

Telecom Regulatory Authority of India



Recommendations

on

Authorisation Framework for Application-based Linear Television Distribution (ALTD) Services

26th October 2026

4th, 5th,6th & 7th Floor, Tower F
World Trade Centre, Nauroji Nagar
New Delhi-110029
Website: www.trai.gov.in

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CHAPTER I: Introduction and Background

A. MIB reference dated 15th December 2025

1.1 Telecom Regulatory Authority of India (hereinafter referred to as "TRAI" or "the Authority") received a reference from the Ministry of Information and Broadcasting (MIB) dated 15th December 2025 **(Annexure-I)**, under Section 11(1)(a) of the TRAI Act, 1997, seeking recommendations on the formulation of an appropriate regulatory framework governing Free Ad-Supported Streaming Television (FAST) services in India.

1.2 An extract of the reference dated 15th December 2025 is reproduced below:

> *'… this Ministry has been deliberating on the industry concerns regarding the Free Ad-Supported Streaming Television (FAST) services in India. In this regard ministry received representations from industry stakeholders, including the All India Digital Cable federation (AIDCF), expressing concern over the unregulated FAST services (Copy attached).*
>
> *2. The said issue was discussed with various industry stakeholders and comments were sought from them. The responses received from them (Copy attached) indicate that FAST platforms are currently being deployed through preloaded or built-in applications on connected TVs and operate on an advertisement-supported model without any licensing or registration framework.*
>
> *3. The Telecom Regulatory Authority of India (TRAI), in its earlier recommendations on (i) "Regulatory Framework for Ground-Based Broadcasters" (dated 15.01.2025) and (ii) "Framework for Service Authorisations for Provision of Broadcasting Services under the Telecommunications Act, 2023" (dated 21.02.2025), has also noted*

the growing presence of FAST services and recognized the existence of regulatory gaps in the present framework and recommended that a separate authorization for FAST channel distribution may be considered.

4. In view of the above and keeping in mind the evolving broadcasting landscape, the Ministry is of the view that there is a need to examine the matter comprehensively and develop a clear regulatory framework for FAST services, ensuring parity, content accountability, and consumer protection.

5. Accordingly, in exercise of the powers conferred under Section 11(1)(a) of the Telecom Regulatory Authority of India Act, 1997, the Ministry hereby seeks the recommendations of TRAI on the formulation of an appropriate regulatory framework governing Free Ad-Supported Streaming Television (FAST) services in India.

…'

1.3 The reference also attached two representations received from an association of Multi-System Operators (MSOs) dated 16th June 2025 and 24th April 2025. The Ministry had also consulted various industry stakeholders and solicited their comments on certain issues pertaining to FAST Services viz. following specific questions, which are reproduced as under:

1. *Name of TV Manufacturer*
2. *Brand Name(s) for Smart TV*
3. *Model Name(s) and Size of Screen of Smart TVs*
4. *Operating System in use*
5. *Playstore (or known by any other name) in use for downloading of FAST channels*
6. *Complete list of PRE-LOADED FAST channels/applications for FAST channels*
7. *What is your process to verify the permission status of a channel before including it in your FAST service?*

8. *What internal systems are in place to ensure that all channels on your FAST service comply with the Programme Code and Advertising Code under the Cable Television Networks (Regulation) Act, 1995?*
9. *How is compliance with content standards monitored — do you maintain a content recording/archiving system?*
10. *How do you handle complaints regarding objectionable content or advertising?*
11. *What is the commercial arrangement between Smart TV Manufacturer and broadcaster/content owners for carrying FAST channels?*
12. *Do you share advertising revenues with broadcasters, and on what terms?*
13. *What type of viewer data is collected through FAST services (e.g., watch time, channel preferences, demographics)?*

B. Summary of stakeholder comments received with MIB reference

1.4 In response to the information sought by MIB from the stakeholders, MIB received submissions from three stakeholders, along with representations from an MSO association attached with the reference. These submissions indicated that the stakeholders have adopted varied approaches for provisioning of such services.

1.5 Stakeholders furnished information on the operational architecture of FAST Services and the manner in which such services are being delivered. Their submissions, *inter alia*, described the following key processes:

i. Onboarding and verification of channels
ii. Mechanisms adopted for compliance with the Programme Code and Advertising Code
iii. Arrangements for grievance redressal

iv. Revenue sharing models and data collection practices

These submissions also provided insights into who controls what, and to what degree, across platform operations, content aggregation and service delivery within the overall service ecosystem.

1.6 Further, the submissions reflected distinct approaches to provisioning of FAST services, which may be differentiated based on the nature of operations and the roles performed within the service delivery ecosystem. Stakeholders' comments and modes of provisioning FAST services are as below: -

Stakeholder I

i. FAST services are provided through a proprietary application platform integrated within its device ecosystem, wherein application is pre-installed on its smart television models and available across selected connected devices.

ii. Channels available on platform are onboarded after undertaking verification, most of the channels are already present on linear television and also distributed through traditional platforms and Over-the top (OTT) services.

iii. Adherence to Programme Code and Advertising Code is ensured through due diligence process, including reliance on applicable regulatory frameworks and advertising guidelines (Guidelines for Prevention of Misleading Advertisements and Endorsements, 2022[1], under the Consumer Protection Act, 2019[2] and the Advertising Standards Council of India (ASCI) guidelines[3]). Advertisement content is managed at the platform level.

[1] https://consumeraffairs.gov.in/public/upload/files/CCPA_Notification_1732707665.pdf (accessed on 13th October 2026)
[2] https://consumeraffairs.gov.in/public/upload/files/CP%20Act%202019_1732700731.pdf (accessed on 13th October 2026)
[3] https://www.ascionline.in/wp-content/uploads/guidelines/ASCI_Codes_Guidelines_Book.pdf (accessed on 13th October 2026)

iv. Grievance redressal is undertaken through customer care mechanisms, wherein complaints are logged, assessed and acted upon, including removal of content where required.

v. Business model operates on advertisement inventory sharing and revenue-sharing with content partners and data collection is limited to anonymised and aggregated viewer metrics.

Stakeholder II

i. Stakeholder-II is engaged in distribution of smart television (TV) devices in India, manufacturing is undertaken by third-party manufacturers and finished products are procured for distribution. Smart TV operate on an android-based operating system (OS), available across multiple screen sizes. FAST services are not owned or operated by the stakeholder but are provided by an affiliated overseas entity, with application being accessible through the OS application store.

ii. Content/channel aggregation, onboarding and delivery is undertaken by third-party aggregators in association with the overseas platform entity, which provides FAST services.

iii. Channel verification prior to onboarding is conducted by content aggregator, while compliance with Programme Code and Advertising Code is managed by the overseas entity. Only channels specific to Indian territory are permitted for distribution. Indian entity does not undertake monitoring, recording or archiving of content.

iv. Grievance redressal for Indian users is facilitated through designated grievance officers, wherein complaints received are forwarded to the overseas entity operating FAST services. Users may also directly approach the overseas entity through specified communication channels.

v. Stakeholder-II does not receive any share of advertisement revenue under the existing arrangement. Data collection practices do not involve personally identifiable information (PII), and no viewership data relating to user preferences or demographics is collected.

Stakeholder III

i. Stakeholder-III provides an android-based smart TV OS that powers devices across multiple registered and white-labelled TV brands in India. Access to FAST channels is enabled through application store integrated within OS, including pre-loaded channels.

ii. Channel onboarding involves verification of antecedents and content strategy prior to inclusion on platform, including checks on content suitability and availability on other video streaming or global FAST platforms.

iii. Stakeholder-III functions as an intermediary in service delivery chain and does not exercise direct control over channels. Compliance with Programme Code and Advertising Code is not undertaken at platform level, though limited checks are maintained with respect to nature of content.

iv. Grievance redressal is facilitated through a dedicated email-based mechanism made available within application interface and terms of service.

v. Revenue arrangements operate on sharing mechanism between platform and content providers, with varying proportions. Data collection is limited to application-level analytics such as session duration and platform performance, without collection of personal or demographic viewer information.

1.7 Further, an MSO association, in its submission to MIB, has mentioned that FAST services are being offered outside the existing regulatory framework governing TV channel distribution in India. It has been emphasised that, under the extant uplinking and downlinking guidelines, television channels can be made available for public viewing only after obtaining the necessary permissions from MIB, and that these guidelines prescribe the mandatory conditions for lawful transmission of such channels.

1.8 The association has further submitted that distribution of TV channels in India is presently permitted only through authorised platforms such as MSOs, Direct-to-Home (DTH) operators, Headend-in-the-Sky (HITS) platforms and Internet Protocol Television (IPTV) services, all of which operate under defined licensing and regulatory obligations, including adherence to Programme Code and Advertising Code. Any distribution of linear TV channels beyond these recognised platforms warrants examination. The association also indicated availability of pay channels on FAST platforms, without any subscription fee, which is not consistent with the provisions of TRAI's Tariff Order 2017[4].

C. TRAI's earlier recommendations on FAST Services

1.9 The Authority in its recommendations on 'Regulatory framework for Ground-based Broadcasters' dated 15th January 2025[5] [hereinafter referred to as 'GBB Recommendations'] and 'Framework for Service Authorisations for provision of Broadcasting Services under the Telecommunications Act, 2023' dated 21st February 2025[6] [hereinafter referred to as 'Authorisation Recommendations'] noted

[4] https://trai.gov.in/sites/default/files/2024-09/CR_22072024.pdf
[5] https://trai.gov.in/sites/default/files/2025-01/Recommendation_15012025.pdf
[6] https://trai.gov.in/sites/default/files/2025-02/Recommendations_21022025.pdf

that FAST channels are newly introduced services and yet to be brought under the regulatory framework.

1.10 During the stakeholder consultation on regulatory framework for GBB, several stakeholders highlighted the growing proliferation of application-based platforms offering live TV channels and FAST services outside the existing regulatory framework. Stakeholders expressed some concern that such services, while functionally similar to conventional distribution platforms, operate without comparable regulatory oversight and are creating regulatory asymmetry and an uneven competitive environment. They, therefore, emphasised need for an appropriate regulatory framework to address distribution of linear TV channels through such application-based platforms.

1.11 The Authority noted that FAST services, to the extent, they offer TV channels, are quite similar to traditional broadcasting. The concerns raised by stakeholders regarding rapid and unregulated proliferation of FAST channels in India leading to regulatory disparity, thereby affecting level playing field needs further examination. Therefore, it was recommended that MIB may like to examine as to whether FAST channels, which appear to be similar to traditional broadcasting, are compliant with extant guidelines/ policy framework and whether there is a need to bring any additional policy guidelines for such channels, to bridge the gap, if any.

1.12 The Authority in its 'Authorisation Recommendations' noted that concerns related to FAST services, in so far as they stream TV channels including those authorised by MIB, are performing a function similar to that of a Distribution Service Provider[7] without

"Distribution Service Provider (DSP)" shall mean 'Distribution Platform Operator (DPO)' and includes Direct-to-Home (DTH) service provider, Head-end In The Sky (HITS) service provider, Internet Protocol Television (IPTV) service provider, Multi-System Operator (MSO) or any other service provider engaged in distribution of programmes/television channels to the users; Definition taken from 'Authorisation Recommendations'.

any regulatory oversight, is a genuine one. This is leading to regulatory disparity and is affecting level playing field with respect to regulated broadcasting players. Such regulatory arbitrage is likely to tilt the competitive balance in the industry.

1.13 Accordingly, in the 'Authorisation Recommendations', the Authority had recommended that a separate authorisation for FAST channels distribution may be considered under 'Television Channel Distribution Services'. MIB may make a reference to the Authority to provide detailed terms and conditions for the service authorisation for 'FAST channels distribution service'.

D. Evolution of Television Distribution Services in India

1.14 The broadcasting sector in India has undergone a progressive transformation over the past two decades, characterised by advancements in distribution technologies and digitisation of service delivery. In its initial phase, television services were primarily delivered through terrestrial transmission and analog cable television networks, which operated on non-addressable systems with limited channel carrying capacity and the absence of transparency in subscriber management.

1.15 With the growth in number of television channels and increasing demand for improved service quality and consumer choice, limitations of analog systems necessitated a transition towards digital and addressable modes of distribution.

1.16 In order to support the process of digitisation and align broadcasting services with evolving technological developments, Government mandated digitisation of cable television networks in a phased manner across the country. Implementation of Digital Addressable Systems (DAS) enabled transition from analog cable TV systems to digital addressable platforms. Rollout of DAS commenced in

January 2012 and was carried out in a phased manner, with completion in March 2017.

1.17 Thereafter, TRAI on 3rd March 2017 notified a comprehensive regulatory framework for broadcasting sector following due consultative process. While designing the framework, the Authority noted the phase-wise implementation of DAS. The framework comprises of the following:

i. The Telecommunication (Broadcasting and Cable) Services (Addressable Systems) Tariff Order, 2017[8] [Tariff Order, 2017]

ii. The Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017[9] [Interconnection Regulations, 2017]

iii. The Telecommunication (Broadcasting and Cable) Services Standards of Quality of Service and Consumer Protection (Addressable Systems) Regulations, 2017[10] [QoS Regulations, 2017].

1.18 However, pursuant to legal challenges, regulations were re-notified on 3rd July 2018 and came into effect from 29th December 2018. The Authority has subsequently notified certain amendments, last being on 8th July 2024. These amendments were aimed to address the practical difficulties and emerging issues during the implementation of the regulatory framework facilitating its effective implementation.

1.19 In parallel with digitisation, modes of distribution of TV services also evolved. The sector expanded from cable television networks to include satellite-based DTH services[11], followed by IPTV[12] and

[8] https://trai.gov.in/sites/default/files/2024-09/CR_22072024.pdf

[9] https://www.trai.gov.in/sites/default/files/2026-03/CR_16032026.pdf

[10] https://trai.gov.in/sites/default/files/2024-11/Consolidated_Regulation_16082024.pdf

[11] Direct-to-Home (DTH) is a satellite-based television distribution platform in which television signals are transmitted from a satellite and received directly at the subscriber's premises through a dish antenna and set-top box.

[12] Internet Protocol Television (IPTV) refers to the delivery of multi-channel television programmes in addressable mode using Internet Protocol over a closed network of one or more service providers.

HITS[13] systems, reflecting transition towards diverse and technology-driven distribution platforms.

1.20 MIB issued following policy guidelines and rules to govern these distribution platforms. The permitted distribution platforms include DTH, IPTV and HITS services, and cable services provided through MSOs and their linked Local Cable Operators (LCOs).

i. **Policy Guidelines for DTH Service:** Policy guidelines for obtaining license for providing DTH broadcasting service were issued on 15th March 2001. The said guidelines were amended from time to time, with amendments being made in 2007[14] and 2020[15]. Subsequently, the 'Operational DTH Guidelines' were issued by MIB on 16th September 2022[16] with respect to license fee, platform service channels and sharing of infrastructure.

ii. **Policy Guidelines for IPTV Service**: Policy guidelines for IPTV operations were issued on 8th September 2008[17]. The guidelines establish clear principles for various IPTV platforms to encourage stakeholder participation in Indian IPTV market.

iii. **Policy Guidelines for HITS Service:** Issued on 26th November 2009[18], the guidelines provided granting permission to eligible

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[13] Headend-in-the-Sky (HITS) is a satellite-based television distribution system in which television channels are aggregated and encrypted at a central headend, uplinked to a satellite, and thereafter downlinked by cable operators for distribution to subscribers; HITS may also provide signals to subscribers through its own cable network.

[14] https://new.broadcastseva.gov.in/digigov-portal-web app/jsp/mib/common/PDFContent/DTH_PDF/DTH%206.11.2007%20(1).pdf (accessed on 13th October 2026)

[15] https://mib.gov.in/sites/default/files/2024-12/amendment-in-guidelines-for-obtaining-license-for-providing-dth-broadcasting-services-in-india.pdf (accessed on 13th October 2026)

[16] https://mib.gov.in/sites/default/files/2024-12/-english-version-operational-guidelines-for-direct-to-home-dth-broadcasting-service-in-india-dated-16.09.2022.pdf (accessed on 13th October 2026)

[17] https://mib.gov.in/sites/default/files/2024-12/ilovepdf_merged_1.pdf (accessed on 13th October 2026)

[18] https://mib.gov.in/sites/default/files/2024-12/headend_repaired.pdf (accessed on 13th October 2026)

entities to establish, maintain and operate HITS services in India. Further, an amendment was issued on 6th November 2020[19], permitting sharing of infrastructure.

iv. **Act and Rules for cable registration and operation**: The registration and operation for cable television services (which includes MSOs and LCOs[20]) is done under 'The Cable Television Networks (Regulation) Act, 1995[21]' and rules made thereunder, which have been amended from time-to-time.

1.21 Further, the Telecommunications Act, 2023[22], to amend and consolidate the law relating to development, expansion and operation of telecommunication services and networks, assignment of spectrum, and for matters connected therewith or incidental thereto was enacted on 24th December 2023. The Act amended and consolidated the law relating to telecommunications to establish a comprehensive, technology-neutral and coherent statutory framework for the sector. It repeals the Indian Telegraph Act, 1885 and the Indian Wireless Telegraphy Act, 1933, thereby replacing the erstwhile legislative framework and consolidating the legal provisions relating to telecommunication services and networks, spectrum management, authorisation of telecommunication entities and possession of radio equipment under a single enactment. MIB had sought recommendations from TRAI on the terms and conditions, including fees or charges for authorisation to provide broadcasting services, aligned with provisions of the

[19] https://mib.gov.in/sites/default/files/2024-12/amendment-in-hits-guidelines-compressed.pdf (accessed on 13th October 2026)

[20] Local Cable Operator (LCO) means a person registered under rule 5 of the Cable Television Networks Rules, 1994

[21] https://indiacode.gov.in/pdf-viewer/9d689ed7-abb8-4d14-ae6c-5540a2383d1c/341d603c-bc29-4519-a4b8-5b189095370c (accessed on 13th October 2026)

[22] https://egazette.gov.in/WriteReadData/2023/250880.pdf (accessed on 13th October 2026)

Telecommunications Act, 2023, and harmonizing the terms and conditions across various service providers.

1.22 Based on the MIB reference, after due consultation, TRAI had issued 'Authorisation Recommendations'. The recommended authorisation framework provided two distinct sets of terms and conditions.

a. The first set dealt with obtaining the authorisation for broadcasting services, referred to as 'The Broadcasting (Grant of Service Authorisations) Rules'.

b. The second set, referred to as 'The Broadcasting (Television Channel Broadcasting, Television Channel Distribution, and Radio Broadcasting) Services Rules', to be complied with by the authorised entity for service provisioning during the entire period of authorisation.

1.23 Broadcasting services under authorisation framework were recommended to be classified into three primary categories namely, 'Television Channel Broadcasting Services', 'Television Channel Distribution Services' and 'Radio Broadcasting Services'.

1.24 The second category of services, namely, 'Television Channel Distribution Services' contains two authorisations, viz., 'DTH Service' and 'HITS Service' or any other service notified by the Central Government. Further 'IPTV Services' can be provided by the authorised entities having authorisation under Unified Service Authorisation, Access Service Authorisation, Internet Service Authorisation or MSO registration. It may be noted that the authorisation framework did not include authorisation for MSOs and LCOs, since they are governed under the Cable Television Networks (Regulation) Act, 1995. However, the Authority, in the 'Authorisation Recommendations', had recommended that the Central Government (MIB) may consider bringing the registration of

MSOs (and LCOs) under the purview of the Telecommunications Act, 2023, and thereafter, the provisions related to registration and operations of MSOs (and LCOs) governed by the Cable Television Networks (Regulation) Act, 1995 may be repealed, while retaining the provisions relating to content regulation of broadcasting services under the said Act.

1.25 Advancements in technology have led to the evolution of new modes of delivery of linear TV channels that enabled improved service delivery and enhanced consumer choice. Over time, these technological developments have been accompanied by evolving regulatory and policy frameworks to ensure orderly growth of the sector, promote transparency and safeguard consumer interest.

1.26 In this context, the Authority is of the view that any new mode of distribution of linear TV channels warrants appropriate regulatory consideration within the existing framework to provide a level playing field for all distribution platforms.

E. Present Television Broadcasting Landscape in India

1.27 The television broadcasting landscape comprises of 300+ broadcasters, 735[23] registered MSOs, 2 HITS operators and 4 pay DTH operators. Besides, there is a free-to-air DTH service, 'DD Free Dish' owned and operated by Prasar Bharati, the public service broadcaster of the country. Additionally, 76[24] IPTV service providers have given self-declaration for providing TV services to the consumers. In addition, there are 81,706 LCOs registered in the country as of 1st January 2022, as communicated to MIB by the Department of Posts.

[23] https://mib.gov.in/sites/default/files/2026-09/registered-msos-as-on-31.08.2026.pdf (accessed on 6th October 2026)

[24] https://trai.gov.in/sites/default/files/2026-06/QPIR_22062026.pdf

1.28 Considering that FAST Service is new and not a part of structured regulatory regime, an assessment of proliferation of these services and their impact on existing services can only be accessed from various market reports[25]. Various industry reports mentioned in the consultation paper indicated that the sector is undergoing a significant transformation. India has over 193 million[26]television households (which included Cable, DTH, HITS and Free TV Services and connected TV) and more than 1 billion[27] internet subscribers, while as per an industry report, Connected TV (CTV) audience has grown rapidly to over 129 million[28] users in 2025. Another industry estimates also indicated that user base of FAST Services is expected to grow from about 116 million in 2023 to nearly 149 million by 2027[29].

1.29 The Federation of Indian Chambers of Commerce and Industry (FICCI) and Ernst & Young (EY) report titled 'Stories, scale and impact: Unlocking India's media and entertainment economy, March 2026'[30] estimates that the television broadcasting sector generated a revenue of Rs. 617 billion in 2025.

1.30 These trends reflect changing consumer viewing habits, characterised by increasing consumption of linear TV channels through internet-enabled devices and application-based platforms. These services have therefore emerged as an important mode of

[25] A gist of these market reports is presented from para 1.47-1.60 in the consultation paper released on 6th April 2026.

[26] Stories, scale and impact: Unlocking India's media and entertainment economy (accessed on 13th October 2026)

[27] https://trai.gov.in/sites/default/files/2025-12/%28Press%20Release%20No.155%29.pdf

[28] https://www.ormaxmedia.com/insights/stories/indias-ctv-growth-story-in-numbers.html (accessed on 13th October 2026)

[29] Report by MUVI titled as 'FAST Forward: Projecting the explosive growth of FAST Channels from 2024 to 2027' available at https://www.muvi.com on registration

[30] https://www.ey.com/content/dam/ey-unified-site/ey-com/en-in/insights/media-entertainment/documents/ey-stories-scale-and-impact-unlocking-indias-media-and-entertainment-economy.pdf (accessed on 13th October 2026)

distribution, requiring an appropriate regulatory framework that promotes innovation while ensuring consumer protection, content accountability and regulatory parity.

F. Consultation on 'ALTD Service': Ecosystem and Stakeholders

1.31 Based on the MIB reference, representations and interactions held with stakeholders by TRAI, it has been observed that provisioning of internet-based linear television services has evolved beyond the conventional concept of FAST Services. Such services are presently offered through a diverse ecosystem involving television manufacturers, OS providers, application providers, content aggregators, broadcasters and website operators.

1.32 The Authority notes that the term 'FAST', i.e., Free Ad-Supported Streaming Television, has gained widespread acceptance to describe Internet-based platforms offering linear TV channels, primarily supported through advertising. However, the defining characteristics of these services lie neither in their free of charge availability nor in their advertising-based monetisation model. While such services are presently offered largely without subscription charges and are monetised predominantly through advertising, their underlying commercial models continue to evolve and may in future incorporate subscription-based, hybrid or other forms of monetisation. Consequently, the term 'FAST' may not adequately capture the evolving nature and commercial models of such services.

1.33 The Authority has further noted that such services are no longer confined to applications pre-installed on TV sets. They are increasingly accessible through a wide range of Internet-connected devices, either as pre-installed applications or downloadable through application stores or being integrated by the OS provider

itself. The common characteristic of these services is, therefore, neither the business model for service provisioning nor the device on which they are accessed, but the activity of making linear television channels available to consumers through an application over the Internet.

1.34 In view of above, the Authority has adopted broader and technology-neutral expression '**Application-based Linear Television Distribution Service**' or '**ALTD Service**' to describe these services. The term encompasses all application-based services involving aggregation and distribution of linear television channels over IP-based networks, irrespective of the category of service provider, mode of access or the underlying business model. 'FAST Services' being one form of application-based linear television distribution, are included in 'ALTD Service'.

1.35 The Authority, accordingly, on 6th April 2026, issued a Consultation Paper on 'Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services)' [hereinafter referred to as 'ALTD Consultation Paper']. Written comments were invited from the stakeholders by 4th May 2026 and counter-comments by 18th May 2026. The last date of receiving comments and counter-comments was later extended to 11th May 2026 and 25th May 2026 respectively on stakeholders' request. 207 comments and 11 counter-comments were received from various associations, broadcasting companies, platform providers, technology companies, consumer advocacy groups and individuals.

1.36 An Open House Discussion (OHD) was held on 10th June 2026. The comments, counter-comments and OHD deliberations have been analysed and considered while framing these recommendations.

1.37 Based on various reports and stakeholder consultation, it is observed that ALTD applications are engaged in delivery of the following services to consumers:

i. **Linear television channels** wherein TV channels are delivered over internet-based networks in scheduled programming format.

ii. **Value-added services** in the form of on-demand content, which includes non-linear content.

1.38 The delivery of 'ALTD Service' to consumers is operationally enabled through TV set or mobile device or web applications. These applications may come pre-installed on smart TVs, made available for download through application stores provided by OS providers or accessed through web browser. Irrespective of the access mode, the application serves as the medium through which TV channels are made available to end-users.

1.39 The operational business models can be broadly characterized as:

i. **Device-integrated model**: wherein ALTD service is delivered through applications embedded within proprietary platforms of television manufacturers, with the application layer being pre-integrated and controlled at the device level.

ii. **Platform-operated model**: wherein ALTD service is delivered through applications operated by platform providers or OS providers, which aggregate, curate the Electronic Programme Guide (EPG), insert ads and distribute linear television channels across connected devices.

iii. **Aggregator-driven model**: wherein third-party technology/ solution providers aggregate TV channels, curate EPG, do ad-insertion and supply this curated product to application platforms for distribution through their application interface.

iv. **Web-enabled model:** wherein access to linear TV channels is provided through browser-based interfaces, which enable display over internet-based environments without requiring installation of a native application. In such configurations, web applications replicate application-like functionality while operating through web-based architectures.

