satellite has been given NoC by ISRO, any additional channel on the same satellite should not again require any NoC from ISRO and should be approved by MIB itself without again being referred to ISRO.

- b) If a satellite is replaced by ISRO due to end of life or other reasons, the Teleport approvals on the satellite should automatically get transferred to the new satellite, without users having to make a fresh teleport application to the new satellite.
- c) If a broadcaster(s) shifts their set of channel(s) from one approved teleport in one city to another approved teleport in another city of already on-air channel(s) MIB should not refer the application to DOS – provided there is no change in satellite/transponder; bandwidth/frequency allocation and no other amendments in the uplinking and downlinking permissions. The issue primarily pertains to SACFA clearance from WPC only.

Hence, the present system of getting fresh and additional space segment capacity on Indian and foreign satellites certainly require improvement in various processes from point of view of Ease of Doing Business:

- a. There should be complete end to end online process which is well defined.

There should be a single window for making application with regard to hiring space segment capacity.

- b. The application should be simple and should be submitted online.
- c. There should be clear timelines for grant of various permissions / approvals.
- d. In case of any query, all queries should be raised at once by one agency.

e. There should be seamless integration and approvals across various ministries/ departments with the end to end online system

f. The procedures, timelines and online system of notice / appeal for rejection/cancellation of space segment capacity should be clearly defined. There should be no delay in decision making in DOS.

#### **Q14 to 19**

We don't have any specific comments

**Q20. What measures are required to be taken to simplify the various submissions/filings made by teleport operators, DTH operators, MSOs, and other stakeholders at MIB? Provide your detailed reply with justifications.**

A simple Online and paperless system should be designed with accepting digital signatures for all the routine filings done by service providers. While ensuring compliance and effective regulatory monitoring, this will, to a great extent, reduce the burden on the service providers.

**Q21. TRAI seeks multiple reports through its multiple divisions at predefined frequency intervals. Reports submitted by operators are examined and for non-compliances, show cause notices are issued and financial disincentives are imposed, wherever applicable. Do you think there is a need to improve reporting and compliance system in TRAI? Please elaborate your response with justifications.**

Yes, we are of the opinion that there is a need to improve reporting and compliance system in TRAI. For example, the Broadcasting and Cable Services Integrated Portal (BIPS) introduced by TRAI for filing of the interconnection agreements is a good step towards digital transformation, however, the BIPS portal has certain teething issues which need to be resolved for its effective functioning. It should be ensured that the data asked under the portal should be relevant and the portal should be made user friendly.



**Q22. Identify those redundant items which require deletions and at the same time the items that need to be included in the reporting and regulatory compliance systems due to the technological advancements. Suggest such changes with due justifications.**

The following redundant items can be deleted from the reporting requirements:-

The system of cross-verification of the RIO documents should be removed. There should be no need for cross confirmation of the RIO agreements entered into by the service providers. Instead, an option could be given to the service provider to raise dissent if any on any of the agreements punched in by other service provider, if the same is not correct. Such dissent entries may require further steps for closure. For other cases, where the data is correct, there should be no need for any further action. This will reduce the unnecessary cross verification processes to a large extent.

**Q23. What kind of IT-based reports and compliance submission processes do you suggest in TRAI? Provide your comments.**

We don't have any specific comments at present.

**Q24. Are there any other issues in the present system of licenses/permissions/registrations granted by MIB/DoT/WPC/NOCC/TEC/DOS/ MeitY/MoP that can be identified as relevant from the perspective of ease of doing business in the telecom and broadcasting sector? If yes, provide a list of those processes and suggest ways for their improvement.**

The regime should be based on light touch regulation wherein the regulations are for the benefit of the sector and the regulations serve as facilitators rather than come as a burden or hindrance in the working of business.

The regime should have special provisions for bypassing the process in case of disasters. The same can be regularized post the normalization of such happening.

Thanking you,

Sanjay Agarwal

Times Network

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