1.40 Based on various reports and stakeholder consultations, it has been observed that following categories of stakeholders are involved in offering 'ALTD Service':

i. **Television manufacturers:** who manufacture smart television devices and, in certain cases, integrate or pre-install applications enabling access to ALTD Service.

ii. **Television and consumer equipment distributors**: who procure and distribute smart TV devices in the Indian market, including devices capable of accessing ALTD applications.

iii. **Operating system providers**: who supply software environment for smart TVs and connected devices and provide system level interfaces and application stores through which ALTD applications are made available.

iv. **Application providers**: who operate the applications through which ALTD Service is delivered to consumers. These entities aggregate and present linear television channels, along with advertisements and in certain cases, value-added content. Content aggregation functions are done at application or platform level, either directly or through arrangements with content partners.

v. **Broadcasters and content providers**: whose television channels and programmes are made available on ALTD

applications, including permitted TV channels distributed through traditional authorised broadcasting platforms.

vi. **Website owners and web-based service providers**: who facilitate access to linear television channels through browser-based interfaces, including websites and progressive web applications (PWAs)[31].

1.41 It is noted that stakeholders mentioned above participate in the ALTD service ecosystem in different combinations, depending on the business and operational model adopted. In certain arrangements, a single entity may perform multiple functions including device enablement, platform operation and content aggregation, while in other arrangements these functions are distributed across different entities through contractual or commercial relationships. An indicative diagram of the ALTD ecosystem players is given in **Figure 1.1**.

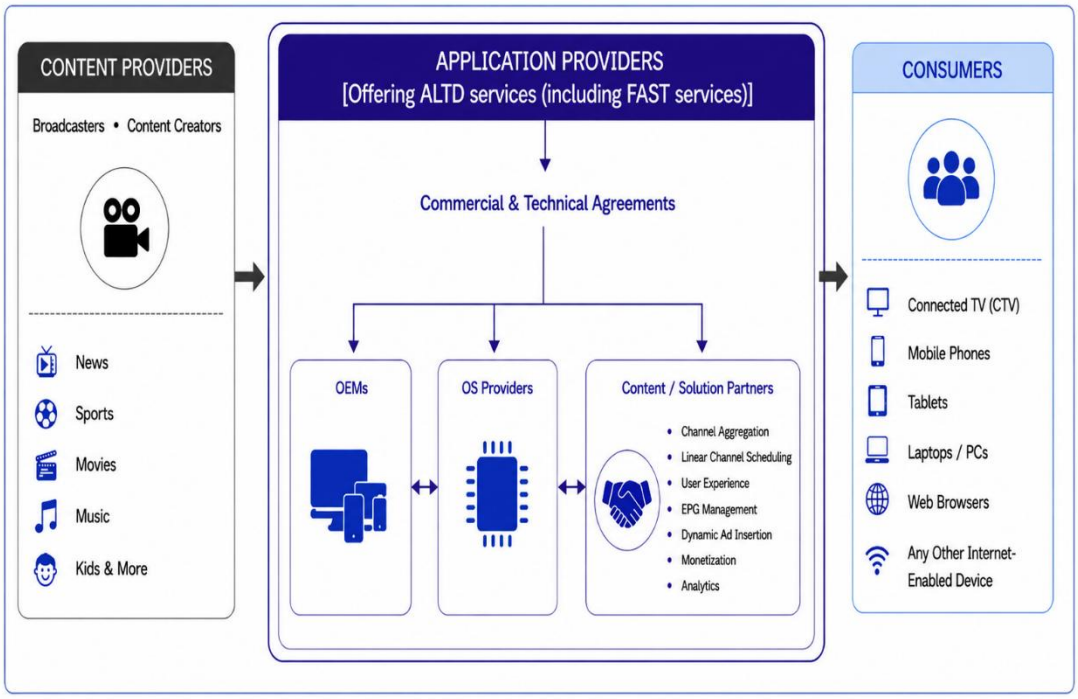


Figure 1.1: ALTD ecosystem participants

[31] Progressive Web Apps (PWAs) are web applications that use modern browser capabilities to deliver an app-like experience.

1.42 **Figure 1.1** illustrates the broad ecosystem of 'ALTD Service' stakeholders. On one side are the content providers, including broadcasters and other content creators, who produce linear television channels across various genres such as general entertainment, sports, movies, music etc. These channels are made available to application providers through commercial arrangements. Application provider acts as the central aggregator, bringing together TV channels from multiple content providers and broadcasting them to consumers.

1.43 To deliver 'ALTD Service', the application provider enters into commercial and technical arrangements with original equipment manufacturers (OEMs), OS providers and other technology or content solution partners.

1.44 The flow of linear television channels from broadcasters and content providers to end users through an ALTD application is depicted in **Figure 1.2**. It shows how content is received from content providers, organised at application platform level, and then delivered to users over wired or wireless networks. It indicates that ALTD application carries out content aggregation and platform management functions, including bringing together linear television channels, organising them into channel-based services and making them available to users through applications.

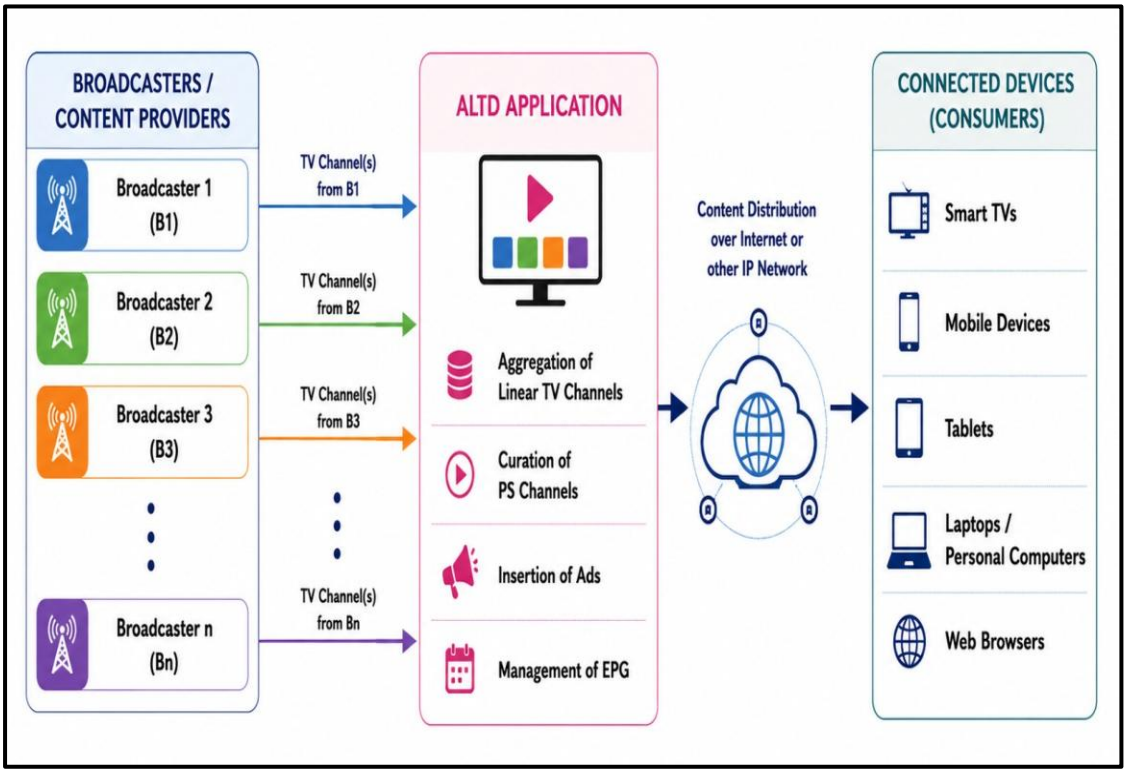


Figure 1.2: Flow of Linear television distribution over through ALTD application

1.45 'ALTD Service' operate through an application-centric distribution architecture wherein linear television channels from multiple broadcasters and content providers are aggregated using a common application platform which is termed as '**ALTD Application**' or '**ALTD App**'. The application provider enters into commercial arrangements with broadcasters and other content providers to onboard their television channels and make them available through a single consumer interface. Unlike conventional broadcasting distribution platforms that rely on dedicated transmission infrastructure, 'ALTD Service' utilise software applications operating over the public Internet.

1.46 ALTD application serves as the principal interface between content providers and consumers. Besides aggregating linear television channels, the application performs several key functions, including

curation of Platform Service (PS) channels, if any, management of EPG, utilisation of ad-markers[32] embedded by the broadcasters to enable Dynamic Ad Insertion[33] (DAI), organisation of television channel listings to facilitate content discovery and enhance the consumer viewing experience. The application provider, therefore, plays a central role in aggregation, presentation and distribution of television channels to end users.

1.47 Consumers can access 'ALTD Service' through a variety of internet-enabled devices, including smart TVs, mobile phones, tablets, laptops, personal computers and web browsers. The application provides consistent viewing experience across multiple device categories.

G. The Present Recommendations

1.48 Based on comments and counter-comments received, inputs gathered from the stakeholders during OHD and its own analysis, the Authority has finalised these recommendations, divided into four chapters. These chapters provide a detailed description of the issues, brief of stakeholders' comments and the Authority's view, analysis and the recommendations thereupon.

1.49 **Chapter I** provides the details of the MIB reference received, an overview of the existing distribution services, introduction of 'ALTD Service' ecosystem, stakeholders involved and business models through which such services are delivered and details of the consultation process.

[32] Ad markers are digital bookmarks inserted into a broadcast video stream. They tell ad systems exactly when a commercial break starts and ends.

[33] Application Provider inserts advertisements into the designated ad breaks in the television stream, replacing generic stream content with targeted commercials in real-time.

1.50 **Chapter II** examines and recommends the authorisation framework for 'ALTD Service'. The chapter defines 'ALTD Service' and provides its terms and conditions. It further provides the gist of stakeholders' comments received on questions raised in the consultation paper, analysis of the issues and the recommendations thereon.

1.51 **Chapter III** provides recommendations on the obligations of OEMs including television manufacturers, OS providers and the broadcasters/content owners of the television channels distributed through ALTD applications. The chapter also analyses and recommends other related aspects of the authorised entities offering 'ALTD Service'.

1.52 **Chapter IV** provides the summary of recommendations.

CHAPTER II: Authorisation framework for 'ALTD Service'

2.1 As discussed in the Chapter I, TRAI upon receiving reference from MIB, had issued 'ALTD Consultation Paper', inviting comments and counter-comments from the stakeholders. The consultation paper examined emergence of ALTD applications.

2.2 It has been noted that such services, while delivered through ALTD applications, perform functions similar to linear television channel distribution, including carriage of multiple linear channels, ad-insertion and monetisation, placement of channels in EPG and consumer facing service management. Accordingly, 'ALTD Consultation Paper' sought comments on various aspects related to definition, scope, authorisation framework, consumer protection and audience measurement for 'ALTD Service'.

2.3 The objective is to formulate an appropriate regulatory framework balancing innovation, ease of doing business, consumer protection, content accountability, orderly growth of the sector and parity across comparable modes of distribution. Further, in the process of consultation, TRAI received written comments and counter-comments from a wide range of stakeholders. An OHD was also conducted to obtain stakeholder feedback.

2.4 The issues raised in the 'ALTD Consultation Paper', summary of stakeholders' comments and counter comments, views of the Authority and recommendations thereon are discussed in this chapter.

A. Introduction of 'ALTD Service' under authorisation framework

2.5 The regulatory framework governing broadcasting services in India has evolved over several decades through a combination of statutory enactments, policy guidelines and regulatory measures issued by the Central Government, as discussed in Chapter I. Traditionally, the Central Government, through MIB, has been granting licences, permissions and registrations for various broadcasting services under the provisions of the Indian Telegraph Act, 1885[34].

2.6 These services, *inter alia,* include uplinking and downlinking of television channels, teleports, DTH, HITS, IPTV, cable TV, FM radio broadcasting, Community Radio Stations (CRS) and other broadcasting services. Over the years, these policies have facilitated orderly growth of the sector by prescribing eligibility conditions, technical standards, operational obligations and other appropriate regulatory requirements.

2.7 Two distinct regulatory perspectives were discernible from the stakeholder comments received regarding ALTD services. Existing DPOs, a few broadcasters and consumer associations advocated for regulatory parity for similar services, contending that existing asymmetry places permitted DPOs at a competitive disadvantage. In contrast, some stakeholders including application providers and some broadcasters opposed extension of existing regulatory framework to Internet-based service delivery, arguing that such services differ fundamentally in technological architecture, business models and mode of operation, therefore, warrant a separate regulatory approach.

[34] https://www.trai.gov.in/sites/default/files/2024-10/Indian_Telegraph_Act_1885.pdf (accessed on 13th October 2026)

2.8 Some stakeholders' submissions indicated support for recognising ALTD service as a distinct category within the broadcasting ecosystem. Such stakeholders emphasised that these platforms have evolved beyond mere content discovery or aggregation and are increasingly performing the core function of broadcasting, that is, making linear TV channels available to consumers through applications. According to them, regulatory treatment of such services should be guided by the function performed rather than the technology deployed for service delivery.

2.9 While the section of stakeholders opposing the proposed regulatory framework submitted that 'ALTD Service' is an application-layer service operating over public Internet and, therefore, does not constitute either a telecommunication service under the Telecommunications Act, 2023 or a broadcasting service under the regulatory framework administered by MIB and TRAI. They contended that ALTD application providers neither own nor operate telecommunication networks nor undertake the transmission of signals but merely utilise the underlying infrastructure of licensed telecom and Internet service providers.

2.10 These stakeholders further submitted that linear presentation of content in a channel-like format is merely a mode of Internet-based content delivery and does not alter its character as an OTT service. Accordingly, they argued that 'ALTD Service' should continue to be governed under the existing legal framework applicable to digital and Internet-based services, which is the Information Technology Act, 2000, the rules framed thereunder, and other applicable consumer protection laws, rather than being subject to a broadcasting or telecom authorisation framework.

2.11 The Authority notes the divided views expressed by stakeholders on the applicability of the authorisation framework of 'ALTD Service'.

Before examining the necessity or contours of an authorisation framework, it is essential to first determine the true nature of the service, address the jurisdictional issue and ascertain whether the activities undertaken by such entities are, in substance, those of a television channel distribution service. Accordingly, the Authority has examined the legal and functional character of 'ALTD Service' in light of relevant legal and statutory provisions to determine whether it constitutes a broadcasting service, in particular, a television distribution service under the proposed authorisation framework.

Broadcasting and Cable Services as Telecommunications Services

2.12 Broadcasting services were brought within the regulatory ambit of TRAI through an executive order. In exercise of powers under Section 2(1)(k) of the TRAI Act, 1997, the Central Government, vide Gazette Notification No. S.O. 44(E) dated 9th January 2004, notified broadcasting services and cable services as telecommunication services, thereby bringing broadcasting services under the jurisdiction of TRAI.

Definitions under the Telecommunications Act, 2023

2.13 The enactment of the Telecommunications Act, 2023 marks a significant milestone in the evolution of the legal framework governing telecommunication services in India. The Act seeks to provide a modern legislative framework that facilitates orderly development of the telecommunications sector, promotes regulatory certainty, ensures efficient management and utilization of spectrum, and addresses the evolving requirements of the telecommunications ecosystem. There is a significant shift from the traditional "Licence" regime under the Indian Telegraph Act, 1885 to an "Authorisation" regime under the Telecommunications Act, 2023. The Act defines "authorisation" to mean a permission, by whatever name called,

granted under the Act for providing telecommunication services, establishing, operating, maintaining or expanding telecommunication networks, or possessing radio equipment.

2.14 Section 3(1) of the Telecommunications Act, 2023 enabling authorisation for telecommunications services is reproduced below:

*'**3.** (1) Any person intending to—*

(a) provide telecommunication services;

(b) establish, operate, maintain or expand telecommunication network; or

(c) possess radio equipment, shall obtain an authorisation from the Central Government, subject to such terms and conditions, including fees or charges, as may be prescribed.'

2.15 The Telecommunications Act, 2023 provides the definitions for 'message', 'telecommunication', 'telecommunication equipment', 'telecommunication network' and 'telecommunication service' vide Sections 2(g), 2(p), 2(q), 2(s) and 2(t) respectively, which are reproduced below:

'2(g) "message" means any sign, signal, writing, text, image, sound, video, data stream, intelligence or information sent through telecommunication;

2(p) "telecommunication" means transmission, emission or reception of any messages, by wire, radio, optical or other electromagnetic systems, whether or not such messages have been subjected to rearrangement, computation or other processes by any means in the course of their transmission, emission or reception;

2(q) "telecommunication equipment" means any equipment, appliance, instrument, device, radio station, radio equipment, material, apparatus, or user equipment, that may be or is being

used for telecommunication, including software and intelligence integral to such telecommunication equipment; and excludes such equipment as may be notified by the Central Government;

2(s) "telecommunication network" means a system or series of systems of telecommunication equipment or infrastructure, including terrestrial or satellite networks or submarine networks, or a combination of such networks, used or intended to be used for providing telecommunication services, but does not include such telecommunication equipment as notified by the Central Government;

2(t) "telecommunication service" means any service for telecommunication;'

2.16 The Authority has examined the aforesaid definitions in the context of 'ALTD Service'. A joint reading of "message", "telecommunication" and "telecommunication service" classifies 'ALTD service' as a 'telecommunication service'. The definition of **"message"** under Section 2(g) expressly includes any sign, signal, writing, text, image, sound, video, data stream, intelligence or information transmitted through telecommunication. The television channels distributed through 'ALTD Service' comprises of audio-visual content together with associated data streams and therefore constitute "message".

2.17 Further, Section 2(p) defines **"telecommunication"** to mean the transmission, emission or reception of any message by wire, radio, optical or other electromagnetic systems, irrespective of whether such messages are subject to rearrangement, computation or other processing during transmission and **"telecommunication service"** as *"any service for telecommunication".* 'ALTD Service' deliver linear television channels over public Internet or other IP-based networks through software applications. Such delivery inherently involves the

transmission, emission and reception of messages through optical fibre, wireless broadband and other communication systems, and therefore, can be considered as "telecommunication service" under the Act.

2.18 In view of the foregoing, the Authority is of the considered opinion that 'ALTD Service' constitute a telecommunication service as per provisions of the Telecommunications Act, 2023. Since the service essentially involves the distribution of linear television channels, it appropriately falls in the category of **Broadcasting Services** under authorisation framework envisaged under the Act. The Authority, therefore, finds no merit in the contention of some of the stakeholders that such services do not constitute broadcasting services.

2.19 The contention advanced by these stakeholders that ALTD/FAST services are merely an extension of internet-based OTT ecosystem, and that delivery over Internet is itself sufficient to place them outside the broadcasting regulatory framework is misplaced. The transport layer through which a service is delivered is a technological attribute and does not, by itself, alter the essential character of the service offered to consumer. What is determinative is the nature of the content experience, which, in this case is linear television channels presented in a manner that replicates traditional television viewing, and not the medium of transmission. To hold otherwise would allow the regulatory treatment of a service to be dictated by the choice of distribution technology rather than by its functional substance, an outcome inconsistent with the principle of technology neutrality and the objective of ensuring parity among platforms offering materially similar services.

ALTD application provider as a Distribution Service Provider requiring Authorisation under the Telecommunications Act

a. Definitions recommended in 'Authorisation Recommendations'

2.20 TRAI in 'Authorisation Recommendations', has recommended the terms and conditions of authorisation for various broadcasting services. Recommended framework classifies broadcasting services into three principal categories, namely 'Television Channel Broadcasting Services', 'Television Channel Distribution Services' and 'Radio Broadcasting Services'. The classification has been consciously designed on a function-based approach, wherein services performing similar functions are grouped under a common service category, irrespective of the technology employed for delivering such services.

2.21 The recommendations provide the definitions of 'Broadcaster', 'Broadcasting Services', 'Terrestrial Communication Medium' and 'Ground infrastructure', as per the following:

*"**Broadcaster**" means a person or a group of persons, or body corporate, or any organization or body who, after having obtained, in its name, authorisation from the Central Government, is providing programming services;*

*"**Broadcasting Services**" means the dissemination of any programme(s) through terrestrial or satellite communication medium or a combination of both, intended to be received by the users, either directly or indirectly and all its grammatical variations and cognate expressions shall be construed accordingly;*

*"**Programme**" means any message which is transmitted using a terrestrial or satellite communication medium or a combination of both, intended to be received by the user, and includes but not limited to-*

(i) exhibition of films, features, dramas, documentaries, advertisement and serials;

(ii) News & Current Affairs, Non-News & Current Affairs, educational content;

(iii) any audio or visual or audio-visual live performance or presentation or pre-recorded content;

and the expression "Programming Services" shall be construed accordingly;

*"**Terrestrial Communication Medium**" means a communication medium using ground infrastructure, which includes but is not limited to wireline (e.g. cable/fibre, etc.)/wireless (e.g. cellular/microwave/Wi-Fi, etc.)/internet/cloud or any other equipment/system other than satellite medium;*

*"**Ground infrastructure**" means the facilities and systems comprised of communication network nodes (e.g. switches, routers, servers and/or transmission systems, etc.) and the means to connect them (e.g., wireline (cable/fibre) including underground cable/fibre, etc.) or wireless (e.g. cellular/microwave/Wi-Fi, etc.)/internet/cloud, etc. for the purpose of communication between two points;*

*"**Television Channel**" means a channel, which has been granted authorisation for broadcasting services by the Central Government;*

b. <u>Definitions under MIB's Draft Telecommunications (Television, Radio and Associated Services) Rules, 2026</u>

2.22 These recommendations are under consideration of the Government. The draft Rules have been published by MIB on 12th

June 2026[35] and a revised version on 2nd September 2026[36] for stakeholder consultation. The revised version of rules defines "broadcasting service", "television channel" and "programme", on similar lines, as:

*"**broadcasting service**" means a telecommunication service in which programmes are transmitted, directly or indirectly, for simultaneous reception by users, and all its grammatical variations and cognate expressions shall be construed accordingly*

"***television channel***" *means broadcast of programme in linear manner;*
Explanation: 'programmes in linear manner' refer to programme that is transmitted in a fixed, time-bound sequence decided by the authorised entity for the television channel, not chosen by the viewer.

*"**programme**" means any message comprising audio, visual, or audio-visual content intended for broadcasting, and it may include exhibition of films, features, dramas, documentaries, advertisements and serials, as well as any audio, visual or audio-visual live performance, presentation, or prerecorded message;*

2.23 Further in the types of Authorisations, the following has been mentioned:

'Television channel comprises news channel and non-news channel, broadcast through satellite transmission medium or terrestrial transmission medium, which may be provided to —

[35] https://mib.gov.in/sites/default/files/2026-06/draft-rules-for-consultation-dated-12th-june-2026.pdf

[36] https://www.mib.gov.in/sites/default/files/2026-09/g.s.r-773-e-the-draft-telecommunications-television-radio-and-associated-services-rules-2026.pdf (accessed on 13th October 2026)

(a) an authorised entity for television channel distribution services;
(b) a multi-system operator; or
(c) an internet protocol television service provider,
for further re-transmission to its users.'

2.24 A conjunctive reading of these definitions indicates that the determinative element of a "broadcasting service" is not the mode of transmission but two functional attributes: (i) transmission of a "programme", a term defined broadly enough to encompass virtually any audio, visual or audio-visual content, whether live or prerecorded; and (ii) delivery of such programme for simultaneous reception by users. The definition of "broadcasting service" proposed by MIB is technology-neutral and applies to transmission "directly or indirectly" and is not confined to any particular mode of delivery such as terrestrial, satellite or cable infrastructure. Notably, the definition of "broadcasting service" prescribed in TRAI recommendations also focuses on dissemination of any programme intended to be received by users, either directly or indirectly, and encompasses all transmission medium including internet. Further, the authorisation details specify that "television channel" comprises of news channel and non-news channel which are broadcast through the satellite or terrestrial transmission medium.

2.25 This is consistent with the Authority's view, set out in the preceding paragraphs, that the defining characteristic of ALTD/FAST Services is the functional equivalent of the manner of distribution of linear television, and not their delivery over the internet, or their pricing model, or absence of a subscription fee. By contrast, OTT/on-demand services, where content is accessed at a time and in a sequence chosen by the viewer rather than transmitted for simultaneous reception, would not meet the "linear" and "simultaneous reception" elements of these definitions. The definitions in draft Rules are thus aligned to the Authority's

recommendation that 'ALTD Service' be regulated as a distinct category of distribution services, separate from OTT services.

2.26 Both the TRAI 'Authorisation Recommendations' and MIB draft Rules emphasise the essential attributes of a broadcasting service, which is transmission of programmes and simultaneous reception by users. Television channels as per definition implies broadcasting of programmes in a linear manner for simultaneous reception by users. 'ALTD Service' as discussed in Chapter I primarily involves aggregation and distribution of linear television channels which are received simultaneously by users.

2.27 Further, the definitions of 'Distribution Service Provider (DSP)' and 'Television Channel Distribution Services' in 'Authorisation Recommendations' reproduced under enables provisions for other type of distribution services:

> *"Distribution Service Provider (DSP)" shall mean 'Distribution Platform Operator (DPO)' and includes Direct-to-Home (DTH) service provider, Head-end In The Sky (HITS) service provider, Internet Protocol Television (IPTV) service provider, Multi-System Operator (MSO) or any other service provider engaged in distribution of* programme(s)/television channel(s) *to the users;'*
>
> *"Television Channel Distribution Services" means and includes 'Direct-to-Home Service', 'Head-end In The Sky Service' and 'Internet Protocol Television Service' or any other service as notified by the Central Government from time to time;*

2.28 These definitions are broad and technology-neutral to include both existing and future modes of distribution and hence 'ALTD Service' qualifies to be authorised under the Telecommunications Act, 2023 and can be suitably placed under the category of 'Television Channel Distribution Services' based on the principles of functional

equivalence and technology neutrality. Further, 'ALTD Application Provider' can be considered as a 'Distribution Service Provider'.

2.29 The present exercise has been undertaken pursuant to a reference from MIB to provide its recommendations, under Section 11(1)(a) of the TRAI Act, 1997 for the formulation of an appropriate regulatory framework governing FAST Services in India.

2.30 Section 11(1)(a) reproduced below mentions the functions of Authority:

'…

(a) make recommendations, either suo motu or on a request from the licensor, on the following matters, namely:

(i) need and timing for introduction of new service provider;

(ii) terms and conditions of licence to a service provider;

…'

2.31 In this case, MIB reference seeks TRAI recommendations for the introduction of a new service provider, here 'ALTD Application Provider' and its corresponding terms and conditions.

2.32 The scope of 'ALTD Service' remains limited to aggregation and distribution of linear TV channels. The Authority is of the considered view that ALTD Service, including FAST Service, are conceptually and functionally distinct from OTT (on-demand) services and ought not to be conflated with the latter for regulatory purposes. Unlike OTT/VOD platforms, where the viewer actively selects individual content from a library at a time of their choosing, in 'ALTD Service', the consumer does not determine the sequence or timing of the content; rather, the service provides a continuous viewing experience like that of a conventional distribution platform, albeit through Internet-based applications. From the standpoint of

consumers, ALTD services are functionally indistinguishable from those distributed through DTH, cable or IPTV.

2.33 From the perspective of broadcasters, ALTD applications serve an additional mode of distribution of television channels. Such apps include distribution of linear TV channels that are permitted by MIB for distribution on DTH, HITS, Cable TV and IPTV. Further, it is observed that ALTD services include certain channels which are internet-native and do not have any approval from the Central Government. This is a regulatory gap, as any content that is broadcast in India should have oversight of the Central Government.

2.34 The objective to bring 'ALTD Service' within the authorisation framework is to ensure that entities engaged are subject to an appropriate degree of regulatory accountability commensurate with their functions.

2.35 For ease of processes in the governance of authorisation, it would be useful to establish an online portal to facilitate the end-to-end process for approvals related to 'ALTD Service', including submission and processing of authorisation applications, registration of 'Internet-native linear television channel' and compliance-related reporting.

2.36 Therefore, the Authority is of the considered view that 'ALTD Service' should be recognised as a distinct sub-category of 'Television Channel Distribution Service' under the authorisation framework recommended under the Telecommunications Act, 2023. **Figure 2.1** depicts this classification and the placement.

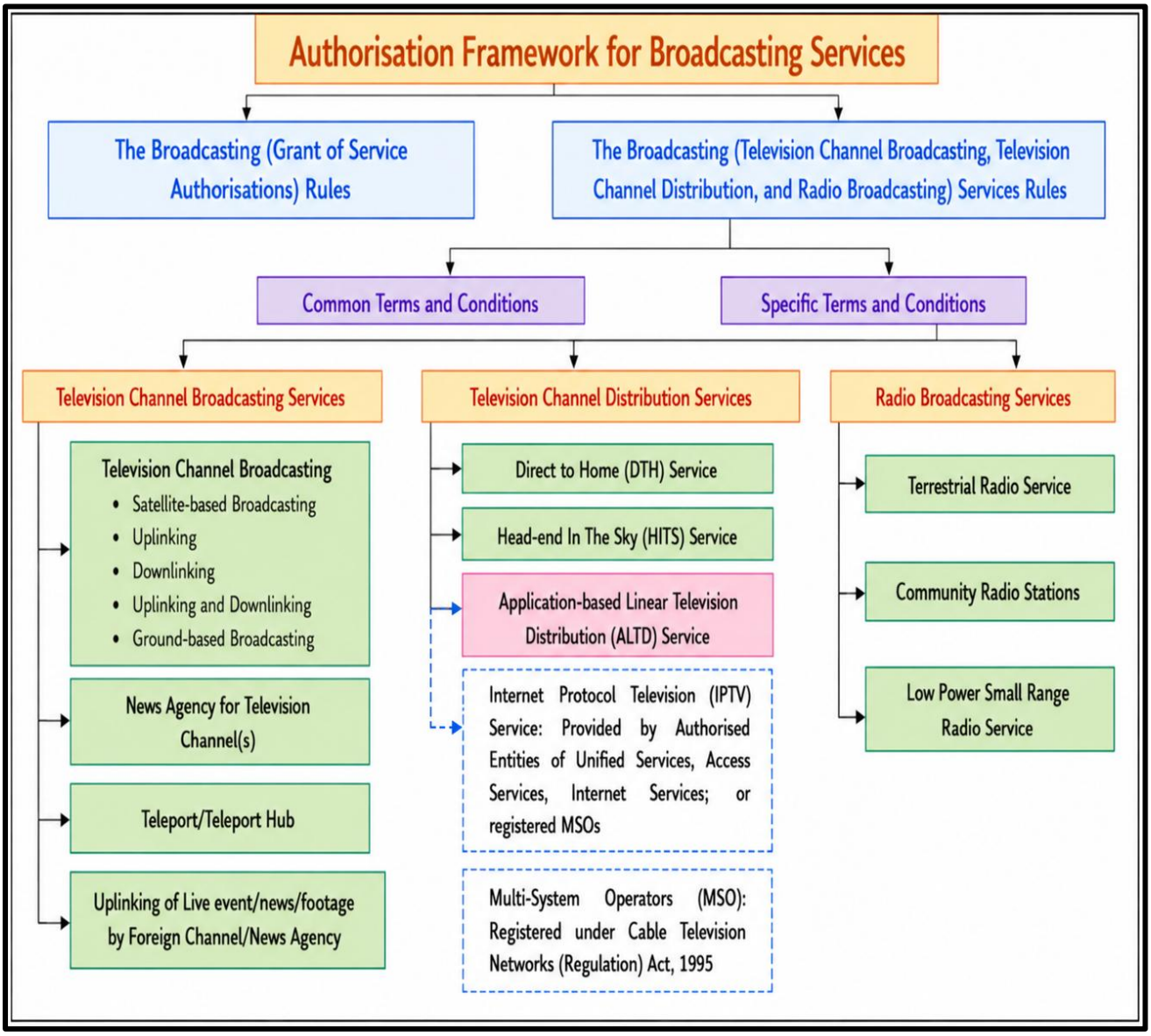


Figure 2.1: Introduction of 'ALTD Service' in authorisation framework

2.37 In view of above, **the Authority recommends that:**

a. An authorisation of 'Application-based Linear Television Distribution (ALTD) Service' should be introduced under Section 3(1)(a) of the Telecommunications Act, 2023, as a sub-category of 'Television Channel Distribution Services'

under the recommended authorisation framework for broadcasting services[37].

b. The terms and conditions for such 'ALTD Service' authorisation should be notified as Rules under Section 56 of the Telecommunications Act, 2023, and the authorised entity shall be required to abide by such Rules.

c. The Central Government shall enable the process of authorisation application, channel registration and reporting through an online portal.

B. Definition and Scope of 'ALTD Service'

2.38 Television channel is the broadcast of programme in a linear manner referring to programme that is transmitted in a fixed, time-bound sequence decided by the authorised entity for the television channel, not chosen by the viewer. Since ALTD apps are also retransmitting television channels containing programme in linear manner, they are essentially acting as a DSP.

2.39 Some countries like United Kingdom, Canada, Australia and Italy through their official documents or reports, enunciated various definitions or terminologies to describe FAST channels or services, which have been mentioned in the 'ALTD Consultation Paper'.

2.40 The document titled 'Future of TV distribution' published by the Office of Communications (OfCom), United Kingdom on 17th October 2023[38], provided the definition of FAST channels in footnote number 11 of the document as under:

[37] TRAI Recommendations on 'Framework for Service Authorisations for Provision of Broadcasting Services under the Telecommunications Act, 2023' dated 21st February 2025.

[38] https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/269636-call-for-evidence-future-of-tv-distribution/associated-documents/call-for-evidence-future-of-tv-distribution?v=330282 (accessed on 13th October 2026)

'Free Ad-Supported Streaming Television (FAST) channels are linear channels that viewers access to watch TV shows, films, and other content without paying a subscription fee. These channels generate revenue through advertising.'

2.41 The Canadian Radio-television and Telecommunications Commission (CRTC), while highlighting the audience measurement data[39] for broadcast radio, linear television and audiovisual streaming, provided definition for FAST channels under Video Audience Measurement section as:

'Free Ad-Supported TV (FAST) refers to Connected TV video platforms that are typically free to watch, are advertising-supported, and provide linear channels and on-demand programming together.'

2.42 The Australian Communications and Media Authority (ACMA) in its '2025 Annual ACMA Consumer Survey #1 – Broadcasting, Online Content and News Questionnaire' issued on 21st April 2025 provided the following definition on FAST channels:

'FAST services are subscription-free streaming services that play live video content continuously like a traditional TV channel, but it is delivered via the internet. Some services may also offer advertising-based video on demand content.'

2.43 The Autorità per le Garanzie nelle Comunicazioni (the Italian Communications Regulatory Authority) issued the first two authorizations for the provision of audiovisual media services to a distributor network for two FAST channels on 19th March 2025[40] and defined FAST channels as under:

[39] https://crtc.gc.ca/eng/publications/reports/PolicyMonitoring/audmetho.htm (accessed on 14th October 2026)
[40] https://www.agcom.it/node/44196/printable/print (accessed on 14th October 2026)

'These are free-to-air linear television channels of the so-called Fast Channels type, which broadcast via IP protocol and are therefore accessible exclusively on Internet-connected TVs.'

2.44 Given the increasing adoption of such services and the absence of a uniform definition across jurisdictions, 'ALTD Consultation Paper' sought stakeholders' comments on the appropriate definition and scope of 'ALTD Service'. Accordingly, the following question was raised:

Q1. What should be the appropriate definition and scope of Application-based Linear Television Distribution Services, i.e., 'ALTD Services' in the Indian broadcasting context, taking into account terminologies available internationally? Stakeholders are requested to provide their comments with detailed justification.

Summary of stakeholders' comments on Q1

2.45 In response to Q1, stakeholders provided comprehensive comments on definition and scope. Their submissions covered various aspects, including nature of service, entities involved, mode of delivery and distinguishing features of 'ALTD Service' vis-à-vis other internet-based services. There has been considerable diversity of functional attributes, operational architecture and stakeholder ecosystem that should be reflected in the definition of the service.

2.46 Stakeholders supporting the inclusion of 'ALTD Service' in the authorisation framework suggested broadly similar definitions, albeit with variations in terminology and emphasis. The common thread running through stakeholder submitted definitions is that 'ALTD Service' involves aggregation and distribution of linear television channels over public Internet or other IP-based networks through applications, websites or similar consumer interfaces

accessible across connected devices. Many stakeholders recognised that such services may also include value-added services, having on-demand audio-visual content, and may be offered under advertising-supported, subscription-based or hybrid business models.

2.47 Several stakeholders emphasised that 'ALTD Service' should be characterised by distribution of linear TV channels through applications that are owned, operated or managed by an identifiable application provider. According to these stakeholders, application providers possess the requisite rights for distribution of TV channels and exercise operational control over aggregation, organisation and presentation of service to end users. Some stakeholders also highlighted the need to maintain a clear distinction between the application platform and broadcasters or content providers whose channels are carried on such platforms.

2.48 Divergent views were expressed regarding the appropriate nomenclature of the proposed service. While one stakeholder suggested retaining the term 'FAST Services', considering its wider industry recognition, another suggested that the expression 'Application-based Media Services' reflects availability of such services across multiple internet-enabled devices beyond television sets. One stakeholder stated that in addition to defining the service, the corresponding entities involved in content aggregation and distribution activities should also be defined.

2.49 On the other hand, stakeholders not in favour of the proposed authorisation framework contended that 'ALTD Service' are application-layer services operating over public Internet and should not be brought within the ambit of broadcasting regulatory framework. They stated that regulatory interventions relating to FAST Services in jurisdictions such as UK, Canada and Italy remain

limited in scope and are primarily confined to connected television environments. According to these stakeholders, there is no demonstrable market failure warranting regulatory intervention, and regulating them could create unnecessary entry barriers, adversely affecting innovation and investment.

2.50 Stakeholders hailing from manufacturing industry submitted that OEMs, TV manufacturers and OS providers provide platform or operating environment and do not exercise control over the content distributed through third-party applications. Such entities should be excluded from the scope of 'ALTD Service'.

2.51 It was also suggested by them that the definition should exclude streaming platforms primarily offering on-demand content with incidental live or linear features, social media platforms carrying live streams and broadcasters' own websites or applications distributing their own channels. However, a streaming platform may qualify as an ALTD service, if it provides a dedicated linear television programming service functionally equivalent to an ALTD offering.

Analysis of the issues

Definition of 'ALTD Service'

2.52 The Authority has carefully considered the stakeholders comments. There has been a significant transformation in television channel distribution in recent years. While conventional TV distribution has historically relied upon managed broadcasting networks, advances in internet connectivity and software-based delivery mechanisms have enabled application-based interfaces. Such technological evolution affects only the medium through which the service reaches the consumer and does not alter the fundamental nature of the service.

2.53 The Authority is of the view that any definition should reflect the nature of the service, viz., aggregation and distribution of linear television channels, rather than focusing on the underlying transmission technology. Such an approach would ensure that regulatory framework remains technology neutral adaptable to technological evolution, without requiring frequent amendments.

2.54 At the same time, the Authority notes that the proposed framework should not be predicated upon any particular consumer interface or access mechanism. Whether the service is accessed through an internet-native application, a web-based interface or any other future software environment, or whether it is viewed on a connected TV, mobile handset, tablet, personal computer or any other internet-enabled device, the underlying service remains the same. The regulatory treatment of a service should be form factor agnostic and should not vary merely because consumers have different means of accessing it.

2.55 Having regard to the foregoing, the defining attribute of an 'ALTD Service' lies in its role as a platform through which linear television channels are brought together and made available to viewers over public Internet or other IP-based networks. The proposed definition, therefore, needs to identify the service by reference to its functional identity rather than its technical implementation, thereby ensuring that it remains equally applicable over time as delivery technologies continue to change and evolve.

2.56 Some ALTD apps also offer value-added services through the same application or consumer interface. However, their inclusion is an additional feature and does not alter the principal function of the ALTD application which is aggregation and distribution of linear television channels. The Authority notes that several stakeholders emphasised the need to clearly distinguish 'ALTD Service' from

video-on-demand services, social media platforms and other Internet-based content services. The examination of such value-added services is beyond the scope of this present consultation.

2.57 Accordingly, **the Authority recommends that 'ALTD Service' should be defined as:**

'Application-based Linear Television Distribution (ALTD) Service' means aggregation of linear television channels that have been approved by the Central Government, including 'Internet-native linear television channels' (with approved name and logo), along with ALTD application provider's own platform service channels, and its distribution to the users, with or without value-added services including on-demand audio-visual content, over public Internet or other IP-based networks through applications, websites or any other similar consumer interface, accessed through Internet-enabled devices.

<u>Scope of 'ALTD Service</u>'

2.58 Having considered the comments received during the consultation process and its own analysis, the Authority is of the view that scope for 'ALTD Service' would need to cover the development, deployment and management of such applications, websites or similar consumer interfaces which aggregate linear television channels approved by the Central Government (classification of television channels distributed through ALTD applications is discussed in detail in Chapter III), together with platform service channels and distribute to users in India.

2.59 While defining the scope of 'ALTD Service', the Authority has carefully considered the diverse models currently operating in digital broadcasting ecosystem. The objective of this regulatory framework is to regulate those entities which are involved in the business of

aggregating linear television channels, organising them in an EPG or any sequence or any manner, and distributing them over public Internet or other IP-based networks.

2.60 At the same time, the Authority is conscious that regulatory framework of 'ALTD Service' should not extend to every internet application carrying linear content. An application or website operated by a broadcaster solely for making available its own television channels or the channels of subsidiary company or holding company or subsidiary company of the holding company[41] does not perform the role of an independent television distribution platform. Hence, it would be reasonable to keep such an application/website outside the scope of 'ALTD Service'.

2.61 Similar considerations apply to live streaming of programmes on social media intermediaries. Such services are fundamentally different in terms of their nature and purpose and are already governed by regulatory provisions under the IT Act, 2000[42].

2.62 Accordingly, **the Authority recommends the scope of 'ALTD Service' as:**

'To develop, deploy and manage an application, website or similar consumer interface, or a combination of these, to aggregate and distribute linear television channels that have been approved by the Central Government, including 'Internet-native linear television channels' (with approved name and logo) and ALTD application provider's own platform service channels over public Internet or other IP-based networks to the users in India.'

[41] The definition of "subsidiary company" and "holding company" shall be the same as assigned to them in the Companies Act, 2013

[42] Information Technology Act, 2000 and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021

The Scope excludes:

a. **applications or websites of broadcasters that distribute only their own channels or the channels of subsidiary company or holding company or subsidiary company of the holding company.**

b. **live streams made available through social media intermediaries.**

Note 1: The definition of 'subsidiary company' and 'holding company' shall be the same as assigned to them in the Companies Act, 2013.

Note 2: The definition of 'social media intermediaries' shall be the same as defined in the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

C. Primary Stakeholder offering 'ALTD Service'

2.63 Based on analysis of the responses to MIB's questionnaire and TRAI's discussion with industry representatives, it has been noted that multiple stakeholders including application providers, OEMs, OS providers and technology/solution providers are involved in offering 'ALTD Service'. Further, various websites, online platforms, TV and mobile applications also offer linear television channels.

2.64 In view of the above, it is important to identify the primary stakeholder offering 'ALTD Service'. Accordingly, the following question was included in the consultation paper:

Q2. The 'ALTD Services' ecosystem involves multiple entities, including application providers, television equipment manufacturers, operating system providers, broadcasters, content providers, content aggregators and other technology or solution providers.

However, the application provider appears to play a central role in the distribution of linear television channels across various business models. In this context, should the Application Provider be designated as the primary stakeholder responsible for obtaining authorisation for the provisioning of 'ALTD Services'?

a. If yes, please provide detailed justification and supporting reasons.

b. If not, please identify the appropriate stakeholder(s) who should be responsible for obtaining such authorisation, along with rationale.

Summary of stakeholders' comments on Q2

2.65 Stakeholders expressed divergent views on designating 'Application Provider' as the primary stakeholder responsible for obtaining authorisation of 'ALTD Service'.

2.66 While a majority of stakeholders endorsed the proposal, a section of stakeholders opposed the very premise of identifying a primary stakeholder. They argued that 'ALTD Service' is, in essence, an OTT-based internet service and, therefore, should remain outside the ambit of the authorisation framework.

2.67 A few stakeholders stated that OEMs including TV manufacturers and OS providers perform a facilitative role by providing the underlying hardware and software environment through which ALTD apps are made available and do not themselves distribute TV channels. Consequently, they should not be treated as the primary stakeholders for the purpose of authorisation.

2.68 Some stakeholders suggested a cascading contractual model as provided in **Table 2.1**, wherein obligations are appropriately devolved among different entities in the ALTD value chain rather than being centralised.

Stakeholder	Primary Responsibility	Secondary Oversight
Application Provider	UX, content aggregation, ad standards, grievance redressal, data governance	Registration & periodic compliance reporting
Content Provider/Broadcaster	Programme Code compliance, content certification, EPG/metadata accuracy	Contractual compliance obligations to platform
Ad Network/DSP	Advertising Code compliance, brand safety, DPDP Act user consent	Platform-level ad audit rights
OEM/OS Provider	Pre-installation terms, app store policies	No direct TRAI regulatory obligation
CDN/Hosting Provider	Takedown compliance (IT Act intermediary obligations)	No direct TRAI regulatory obligation

Table 2.1: Cascading Responsibility

2.69 Another stakeholder, while agreeing that the application provider should be the primary stakeholder for obtaining authorisation, further stated that all the participants of ALTD ecosystem should be brought within the regulatory framework. According to this view, obligations should extend to smart/connected TV manufacturers, mobile and tablet manufacturers, OS providers, broadcasters, content providers and aggregators and technology or solution providers, in accordance with the functions performed by them within the ALTD ecosystem.

2.70 Some stakeholders submitted that content-related responsibilities should continue to remain with broadcasters and content providers, while the application provider should be responsible for distribution and platform related obligations.

2.71 Stakeholders supporting the proposal stated that the application provider occupies a central position in the ALTD ecosystem and should, therefore, be the primary stakeholder responsible for

obtaining authorisation. These stakeholders stated that the application provider conceptualises, develops and administers the application platform, acts as the principal interface with consumers, controls the user interface, EPG and enter into commercial arrangements with broadcasters for content acquisition and advertisers for monetisation. Therefore, by virtue of operational and commercial control over the service, they are the most appropriate entity to discharge the regulatory responsibilities related to 'ALTD Service'.

Analysis of the issues

2.72 The ALTD ecosystem comprises multiple stakeholders, including application providers, broadcasters, content providers, TV equipment manufacturers, OS providers, content aggregators and other technology or solution providers. Each of these entities performs distinct functions within the overall value chain.

2.73 The Authority has examined the respective roles and responsibilities of these entities to identify the stakeholder that exercises effective operational and commercial stewardship over the service and is best positioned to assume the regulatory responsibilities associated with 'ALTD Service'.

2.74 The application provider exercises effective operational and commercial control over the entire service lifecycle from acquisition and organisation of television channels to consumer-facing service delivery, ad-insertion and monetisation. Given its overarching control over the provisioning and management of the service, the application provider is the most appropriate entity to discharge the regulatory responsibilities under the proposed authorisation framework. Many stakeholders also supported application provider as the primary stakeholder responsible for obtaining authorisation for its ALTD application.

2.75 Television manufacturers provide the hardware platform and OS providers provide operating environment or application store through which ALTD applications are accessed. Similarly, broadcasters and content providers remain responsible for the creation and supply of television channels/content, whereas technology and solution providers perform facilitative technical functions. These entities are not involved in the distribution of television channels and are not the consumers endpoint. Hence, they may not be obligated to obtain authorisation of 'ALTD Service'.

2.76 The Authority is of the view that placing the responsibility for obtaining authorisation on the application provider would establish a single identifiable entity responsible for compliance with the applicable regulatory framework, while avoiding duplication and fragmentation of obligations on other participants in the ALTD ecosystem. The obligation of compliance to programme code and advertisement code will continue to rest with the broadcasters/content providers.

2.77 In view of above, the Authority considers it appropriate that 'Application Provider' should obtain an authorisation for 'ALTD Service' in the category of 'Television Channel Distribution Services' under Section 3(1)(a) of the Telecommunications Act, 2023 (as recommended in the authorisation framework), for its 'ALTD application'.

2.78 Accordingly, **the Authority recommends that 'Application Provider' intending to provide or providing 'ALTD Service' in India should obtain authorisation from the Central Government under the category of 'Television Channel Distribution Services' for its 'ALTD Application' and shall abide by the Rules notified by the Central Government for 'ALTD Service' and the Regulations/Orders/Directions of TRAI for such service.**

Terms and conditions for authorisation of application provider provisioning 'ALTD Service'

2.79 At present, there are four permitted distribution platforms. They are governed by the policy guidelines and rules issued by MIB. These include DTH, HITS, IPTV and cable TV services as elaborated in Chapter I.

2.80 Any entity involved in distributing linear television broadcasting services in India requires permission from MIB. Since ALTD platforms also offer similar services distributing linear television channels albeit using different technology, it is appropriate to bring them under a similar regulatory framework.

D. Grant of Service Authorisation to 'ALTD Service'

2.81 The Authority in 'ALTD Consultation Paper', referred to the terms and conditions for grant of service authorisation for various broadcasting services from 'Authorisation Recommendations' (set out in Annexure-II of the said recommendations (page no. 306 to 363). Accordingly, the following question on terms and conditions, for seeking grant of authorisation for 'ALTD Service' was included in the consultation paper.

Q3. What should be the terms and conditions including fees or charges for the grant of service authorisation to the application providers provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Annexure-II of 'Authorisation Recommendations dated 21st February 2025'? Stakeholders are requested to provide their detailed comments covering, though not limited to, the following conditions:

a. Service Area

b. Validity Period

c. Eligibility Conditions

d. Minimum Net worth

e. Processing Fee

f. Entry Fee

g. Bank Guarantee

h. Authorisation Fee

i. Security Deposit

j. Roll Out Obligations

k. Any other terms and conditions

Further, what terms and conditions/obligations should be put in place for foreign entities providing 'ALTD Services' in India?

Summary of stakeholders' comments on Q3

2.82 A section of stakeholders who did not support the proposal for introducing an authorisation framework for 'ALTD Service' have not suggested any terms and conditions for grant of authorisation. These stakeholders reiterated that 'ALTD Service' is essentially an OTT or internet-based service and, therefore, should not be subject to the regulatory framework for television distribution services.

2.83 Some other stakeholders favoured an OTT-aligned, light-touch regulatory framework for 'ALTD Service', stating that it should reflect the nature of internet-based services and avoid replicating the legacy DPO framework. They suggested a simple registration mechanism with minimal procedural requirements and basic service-related obligations to promote innovation, support Indian start-ups and MSMEs and facilitate the growth of globally competitive Indian digital platforms.

2.84 One stakeholder proposed that a light-touch regulatory framework may follow a tiered and revenue-indexed registration model as given in **Table 2.2**.

Tier	Criteria	Obligation	Fee
1 Startup	Revenue < ₹5 cr platform age < 3 yr	Self-declaration, basic KYC, grievance officer	Nil
2 Growth	Revenue ₹5–50 cr	Registration + compliance self-certification + annual audit	Nominal (₹ 1–2 Lakh)
3 Established	Revenue > ₹50 cr or >1M MAUs	Full registration + quarterly reporting + compliance audit	Standard (TBD by TRAI)

Table 2.2: Revenue-indexed registration model

2.85 The stakeholders supporting the proposed regulatory framework for 'ALTD Service' broadly agreed that the application provider should obtain authorisation and should comply with applicable terms and conditions. Their submissions on the terms and conditions under the respective heads are summarised as under:

Service Area

2.86 A majority of stakeholders favoured an 'All India' authorisation for 'ALTD Service'. Some stakeholders further suggested that, while the authorisation may be pan-India in nature, geo-restriction capabilities may be applied wherever content rights are region-specific. However, a few stakeholders submitted that internet-based services are inherently global and, therefore, 'ALTD Service' should not be subject to traditional service area restrictions applicable to conventional broadcasting platforms.

Validity Period

2.87 The stakeholders expressed varying views regarding the validity period of authorisation for 'ALTD Service', as under:

- 20 years
- 10 years with automatic renewal
- 10 years with non-automatic renewal, subject to compliance
- 10 years with renewal for a further period of 10 years
- 10-15 years with compliance-based renewal
- 10-20 years with a simple renewal process
- 5 years with a streamlined renewal mechanism

Eligibility Conditions

2.88 Stakeholders generally stated that only legally recognised entities having a demonstrable presence in India should be eligible to obtain authorisation. They suggested that eligibility conditions should ensure transparency of ownership and management, while facilitating regulatory oversight and accountability.

2.89 In this regard, the stakeholders suggested the following eligibility conditions:

- Applicant should be a Company or LLP.
- Principal place of business should be located in India.
- Entity should have majority Indian ownership (51% or more).
- Entity should have GST registration and make full disclosure of its shareholding pattern.
- Applicant should satisfy management and governance requirements, including relevant experience in media sector.
- Existing licensed distribution platforms, such as MSOs, may also be eligible to participate in ALTD ecosystem.

Obligations on foreign entities providing 'ALTD Service' in India

2.90 The stakeholders stated that foreign entities providing 'ALTD Service' in India should establish an appropriate legal entity and have operational presence within the country to ensure effective regulatory oversight, accountability and compliance with applicable laws.

2.91 In this regard, the stakeholders suggested the following conditions:

- Foreign entities should operate through an Indian representative entity registered in India.
- If a foreign entity provides 'ALTD Service' in India, an Indian company registered under the Companies Act should act as its guarantor.
- Foreign entities should not be permitted to directly hold ALTD authorisation.
- Indian subsidiaries of foreign companies may be permitted to obtain authorisation, subject to the same terms and conditions applicable to other Indian applicants.
- The registered office, Network Operation Centre (NOC), content monitoring facility, grievance redressal infrastructure and EPG management functions should be physically located in India.

Minimum Net Worth

2.92 The stakeholders expressed divergent views regarding minimum net worth requirement. Some stated that no minimum net worth should be prescribed, as it may create entry barriers for start-ups and small operators. Others suggested that, if considered necessary, the net worth requirement should be kept nominal.

2.93 In this regard, the stakeholders suggested the following different conditions:

- No minimum net worth requirement. If prescribed, should not be more than ₹1 crore
- ₹1 crore for platforms having <= 1 million users; ₹5 crore for > 1 million users
- ₹10 crore
- ₹ 25 crore

Processing Fee

2.94 The stakeholders suggested that the processing fee should be kept low and commensurate with the nature of internet-based services. Different views are expressed regarding the appropriate amount of such fee. In this regard, the stakeholders suggested the following options:

- A nominal processing fee
- ₹10,000
- ₹50,000
- ₹1 lakh

Entry Fee

2.95 The stakeholders expressed differing views regarding prescription of an entry fee. While some stakeholders submitted that no entry fee should be levied as 'ALTD Service' do not utilise spectrum or Government infrastructure, others suggested that a nominal or fixed entry fee may be prescribed, varying from ₹10 lakh to ₹ 5 crore to ₹10 crore (as applicable to DTH/HITS services).

Authorisation Fee

2.96 The stakeholders expressed widely divergent views on authorisation fee. Some stakeholders submitted that no authorisation fee should be levied, particularly in view of internet-based nature of 'ALTD Service'. Other stakeholders suggested that the authorisation fee may either be fixed, channel-linked, platform-size based or revenue-linked.

2.97 In this regard, the stakeholders suggested the following options:

- ₹1 lakh per channel per year, since the number of channels carried on a platform may vary annually.
- ₹5 lakh per annum for platforms having > 10 million monthly active users and ₹1 lakh per annum for smaller platforms.

- Fee similar to downlinking permission, i.e., ₹5 lakh when uplinked from India and ₹15 lakh when uplinked from outside India.
- Percentage of AGR aligned with DTH services, or a nominal fixed fee in initial years.
- 1% of AGR, with a concessional rate of 0.5% of AGR for services in the first two years of operation.
- 3% of Gross Revenue.
- 8% of Adjusted Gross Revenue.
- Fixed or modestly revenue-linked authorisation fee.

Bank Guarantee

2.98 The proposal relating to the requirement of a Bank Guarantee (BG) elicited divergent views from stakeholders. Some stakeholders submitted that BG are generally intended to secure infrastructure related obligations and, therefore, are not necessary for internet-based services. Other stakeholders suggested that, if prescribed, the BG should be proportionate and risk based.

2.99 In this regard, stakeholders suggested the following options:

- Minimal and risk-based BG, without capital-intensive obligations.
- ₹10 lakh for a period of 12 months, limited to operationalisation period of platform.
- ₹25 lakh throughout the authorisation period.
- ₹5 crore or 20% of the authorisation Fee for two quarters, whichever is higher.
- ₹5 crore or 50% of the authorisation Fee for six months.
- ₹5 crore.

Security Deposit

2.100 The proposed requirement of furnishing a Security Deposit evoked differing responses from stakeholders. While some stakeholders stated that internet-based services do not warrant a security

deposit, others suggested that a refundable deposit may be prescribed.

2.101 In this regard, stakeholders suggested the following options:

- No Security Deposit requirement.
- Nil Security Deposit, where a BG of ₹10 lakh is prescribed.
- ₹10 lakh, refundable upon surrender of the authorisation.
- ₹1 crore.
- ₹5 crore.

Roll-out Obligations

2.102 The stakeholders expressed differing views regarding roll-out obligations. Some stakeholders submitted that ALTD apps are internet-based and can provide pan-India services from the date of launch without requiring any physical infrastructure deployment and, therefore, no specific roll-out obligations are necessary. Other stakeholders suggested that application should become operational within a specified timeframe.

2.103 In this regard, the stakeholders suggested the following options:

- No specific roll-out obligations; however, the platform should become operational within 6 months.
- App should become operational within 12 months, with the application carrying a minimum number of television channels.
- Roll-out obligations may be limited to basic operational readiness timelines.

Any other terms and conditions

2.104 The stakeholders also suggested certain additional terms and conditions that may be incorporated in the authorisation framework for 'ALTD Service'. These include:

- Compliance with the Programme Code and Advertising Code.

- Compliance with applicable TRAI Regulations.
- Compliance with Must Carry and Must Provide provisions.
- Transparency in channel offering, listing, pricing and packaging.
- Non-discriminatory treatment of broadcasters.
- Robust grievance redressal mechanism.
- Minimum service quality benchmarks for streaming.
- Immediate discontinuation of unlicensed channels.
- Carriage of only MIB-permitted channels.
- Appropriate powers to the Government to suspend, revoke or take over services in the interest of national security.

Analysis of the issues

2.105 'ALTD Service' has emerged as a popular means of TV channel distribution. Unlike conventional television distribution platforms, 'ALTD Service' is application-based and does not require deployment of dedicated broadcasting infrastructure, satellite capacity, spectrum, right-of-way or last-mile physical networks. Instead, it leverages existing internet connectivity and use software-based applications or web interfaces.

2.106 Currently there is no regulatory oversight for ALTD services in India. The absence of regulatory framework for 'ALTD Service' has led to several anomalies in TV channel distribution as compared to traditional platforms. It is observed that there is regulatory arbitrage between traditional distribution platforms and ALTD platforms. TV channels being distributed through ALTD apps include several channels that are not approved by MIB, there are no quality-of-service norms, lack of transparent commitment for service from the service providers and lack of transparent accountability for consumer grievances. At the same time, the Authority is aware that over regulation would discourage innovation, inhibit investments and impede the growth of digital distribution platforms.

2.107 The regulatory framework should ensure accountability while avoiding infrastructure and capacity related obligations. While many stakeholders supported bringing 'ALTD Service' within an appropriate regulatory framework, they generally favoured a simplified and enabling framework recognising the emerging Internet-based nature of service.

2.108 Accordingly, the Authority is of the view that terms and conditions of 'ALTD Service' should be enabling, light-touch and future-ready, fulfilling the objective of regulatory accountability and consumer protection, encouraging innovation, investment and facilitating ease of doing business. The terms and conditions (T&C) for grant of service authorisation for 'ALTD Service' are broadly aligned with T&C for grant of service authorisation for other services as contained in 'Authorisation Recommendations', while suitably rationalising the financial and operational obligations for establishing a light touch regulatory framework for 'ALTD Service'.

2.109 Accordingly, an application provider intending to provide 'ALTD Service' through its ALTD application should obtain service authorisation and comply with T&C for grant of service authorisation applicable to 'ALTD Service' (to be notified as Rules by MIB). To ensure regulatory consistency, terms and conditions for grant of authorisation presented in following paragraphs are under the same heads as given in the Annexure II (page no. 306 to 363) of the 'Authorisation Recommendations'.

1. Definitions

2.110 The different terms and expressions used in T&C for grant of authorisation of 'ALTD Service' have been defined in Annexure II of these recommendations. The Authority has adopted the definitions from the service authorisation framework. In addition, new definition of 'ALTD Service' has been introduced, (Refer

Recommendation No. 4.2 of these recommendations). The definition of DSP as given in 'Authorisation Recommendations' has been modified to include ALTD Service provider. Similarly, definition of 'Television Channel Distribution Services' has been modified to include 'ALTD Service'. Further, the definition of 'Internet-native linear television channel' has also been introduced which is discussed in Chapter III.

2. Non-exclusivity

2.111 The principle of non-exclusivity is a fundamental feature of existing authorisation framework. Since the same considerations are equally applicable to 'ALTD Service', the non-exclusivity provision has been adopted without modification.

3. Framework of Authorisations for Broadcasting Services

2.112 A separate authorisation sub-category for 'ALTD Service' has been introduced under 'Television Channel Distribution Service' as per the following (refer Figure 2.1 on page no. 39):

> ***'Application-based Linear Television Distribution (ALTD) Service:*** The authorisation for 'ALTD Service' shall enable the entity to develop, deploy and manage an application to aggregate and distribute linear television channels that have been approved by the Central Government, including 'Internet-native linear television channels' (with approved name and logo), along with ALTD application provider's own platform service channels, with or without value-added services including on-demand audio-visual content, over public Internet or other IP-based networks to the users.'

4. Scope of Service and Service Area

2.113 Scope has already been defined (Refer Recommendation No. 4.3 of these recommendations). For defining the service area, it has been

noted that although the 'ALTD Service' is delivered over public Internet or other IP-based networks and is accessible beyond the territorial boundaries of India, the proposed authorisation is intended to govern such service within India. Accordingly, for regulatory purposes, including authorisation, compliance and enforcement, the service area has been defined as 'National', i.e., entire territory of India.

5. Validity Period

2.114 A longer authorisation period provides regulatory certainty, facilitates long-term investments and business planning and promotes consistency across distribution platforms. Accordingly, validity period of authorisation has been recommended as 20 years, with a renewal period of 10 years, in line with other broadcasting distribution services.

6. Eligibility Conditions

2.115 Any company incorporated under the provisions of the Companies Act, 2013 and LLP registered under the Limited Liability Partnership Act, 2008 should be eligible to obtain authorisation of 'ALTD Service'. Further, it is seen that some applications are being run by foreign entities. The Authority is of the view that foreign entities intending to provide 'ALTD Service' in India should operate through an entity incorporated in India and comply with the applicable provisions relating to foreign investment, security and other laws in force. Such an approach would ensure regulatory accountability and consistency, in line with eligibility conditions of other services.

2.116 **Net worth**: 'ALTD Service' operates primarily through software-based applications over the Internet and do not require dedicated infrastructure or network deployment. Hence, the entry barriers and capital investment requirements are significantly lower than permitted distribution platforms. While the extant regulatory regime

prescribes a minimum net worth of ₹10 crore for DTH and HITS operators, no such requirement is prescribed for MSOs or ISPs (providing IPTV). Considering the relatively low infrastructure requirements and capital investments for 'ALTD Service'; the Authority is of the view that there is no need to prescribe any minimum net-worth requirement to ensure roll out and operations of ALTD service. Hence, no minimum net-worth requirement has been recommended for entity seeking authorisation of 'ALTD Service'.

7. Financial Conditions

2.117 The various fees and charges for authorisation of 'ALTD Service' are discussed below:

Processing Fee

2.118 The Authority is of the view that a processing fee of ₹10,000 should be prescribed to eligible entities applying for 'ALTD Service', aligned with other television broadcasting and distribution services. Such a fee would adequately cover administrative costs without creating unnecessary barriers to market entry.

Entry Fee

2.119 Entry fees for various broadcasting services are aligned with the nature of the service and the corresponding level of infrastructure investment required. DTH and HITS services, requiring substantial infrastructure deployment, are subject to an entry fee of ₹10 crore each, whereas registration of MSOs entails a nominal fee of ₹1 lakh for a ten-year validity period. Given that 'ALTD Service' is application-based and requires no comparable infrastructure investment, the Authority considers a one-time, non-refundable nominal entry fee of ₹1 lakh to be appropriate. The proposed fee would ensure the commitment of applicants and discourage non-serious players while promoting ease of doing business.

Authorisation Fee

2.120 A recurring authorisation fee serves as a regulatory levy associated with the continued provision of an authorised service. The Authority notes that TRAI in its earlier recommendations had recommended an authorisation fee of 3% of AGR for DTH services, reducing to NIL after three years. However, the draft Rules published by MIB for consultation do not incorporate the said recommendation and maintains the authorisation fee at 8% of AGR. Further, no authorisation fee is applicable to HITS or cable services or IPTV operators providing IPTV services registered as MSOs.

2.121 Given the low capex requirements for starting 'ALTD Service' and to encourage innovation and wider market participation, the Authority is of the view that the proposed framework should have minimal recurring financial obligations as in the case of HITS, MSOs and MSOs providing IPTV services. Accordingly, the Authority recommends that no recurring authorisation fee should be prescribed for authorised entities providing 'ALTD Service'.

Bank Guarantee (BG)

2.122 As per the extant DTH policy guidelines, the DTH operators are required to furnish a BG of an amount equal to Rs. 5 crore and subsequently, an amount equivalent to the estimated license fee for 2 quarters or Rs. 5 crore whichever is higher. Whereas, as per the extant HITS policy guidelines, an applicant is required to furnish a BG of Rs. 40 crore, valid for a period of three years, within one month of the issuance of SACFA clearance by WPC to MIB. The BG is returned after three years.

2.123 In the 'Authorisation Recommendations', considering the similarity in technical setup of DTH and HITS platform, the BGs have been harmonized and recommended as under:

(1) Bank Guarantee for DTH Service: Rs. 5 crore or 20% of (the Authorisation Fee for two quarters and other dues not otherwise securitized), whichever is higher.

(2) Bank Guarantee for HITS Service: Rs. 5 crore for entire duration of authorisation.

2.124 On the other hand, there is no BG prescribed for MSOs and IPTV services. The primary purpose of BG is to secure Government dues, including authorisation fee, and ensure compliance with applicable T&C. Since no authorisation fee is proposed for 'ALTD Service', therefore prescribing a BG would not be necessary. In addition, the Telecommunications Act, 2023 and the TRAI Act,1997 provides for a comprehensive enforcement framework including financial penalties for contravention of authorisation conditions. Accordingly, no Bank Guarantee is recommended for 'ALTD Service' authorisation.

Security Deposit

2.125 It is observed that no security deposit is presently prescribed for DTH, HITS, MSOs, MSOs and ISPs providing IPTV. Since 'ALTD Service' have minimal financial obligations and enforcement mechanisms are already available under the Telecommunications Act, 2023, and the TRAI Act, 1997, the Authority recommends that no Security Deposit should be prescribed keeping it at par with other DSPs.

Renewal Fee

2.126 A renewal fee of ₹10,000 is recommended, consistent with all other broadcasting services. A nominal renewal fee facilitates long term visibility and service continuity without imposing undue financial burden on the authorised entity.

8. Process of Application to obtain Service Authorisation

2.127 The process of submitting application for grant of authorisation of 'ALTD Service' essentially remains the same as that for other broadcasting services, except for furnishing Bank Guarantee, which is not prescribed for 'ALTD Service'.

9. Grant of Service Authorisation

2.128 The process of grant of service authorisation by the Central Government to the eligible entities should also remain similar to other broadcasting services. The 'Service Authorisation Document' overleaf format has been modified to incorporate the particulars related to 'ALTD Service', which include name of the ALTD application and the list of board of Directors/Partners.

2.129 In so far as roll-out obligations are concerned, it is noted that unlike conventional distribution services, 'ALTD Service' can be operationalised without deployment of extensive physical infrastructure. Accordingly, the Authority is of the view that a roll-out period of one year would be appropriate, i.e., the ALTD application for which the authorisation has been obtained, should be made live within one year from the effective date of authorisation. This period is considered adequate to enable application providers to complete the necessary technical, commercial and operational arrangements while ensuring that the authorisation granted is utilised within a reasonable timeframe.

10. Security Conditions

2.130 The provisions related to security conditions are fundamental and are intended to safeguard national security, public safety and the integrity of broadcasting ecosystem and are equally applicable to all services, irrespective of the underlying technology used for service

delivery. They do not warrant any modification and have, therefore, been adopted, as it is, from 'Authorisation Recommendations'.

11. Migration of existing service providers

2.131 The Authority also notes that the provision relating to migration of existing service providers is not applicable in case of 'ALTD Service', since no framework presently exists for such services.

2.132 In view of the above, **the Authority recommends that the service area, validity and renewal period, fees and charges applicable to an entity seeking authorisation of 'ALTD Service' should be as provided below:**

Service Area: National

Validity and Renewal Period:

- **Validity Period: 20 years from the effective date of authorisation**
- **Renewal Period: 10 years for each renewal term**

Fees and Charges:

- **Processing Fee: Rs. 10,000**
- **Entry Fee: Rs. 1,00,000 (non-refundable)**
- **Renewal Fee: Rs. 10,000**

The detailed terms and conditions including eligibility conditions for the grant of authorisation for 'ALTD Service' should be adopted as provided in Annexure-II of these recommendations. These are aligned with the terms and conditions for grant of service authorisation prescribed in Annexure-II of TRAI's 'Authorisation Recommendations'[43], with suitable modifications.

[43] Recommendations on 'Framework for Service Authorisations for provision of Broadcasting Services under the Telecommunications Act, 2023' dated 21st February 2025.
(https://trai.gov.in/sites/default/files/2025-02/Recommendations_21022025.pdf)

E. Common Terms and Conditions of 'ALTD Service' with other broadcasting services

2.133 In 'Authorisation Recommendations', TRAI has recommended common terms and conditions for provision of various broadcasting services contained in Annexure-III (page no. 364 to 477). Part-I contains 'Common Terms and Conditions', while Part-II contains 'Specific Terms and Conditions' for each broadcasting service.

2.134 Question No. 4 in the consultation paper is related to the common terms and conditions applicable for 'ALTD Service' provisioning. The question, summary of stakeholder's comments and analysis are provided below:

Q4. What should be the common terms and conditions applicable for the authorised entities provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Part-I of Annexure-III in 'Authorisation Recommendations dated 21st February 2025'? Stakeholders are requested to provide their detailed comments on the following conditions:

- *a. Renewal of Authorisation*
- *b. Renewal Fee*
- *c. Equity Holding and Management Control*
- *d. Restriction on cross-holding of equity shares/capital contribution between*
  - *i. TV broadcasters and application providers provisioning ALTD services*
  - *ii. Application Providers provisioning ALTD services and other DSPs*
- *e. Transfer/Surrender of Service Authorisation*
- *f. Sharing of Infrastructure*
- *g. Any other terms and conditions*

Summary of stakeholders' comments on Q4

2.135 A section of stakeholders who are not in favour of 'ALTD Service' authorisation have not submitted comments on common terms and conditions for such service. These stakeholders reiterated their view that ALTD service operates at the application layer over the open internet and, hence, should not be subject to regulatory framework designed for traditional television distribution services.

2.136 Further, the same set of stakeholders, in their counter-comments have reaffirmed the above position and submitted that since 'ALTD Service' are essentially internet-based, no common terms and conditions for the operation of service authorisation is required.

2.137 The stakeholders supporting the authorisation framework have expressed varying views regarding the renewal of authorisation for 'ALTD Service'.

Renewal Period

2.138 While some stakeholders favoured a fixed renewal period, others suggested that renewal should be automatic subject to continued compliance with applicable terms and conditions.

2.139 In this regard, stakeholders suggested the following:

- Renewal for a period of 10 years.
- Renewal for a period of 10 years, subject to obtaining fresh security clearance from the Ministry of Home Affairs.
- Automatic renewal subject to compliance with the applicable terms and conditions, with audit every five years.
- Renewal on same terms and conditions as for DTH operators.

Renewal Fee

2.140 Stakeholders generally agreed that renewal of authorisation should be subject to payment of an appropriate renewal fee. However,

different views are expressed on the quantum of such fee. Some stakeholders suggested that renewal fee should be nominal and aligned with other broadcasting services, while others proposed a fixed fee in the range of ₹10,000 to ₹5 lakh. One stakeholder suggested that the renewal fee may be kept equivalent to annual authorisation fee.

2.141 Some stakeholders also stated that renewal process should be simple and predictable. Many stakeholders suggested that application for renewal of authorisation may be submitted at least three months prior to the expiry of authorisation period.

Equity Holding and Management Control

2.142 The stakeholders stated that equity holding and management control requirements should be broadly aligned with the overall regulatory framework governing broadcasting and digital media sectors and applicable Foreign Direct Investment (FDI) policy. However, differing views are expressed regarding the permissible level of foreign investment.

2.143 Certain stakeholders favoured alignment with FDI policy applicable to digital media, i.e., 26% FDI in news and current affairs channels and 100% FDI in non-news channels. Some stakeholders proposed that FDI limits applicable to broadcasters may be adopted, viz., 49% for news and current affairs channels and 100% for entertainment channels.

2.144 One stakeholder suggested that 100% FDI should be permitted. Another stakeholder proposed that FDI up to 49% may be allowed through automatic route and FDI between 49% and 74% through Government approval route. One stakeholder, however, suggested a more restrictive approach by prescribing a ceiling of 20% FDI, coupled with Indian management control, majority Indian

representation on Board and a resident Indian Chief Executive Officer.

2.145 Regarding ownership and management disclosures, stakeholders suggested that authorised entity should disclose its shareholding pattern and ownership of ultimate beneficiary. It was further suggested that such disclosures should be in accordance with the applicable FDI and Foreign Exchange Management Act (FEMA) framework and annual investment disclosures should be made, along with such additional information as required by the Government from time to time.

2.146 Some stakeholders further submitted that the provisions relating to equity holding and management control may be aligned with 'Authorisation Recommendations'. One stakeholder also suggested that the applicant, its directors and key managerial personnel should satisfy the prescribed security clearance requirements.

Restrictions on cross-holding of equity shares/capital contribution

2.147 Stakeholder opinion remained divided on the restrictions on cross-holding of equity shares/capital contribution between TV broadcasters and application provider and between application provider and other DSPs.

2.148 Some stakeholders stated that no cross-holding restrictions should be prescribed.

2.149 Some stakeholders favoured partial restrictions, stating that vertical integration between a broadcaster and its own ALTD platform may be permitted, while horizontal integration among ALTD apps may be restricted to prevent market concentration.

2.150 One stakeholder stated that there should be no restriction between broadcaster and ALTD app provider. However, between ALTD app provider and other DPOs, cross-holding may be permitted subject to disclosures. Further, no exclusive agreement with device manufacturers should be allowed to ensure fair competition. Another stakeholder suggested limited restrictions only to address demonstrable competition and consumer harm concerns without restricting innovation or commercial partnerships.

2.151 Some stakeholders favoured restrictions on cross-holding. It is stated that such restrictions should either be removed entirely or applied uniformly across linear and digital platforms as applicable to DTH/HITS and broadcasters.

2.152 Some stakeholders stated that vertical cross-holding between broadcaster and ALTD App Provider must be capped as applicable for DTH operators, i.e., up to 20%. It is also stated that vertical integration restrictions of 20% equity cap should be extended to telecom service providers controlling both distribution platforms and content libraries.

2.153 Further, it is stated that an entity holding more than 20% equity in 'ALTD Service' should not hold more than 20% equity in a broadcaster. It was also suggested that cross-holding between two or more ALTD providers may be permitted, subject to combined market share cap of 40%, to prevent monopolisation. Whereas, cross-holding between ALTD app providers and other DPOs may be permitted as complementary services, subject to consolidated market share monitoring by TRAI.

Transfer/Surrender of Service Authorisation

2.154 Stakeholders expressed differing views regarding transfer of service authorisation. One stakeholder stated that transfer should not be permitted. Some stakeholders, however, suggested that transfer,

assignment, sub-authorisation or partnership arrangements may be permitted, subject to prior approval of MIB.

2.155 Regarding surrender of service authorisation, some stakeholders stated that the process should be flexible and market-driven. However, other stakeholders suggested that surrender should be subject to an advance notice period and settlement of all outstanding obligations.

2.156 In this regard, one stakeholder suggested an advance notice period of one month and refund of BG after adjustment of dues. Other stakeholder proposed an advance notice period of ninety days, subject to settlement of outstanding AGR. One stakeholder suggested an advance notice period of six months along with clearance of all dues.

2.157 A stakeholder further stated that prior notice should be given to MIB and TRAI, along with a subscriber migration plan, refund of unutilised subscription amounts and retention of grievance records. It was also suggested that BG may only be released upon completion of the wind-down obligations.

Merger & Acquisition (M&A)

2.158 The stakeholders expressed limited but differing views regarding M&A involving authorised ALTD entities. One stakeholder submitted that merger, acquisition and restructuring should be subject to intimation rather than prior approval. Another stakeholder suggested that M&A transactions should be notified to appropriate authorities for assessment.

Sharing of Infrastructure

2.159 Some stakeholders suggested that infrastructure sharing should not be made applicable to 'ALTD Service', as they operate on shared commercial internet infrastructure and, therefore, do not require a

separate infrastructure sharing framework. One stakeholder further submitted that the underlying technology, including operating systems, is proprietary in nature and mandatory sharing may involve security risks and infringement of intellectual property rights.

2.160 Some stakeholders stated that 'ALTD Service' does not involve physical Right of Way (RoW), Set Top Boxes or transponders and primarily relies upon cloud servers, Content Delivery Networks (CDNs) and software playout solutions. Such infrastructure sharing is standard global technological practice and may be permitted without any specific regulatory requirements.

2.161 Some stakeholders favoured permitting infrastructure sharing. These stakeholders submitted that sharing of cloud infrastructure, CDNs, servers, encoding infrastructure and similar facilities may be permitted. However, such sharing should not be used to circumvent cross-holding restrictions.

2.162 A few stakeholders further submitted that infrastructure sharing may be permitted subject to security conditions and without compromising service quality. One stakeholder suggested that infrastructure sharing should remain flexible and market-driven, while another submitted that it should be permitted to promote efficiency and cost optimisation. Yet another stakeholder submitted that infrastructure sharing framework for 'ALTD Service' may be aligned with that applicable to DTH operators.

Any Other Terms and Conditions

2.163 The stakeholders suggested few additional terms and conditions. Some stakeholders submitted that regulatory framework should focus on basic content code compliance and consumer grievance redressal mechanisms and should avoid application of carriage-

related obligations such as must-carry provisions or tariff regulations.

2.164 Some stakeholders stated that licensee should ensure strict adherence to Programme Code and Advertisement Code. It was also suggested that channel listing, ranking and placement should be fair, transparent and on non-discriminatory basis. The system should be compliant with applicable Indian data protection and IT laws.

2.165 One stakeholder stated that framework should mandate non-discrimination, parity in pricing, placement and technical quality, along with transparency in platform policies, revenue sharing arrangements and content discovery mechanisms. Another stakeholder suggested that framework should focus on content compliance, anti-piracy measures, grievance redressal, transparency and lawful cooperation, while avoiding prescriptive mandates.

2.166 Some stakeholders further stated that ALTD application providers should ensure that all television channels distributed on their platforms should hold valid permission from MIB.

2.167 One stakeholder suggested that the annual compliance certification and periodic third-party audits should be mandatory for authorised entities. It was also stated that authorised entities should cooperate with inspections carried out by MIB/TRAI and disclose litigation, regulatory actions and security incidents.

2.168 Further it was suggested that authorised entities should ensure compliance with net neutrality, accessibility norms, consumer protection requirements, Digital Personal Data Protection (DPDP) Act, 2023[44] and IT Rules, 2021. One stakeholder submitted that

[44] https://www.meity.gov.in/static/uploads/2024/06/2bf1f0e9f04e6fb4f8fef35e82c42aa5.pdf (accessed on 14th October 2026)

facilities should not be used for objectionable, obscene or anti-national activities and that any violation may lead to immediate termination of authorisation.

Analysis of the issues (Common Terms and Conditions)

2.169 The 'Authorisation Recommendations' had recommended a comprehensive set of terms and conditions applicable to all authorised entities providing broadcasting services. These common terms and conditions prescribe the general rights and obligations of authorised entities during the currency of the authorisation and provide a harmonised regulatory framework relating to ownership and management control, renewal of authorisation, provision of services, monitoring and inspection, reporting requirements, security conditions, dispute resolution and other regulatory obligations. The Authority is of the view that the common regulatory principles applicable to other services should, to the extent applicable, also govern the authorised entity providing 'ALTD Service'. At the same time, the Authority recognises that 'ALTD Service' are application-based and infrastructure light services and, therefore, certain provisions require modifications to reflect their unique operational characteristics.

2.170 The Authority has examined the comments and counter-comments received from the stakeholders on common T&C applicable to authorised entity provisioning 'ALTD Service' vis-à-vis the common T&C prescribed in **Part-I** of **Annexure-III** (page no. 364) of its 'Authorisation Recommendations' to assess their applicability to 'ALTD Service'. A majority of these provisions are generic in nature and are intended to regulate the conduct and obligations of the authorised entity rather than the technology employed for service delivery. Accordingly, such provisions continue to remain equally applicable for 'ALTD Service' and appropriately adopted, *mutatis*

mutandis. The common terms and conditions considered for 'ALTD Service' are discussed below.

2.171 **Assignment and Use of Spectrum**: This provision applies only to those broadcasting services which require assignment of radio frequencies or satellite spectrum by Central Government. Since 'ALTD Service' is provisioned over public Internet or on such other network chosen by the operator, and it does not require spectrum, hence this condition is not applicable to 'ALTD Service'.

2.172 **Equity Holding and Management Control**: It has been noted that stakeholders have expressed differing views on the applicability of provisions relating to equity holding, management control and restrictions on cross-holding in respect of 'ALTD Service'. While some stakeholders have suggested that these restrictions may not be extended to 'ALTD Service' considering its application-based nature, others have favoured their continued applicability across all television distribution platforms.

2.173 The Authority is, however, of the view that the provisions relating to equity holding, management control and restrictions on cross-holding are not service-specific requirements but foundational regulatory safeguards governing the broadcasting sector. These provisions are intended to ensure diversity of ownership, prevent concentration of control and the emergence of dominant entities across different verticals of the broadcasting value chain so as to preserve competition and plurality of views. These underlying objectives remain equally relevant irrespective of the mode of television distribution. Accordingly, the Authority is of the view that these provisions should continue to apply to 'ALTD Service' and recommends that corresponding provisions contained in 'Authorisation Recommendations' be incorporated in the Common Terms and Conditions for 'ALTD Service'.

2.174 **Renewal of Authorisation:** The renewal period and renewal fees for 'ALTD Service' have already been discussed in paras 2.116 and 2.126 and recommended under the terms and conditions of grant of authorisation (Refer Recommendation No. 4.5 of these recommendations). The other detailed provisions applicable to renewal of authorisation have been adopted from those contained in 'Authorisation Recommendations' and provided in Annexure-III of these recommendations.

2.175 **Sharing of Infrastructure:** The Authority observes that unlike other television distribution platforms such as DTH, HITS, MSOs and IPTV, the authorised entity providing 'ALTD Service' does not ordinarily deploy extensive physical distribution infrastructure. Instead, provisioning of ALTD services primarily relies on standard information technology infrastructure, including cloud computing resources, CDNs, servers, encoding and transcoding infrastructure, storage systems and other similar digital facilities. Accordingly, the Authority is of the view that the provisions relating to infrastructure sharing should expressly permit the sharing of such IT and cloud-based infrastructure, in line with globally accepted technological practices and applicable standards, while ensuring compliance with all applicable security, data protection and regulatory requirements.

2.176 **Financial Conditions:** The Authority also notes that the financial conditions applicable to 'ALTD Service', including the quantum of processing fee, entry fee, renewal fee have already been examined and included under the terms and conditions for grant of service authorisation. The same has been retained.

2.177 **Commercial Conditions:** The Authority observes that, at present, most ALTD services are offered to consumers on a free-to-access basis, with revenues primarily generated through advertising and other market-driven monetisation models. However, the Authority

recognises that the ALTD ecosystem may evolve over time, with authorised entities adopting hybrid business models comprising both free and subscription-based services or other commercial arrangements. In such a scenario, appropriate tariff and commercial regulatory framework would be made applicable to 'ALTD Service'.

2.178 The terms and conditions relating to 'Definitions', 'Assignment and use of Spectrum', 'Equity Holding and Management Control', 'Renewal of Authorisation', 'Modification in the Terms and Conditions of Service Authorisation', 'Creation of Security Interest', 'Restrictions on 'Transfer of Authorisation', 'Provision of Service', 'Monitoring & Inspection', 'Reporting Requirements', 'Adherence to the Programme Code and Advertising Code', 'Sharing of Infrastructure', 'Financial Conditions', 'Commercial Conditions', 'Security Conditions', 'Technical Conditions', 'Confidentiality', 'Force Majeure', 'Disputes with Other Parties', 'Dispute Resolution and Jurisdiction', 'Surrender of Authorisation', 'Contravention of Rules/Regulations and Violation of Orders/Directions/Codes', 'Offences', 'Termination of Authorisation', 'Obligations of the Authorised Entity' and 'Residual Clause', as applicable to the authorised entity providing 'ALTD Service', are adopted, as specified in **Part-I of Annexure-III** of these Recommendations.

2.179 In view of the above, **the Authority recommends that the common terms and conditions applicable to the authorised entity of 'ALTD Service', should be adopted as specified in Part-I of Annexure-III of these recommendations. These are aligned with the terms and conditions prescribed in Part-I of Annexure-III of TRAI's 'Authorisation Recommendations'[45], with suitable modifications.**

[45] Recommendations on 'Framework for Service Authorisations for provision of Broadcasting Services under the Telecommunications Act, 2023' dated 21st February 2025.
(https://trai.gov.in/sites/default/files/2025-02/Recommendations_21022025.pdf)

F. Specific Terms and Conditions for 'ALTD Service'

2.180 Section 2, Part II, Annexure-III of 'Authorisation Recommendations' lays down the terms and conditions governing 'Television Channel Distribution Services'. Within this, Section 2.1 specifies the specific provisions applicable to DTH and HITS services (page no. 425 to 429), while Section 2.2 outlines those pertaining to IPTV services (page no. 430 to 437).

2.181 For specific terms and conditions of 'ALTD Service', Q5 was raised in the Consultation Paper, reproduced as under:

Q5. What should be the specific terms and conditions for the authorised entities provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Part II of Annexure-III in 'Authorisation Recommendations dated 21st February 2025'? Stakeholders are requested to provide their detailed comments on the following conditions:

a. Reservation of operational channel capacity by Vertically Integrated Entity

b. Platform Services (PS) offered by application providers provisioning ALTD services

c. Monitoring and Inspection of facilities

d. Supply of Information to Central Government/ TRAI

e. Contravention of terms and conditions of authorisation

f. Any other terms and conditions

Further, whether the mandatory sharing of Sports Broadcasting Signals with Prasar Bharati and the compulsory transmission of certain channels as mandated for DTH, HITS and IPTV services should be applied to the application providers provisioning 'ALTD Services'. Stakeholders are requested to provide their comments with detailed justification on all such obligations that should be made applicable on such entities.

Summary of stakeholders' comments on Q5

2.182 A section of stakeholders who did not support the proposal to bring 'ALTD Service' under the authorisation framework have not furnished comments on the specific T&C. The comments submitted by the remaining stakeholders on the conditions mentioned in Q5 are summarised in the paragraphs as under.

Reservation of operational channel capacity by vertically integrated entity

2.183 Stakeholders expressed differing views on this condition. Some stakeholders did not favour reservation of operational channel capacity, submitting that channel capacity reservation requirements are designed for legacy platforms with limited bandwidth and are not technically and legally justified for services operating over open internet. Some stakeholders stated that an ALTD app provider, who is also a broadcaster, should offer channel carriage on non-discriminatory terms to all broadcasters.

2.184 Some stakeholders favoured reservation of operational channel capacity and suggested that reservation may be limited to 15 to 20% of the operational channel capacity.

2.185 One stakeholder favoured disclosure-based framework and submitted that such provisions may be invoked only if necessary, avoiding prescriptive operational controls.

Platform Services (PS) offered by Application Providers provisioning 'ALTD Service'

2.186 Stakeholders generally favoured permitting application providers provisioning 'ALTD Service' to offer platform services channels. However, differing views are expressed regarding the extent of regulatory oversight and the conditions governing such services.

2.187 Some stakeholders submitted that application providers should be allowed to innovate with PS channels under a light-touch regulatory framework. Some stakeholders further suggested that PS may be permitted without any cap on the number and without requiring any specific approval from Government.

2.188 It was also submitted by some stakeholders that PS may be permitted subject to certain conditions, however unregistered foreign channels should not be permitted. PS channel may be capped at 5% of total capacity, and mandatory EPG classification should be ensured.

Monitoring and Inspection of Facilities

2.189 Stakeholders expressed varying views on this condition.

2.190 A group of stakeholders favoured provision of monitoring and inspection by Government and Regulator. One stakeholder submitted that inspection by MIB/TRAI may be undertaken after giving prior notice and should apply to all streaming platforms carrying television channels.

2.191 However, a few stakeholders did not favour physical inspection of facilities and therefore submitted that 'ALTD Service' operate on decentralized cloud architectures, software playout solutions and third-party CDNs, and therefore there is no physical infrastructure to inspect. It has been suggested that physical inspections may be replaced with digital compliance reporting. One stakeholder stated that standard reporting requirements may be prescribed, as physical access could compromise security, intellectual property rights and operational integrity. Another stakeholder suggested that monitoring should focus on service compliance, security and lawful interception rather than intrusive inspections.

2.192 Some stakeholders suggested that the authorised entity should maintain channel logs, including recording of channels for a period of 90 days, and that failure to comply with such requirements should attract appropriate penalties.

Supply of Information to Central Government/TRAI

2.193 Some stakeholders suggested that the authorised entity should periodically furnish information to the Central Government/TRAI. Quarterly reports contain details of user base, revenue, channels carried, complaints and content compliance incidents may be submitted and that audited financial statements may be furnished within 90 days of the end of the financial year.

2.194 One stakeholder suggested that bi-annual and event-based disclosures may be furnished, including details relating to channels onboarded and their permission status, revenue-sharing arrangements, advertisement inventory and monetisation practices, anonymized viewership data, content recommendation practices and consumer complaints along with their resolution.

2.195 A few stakeholders stated that information relating to viewership data, channels carried, pricing details, agreements and technical, financial and operational data may be periodically furnished in a standardized format as may be prescribed.

Mandatory Sharing of Sports Broadcasting Signals with Prasar Bharati

2.196 Stakeholders expressed differing views on this condition. Some favoured applicability of such obligation to 'ALTD Service'. A stakeholder stated that the obligation should ensure universal access to major sporting events of national importance and prevent exclusive distribution on proprietary ALTD apps.

2.197 One stakeholder stated that ALTD apps should carry sports events of national importance. One stakeholder suggested that the definition of distribution should be amended to encompass internet-delivered linear streams so as to fulfil the primary public interest objective of the Act.

2.198 Some stakeholders did not favour the applicability of such obligation to 'ALTD Service'. They stated that live sports content is generally not available on ALTD apps and, therefore, mandatory sharing may not be required. Some other stakeholders stated that such obligation should not be extended to 'ALTD Service' considering their internet-based and on-demand nature.

Compulsory Transmission of Certain Channels

2.199 This condition is also commented differently by different stakeholders. Some stakeholders favoured the applicability to 'ALTD Service'. One stakeholder submitted that carriage of Doordarshan channels, other channels notified by the Government in public interest and emergency broadcast signals should be mandatory. Another stakeholder supported the proposal stating that it would make consumer choice easier.

2.200 Some stakeholders stated that ALTD providers should not be mandated to bear cloud hosting and CDN streaming costs for compulsory carriage of public broadcaster channels. One stakeholder submitted that the mandatory carriage of Prasar Bharati channels has outlived its purpose and should ideally be removed for all DPOs. One stakeholder stated that this obligation is applicable on broadcasters and not on DPOs, hence should be removed.

Contravention of Terms and Conditions of Authorisation

2.201 Some stakeholders stated that appropriate action may be prescribed for contravention of terms and conditions of authorisation. It was

suggested that financial penalties, suspension or revocation of authorisation may be imposed for violation of prescribed conditions.

2.202 Other stakeholders stated that a graded penalty framework may be adopted based on nature and severity of violation. It was suggested that penalties up to ₹5 lakh may be imposed for non-compliance and repeat or wilful violations should attract stricter action.

2.203 One stakeholder stated that contravention of T&C should be dealt with in accordance with the rules and regulations framed by MIB/TRAI. Another stakeholder suggested that violation of authorisation conditions may in addition to other actions, attract revocation of authorisation and penalty up to ₹50 crore.

Any Other Terms and Conditions

2.204 The stakeholders suggested some additional terms and conditions for application providers provisioning 'ALTD Service'.

2.205 Some stakeholders stated that data governance for 'ALTD Service' should be aligned with the DPDP Act, 2023. One stakeholder suggested that Indian user data should be stored on servers located in India or in jurisdictions having adequate data protection laws, in line with the National Data Governance Policy, 2022, while also facilitating law enforcement access without imposing technical burden on platforms.

2.206 One stakeholder stated that ALTD apps should adhere to the Guidelines for Prevention and Regulation of Dark Patterns, 2023. It was also suggested that advertisements on ALTD apps should comply with applicable laws relating to misleading advertisements and the Consumer Protection Act, along with applicable TRAI Regulations.

2.207 Some stakeholders stated that application providers should make efforts to promote accessibility and inclusion by providing subtitles, audio assistance and user-friendly interfaces for elderly persons and persons with disabilities. It was also suggested that captions for key content and regional languages and support for low-bandwidth usage may be enabled, wherever feasible.

2.208 One stakeholder stated that in the event of service outages, consumers should be informed and corrective action should be taken within stipulated time.

2.209 Another stakeholder stated that ALTD apps should follow the same reporting requirements as applicable to DPO platforms, including submission of EPG information and Performance Monitoring Reports.

Analysis of the issues (Specific Terms and Conditions)

2.210 The Authority has carefully considered the comments and counter-comments received from stakeholders on specific terms and conditions applicable to authorised entity provisioning 'ALTD Service'. The Authority has also examined the operational characteristics of 'ALTD Service' and existing regulatory provisions governing television distribution services contained in 'Authorisation Recommendations'.

2.211 The specific terms and conditions applicable to 'ALTD Service' should be minimal, and commensurate with the underlying technology. Accordingly, only the necessary service-specific provisions have been proposed, primarily to address requirements unique to 'ALTD Service'.

1. Prohibition of certain Activities

2.212 The provisions relating to prohibition of certain activities are generic in nature and are intended to ensure that authorised entities operate

within the scope of their authorisation and comply with the applicable statutory framework. Since these obligations are equally relevant for 'ALTD Service', the Authority is of the view that the corresponding provisions may be adopted, *mutatis mutandis*, from the 'Authorisation Recommendations'.

2. Value Added Services (VAS)

2.213 A few ALTD applications are also providing value-added services in the form of on-demand content, which is presently governed by the provisions of the Information Technology Act, 2000, the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021. Detailed examination of on-demand content being offered is a larger issue and beyond the scope of this consultation. The Authority is of the view that value-added services offered on ALTD apps should be governed by the applicable laws, rules, guidelines, regulations, orders or directions or issued by the Central Government/TRAI from time to time.

3. Platform Service (PS) Channels for 'ALTD Service'

2.214 Like all other DSPs, Authority is of the view that ALTD apps should also be permitted to offer their own PS channels in addition to television channels approved by the Central Government. Considering that 'ALTD Service' do not have transmission capacity constraints unlike satellite and cable platforms, the existing restriction limiting PS channels to a specified percentage of channel capacity is not required. However, such PS channels should require a registration specifying the various details and declaration for the exclusiveness of the programme transmitted on its app as per **Schedule-I** of **Annexure-III**. Moreover, the PS channels of 'ALTD Service' should be subject to applicable regulations, orders and directions issued by MIB/TRAI from time to time to ensure regulatory consistency and prevent misuse of platform services.

2.215 Further, the other terms and conditions recommended for DTH Service and HITS Service, are not applicable for 'ALTD Service', due to the reasons discussed below.

4. Reservation of Operational Channel Capacity

2.216 Requirement relating to reservation of operational channel capacity for vertically integrated entities is prescribed for distribution platforms having finite and capital-intensive transmission capacity, such as DTH platforms. ALTD apps are not constrained in terms of channel carrying capacity, for they operate over public Internet. Therefore, such a requirement is not relevant for 'ALTD Service', hence this provision is not applicable for 'ALTD Service'.

5. Mandatory Sharing of Sports Broadcasting Signals

2.217 Stakeholder comments regarding the applicability of 'mandatory sharing of sports broadcasting signals with Prasar Bharati' have been examined. The statutory obligation relating to sharing of sports broadcasting signals is a mandate for broadcasters and does not constitute an obligation for television distribution platforms as such. The proposed regulatory framework for 'ALTD Service' is based on the principle of a light-touch regulatory approach, wherein only those obligations that are necessary and commensurate with the nature of the service are made applicable. Hence, this provision is not applicable for 'ALTD Service'.

6. Compulsory Carriage

2.218 The rationale for mandatory carriage obligations of certain channels on distribution platforms such as DTH, HITS, IPTV and cable is on the basis that consumers generally access TV services through a dedicated distribution platform and are dependent upon the channels made available by that platform. In contrast, consumers accessing 'ALTD Service' over the Internet are not bound to any

specific platform or proprietary customer premises equipment, such as a Set Top Box (STB). They are free to access television channels through multiple applications available on Internet, including the applications provided by the broadcasters themselves, such as WAVES in the case of public broadcaster. Therefore, the Authority does not consider it necessary to prescribe compulsory carriage obligations for authorised entities providing 'ALTD Service'. Accordingly, carriage of such channels is left to the commercial discretion of the authorised ALTD application provider.

7. Interoperability of Set Top Boxes

2.219 The provisions related to interoperability of STBs for conventional distribution platforms are relevant where consumer premise equipment forms an integral part of service delivery. Since 'ALTD Service' can be accessed through software applications on Internet-enabled devices, said provision is not applicable for 'ALTD Service'.

8. Preference to Indian Satellites

2.220 The provisions relating to preference for Indian satellite systems are relevant only for services utilising satellite transmission infrastructure. Since 'ALTD Service' is delivered through public Internet or other IP-based networks, satellite capacity is not required, hence this condition not applicable for 'ALTD Service'.

9. Channels distributed through ALTD applications

2.221 In addition to the television channels permitted by MIB, a number of linear television channels that do not have MIB permission are presently being made available through ALTD applications. Stakeholders have stated that these channels are curated specifically for ALTD apps and other internet-based platforms.

2.222 It has been noted that under the Policy Guidelines for Uplinking and Downlinking of Satellite Television Channels in India, 2022, an entity seeking permission for downlinking a television channel is required to apply through the Broadcast Seva portal and furnish prescribed information and supporting documents. The eligibility assessment includes, inter alia, verification of the applicant's legal and commercial presence in India, ownership or exclusive distribution rights in respect of the channel, compliance with the applicable FDI policy, details of its directors and key managerial personnel, technical details of the downlinking and distribution system, and arrangements for monitoring and preservation of programme records. Importantly, the process does not end with an assessment of the applicant's eligibility. The application is subject to security clearance and approval of the Ministry of Home Affairs and, wherever considered necessary, other authorities.

2.223 Thereafter, the MIB is required to satisfy itself that the proposed channel is suitable for public viewing in India and that the applicant is fit for approval, before granting permission by an order in writing. The framework further requires permitted channels to comply with the Programme Code and Advertising Code, other applicable content regulations, Government monitoring requirements and maintenance of programme records, and empowers the Central Government to prohibit downlinking, reception, transmission or retransmission of channels in specified circumstances, including those relating to national security. The Authority is of the view that all such linear television channels should be subject to an appropriate approval mechanism by MIB, because any TV channel distributed in India should undergo prescribed scrutiny by the Government. This issue has been examined in detail in Chapter III, wherein the Authority has recommended a registration framework for such 'Internet-native linear television channel'. Accordingly, a corresponding provision has been included in the specific terms and conditions applicable to

'ALTD Service' to ensure that only approved television channels are distributed through ALTD applications.

10. Periodic security audit and other testing requirements

2.224 'ALTD Service' are application-based and Internet-enabled services which involve mobile and TV applications, web portals, APIs, databases, cloud infrastructure, servers and other digital systems. Such IP-based systems process consumer credentials, subscription and billing information, viewing and usage-related information and other operational data. ALTD applications interfaces with broadcasters, content providers, advertisers, payment gateways, analytics systems, EPG systems and other third-party systems. The interconnected nature of these systems may expose 'ALTD Service' to cybersecurity risks, including unauthorised access, data leakage and exploitation of software vulnerabilities.

2.225 In this regard, Indian Computer Emergency Response Team (CERT-In), under Ministry of Electronics and Information Technology had issued Guidelines on 'Secure Application Design, Development, Implementation & Operations' dated 25th January 2024[46], emphasises that security should be incorporated as an integral part of application design and development lifecycle.

2.226 These guidelines provide for security considerations across the various stages of application design, development, audit, deployment, operations and testing by CERT-In empanelled auditing organisations. The CERT-In Comprehensive Cyber Security Audit Policy Guidelines dated 25th July 2025[47] further provide a structured and standardised framework for conducting

[46] https://www.cert-in.org.in/s2cMainServlet?pageid=GUIDLNVIEW02&refcode=CISG-2024-01 (accessed on 14th October 2026)

[47] https://www.cert-in.org.in/s2cMainServlet?pageid=GUIDLNVIEW02&refcode=CISG-2025-02 (accessed on 14th October 2026)

cybersecurity audits, including audit planning, assessment, reporting and follow-up.

2.227 In view of the above, 'ALTD Service', owing to its architecture and handling large consumer profiles, it is essential that the authorised entity should undertake the security assessment of its TV or mobile applications, web portals, APIs, databases, servers and cloud environments, network and other technology components forming part of or supporting the 'ALTD Service'. The security assessment should also take into account relevant third-party integrations and interfaces having a bearing on the security of 'ALTD Service'. The assessment would include vulnerability assessment, penetration testing, application and API security testing, configuration and infrastructure security assessment and mobile application security testing, wherever applicable.

2.228 As per the guidelines, such security assessment should be undertaken prior to the deployment of the services in the production environment. Further, an independent security assessment should be undertaken at least once a year during the operational life of the 'ALTD Service'. Re-assessment should also be undertaken following any major modification, significant upgrade, material change in architecture or hosting environment, migration of the application or any other material change that may affect the security posture of the service.

2.229 In view of the above and basis stakeholders' comments, the Authority is of the view that appropriate pre-deployment and periodic security assessments, including vulnerability assessment and penetration testing, along with re-assessment following material changes, should form part of the specific terms and conditions applicable to the authorised entity providing 'ALTD Service'.

Accordingly, a corresponding enabling provision has been included in the specific terms and conditions.

11. Data Localisation

2.230 The authorised entity providing 'ALTD Service' may collect, generate, store, and process users' viewing pattern and behaviour, account and transaction-related information, application and security logs, and other data relating to the provision and operation of the service. Ensuring that relevant data and logs remain accessible within the Indian jurisdiction is important for effective regulatory oversight.

2.231 In this regard, the Digital Personal Data Protection (DPDP) Act, 2023[48] specifically addresses issues pertaining to processing of personal data outside India. Section 16(1) provides that:

"The Central Government may, by notification, restrict the transfer of personal data by a Data Fiduciary for processing to such country or territory outside India as may be so notified."

2.232 Further, Section 16(2) provides that:

"Nothing contained in this section shall restrict the applicability of any law for the time being in force in India that provides for a higher degree of protection for or restriction on transfer of personal data by a Data Fiduciary outside India in relation to any personal data or Data Fiduciary or class thereof."

2.233 Thus, the applicable data protection framework recognises cross-border transfer of personal data as a regulated matter and enables the Central Government to prescribe requirements in respect thereof. The Rules also prescribe specific requirements relating to

[48] https://www.meity.gov.in/static/uploads/2024/06/2bf1f0e9f04e6fb4f8fef35e82c42aa5.pdf (accessed on 14th October 2026)

security safeguards and logs. Rule 6(1) requires a Data Fiduciary to protect personal data in its possession or control, including processing undertaken by a Data Processor, by taking reasonable security safeguards to prevent personal data breach.

2.234 In particular, Rule 6(1)(c) requires appropriate *"logs, monitoring and review"* to enable visibility on access to personal data for detecting unauthorised access, investigation of any unauthorised access and prevention of recurrence. Further, Rule 6(1)(e) requires the Data Fiduciary to retain *"such logs and personal data for a period of one year"* for the purposes specified therein, unless retention for a longer period is required by any other law for the time being in force.

2.235 In addition, the CERT-In Directions dated 28th April 2022[49], issued under section 70B of the Information Technology Act, 2000, specifically require that *"All service providers, intermediaries, data centres, body corporate and Government organisations shall mandatorily enable logs of all their ICT systems and maintain them securely for a rolling period of 180 days and the same shall be maintained within the Indian jurisdiction."* The Directions further require such logs to be provided to CERT-In along with reporting of an incident or when ordered or directed by CERT-In.

2.236 The Authority notes that the aforesaid provisions, taken together, establish the importance of protecting personal data, regulating its transfer outside India and maintaining appropriate logs for security, monitoring and investigation. While the DPDP Act, 2023 and the DPDP Rules, 2025 do not prescribe a blanket requirement that all categories of data processed by a Data Fiduciary must necessarily be stored within India, the regulatory framework permits restrictions on transfer of personal data outside India by the Central

[49] https://www.cert-in.org.in/PDF/CERT-In_Directions_70B_28.04.2022.pdf (accessed on 14th October 2026)

Government. Further, CERT-In Directions specifically provide for maintenance of ICT system logs within the Indian jurisdiction.

2.237 Considering the nature of 'ALTD Service' and the wide reach in today's digital world, the Authority is of the view that the authorised entity should ensure that personal data of users in India should be maintained in the data centres located in India. Such a requirement would facilitate timely access to relevant records by competent authorities, support investigation of cybersecurity incidents and unauthorised access, and strengthen accountability of the authorised entity and its applications.

12. Grievance Redressal and Consumer Protection

2.238 An effective and transparent grievance redressal mechanism is an essential consumer protection measure under the authorisation framework for 'ALTD Service'. Since 'ALTD Service' is delivered through digital applications, consumers should be able to readily access the communication details of the authorised entity's Grievance Redressal Officer(s) through appropriate digital interfaces, including the website, application and EPG. The grievance redressal mechanism, including the benchmarks and timelines for resolution of consumer complaints, should continue to be governed by the regulations, directions and orders issued by the Authority from time to time. Therefore, the corresponding provision is added in the specific terms and conditions of 'ALTD Service'.

2.239 Accordingly, the Authority recommends that the specific terms and conditions applicable to the authorised entity of 'ALTD Service' be adopted as specified in **Part-II of Annexure-III** of these Recommendations, broadly aligned with the framework prescribed in 'Authorisation Recommendations', with suitable modifications as discussed above.

2.240 In view of above, **the Authority recommends that the specific terms and conditions applicable to the authorised entity of 'ALTD Service' be adopted as specified in Part-II of Annexure-III of these recommendations, aligned with the framework prescribed in TRAI's 'Authorisation Recommendations'[50], with suitable modifications.**

[50] Recommendations on 'Framework for Service Authorisations for provision of Broadcasting Services under the Telecommunications Act, 2023' dated 21st February 2025.
(https://trai.gov.in/sites/default/files/2025-02/Recommendations_21022025.pdf)

CHAPTER III: Obligations on stakeholders involved in ALTD ecosystem

3.1 Chapter II presented authorisation framework and corresponding terms and conditions for 'ALTD Service'. This chapter deals with the obligations on TV manufacturers, OS providers and television channels distributed using ALTD apps, among other aspects.

A. Obligations on OEMs and OS providers

3.2 Television manufacturers and OS providers play an important role in service delivery, particularly where ALTD apps are pre-installed or available for download on their platforms or systems. In this context, it becomes necessary that certain regulatory checks such as assurance/certification are put in place for OEMs and OS providers to comply.

3.3 Accordingly, stakeholders were requested to furnish their comments on Q6, on obligations for OEMs and OS providers:

Q6. *What type of assurance or certification mechanism should be prescribed for television manufacturers and operating system providers to ensure that applications provisioning ALTD services, (whether pre-integrated with television sets or made available for download through application stores or web platforms) are duly authorised by MIB.*

Summary of stakeholders' comments on Q6

3.4 The stakeholders expressed varying views in response to this question.

3.5 Some stakeholders favoured prescribing an assurance mechanism for TV manufacturers and OS providers. These stakeholders stated that television, mobile device manufacturers and OS providers

should ensure that only authorised ALTD apps are pre-installed/pre-loaded on their platforms. These OEMs should submit annual self-certificate to MIB and ensure mandatory removal of unauthorised applications within thirty days of identification or notification by authorised agency.

3.6 One stakeholder suggested that application stores should establish KYC and verification mechanisms including removal of unauthorised apps. It was further submitted that technical safeguards, such as whitelisting and periodic compliance checks, should be adopted. One stakeholder proposed that verified apps should display 'MIB Authorised' badge to enhance consumer transparency.

3.7 Some stakeholders favoured a facilitative approach instead of a mandatory certification. They submitted that MIB may maintain an API-based verification mechanism containing details of authorised ALTD apps, which could be accessed by TV manufacturers and OS providers to verify authorisation status of apps. Another stakeholder suggested that OEMs and OS providers should maintain a public list of authorised ALTD apps available on their platforms.

3.8 One stakeholder suggested that a QR code-based verification mechanism linked to MIB database may be provided enabling users to verify the authorisation status of apps. A stakeholder suggested that physical copy of MIB approval should be maintained and made available for inspection whenever required.

3.9 On the other hand, some stakeholders did not favour bringing TV manufacturers and OS providers within regulatory ambit. One stakeholder submitted that competition-related concerns, if any, should be referred to the Competition Commission of India (CCI) rather than regulating the conduct of OEMs directly. It was also submitted that OEMs, OS and device ecosystems are not regulatory

gatekeepers for online content and only function as hardware and software vendors.

3.10 It was further stated that OEMs already operate under a complex and multi-layered regulatory regime, including compliance with Bureau of Indian Standards (BIS) norms under the Compulsory Registration Scheme (CRS), environmental obligations, legal metrology requirements relating to proper labelling and packaging, energy efficiency labelling requirements, the Consumer Protection Act, 2019 and Wireless Planning and Coordination (WPC) approvals for wireless certification.

3.11 The stakeholder further stated that introduction of an additional certification mechanism would impose an additional regulatory burden on television OEMs and OS providers and could disrupt product launch cycles, hinder innovation and delay the availability of products in the market.

Analysis of the issues

3.12 Based on comments and counter-comments received from stakeholders, the Authority has examined the role and responsibilities of various entities in ALTD ecosystem, including the application provider, device/television manufacturers and OS providers.

3.13 Application provider is the primary entity responsible for obtaining authorisation and comply with the applicable T&C, to be notified as Rules (Refer Recommendation No. 4.4 of these recommendations). However, the Authority also recognises that device (including television) manufacturers and OS providers play an important facilitative role in enabling consumer access to ALTD apps which are pre-installed on various devices or in some case pre-loaded with OS or otherwise available for download on application stores. Therefore,

OEMs and OS providers should exercise reasonable due diligence to ensure that only authorised applications are made available on their devices and platforms. Such a mechanism would complement the authorisation framework to ensure that only authorised applications offer ALTD services.

3.14 Connected televisions and other connected devices have increasingly emerged as popular means for accessing television channels. As OEMs and OS providers control the applications which are pre-installed or available for download, it is logical that these entities exercise due diligence to ensure that only authorised ALTD applications are enabled on their devices. One method to ensure this would be through registration of all such OEMs and OS providers by MIB. However, this may be an additional regulatory burden on them, as also raised by some stakeholders.

3.15 A simpler solution would be for the MIB to maintain and periodically update a 'Master ALTD app repository' of authorised ALTD entities and their corresponding ALTD apps. This repository would serve as the authoritative source of information for device manufacturers and OS providers to verify the authorisation status of all ALTD apps, which can be mandated through rules to be notified by MIB. OEMs and OS providers would, in turn, be required to ensure that their platforms enable access to verified ALTD applications only. For implementation, MIB may provide suitable technical solutions like QR code or API-based verification mechanism. The Authority is of the view that this would be a light regulatory requirement for OEMs and OS providers to comply with.

3.16 Another related issue is the identification by MIB of the device manufacturers or importers selling devices in India. For this purpose, Compulsory Registration Scheme (CRS) and its compliance will be helpful, as major device manufacturers are required to

comply with the scheme. CRS is a conformity assessment scheme administered by BIS under Scheme-II of the BIS (Conformity Assessment) Regulations, 2018[51]. It was originally introduced pursuant to the Electronics and Information Technology Goods (Requirements for Compulsory Registration) Order, 2012 issued by Ministry of Electronics and Information Technology (MeitY) and is now governed by the 2021 Order and subsequent amendments. The scheme presently covers many electronics and IT products including Television sets, Plasma/LCD/LED televisions, STBs, video monitors, tablets, mobiles etc. OEMs cannot manufacture, import or sell these products in India without complying with prescribed BIS requirements.

3.17 The existing BIS registration framework provides a comprehensive database of manufacturers/importers of television sets and other notified electronic devices marketed in India. This would serve as a useful reference for MIB to identify manufacturers of connected television devices, wherever required.

3.18 Further, as discussed earlier in Chapter II, an applicant while seeking authorisation for its ALTD application would be required to disclose whether the app is pre-installed on television or any other device, with details of the respective device manufacturer(s). Accordingly, as the authorisation framework is implemented, MIB would progressively develop a repository linking authorised ALTD applications with corresponding device manufacturers. This repository, taken together with the information available under BIS CRS framework, would enable MIB to identify the relevant device manufacturers for regulatory oversight and compliance purposes, wherever necessary, without burdening the OEMs with an additional registration framework.

[51] https://www.bis.gov.in/wp-content/uploads/2019/03/BIS_CA_12032019.pdf#page=243 (accessed on 14th October 2026)

3.19 Further, device (television) manufacturers should ensure authorised ALTD apps are treated equitably. No authorised ALTD app should be blocked, gated, restricted, removed or otherwise subject to discriminatory treatment with respect to their installation, availability, access, functionality or discoverability on their devices.

3.20 Similarly, the OS providers should ensure that only authorised ALTD apps are pre-downloaded on devices operating on their OS or made available for download through the application stores operated or managed by them. Further, any authorised ALTD application should not be blocked, gated, restricted or otherwise subjected to discriminatory treatment with respect to its availability, installation, access or discoverability on their application stores or operating systems.

3.21 It should be the responsibility of OEMs and OS providers to immediately remove or disable any application providing 'ALTD Service' without requisite authorisation, or where the authorisation of the ALTD application provider has been suspended, revoked or otherwise rendered invalid by itself or on directions from Central Government or any competent authority. Such a mechanism would ensure that applications not eligible to provide 'ALTD Service' available to consumers.

3.22 OEMs and OS providers should furnish an annual compliance report, in the form given in **Annexure V**, certifying their compliance with the proposed obligations. Such compliance should not be limited to verification of applications at the time of installation but should be carried out on a continual basis.

3.23 **Accordingly, the Authority recommends that:**

a. **MIB should maintain and periodically update a 'Master ALTD app repository' of authorised entities provisioning ALTD services along with their application names, which should be relied upon by the original equipment manufacturers (including television manufacturers) and operating system providers for verification. MIB should provide suitable technical solutions like QR code or API-based verification mechanism for implementation. Only applications listed in the Master repository should be enabled by OEMs and OS providers in a non-discriminatory manner on their systems.**

b. **Original equipment manufacturers (including television manufacturers) and operating system providers should ensure that any application providing 'ALTD Service' without the requisite authorisation (as in 'a' above) is immediately removed or disabled from its device/application store(s).**

c. **Any such application should also be immediately removed/disabled:**
   i. **as and when directed by the Central Government or any competent authority; or**
   ii. **where the authorisation of the concerned ALTD application provider has been suspended, revoked or otherwise rendered invalid by the Central Government.**

d. **Original equipment manufacturers (including television manufacturers) and the operating system providers should submit an annual compliance report to MIB in the format as prescribed in Annexure-V.**

B. Obligations on authorised entity of 'ALTD Service'

3.24 It is necessary that television channels distributed by the ALTD apps are approved by the Central Government, so as to have the content accountability.

3.25 Accordingly, stakeholders were requested to furnish their comments on Q7 w.r.t. onboarding of channels on their apps:

Q7. What kind of assurance mechanisms should be instituted to ensure that the application providers authorised for provisioning ALTD services carry only those channels which are authorised/permitted by MIB for distribution in India. What kind of penalty/disincentive/deterrent be instituted for non-compliance? Provide your comments with justification.

Summary of stakeholders' comments on Q7

3.26 The stakeholders generally favoured that ALTD apps should carry only those channels which are authorised/permitted by MIB for distribution in India.

3.27 Some stakeholders stated that MIB should maintain a public updated list of authorised/permitted television channels, which can be used by application providers for verification. These stakeholders further suggested that ALTD app should undertake verification of the authorisation status of each channel before onboarding on their platforms. It was also stated that application providers and, where applicable, OEMs should periodically audit the channels carried on their platforms and remove any unauthorised channels identified during such audits.

3.28 One stakeholder suggested that broadcasters should certify that the channels being provided to ALTD platforms hold valid authorisation from MIB. It was further stated that application providers should be permitted to rely on such declarations and that liability for false declarations should rest with the broadcasters concerned.

3.29 Some stakeholders also suggested the establishment of a complaint-based enforcement mechanism. MIB may establish a mechanism through which stakeholders can report non-permitted channels. It was further suggested that ALTD apps should remove such channels within 48 hours of MIB notification.

3.30 With regard to penalties and deterrent measures for non-compliance, one stakeholder proposed a graded enforcement framework. First violation may attract a written warning along with a 48-hour correction window, a repeat violation may attract a financial penalty of ₹1 lakh per instance and persistent violations may result in suspension of ALTD authorisation. Some stakeholders submitted that non-compliance should attract appropriate deterrent measures, including warnings, financial penalties, suspension or cancellation of authorisation, depending upon the nature and severity of violation.

3.31 One stakeholder, on the other hand stated that compliance relating to content should primarily rest with content creators and that rigid certification mechanisms for ALTD platforms may not be necessary.

Analysis of the issues

3.32 Application provider is responsible for onboarding and distributing television channels through its ALTD app. Accordingly, a significant responsibility for ensuring carriage of only permitted television channels should rest with the authorised entity providing 'ALTD Service'. This would be applicable to both approved television

channels as well as registered 'Internet-native linear television channels'. Internet-native linear television channels are the channels solely operating through internet without the need of satellite based uplinking/downlinking. (discussed in the subsequent paras).

3.33 Therefore, the Authority is of the view that MIB should also maintain a central 'Master TV channels repository' of authorised/registered television channels to facilitate verification by ALTD apps. Such a repository would provide a uniform and reliable mechanism for verifying the authorisation status of television channels. For implementation, MIB may provide suitable technical solutions like QR code or API-based verification mechanism.

3.34 It is also observed that the verification of the authorisation status of television channels should be a continuous process and not limited to the stage of onboarding. The application provider should undertake periodic due diligence to ensure that only MIB approved channels are distributed through its ALTD application.

3.35 It should be the responsibility of ALTD Application provider to immediately remove any television channel found to be operating without MIB approval or where the authorisation, permission or registration of the channel has been suspended, revoked or otherwise rendered invalid by the government, from the ALTD app, by itself or upon receipt of directions from the Central Government. This would ensure that unauthorised television channels are not made available to consumers through ALTD apps.

3.36 A half yearly submission of compliance reports by authorised ALTD app as prescribed in **Annexure-VI** would facilitate regulatory oversight by the Central Government and the Authority.

3.37 Apropos, **the Authority recommends that authorised entity of 'ALTD Service' should:**

a. distribute only those television channels, on its application(s) which:

i. hold permission of 'Downlinking of TV Channel', or authorisation of 'Television Channel Broadcasting'; or

ii. registration of 'Internet-native linear television channel'

from the Central Government.

b. ensure that any channel without permission/authorisation or registration of Central Government is immediately removed from its application.

c. immediately remove any channel from its application:

i. as and when directed by the Central Government or competent authority; or

ii. where the authorisation of the concerned ALTD application provider has been suspended, revoked or otherwise rendered invalid by the Central Government.

d. Application providers of 'ALTD Service' should submit a half-yearly compliance report to MIB in the format as prescribed in Annexure-VI.

Value-added services offered by ALTD Apps

3.38 As discussed, various application providers in addition to provisioning linear television channels are also offering on-demand services as value-added services (VAS). Accordingly, Q8 was raised in the Consultation Paper:

Q8. Whether there is a need to prescribe any specific terms and conditions for value-added services offered by ALTD service providers? If yes, what should be the terms and conditions?

Stakeholders are requested to provide their detailed comments with justification.

Summary of stakeholders' comments on Q8

3.39 The stakeholders expressed differing views regarding the need for prescribing specific terms and conditions for value-added services offered by application providers provisioning 'ALTD Service'.

3.40 Some stakeholders favoured prescribing specific terms and conditions for VAS. One stakeholder submitted that value-added services should be permitted as part of ALTD authorisation. Another stakeholder suggested that time-shifted linear channels, Video on demand (VOD) content and OTT content sourced from broadcasters with whom the application provider has entered into agreements should be permitted for distribution through apps.

3.41 A few stakeholders stated that catch-up television, on-demand content, highlights, original content and interactive features may be offered as part of value-added services. However, it was suggested that pay television channels should not be bundled free of cost or below their prescribed MRP through value-added service offerings and such services should comply with applicable content, accessibility and consumer protection requirements.

3.42 Some stakeholders stated that value-added services should be clearly distinguishable from linear television channels and that the applicable framework should ensure transparency in their presentation, access and usage. It was further suggested that VAS should not dilute compliance obligations applicable to linear television distribution.

3.43 Some stakeholders stated that value-added services are separate from linear television channels. Such services are governed by Information Technology (Intermediary Guidelines and Digital Media

Ethics Code) Rules, 2021, incorporating appropriate user-interface labelling and adhere to the applicable codes prescribed by the Advertising Standards Council of India (ASCI).

3.44 These stakeholders further stated that value-added services should remain market-driven and innovation-led and should be governed through general obligations relating to disclosure, data protection, content regulation and non-discrimination rather than through sector-specific ALTD regulations. One stakeholder suggested that, if considered necessary, only principle-based safeguards such as transparency, disclosures and self-regulation may be prescribed.

3.45 Stakeholders not in favour of allowing VAS by ALTD application providers stated that VAS should not be permitted within the scope of distribution activities. They however suggested that PS channels similar to those permitted for DPOs may be allowed.

3.46 One stakeholder suggested that VAS linked to financial rewards or incentives should be prohibited to mitigate risks relating to fraud, money laundering and gambling.

Analysis of the issues

3.47 The Authority has considered stakeholders comments regarding the provision of value-added services by application providers offering 'ALTD Service'. The Authority is of the view that the enabling provision for value-added services has already been incorporated in the definition of the 'ALTD Service' (Refer Recommendation No. 4.2 of these recommendations). Such services shall be governed by the applicable laws of the country. The detailed examination of such value-added services is beyond the scope of the present consultation.

C. Obligations on TV channels distributed through ALTD apps

3.48 Based on the representations received from DPOs and TRAI's own examination, it is observed that the channels appearing on ALTD apps can broadly be categorised into two types. These are:

- Channels duly permitted by MIB for downlinking in India
- Channels not having any permission from MIB

3.49 As per the extant uplinking and downlinking guidelines 2022, only satellite-based broadcasting is permitted, wherein broadcasters are required to obtain permission for 'uplinking only', 'downlinking only' or 'uplinking and downlinking' for their channels.

3.50 Further, as per 'GBB Recommendations', broadcasters can also use communication medium other than satellite-based broadcasting, which can be wireline (cable/fibre) including underground cable/fibre, etc. or wireless (e.g. cellular/microwave/ Wi-Fi, etc.)/internet/cloud, etc. The detailed T&C for ground-based broadcasting are available in 'GBB Recommendations' and also extended in 'Authorisation Recommendations'. The draft MIB Rules Telecommunications (Television, Radio and Associated Services) Rules, 2026 notified on 2nd September 2026 provisions for broadcast of television channels through terrestrial medium in addition to satellite medium.

3.51 In 'ALTD Service', TV channels being delivered over internet to the users are linear in nature, referring to the programme that is transmitted in a fixed, time-bound sequence decided by the authorised entity for television channel, not chosen by the viewer. While the application providers are offering channels approved by MIB, there are concerns related to the second category of unapproved channels, as they do not undergo formal scrutiny before distribution. As they are operating entirely outside regulatory

oversight, there are valid concerns relating to content regulation, compliance to Programme Code and Advertising Code and consumer protection.

3.52 For example, on 19th March 2025[52], AGCOM (the Italian Regulator) issued the first two authorizations for the provision of audiovisual media services via alternative communication networks to a Fast Channel Network for its two FAST channels. The authorization process was conducted in accordance with Article 4 of the regulation adopted under Resolution No. 295/23/CONS. Specifically, it stipulates that FAST channels must obtain authorization based on each individual programming schedule they offer. Consequently, all audiovisual media service providers operating FAST channels, including those already available on Italian smart TVs, are required to obtain specific authorization from AGCOM for each programming schedule they offer.

3.53 To address the above issue in Indian context, a regulatory approach similar to AGCOM may be adopted such that channels provided by any broadcaster or content provider to ALTD application provider should be duly approved.

3.54 In view of the above discussion, stakeholders were requested to furnish their comments on Q9:

Q9. Whether the broadcasters/ content owners providing or intending to provide television channels on ALTD platforms operating in India be mandated to obtain authorisation either for:

- *Satellite-based Broadcasting and/ or*
- *Ground-based Broadcasting*

along with its applicable terms and conditions, before entering into the agreements with authorised entities provisioning ALTD services to consumers? If yes, provide reasons with justifications.

[52] https://merlin.obs.coe.int/article/10279

Summary of stakeholders' comments

3.55 In response to Q9, varied views from stakeholders have been recorded.

3.56 Many stakeholders favoured such a requirement. These stakeholders stated that all broadcasters and the content owners whose channels are being made available on ALTD apps should obtain authorisation. Such a requirement would ensure that only permitted television channels are distributed through ALTD apps operating in India and would provide greater regulatory certainty and legitimacy of channels being carried on such apps.

3.57 One stakeholder, while supporting the requirement of carrying only authorised channels, stated that broadcasters holding valid permissions for their TV channels is sufficient and should not be required to obtain any separate permission merely because their channels are being distributed through ALTD apps.

3.58 Some stakeholders did not favour imposing any authorisation requirement on broadcasters/content owners before re-distributing on ALTD apps. These stakeholders stated that broadcasters and content owners should not be required to obtain any further authorisation for distribution to ALTD apps. It was further stated that internationally such services are generally recognised as digital services and are not subject to legacy broadcasting regulatory frameworks. According to these stakeholders, extending such requirements to content owners using internet-based distribution platforms would amount to applying legacy constructs to a fundamentally different digital ecosystem.

3.59 A set of stakeholders, mostly belonging to the FAST ecosystem, mentioned that there are around 70% channels which are curated particularly for Internet-based platforms only. They suggested a

light-touch registration framework for such Internet-native channels instead of a full-fledged authorisation framework. An online mechanism may be introduced for registration under an "Internet Channel Registration" framework. Such channels should be complaint with Programme Code and Advertising Code, have provision for disclosure of identity of content owner, content genre and details of Indian representative. A nominal registration fee of less than ₹25,000 per channel and annual renewal based on self-certification of compliance may be prescribed.

3.60 The stakeholders further stated that enforcement measures for violations by such registered channels may be aligned with those applicable to permitted television channels. It was suggested that this approach would provide regulatory oversight for Internet-native channels while avoiding the compliance burden associated with a full broadcasting authorisation regime.

Analysis of the issues

3.61 The Authority notes that under the existing regulatory framework, television channels distributed through conventional DPOs are required to obtain requisite permission (or authorisation upon notification of Rules under the Telecommunications Act, 2023) from the Central Government. Such channels are subject to the applicable statutory and regulatory framework, including MHA security clearance, compliance to the Programme Code and Advertising Code, and have approved name and logo in addition to other regulatory requirements. Accordingly, their distribution through ALTD applications should not necessitate any additional permission or authorisation.

3.62 In fact, as a counter-check, it is essential that permission holders of television channels ensure that they enter into interconnection agreement only with authorised 'ALTD application providers' for

distribution of their television channels. The Authority notes that 'ALTD Service' is a distinct and emerging category within the broadcasting distribution ecosystem and while such an authorisation framework is finalised and notified, there would be various ALTD apps already operating without any approval.

3.63 In this regard, an obligation should be placed on the existing broadcasters to provide signals of their television channels only to authorised ALTD application providers. Such an obligation is particularly envisaged as a transitional enabling step for these ALTD providers to obtain authorisation in a timely manner. Accordingly, the Authority is of the view that a reasonable period of one year may be given for 'ALTD Service' to be effective from the date of notification of the authorisation framework, such that the existing application providers get sufficient time to obtain the requisite authorisation from the Central Government. In case any ALTD application provider fails to obtain such authorisation within this stipulated period of one year, the broadcaster should discontinue providing its television channel signals to such application provider.

3.64 Since broadcasters, as permission/authorisation holders, already operate within a regulated framework and are accountable to the Central Government, it is logical that this accountability gets extended downstream to ALTD providers. The integrity of the regulatory framework should not be diluted merely because the delivery mechanism has migrated from conventional platforms to internet-based distribution.

3.65 The Authority further notes that such an approach is consistent with the existing regulatory approach governing the broadcasting distribution sector, wherein permission holders of television channels are required to provide television channels only to authorised DPOs (DTH, HITS, MSO and IPTV). This would also help safeguard consumer interests by ensuring that television channels

reaching consumers through internet-based platforms continue to do so through entities that are accountable and identifiable within regulatory boundaries, thereby preserving the overall sanctity and traceability of the television distribution ecosystem as it evolves to accommodate new technologies and platforms.

3.66 Further to discussion of television channels available on ALTD apps, it is observed that the digital ecosystem has enabled emergence of Internet-exclusive linear television channels, which are distributed solely through internet-based platforms and presently fall outside existing regulatory framework. Such channels currently lack an appropriate mechanism for regulatory identification and oversight, despite performing similar functions of distributing linear television content.

3.67 A distinction needs to be drawn between these two categories of TV channels. While existing permitted TV channels should continue to be distributed without any further approval, Internet-exclusive linear television channels should be brought within a light-touch registration framework. The content provider/broadcaster of such channels should have a distribution agreement with an Indian company for the purpose of application and compliance. It is observed that such channels predominantly carry content related to general entertainment, music, lifestyle, devotion, education, sports and other non-news genres. Accordingly, the Authority considers it appropriate that the proposed registration framework should be limited to distribute channels in the category 'Non-News and Current Affairs' only. The exclusion of 'News and Current Affairs' channels is considered necessary having regard to the nature and public significance of news and current affairs content. Unlike general entertainment or other non-news genres, news and current affairs content have a direct bearing on public discourse and may have significant implications for public order, national security,

social harmony and the integrity of information disseminated to the public. Accordingly, such channels warrant a higher degree of regulatory oversight and accountability.

3.68 Further, permitting Internet-exclusive news and current affairs channels to commence distribution through a light-touch registration mechanism, without being subject to the existing permission framework applicable to television news channels, could result in the emergence of an alternate regulatory route for television news distribution. This may create an uneven regulatory framework wherein substantially similar news and current affairs services are subject to different levels of scrutiny merely on account of the mode through which they are distributed. Such regulatory asymmetry may also provide an incentive for entities to structure or position their services as Internet-native linear television channels in order to avoid the regulatory requirements applicable to permitted television news channels.

3.69 The Authority has also examined the appropriate fee structure for registration of 'Internet-native linear television channel'. Under the existing policy framework, a non-News and Current Affairs television channel requires permission from the Central Government for downlinking in India, for which an annual permission fee of ₹5 lakh is prescribed. Such channels are permitted to be distributed across all permitted television distribution platforms. In contrast, the proposed 'Internet-native linear television channel' are intended to be distributed exclusively through authorised ALTD applications and do not involve satellite uplinking or downlinking. Keeping in mind the light-touch registration mechanism for such channels and having regard to comparatively limited scope of operation and restricted distribution ecosystem, the Authority is of the considered view that an annual registration fee of ₹1 lakh per channel would be reasonable and proportionate.

3.70 The Authority further considers that a one-time processing fee of ₹10,000 would be adequate to cover the administrative cost of processing the registration application, while avoiding unnecessary entry barriers for new digital linear television channels. The registration shall remain valid for a period of ten years, in line with the validity prescribed for other permitted/authorised television channels and would be renewed for a further period of ten years upon payment of a renewal fee of ₹10,000. Further, the transition period of one year after notification of Authorisation framework will be enough for the content owners to get registration of their channels.

3.71 Such a framework would provide a light touch regulatory oversight over such channels with content accountability through compliance to the Programme Code and Advertising Code and an approved name and logo.

3.72 The proposed framework strikes an appropriate balance between regulatory oversight and ease of doing business. It avoids duplicative approvals for existing permitted TV channels while establishing a light-touch registration mechanism for Internet-exclusive linear television channels, thereby promoting regulatory certainty, strengthening accountability and ensuring consistent regulatory treatment of all linear television channels distributed through ALTD applications.

3.73 In view of the above, **the Authority recommends that:**

a. The broadcasters of television channels permitted for downlinking in India or authorised for satellite or ground-based (terrestrial) broadcasting, along with their approved name and logo should enter into interconnection agreements and provide the signals/feed of their television channels

ONLY to the authorised application providers of 'ALTD Service'.

b. In addition to the television channel(s) mentioned above, the content owners of linear channels curated exclusively for ALTD applications, should obtain registration from MIB as per the format specified in Annexure-IV. Such channels are classified as 'Internet-native linear television channel' and should fall under the category of 'Non-news and Current Affairs'. The registration should be subject to the following conditions:

i. The applicant entity should have a distribution agreement with an Indian company for the purpose of application and compliance.

ii. A one-time application processing fee of ₹10,000 payable at the time of submission of registration.

iii. The registration shall remain valid for a period of ten years.

iv. An annual registration fee of ₹1,00,000 per channel shall be payable during the validity period.

v. The registration shall be renewed for a further period of ten years upon payment of a renewal fee of ₹10,000, in accordance with the procedure prescribed by the Central Government.

vi. The registered channels shall comply with the applicable Programme Code and Advertising Code and any other terms and conditions as may be prescribed by the Central Government from time to time.

Pay television channels available as free on ALTD apps

3.74 Based on representations received from stakeholders, it has been observed that a few television channels which are offered as pay channels on permitted distribution platforms are available free of

charge on ALTD apps. Several applications and other digital platforms retransmit such pay channels without charging any subscription fee from end users, which are otherwise monetised as pay channels on other regulated distribution platforms.

3.75 In addition to ALTD apps, several OTT platforms also provide access to linear television channels, either as standalone offerings or bundled with video-on-demand services. In many such cases, the pricing of individual linear channels is neither disclosed nor is separately identifiable, being subsumed in the overall subscription charges. The absence of channel-wise price may make it difficult to determine the effective price being charged for these channels, or any cross-subsidization provided to the consumer.

3.76 In view of the above discussion, stakeholders were requested to furnish their comments on Q10.

Q10. In view of the availability of the pay television channels on ALTD platforms, what pricing methodology should be adopted for price parity of television channels across these platforms? Please provide detailed justification for your response.

Summary of stakeholders' comments on Q10

3.77 Stakeholders expressed divergent views on pricing of television channels distributed through ALTD apps. A section of stakeholders favoured extending the existing tariff framework applicable to traditional DPOs to 'ALTD Service' in order to ensure price parity across distribution platforms.

3.78 These stakeholders stated that when the same pay television channels are distributed through both regulated DPOs and ALTD apps, they should be subject to the provisions of TRAI's Tariff Order and related regulatory provisions. According to them, a uniform

pricing regime is necessary to ensure regulatory parity, competitiveness and level playing field across television distribution platforms.

3.79 Some stakeholders further stated that broadcasters should supply television channels to ALTD apps through mutually negotiated commercial agreements. While supporting commercial flexibility in channel packaging and bouquet formation, they are of the view that such arrangements should remain consistent with the applicable tariff framework.

3.80 On the other hand, several stakeholders opposed prescribing any tariff regulation or price parity requirement for ALTD application providers. They contended that ALTD apps are internet-based application services and should not be subject to the tariff framework applicable to regulated distribution platforms.

3.81 These stakeholders further stated that pricing of television channels and related services on ALTD apps should be determined by market forces and commercial negotiations between concerned parties. It was also argued that broadcasters should have the flexibility to adopt different monetisation models, including classifying television channels as pay or free on a platform-specific basis, depending upon the underlying business model. Some stakeholders further stated that if regulatory asymmetry exists between conventional DPOs and ALTD apps, appropriate policy interventions should progressively reduce tariff regulation on traditional platforms rather than extending such regulations to 'ALTD Service'.

Analysis of the issues

3.82 The Authority has carefully considered the comments of stakeholders on the issues relating to the commercial arrangements

and regulatory framework governing television channels distributed through ALTD apps.

3.83 The primary objective of the present consultation is to examine the appropriate authorisation framework and defining 'ALTD Service' within the service authorisation framework under the Telecommunications Act, 2023. Accordingly, the present Recommendations are primarily intended to establish the regulatory framework governing the authorisation, obligations and responsibilities of entities providing 'ALTD Service'.

3.84 The Authority further observes that issues relating to the commercial framework governing television channels distributed through ALTD platforms, including the applicability of tariff, pricing and other market-related regulatory provisions, involve regulatory considerations related to tariff, interconnection and consumer protection. The Authority is of the view that examination of such issues would be more appropriate once the authorisation framework for 'ALTD Service' is finalised by the Central Government. The tariff, interconnection, quality of service-related regulations will be framed subsequently duly accounting for the terms and conditions finalised for authorisation and after following a stakeholder consultation process specific to regulatory issues.

3.85 In view of the above, the Authority considers that the issues raised in the present question may be examined separately at an appropriate stage after finalisation of the proposed authorisation framework for 'ALTD Service'.

D. Consumer protection under 'ALTD Service' framework

3.86 It is observed that MIB in its reference has, *inter alia*, highlighted the need for ensuring parity, content accountability and consumer

protection while examining the regulatory framework for 'ALTD Service'. Consumer protection, including an effective grievance redressal mechanism for services and content is therefore a core element for consideration.

3.87 Under the extant regulatory regime, regulated DPOs are subject to detailed consumer protection obligations under the respective policy guidelines issued by MIB and TRAI Regulations. TRAI's regulatory framework, particularly related to quality of service and consumer protection *inter alia* prescribe standards relating to service continuity, complaint handling, time-bound redressal of grievances, availability of customer care services, transparency in service offerings and accountability of the service provider towards subscribers.

3.88 In contrast, application providers offering 'ALTD Service' are currently operating outside any existing framework. From a consumer's perspective, as the services mature, consumer issues related to quality-of-service start emerging. A consumer may have several concerns with respect to ALTD apps such as non-availability of channels, interruption or degradation of service, malfunctioning of applications, errors in EPG, inappropriate content, misleading advertising or difficulties in accessing content. In the absence of a clearly defined grievance redressal framework, consumers may not have clarity on whom to approach for redressal of such grievances- the television brand, application provider, content aggregator or any other intermediary involved in service provisioning. These issues hold importance as ALTD service models mature with growing consumer adoption, thereby increasing the potential impact of service-related and content-related grievances of consumers.

3.89 In view of the above, it becomes necessary to examine the need for consumer protection measures for 'ALTD Service'. Accordingly, in

the Consultation Paper, stakeholders were requested to furnish their comments on Q11.

Q11. What obligations are required to be specified for the authorised entities provisioning ALTD services, with respect to consumer protection and grievance redressal mechanism, considering the different modes of service access such as smart televisions, websites, mobile applications etc.? Please provide your comments with detailed justification.

Summary of stakeholders' comments on Q11

3.90 Some stakeholders submitted that consumer protection, Quality of Service and grievance redressal obligations presently applicable to DPOs should also be made applicable to ALTD apps. According to these stakeholders, consumers accessing television channels through ALTD apps should receive the same level of protection as that in traditional distribution platforms.

3.91 Some stakeholders opposed imposing additional DPO style obligations on 'ALTD Service' calling them unnecessary and that it could result in regulatory duplication. These stakeholders submitted that adequate consumer protection safeguards are already available through the Consumer Protection Act, Information Technology framework and the codes prescribed by Advertising Standards Council of India (ASCI).

3.92 Some stakeholders favoured a light-touch consumer protection framework. These stakeholders submitted that the grievance redressal framework for 'ALTD Service' should be flexible, platform-centric and digital-first in nature, considering the internet-based characteristics of such services. It was suggested that consumer grievance mechanisms should be designed to operate through digital interfaces and should avoid replicating legacy broadcasting frameworks without appropriate modifications.

3.93 Some stakeholders further stated that authorised entity should establish transparent and effective grievance redressal mechanisms. In this regard, it was suggested that Resident Officers, Nodal Officers and Grievance Officers should be designated in India and that their contact details should be prominently displayed on the platform. It was also suggested that suitable escalation mechanisms should be provided and that consumers should be able to submit complaints through multiple channels, including in-application interfaces, websites, email and call centres.

3.94 With regard to consumer protection obligations, some stakeholders stated that application provider should ensure transparency in service terms and conditions, channel availability, pricing arrangements and advertising models. It was further suggested that appropriate parental control features, content labelling mechanisms and safeguards relating to data protection should be implemented to enhance consumer trust and informed choice.

3.95 Some stakeholders stated that grievance redressal responsibilities should be clearly demarcated among OEMs, broadcasters and application providers based on the nature of complaint. According to the stakeholder, issues relating to hardware and device functionality may be addressed by OEMs, content-related complaints by broadcasters and platform-related grievances by ALTD app providers, thereby ensuring clarity of responsibility and efficient resolution of consumer complaints.

Analysis of the issues

3.96 Consumer protection and an effective grievance redressal mechanism are essential elements of any service delivery framework. Since 'ALTD Service' could be accessed through smart televisions, mobile applications, websites and other Internet-

enabled devices, consumers should have access to an effective, accessible and time-bound mechanism for redressal of service-related grievances.

3.97 In the ALTD ecosystem, application provider is the primary interface for a consumer. They manage the application platform through which consumers access television channels and other services. Accordingly, the Authority is of the view that the primary responsibility for addressing consumer complaints should rest with application provider authorised for providing 'ALTD Service'.

3.98 To facilitate timely resolution of consumer grievances, every authorised application provider should designate Grievance Redressal Officer(s) (GRO) located in India. The contact details of the GRO should be prominently displayed on its application or website and also should be suitably published through other appropriate means so that consumers have easy and transparent access to it.

3.99 The Authority also recognises that prescribing a separate grievance redressal framework exclusively for 'ALTD Service' is not necessary. The grievance redressal mechanism, including the timelines for resolution of complaints, shall be governed by Quality of Service and Consumer Protection Regulations issued by the Authority, as appropriate once 'ALTD Service' authorisation is finalised. This would ensure uniform consumer protection standards across all television distribution platforms. A provision enabling grievance redressal is included in the Specific Terms and Conditions for 'ALTD Service' in Part-II of Annexure-III of these recommendations.

3.100 In view of above, **the Authority recommends that application provider shall serve as the primary point of contact for addressing and resolving consumer complaints relating to 'ALTD Service' offered on its ALTD application. The application provider should prominently display and adequately publicise**

the communication details of its Grievance Redressal Officer(s) located in India through its application/website or any other suitable means to facilitate easy and transparent access by the consumers.

E. Audience Measurement

3.101 At present, audience measurement for linear television channels is undertaken by a registered television rating agency, which captures channels distributed through regulated DPOs. Such measurement is carried out on a sample basis and is used to generate television ratings, including channel-wise viewership, reach and time spent, extrapolated to reflect the overall television viewing universe in the country. These ratings serve as a key reference for broadcasters, advertisers and other stakeholders in the value chain.

3.102 With the emergence and growth of ALTD apps, as well as the increasing availability of the same linear television channels on other platforms (including both linear and on-demand formats), the distribution and consumption of linear television content is no longer confined to conventional distribution platforms alone. Viewers now access linear television channels across multiple delivery platforms, including internet-based platforms, leading to fragmentation of viewership across distribution modes.

3.103 MIB had issued Policy Guidelines for Television Rating Agencies in India on 16th January 2014[53] to regulate the functioning and operations of television rating agencies in the country. MIB has amended the aforesaid guidelines and introduced a revised policy titled 'TV Ratings Policy 2026- Guidelines for the Regulation of Television Ratings' on 27th March 2026[54]. The policy facilitates

[53] https://mib.gov.in/sites/default/files/2025-07/policy-guidelines-for-television-rating-agencies-in-india-dt-16.01.2014-1.pdf (accessed on 14th October 2026)

[54] https://mib.gov.in/sites/default/files/2026-03/tv-rating-policy-2026-dated-27032026.pdf (accessed on 14th October 2026)

technology neutral TV rating inclusive of multiple platforms. It also enables individual TV distribution platforms to publish periodic viewership data of broadcasters/channels played on their platforms.

3.104 Service providers during interaction with TRAI have mentioned that they undertake general analytics of the application, and its performance, including analysis of session duration and collect anonymous data. No Personally Identifiable Information (PII) based viewership data such as preferences and demographics is collected. Although certain market research and analytics companies provide viewership estimates for online platforms, these measurements are not standardised and are not integrated into existing television rating system, thereby limiting the availability of a unified and comprehensive view of audience behaviour across platforms. This raises issues relating to the completeness and representativeness of audience measurement, particularly where the same channel is consumed across regulated distribution platforms as well as unregulated or differently regulated digital platforms.

3.105 In view of the above, it becomes necessary to examine the need for integration of 'ALTD Service' data into television ratings framework and publication of viewership data by application providers. Accordingly, in the Consultation Paper, the stakeholders were requested to furnish their comments on Q12 & Q13.

Q12. With the revised guidelines now including multiple viewing platforms in audience measurement, stakeholders are requested to furnish their comments on the right methodology for integrating ALTD service data into the television ratings framework, as well as the proposed timelines for implementation, supported by detailed justifications.

&

Q13. Under the revised guidelines, television distribution platforms and/or OTT platforms may publish periodic viewership data of broadcasters/channels they carry on their platforms and/or on their websites, without prior registration. In this context, stakeholders are invited to provide their comments on how such an enablement can be aligned with the proposed authorisation framework for application providers provisioning ALTD services, along with any related considerations.

Summary of stakeholders' comments on Q12

Integration of 'ALTD Service' viewership into television rating framework

3.106 The stakeholders expressed diverging views regarding the integration of 'ALTD Service' and Connected TV viewership into the television audience measurement framework.

3.107 Stakeholders supporting integration of viewers of 'ALTD Service' into audience measurement framework submitted that ALTD and Connected TV viewership should be integrated in a phased manner. It was suggested that a converged and platform-agnostic methodology covering cable, DTH, IPTV and ALTD platforms should be adopted to ensure uniform and comparable audience measurement across different distribution platforms.

3.108 Some stakeholders further stated that audience measurement should be based on actual consumption data, platform analytics and anonymised return-path data. It was suggested that common standards should be established and the measurement framework should be aligned with global benchmarks. Some stakeholders stated that platform first-party data should be recognised and that BARC and other industry stakeholders should be involved in the development of measurement standards and methodology.

3.109 Some stakeholders emphasised that data sharing for audience measurement should be privacy compliant. In this regard, it is submitted that only anonymised and aggregated data should be shared and no PII or proprietary granular data should be disclosed.

3.110 Regarding implementation timelines, stakeholders suggested timelines ranging from 90 days to 24 months, depending upon the extent of standardisation required, pilot testing and overall system readiness.

3.111 Some stakeholders have not favoured the integration of 'ALTD Service' into television ratings framework at this stage. These stakeholders stated that ALTD service should continue under separate, platform-specific measurement framework in view of distinct content formats, consumption patterns and viewership measurement methodology applicable to such services.

3.112 A few stakeholders mentioned that audience measurement falls outside the jurisdiction of TRAI and that such matters are best left to independent industry-led rating agencies and market-based mechanisms. A stakeholder stated that forcing digital metrics into traditional sample-based television ratings framework would be technologically regressive and practically impossible. In their counter-comments, a stakeholder reiterated that audience measurement is outside the jurisdiction of TRAI.

Summary of stakeholders' comments on Q13

Publication of periodic viewership data by application provider provisioning ALTD Service

3.113 Stakeholder responses reflected a range of opinions on publication of periodic viewership data by application provider provisioning 'ALTD Service' under revised guidelines.

3.114 Some stakeholders supported extending the revised framework to 'ALTD Service'. These stakeholders stated that since the Television Ratings Policy, 2026 permits television distribution platforms to publish viewership data without prior registration, a similar enablement should also be extended to 'ALTD Service'.

3.115 Some stakeholders, however, stated that mandatory public disclosure of viewership data should be avoided, as such information is commercially sensitive and proprietary in nature. It was suggested that only aggregated and non-PII data should be shared in compliance with applicable privacy laws.

3.116 Some stakeholders stated that platform-specific viewership insights should be treated as analytics and should remain distinct from formal audience measurement framework. Another stakeholder suggested that existing practice of sharing platform metrics such as number of users, watch time and sessions relating to ALTD channels may continue.

3.117 Some stakeholders opined that published viewership data should clearly disclose the methodology adopted, measurement parameters, duration and platform coverage and that such data should be accurate, consistent and verifiable. It was also suggested that published or self-reported data may be subject to independent audit or verification through registered agencies or auditors empanelled by TRAI.

3.118 Some stakeholders further stated that viewership and advertisement data of unauthorised platforms should not be considered for television ratings purposes and only authorised or licensed services should qualify for such recognition.

3.119 Some stakeholders submitted that stakeholders should be free to utilise global digital measurement standards without any regulatory oversight.

Analysis of the issues

3.120 Comments received from stakeholders regarding integration of 'ALTD Service' viewership into television audience measurement framework and publication of viewership data by ALTD apps have been examined by the Authority. Provisions of the TV Ratings Policy, 2026, has also been noted, which recognise the evolving television viewing ecosystem and provide for inclusion of multiple viewing platforms in audience measurement framework.

3.121 Television viewing is no longer confined to conventional distribution platforms viz., cable TV, DTH, HITS and IPTV. With emergence of 'ALTD Service', consumers are increasingly accessing linear television channels over public Internet through various connected devices. Therefore, it becomes necessary that the audience measurement framework, in so far as it is useful, also evolves to accurately capture television viewership across all authorised distribution platforms.

3.122 Considering the fast-increasing adoption of connected TV, excluding television channel viewership on ALTD platforms in measurement framework would result in an incomplete assessment of television channel consumption and will not reflect the actual reach and viewership of television channels. Accordingly, the viewership of television channels distributed through ALTD apps should form part of the television audience measurement framework to ensure a comprehensive assessment of television audiences across all authorised distribution platforms.

3.123 The methodology for capturing and reporting viewership data from ALTD apps should be standardised, transparent and capable of producing reliable audience measurement outcomes. The methodology should appropriately account for technological characteristics of Internet-based television distribution, while ensuring consistency and comparability with audience measurement across other television distribution platforms. It must ensure clear disclosure norms regarding the measurement parameters, methodology adopted, data accuracy and verifiability.

3.124 Keeping in view the technical complexities associated with integration of Internet-based viewership data, the Authority is of the view that a detailed methodology may be developed by the registered television rating agency(ies), in accordance with the rules, guidelines and regulations issued by MIB and TRAI, once the authorisation framework for 'ALTD Service' is finalised.

3.125 The Authority also recognises that collection and processing of audience measurement data should adequately safeguard consumer privacy and commercially sensitive information. Accordingly, measurement methodology should rely on anonymised and aggregated viewership data and be implemented in accordance with applicable legal and regulatory framework governing data protection.

3.126 TV Ratings Policy 2026 permits television distribution platforms and OTT platforms to publish periodic viewership data of television channels carried on their platforms without obtaining any separate registration. In view of stakeholder comments received in this regard, the Authority is of the view that authorised ALTD application providers should also be treated at par with other authorised television distribution platforms in this regard. The Authority is of the view that the ALTD application providers should be permitted to

publish periodic viewership data of the television channels distributed through their applications and websites without any separate registration or permission. Such an approach would promote transparency, provide useful market information to stakeholders and ensure consistency with existing television audience measurement framework. However, for accountability, it is recommended that in addition to clear disclosure norms, the self-reported data may be subject to independent audit or verification through registered agencies or auditors empanelled by TRAI.

3.127 In view of the above, **the Authority recommends that:**

a. the viewership of television channels distributed through ALTD apps should be measured and integrated into the television audience measurement framework.

b. such viewership should be appropriately accounted for while determining the ratings of television channels to ensure a comprehensive assessment of viewership across all distribution platforms.

c. the methodology for capturing and reporting viewership data of television channels on ALTD apps should be developed by the registered rating agency(ies), in accordance with the rules/guidelines/regulations issued by MIB and TRAI, once the authorisation framework for 'ALTD Service' is finalised by the Ministry.

d. ALTD application provider may be permitted to publish anonymised periodic viewership data of television channels distributed through their applications and websites, without obtaining any separate registration or permission in accordance with the provisions of the TV Ratings Policy, 2026.

F. Future considerations and other issues

3.128 As per FICCI and EY report titled 'Stories, scale and impact: Unlocking India's media and entertainment economy, March 2026[55]', the revenue of television broadcasting is generated through two means, advertising and distribution. According to the estimates, in the year 2025, the television broadcasting sector generated a revenue of INR 263 billion through advertising and INR 354 billion through distribution, cumulating a total revenue of INR 617 billion. This indicates that television broadcasting in India operates under a mixed revenue model. Similarly, digital platforms also operate on advertising-based or subscription-based or a combination of two models.

3.129 At present, 'ALTD Service' operate largely on a free, ad-supported model, with revenues generated exclusively through advertisements. However, it is possible that in future the business models of 'ALTD Service' evolve to adopt a hybrid structure, such that certain services or channels continue to be offered free of cost, while others made available on paid basis or the entire services be made available on payment of certain subscription cost. In such a scenario, it will become necessary to examine how these 'ALTD Service' will be regulated, particularly with respect to the applicability of tariff, interconnection and QoS regulations.

3.130 In this regard, stakeholders were requested to furnish their comments on Q14.

Q14. Considering the scenario wherein application providers provisioning ALTD services may adopt a hybrid business model offering free and/or paid services, stakeholder comments are

[55] https://www.festivalsfromindia.com/blog/wp-content/uploads/2026/03/ey-stories-scale-and-impact-un-locking-indias-media-and-entertainment-economy.pdf (accessed on 14th October 2026)

invited on how such services should be subject to the regulatory framework, particularly with respect to tariff, interconnection and quality of service aspects. Please provide your comments with justification.

Summary of stakeholders' comments on Q14

3.131 The stakeholders expressed differing views regarding the regulatory treatment of 'ALTD Service', particularly in relation to tariff, interconnection and QoS requirements, if operated under hybrid business models that offer both free and paid services,

3.132 Some stakeholders favoured application of regulatory obligations similar to those applicable to traditional distribution platforms. One stakeholder advocated that regulatory forbearance across all DPOs would be the preferred approach. However, if a regulatory framework is to be prescribed, equivalent obligations should apply to ALTD application providers, including public service broadcaster platform, to ensure level playing field across distribution platforms.

3.133 Some stakeholders stated that pay television channels distributed through ALTD apps should comply with applicable MRP and tariff requirements. One stakeholder further stated that broadcasters offering content through OTT platforms should offer the same or lower pricing to DPOs in order to address concerns relating to competitive neutrality and pricing parity.

3.134 Several stakeholders suggested that hybrid ALTD apps offering paid services should be subject to tariff, interconnection and QoS obligations similar to those applicable to traditional DPOs. However, such obligations may require suitable modifications to account for technological characteristics and operating models of ALTD Service. These stakeholders are of the view that where ALTD apps offer pay

television services comparable to those offered by traditional DPOs, corresponding regulatory obligations should apply.

3.135 Some stakeholders favoured a differentiated approach based on the nature of service being offered. These stakeholders submitted that pure FAST services, which are generally free and advertising-supported, may continue under a light-touch registration framework, whereas regulatory obligations relating to tariff, interconnection and consumer protection may be applied only to the paid components or paid services offered by ALTD application provider. According to these stakeholders, such an approach would distinguish between free ad-supported services and paid television distribution services and would ensure proportionate regulation.

3.136 Some stakeholders stated that free services operating through business-to-business (B2B) arrangements should not be subject to same regulatory obligations as paid consumer-facing services. It was suggested that tariff and interconnection regulations may not be necessary in respect of such free services.

3.137 Several stakeholders emphasised that the regulatory framework for hybrid ALTD service should remain flexible, proportionate, technology-neutral and innovation-friendly. According to these stakeholders, any regulatory intervention should take into account the evolving nature of internet-based television distribution and should avoid imposing unnecessary compliance burdens that may hinder innovation and market development.

3.138 A few stakeholders further stated that prescriptive QoS norms designed for managed broadcasting networks are not suitable for ALTD services delivered over open Internet. These stakeholders argued that service performance on ALTD apps depends on several factors beyond the control of the application provider, including

internet connectivity and network conditions, and therefore traditional QoS parameters may not be directly applicable.

3.139 Some stakeholders also stated that tariff regulation for hybrid business models may not be appropriate at present. According to these stakeholders, pricing of digital and internet-based services should continue to evolve through market mechanisms and commercial arrangements rather than through ex ante tariff regulation.

3.140 Further, stakeholders were requested to provide their comments on Q15 regarding any other issue which should be taken into consideration while formulating the regulatory framework for 'ALTD Service'.

Q15. Whether there are other issues (such as channel positioning on home screen, EPGs, revenue sharing, interconnection agreements including marketing and placement agreements, etc.), not specifically covered in this consultation paper, which may be relevant for consideration while formulating the regulatory framework for ALTD services? Stakeholders are also requested to share relevant international best practices or regulatory approaches, if any, along with appropriate justification.

Summary of stakeholders' comments on Q15

Electronic Programme Guide (EPG)

3.141 Some stakeholders submitted that channel positioning and EPG management are essentially commercial decisions and should remain outside the scope of regulatory intervention. These stakeholders are of the view that EPGs, user interface and user experience (UI/UX) design, search algorithms, content placement and associated revenue-sharing arrangements are commercial

matters between the concerned parties. It was further stated that regulatory intervention in such areas may affect intellectual property rights, platform innovation and freedom of contract of stakeholders.

3.142 Several stakeholders, while supporting a distinct framework for ALTD services, stated that EPG of ALTD apps need not mirror the framework applicable to traditional distribution platforms. However, they suggested that fair and non-discriminatory discoverability of channels should be ensured. It was further stated that ALTD application provider should be allowed to leverage advanced digital functionalities, including video-on-demand integration, catch-up television, AI-driven personalisation and interactive features, which are inherent characteristics of internet-based distribution platforms.

3.143 One stakeholder stated that the existing provisions applicable to DPOs relating to channel placement, EPG structure, interconnection arrangements and associated commercial arrangements may be suitably adapted for ALTD apps.

3.144 One stakeholder further suggested that public service channels may be assigned guaranteed positions in EPG under a must-carry framework to ensure their visibility and accessibility to consumers.

Revenue Sharing

3.145 Some stakeholders stated that revenue-sharing arrangements, marketing and placement-related agreements are Business-to-Business (B2B) commercial agreements that are market-driven in nature and, therefore, should remain outside the scope of regulatory intervention. According to these stakeholders, terms of such arrangements should be determined through commercial

negotiations between broadcasters, content providers and ALTD application providers without regulatory prescription.

3.146 Some stakeholders, however, stated that while revenue-sharing, placement and promotional arrangements may continue to be governed through commercial agreements, such arrangements should be transparent and non-discriminatory. It was further suggested that principles governing these arrangements may be aligned with framework applicable to DPOs so as to ensure fairness and prevent discriminatory treatment among stakeholders.

Interconnection framework

3.147 Some stakeholders stated that a full-fledged DPO-style Reference Interconnect Offer (RIO) framework and must-carry and must-provide provisions may not be necessary for ALTD apps and that flexibility in interconnection arrangements should be maintained. According to these stakeholders, commercial negotiations should continue to play an important role in determining the terms and conditions governing carriage and distribution arrangements between broadcasters and ALTD apps. However, it was also suggested that sufficient flexibility should be retained to allow mutually agreed marketing and commercial arrangements between the concerned parties.

3.148 One stakeholder stated that ALTD apps should not discriminate against broadcasters holding valid permissions from MIB and that fair and equitable access should be ensured for all content creators seeking carriage on such platforms.

3.149 One stakeholder further suggested that a light-touch dispute resolution mechanism may be established for addressing disputes between broadcasters and ALTD apps, thereby enabling timely

resolution of commercial and operational issues without imposing an overly prescriptive regulatory framework.

Analysis of the issues

3.150 The Authority has carefully examined the comments received from stakeholders on Q14 and Q15 pertaining to the regulatory treatment of business models that may be adopted by application providers of 'ALTD Service', and the issues related to tariff, interconnection, QoS, EPG, channel positioning, revenue sharing and commercial arrangements. The Authority notes that stakeholders have raised distinct and, in several respects, divergent views on each of these issues, warranting separate examination on the merits of each issue rather than a consolidated treatment.

3.151 'ALTD Service' is in evolving mode of content distribution and application providers, may adopt varying monetisation models, ranging from purely advertising-supported (FAST) services to subscription-based or hybrid models combining free and paid offerings, in future.

3.152 With respect to the tariff applicability to hybrid ALTD models, the Authority has noted the range of views received, some favouring complete forbearance to those advocating that pay television services offered through ALTD apps be brought at par with tariff obligations applicable to traditional DPOs. Further, there were views that tariff obligations may apply only to the paid component of a hybrid offering. The Authority, believes that this issue merits detailed examination, including the question of differential treatment of free and paid components within a hybrid offering, and would be part of Tariff Order and will be taken up by the Authority once the authorisation framework for 'ALTD Service' is finalised by the Government.

3.153 With respect to the Interconnection framework, RIOs and revenue sharing, must-provide and must-carry obligations, the Authority has noted stakeholder submissions both in favour of extending a RIO framework to ALTD apps offering pay services, and against imposing such a framework given the flexible, technology-driven nature of ALTD distribution. The Authority is of the view that the question of a formal interconnection framework, including the extent to which existing RIO principles applicable to DPOs and possible adaptation of the existing RIO and must-provide and must-carry principles to ALTD apps, is an issue of considerable regulatory significance that cannot be settled in abstract. The Authority shall accordingly examine this issue separately, as part of TRAI Interconnection Regulations including the specific question of non-discriminatory carriage, upon finalisation of the authorisation framework.

3.154 On the QoS issues, the Authority notes the stakeholder concern that QoS parameters designed for managed broadcasting networks may not be directly transposable to ALTD service, given that performance of such services is materially dependent on factors not fully in control of the application provider, for example, consumer's internet connectivity. The Authority acknowledges there are some merit in this submission but is of the view that consumers availing 'ALTD Service' are entitled to a relevant assurance of service quality and consumer protection, particularly on parameters within the control of application provider, such as platform stability, EPG design and channel placement, complaint redressal benchmarks and service parameters. The Authority, accordingly, upon finalisation of the authorisation framework, will separately examine and consider prescribing QoS parameters, as appropriate for 'ALTD Service'.

3.155 Accordingly, the regulatory framework governing 'ALTD Service', including matters relating to tariff, interconnection and quality of service issues, as appropriate, would be considered upon finalisation and notification of the authorisation framework for 'ALTD Service', by the Central Government.

CHAPTER IV: Summary of Recommendations

Authorisation of 'ALTD Service'

4.1 The Authority recommends that:

a. An authorisation of 'Application-based Linear Television Distribution (ALTD) Service' should be introduced under Section 3(1)(a) of the Telecommunications Act, 2023, as a sub-category of 'Television Channel Distribution Services' under the recommended authorisation framework for broadcasting services[56].

b. The terms and conditions for such 'ALTD Service' authorisation should be notified as Rules under Section 56 of the Telecommunications Act, 2023, and the authorised entity shall be required to abide by such Rules.

c. The Central Government shall enable the process of authorisation application, channel registration and reporting through an online portal.

[Para 2.37]

Definition of 'ALTD Service'

4.2 The Authority recommends that 'ALTD Service' should be defined as:

'Application-based Linear Television Distribution (ALTD) Service' means aggregation of linear television channels that have been approved by the Central Government, including 'Internet-native linear television channels' (with approved name and logo), along

[56] TRAI Recommendations on 'Framework for Service Authorisations for Provision of Broadcasting Services under the Telecommunications Act, 2023' dated 21st February 2025.
(https://trai.gov.in/sites/default/files/2025-02/Recommendations_21022025.pdf)

with ALTD application provider's own platform service channels, and its distribution to the users, with or without value-added services including on-demand audio-visual content, over public Internet or other IP-based networks through applications, websites or any other similar consumer interface, accessed through Internet-enabled devices.

[Para 2.57]

Scope of 'ALTD Service'

4.3 The Authority recommends the scope of 'ALTD Service' as:

'To develop, deploy and manage an application, website or similar consumer interface, or a combination of these, to aggregate and distribute linear television channels that have been approved by the Central Government, including 'Internet-native linear television channels' (with approved name and logo) and ALTD application provider's own platform service channels over public Internet or other IP-based networks to the users in India.'

The Scope excludes:

a. **applications or websites of broadcasters that distribute only their own channels or the channels of subsidiary company or holding company or subsidiary company of the holding company.**
b. **live streams made available through social media intermediaries.**

Note 1: The definition of 'subsidiary company' and 'holding company' shall be the same as assigned to them in the Companies Act, 2013.

Note 2: The definition of 'social media intermediaries' shall be the same as defined in the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

[Para 2.62]

Primary Stakeholder of 'ALTD Service'

4.4 The Authority recommends that 'Application Provider' intending to provide or providing 'ALTD Service' in India should obtain authorisation from the Central Government under the category of 'Television Channel Distribution Services' for its 'ALTD Application' and shall abide by the Rules notified by the Central Government for 'ALTD Service' and the Regulations/Orders/Directions of TRAI for such service.

[Para 2.78]

Terms and Conditions for grant of authorisation of 'ALTD Service'

4.5 The Authority recommends that the service area, validity and renewal period, fees and charges applicable to an entity seeking authorisation of 'ALTD Service' should be as provided below:

Service Area: National

Validity and Renewal Period:

- **Validity Period: 20 years from the effective date of authorisation**
- **Renewal Period: 10 years for each renewal term**

Fees and Charges:

- **Processing Fee: Rs. 10,000**
- **Entry Fee: Rs. 1,00,000 (non-refundable)**
- **Renewal Fee: Rs. 10,000**

The detailed terms and conditions including eligibility conditions for the grant of authorisation for 'ALTD Service' should be adopted as provided in Annexure-II of these recommendations. These are aligned with the terms and conditions for grant of service authorisation prescribed in Annexure-II of TRAI's 'Authorisation Recommendations'[56], with suitable modifications.

[Para 2.132]

Common Terms and Conditions of 'ALTD Service' with other broadcasting services

4.6 The Authority recommends that the common terms and conditions applicable to the authorised entity of 'ALTD Service', should be adopted as specified in Part-I of Annexure-III of these recommendations. These are aligned with the terms and conditions prescribed in Part-I of Annexure-III of TRAI's 'Authorisation Recommendations'[56], with suitable modifications.

[Para 2.179]

Specific Terms and Conditions of 'ALTD Service'

4.7 The Authority recommends that the specific terms and conditions applicable to the authorised entity of 'ALTD Service' should be adopted as specified in Part-II of Annexure-III of these recommendations, aligned with framework prescribed in TRAI's 'Authorisation Recommendations'[56], with suitable modifications.

[Para 2.240]

Obligations on OEMs and OS Providers

4.8 The Authority recommends that:

a. MIB should maintain and periodically update a 'Master ALTD app repository' of authorised entities provisioning ALTD services along with their application names, which should be relied upon by the original equipment manufacturers (including television manufacturers) and operating system providers for verification. MIB should provide suitable technical solutions like QR code or API-based verification mechanism for implementation. Only applications listed in the Master repository should be enabled by

OEMs and OS providers in a non-discriminatory manner on their systems.

b. Original equipment manufacturers (including television manufacturers) and operating system providers should ensure that any application providing 'ALTD Service' without the requisite authorisation (as in 'a' above) is immediately removed or disabled from its device/application store(s).

c. Any such application should also be immediately removed/disabled:

i. as and when directed by the Central Government or any competent authority; or

ii. where the authorisation of the concerned ALTD application provider has been suspended, revoked or otherwise rendered invalid by the Central Government.

d. Original equipment manufacturers (including television manufacturers) and the operating system providers should submit an annual compliance report to MIB in the format as prescribed in Annexure-V.

[Para 3.23]

Obligations on authorised entity of 'ALTD Service'

4.9 The Authority recommends that authorised entity of 'ALTD Service' should:

a. distribute only those television channels, on its application(s), which:

i. hold permission of 'Downlinking of TV Channel', or authorisation of 'Television Channel Broadcasting'; or

ii. registration of 'Internet-native linear television channel'

from the Central Government.

b. **ensure that any channel without permission/authorisation or registration of Central Government is immediately removed from its application.**

c. **immediately remove any channel from its application:**
   i. **as and when directed by the Central Government or competent authority; or**
   ii. **where the authorisation of the concerned ALTD application provider has been suspended, revoked or otherwise rendered invalid by the Central Government.**

d. **Application providers of 'ALTD Service' should submit a half-yearly compliance report to MIB in the format as prescribed in Annexure-VI.**

[Para 3.37]

Obligations on TV channels distributed through ALTD applications

4.10 The Authority recommends that:

a. **The broadcasters of television channels permitted for downlinking in India or authorised for satellite or ground-based (terrestrial) broadcasting, along with their approved name and logo should enter into interconnection agreements and provide the signals/feed of their television channels ONLY to the authorised application providers of 'ALTD Service'.**

b. **In addition to the television channel(s) mentioned above, the content owners of linear channels curated exclusively for ALTD applications, should obtain registration from MIB as per the format specified in Annexure-IV. Such channels are classified as 'Internet-native linear television channel' and should fall under the category of 'Non-news and Current Affairs'. The registration should be subject to the following conditions:**

i. **The applicant entity should have a distribution agreement with an Indian company for the purpose of application and compliance.**
ii. **A one-time application processing fee of ₹10,000 payable at the time of submission of registration.**
iii. **The registration shall remain valid for a period of ten years.**
iv. **An annual registration fee of ₹1,00,000 per channel shall be payable during the validity period.**
v. **The registration shall be renewed for a further period of ten years upon payment of a renewal fee of ₹10,000, in accordance with the procedure prescribed by the Central Government.**
vi. **The registered channels shall comply with the applicable Programme Code and Advertising Code and any other terms and conditions as may be prescribed by the Central Government from time to time.**

[Para 3.73]

Consumer Protection and Grievance Redressal

4.11 The Authority recommends that application provider shall serve as the primary point of contact for addressing and resolving consumer complaints relating to 'ALTD Service' offered on its ALTD application. The application provider should prominently display and adequately publicise the communication details of its Grievance Redressal Officer(s) located in India on application/website or any other suitable means to facilitate easy and transparent access by the consumers.

[Para 3.100]

Audience Measurement framework for 'ALTD Service'

4.12 The Authority recommends that:

a. the viewership of television channels distributed through ALTD apps should be measured and integrated into the television audience measurement framework.

b. such viewership should be appropriately accounted for while determining the ratings of television channels to ensure a comprehensive assessment of viewership across all distribution platforms.

c. the methodology for capturing and reporting viewership data of television channels on ALTD apps should be developed by the registered rating agency(ies), in accordance with the rules/guidelines/regulations issued by MIB and TRAI, once the authorisation framework for 'ALTD Service' is finalised by the Ministry.

d. ALTD application provider may be permitted to publish anonymised periodic viewership data of television channels distributed through their applications and websites, without obtaining any separate registration or permission in accordance with the provisions of the TV Ratings Policy, 2026.

[Para 3.127]

List of Acronyms

Abbreviation	Description
ALTD	Application-based Linear Television Distribution
ACMA	Australian Communications and Media Authority
AIDCF	All India Digital Cable Federation
AGR	Adjusted Gross Revenue
ASCI	Advertising Standards Council of India
AVMSD	Audiovisual Media Services Directive (EU)
B2B	Business-to-business
BG	Bank Guarantee
BIS	Bureau of Indian Standards
CDN	Content Delivery Network
CERT-In	Indian Computer Emergency Response Team
CRS	Compulsory Registration Scheme
CRTC	Canadian Radio-television and Telecommunications Commission
CTV	Connected Television
DAI	Dynamic Ad Insertion
DAS	Digital Addressable System
DPDP	Digital Personal Data Protection
DPO	Distribution Platform Operator
DSP	Distribution Service Provider
DTH	Direct-to-Home
EPG	Electronic Programme Guide
EY	Ernst & Young
FAST	Free Ad-Supported Streaming Television
FEMA	Foreign Exchange Management Act
FCC	Federal Communications Commission (USA)
FDI	Foreign Direct Investment

FICCI	Federation of Indian Chambers of Commerce and Industry
FTA	Free-to-Air
GBB	Ground-based Broadcaster
GRO	Grievance Redressal Officer
HITS	Headend-in-the-Sky
IIMA	Indian Institute of Management, Ahmedabad
IPTV	Internet Protocol Television
ISP	Internet Service Provider
LCO	Local Cable Operator
LLP	Limited Liability Partnership
MeitY	Ministry of Electronics and Information Technology
MIB	Ministry of Information and Broadcasting
MSO	Multi-System Operator
PII	Personally Identifiable Information
NOC	Network Operation Centre
OEM	Original Equipment Manufacturer
Ofcom	Office of Communications, United Kingdom
OTT	Over-the-Top
PBG	Performance Bank Guarantee
PS	Platform Services
PWA	Progressive Web Application
STB	Set Top Box
RIO	Reference Interconnect Offer
RoW	Right of Way
TRAI	Telecom Regulatory Authority of India
TV	Television
VAS	Value-Added Services
WPC	Wireless Planning and Coordination

Annexure–I: MIB Reference dated 15.12.2025

No. 2/27/2025-BP&L
Government of India
Ministry of Information & Broadcasting

Shastri Bhawan, New Delhi
Dated: the 15th December, 2025

To,

The Chairman,
Telecom Regulatory Authority of India (TRAI),
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
New Delhi – 110002.



Subject: Seeking recommendations from TRAI under Section 11(1)(a) of the TRAI Act, 1997 regarding formulation of a regulatory framework for Free Ad-Supported Streaming Television (FAST) Services – reg.

Sir,

I am directed to state that this Ministry has been deliberating on the industry concerns regarding the Free Ad-Supported Streaming Television (FAST) services in India. In this regard ministry received representations from industry stakeholders, including the *All India Digital Cable Federation (AIDCF)*, expressing concern over the unregulated FAST services (*Copy attached*).

2. The said issue was discussed with various industry stakeholders and comments were sought from them. The responses received from them (Copy attached) indicate that FAST platforms are currently being deployed through preloaded or built-in applications on connected TVs and operate on an advertisement-supported model without any licensing or registration framework.

3. The Telecom Regulatory Authority of India (TRAI), in its earlier recommendations on *(i) "Regulatory Framework for Ground-Based Broadcasters" (dated 15.01.2024)* and *(ii) "Framework for Service Authorisations for Provision of Broadcasting Services under the Telecommunications Act, 2023" (dated 21.02.2025)*, has also noted the growing presence of FAST services and recognized the existence of regulatory gaps in the present framework and recommended that a separate authorization for FAST channel distribution may be considered.

4. In view of the above and keeping in mind the evolving broadcasting landscape, the Ministry is of the view that there is a need to examine the matter comprehensively and develop a clear regulatory framework for FAST

15/12/2025

1

services, ensuring parity, content accountability, and consumer protection.

5. Accordingly, in exercise of the powers conferred under Section 11(1)(a) of the Telecom Regulatory Authority of India Act, 1997, the Ministry hereby seeks the recommendations of TRAI on the formulation of an appropriate regulatory framework governing Free Ad-Supported Streaming Television (FAST) services in India.

6. This issues with the approval of the competent authority.

Yours faithfully,

Encl.: As above.

15/12/2025

(Shiv Ram Meena)
Under Secretary to the Government of India
Tel. 011-23386746
Email: usbpl-moib@gov.in

AIDCF
ALL INDIA DIGITAL CABLE FEDERATION

Ref: AIDCF/FY 25-26/06
Date: 16th June 2025

To,

Shri Prabhat,
Hon'ble Additional Secretary
Ministry of Information and Broadcasting
6th Floor, A Wing
Shastri Bhawan, New Delhi

Sub: Regulatory Framework for FAST channel over connected TV

Ref:

1. AIDCF meeting dated 13th June 2025 with Hon'ble Additional Secretary, MIB.
2. AIDCF Letter No. AIDCF/FY 25-26/02 dated 24th April 2025
3. TRAI recommendations on 'Framework for Service Authorisations for Provision of Broadcasting Services under the Telecommunications Act, 2023' dated 21st February 2025
4. TRAI recommendations on 'Regulatory Framework for Ground-based Broadcasters' dated 15th January 2024

Respected Sir,

At the outset, we are sincerely thankful to you for granting us time on 13th June 2025 and giving us an opportunity for a patience hearing regarding the Cable TV Industry issues and advising us regarding the solutions.

We are writing this letter regarding one of the issues highlighted by us during the meeting regarding FAST services. We have sent the detailed letter dated 24th April 2025 to Hon'ble Ministry, which is also attached as Annexure 1.

The key points which we like to reiterate are as:

1. One of the most concerning developments in India's evolving broadcasting landscape is the emergence of Free Ad-Supported Streaming Television (FAST) services. **These platforms deliver linear satellite TV channels over digital means in an unregulated and impermissible manner, without adhering to the licensing and compliance requirements that govern the conventional broadcasting framework.**

2. This practice is a direct violation of the Uplinking and Downlinking Guidelines notified by the Ministry of Information and Broadcasting in November 2022 and amended in March 2023.

VIOLATION OF EXISTING POLICY GUIDELINES FOR UPLINKING AND DOWNLINKING OF TELEVISION CHANNELS

3. The foundational intent behind the Uplinking and Downlinking Guidelines, introduced on 5th December 2011, was to ensure that **'No television channel will be permitted for public viewing without registration or permission from Ministry.**

4. **Some excerpts from 5th Dec 2011 Downlinking and Uplinking policy guidelines state that:**

"Ministry of Information and Broadcasting, Government of India, has formulated policy guidelines for downlinking all satellite television channels downlinked / received / transmitted and re-transmitted in India for public viewing. ***Consequently, no person/entity shall downlink a channel, which has not been registered by the Ministry of Information and Broadcasting under these guidelines****"*

"Henceforth, all persons/ entities providing Television Satellite Broadcasting Services (Television Channels) uplinked from other countries to viewers in India as well as any entity desirous of providing such a Television Satellite Broadcasting Service (Television Channel), receivable in India for public viewership, shall be required to obtain permission from Ministry of Information and Broadcasting, in accordance with the terms and conditions prescribed under these guidelines"

5. The above-quoted downlinking guidelines were amended on 9th November 2022, wherein the intention remained the same. **The key clauses of the guidelines which outline the requirements for any channel to be transmitted for public viewing in India along-with a brief description of the violations that FAST channels are indulging in are listed below**:

S. No.	Clause No. of Uplinking and Downlinking Guidelines	Clause Details	Violation of Downlinking Guidelines by FAST Channels
1	Clause 11(3)(h)	*(h) It shall ensure that any of its channels, which is unregistered or prohibited from being telecast or transmitted or re-transmitted in India, under the Cable Television Networks (Regulation) Act 1995 or the DTH guidelines or* ***any other law for the time being in force, cannot be received in India through encryption or any other means***	Several TV channels, which are neither registered with MIB nor have been granted license for broadcasting, are being illegally broadcast in the country as FAST services. **Detailed list of such 'unregistered TV channels' being transmitted illegally in the form of FAST services on prominent platforms such as Distro TV, Yupp TV, Samsung TV Plus, LG WebOS are**

			attached with our letter dated 24th April 2025 as Annexure 1
2	**Clause 20(1)**	***20. Name and logo of a TV Channel*** *(1) A company/ LLP shall display on the permitted TV channel only that name and logo which has been approved by the Ministry.* *Provided that display of name/ logo other than that permitted or display of dual logo would be treated as a violation of the Guidelines inviting penal action.*	The name and logo of a TV channel is approved by MIB and use of the same Name and logo on FAST services is a clear violation of the Downlinking guidelines. **Detailed list of such 'licensed TV channels' being transmitted illegally in the form of FAST services, using the same name and logo on prominent platforms such as Distro TV, Yupp TV, Samsung TV Plus, LG WebOS are attached with our letter dated 24th April 2025 as Annexure 1**

6. The combined reading of the respective clauses indicates that individual TV channels which are licensed to broadcasters by the Ministry, after being uplinked to satellites in encrypted form, can only be downlinked and retransmitted by authorized licensed service providers. **In other words, only 'licensed TV channels' can be distributed in India that too only through 'licensed service providers like MSO, DTH, HITS & IPTV. Any other method of distributing such channels would constitute a legal violation.**

TRAI'S RECOGNITION OF REGULATORY GAPS

7. The Hon'ble Telecom Regulatory Authority of India (TRAI) has also taken note of this issue in its recommendations issued with respect to two separate consultation papers:

- In its recommendations on 'Regulatory Framework for Ground-based Broadcasters' dated 15th January 2024, TRAI noted that *"FAST channel services, to the extent they are streaming TV channels, are quite similar to traditional broadcasting."* **TRAI observed that the issue needed further examination and recommended the Hon'ble Ministry to assess whether FAST channels align with the existing regulatory framework and, if necessary, introduce policy guidelines in consultation with TRAI.**

- In its recommendations on *'Framework for Service Authorisations for Provision of Broadcasting Services under the Telecommunications Act, 2023'* dated 21st February 2025, TRAI observed that concerns over the unregulated proliferation of FAST channels in India were *"a genuine one"* and were *"affecting level playing field with respect to the regulated traditional broadcasting ecosystem."* **TRAI underscored that such regulatory arbitrage had the potential of toppling the competitive balance in the industry. TRAI recommended that a separate authorisation maybe considered for FAST channels distribution and that the Hon'ble Ministry may make a reference to TRAI**

to provide detailed terms and conditions for the service authorisation for 'FAST channels distribution service'.

REQUEST FOR INTERVENTION

8. **Considering the violation of several clauses of the Downlinking Guidelines, we respectfully urge the Hon'ble Ministry to:**

   a. **issue a stringent direction to the concerned satellite TV channels, requiring them to rectify the ongoing violations. This may include, but need not be limited to, discontinuing the transmission of signals to FAST service providers.**

   b. **make a timely reference to TRAI for the formulation of appropriate policy guidelines on FAST services by incorporated this issue into TRAI's forthcoming consultation process on the broadcasting sector.**

9. We hope that our request will merit your kind consideration in the interest of a comprehensive and future ready regulatory framework.

Yours Sincerely,
For, **ALL INDIA DIGITAL CABLE FEDERATION**

Manoj P. Chhangani
Secretary General -AIDCF

Copy to:

1. Shri Gauri Shankar Kesarwani, Hon'ble Additional Director, Ministry of Information and Broadcasting, Shastri Bhawan, New Delhi.
2. Shri Niraj Kumar, Hon'ble Director, TVI, Ministry of Information and Broadcasting, Shastri Bhawan, New Delhi.
3. Shri Amit Kumar, Hon'ble Deputy Secretary, DAS, Ministry of Information and Broadcasting, Shastri Bhawan, New Delhi.

AIDCF
ALL INDIA DIGITAL CABLE FEDERATION

Ref: AIDCF/FY 25-26/02
Date: 24th April 2025

To,

Shri Sanjiv Shankar,
Hon'ble Joint Secretary
Ministry of Information and Broadcasting
5th Floor, A Wing
Shastri Bhawan, New Delhi

Sub: Request for sending reference to TRAI for their recommendations regarding "Policy guidelines for FAST channel services" in their upcoming Holistic Consultation Process of the Cable and Broadcasting Industry.

Ref:

1. TRAI recommendations on 'Framework for Service Authorisations for Provision of Broadcasting Services under the Telecommunications Act, 2023' dated 21st February 2025

2. TRAI recommendations on 'Regulatory Framework for Ground-based Broadcasters' dated 15th January 2024

Respected Sir,

1. The rapid advancement of technology has significantly transformed the overall broadcasting landscape in India. Distribution of TV channels, which was once the exclusive domain of licensed DPOs, has now expanded to a wide array of unregulated content delivery modes, including but not limited to video OTT.

2. **Among the various types of unregulated video OTT services, one significantly concerning development is the rise of FAST (Free Ad-Supported Streaming Television) services.[1] These services are being offered in direct violation of the Hon'ble Ministry's Uplinking and Downlinking Guidelines issued in November 2022 (and amended in March 2023).**

TRAI'S RECOGNITION OF REGULATORY GAPS

3. The Hon'ble Telecom Regulatory Authority of India (TRAI) has also taken note of this issue in its recommendations issued with respect to two separate consultation papers:

[1] FAST services deliver linear TV content to viewers using an ad-supported video-on-demand (AVOD) model. These include two key formats:
- FAST TV, which refers to platforms that stream only free, ad-supported linear TV channels; and
- FAST Channels, which are individual free, ad-supported linear TV channels offered within larger OTT platforms.

- In its recommendations on 'Regulatory Framework for Ground-based Broadcasters' dated 15th January 2024, TRAI noted that *"FAST channel services, to the extent they are streaming TV channels, are quite similar to traditional broadcasting."* **TRAI observed that the issue needed further examination and recommended the Hon'ble Ministry to assess whether FAST channels align with the existing regulatory framework and, if necessary, introduce policy guidelines in consultation with TRAI.**

- In its recommendations on *'Framework for Service Authorisations for Provision of Broadcasting Services under the Telecommunications Act, 2023'* dated 21st February 2025, TRAI observed that concerns over the unregulated proliferation of FAST channels in India were *"a genuine one"* and were *"affecting level playing field with respect to the regulated traditional broadcasting ecosystem."* **TRAI underscored that such regulatory arbitrage had the potential of toppling the competitive balance in the industry. TRAI recommended that a separate authorisation maybe considered for FAST channels distribution and that the Hon'ble Ministry may make a reference to TRAI to provide detailed terms and conditions for the service authorisation for 'FAST channels distribution service'.**

VIOLATION OF EXISTING POLICY GUIDELINES FOR UPLINKING AND DOWNLINKING OF TELEVISION CHANNELS

4. The base intention behind bringing up linking and downlinking guidelines on 5th December 2011 was that **'No television channel will be permitted for public viewing without registration or permission from Ministry.**

5. **Some excerpts from 5th Dec 2011 Downlinking and Uplinking policy guidelines state that:**

   "Ministry of Information and Broadcasting, Government of India, has formulated policy guidelines for downlinking all satellite television channels downlinked / received / transmitted and re-transmitted in India for public viewing. ***Consequently, no person/entity shall downlink a channel, which has not been registered by the Ministry of Information and Broadcasting under these guidelines****"*

   " Henceforth, all persons/ entities providing Television Satellite Broadcasting Services (Television Channels) uplinked from other countries to viewers in India as well as any entity desirous of providing such a Television Satellite Broadcasting Service (Television Channel), receivable in India for public viewership, shall be required to obtain permission from Ministry of Information and Broadcasting, in accordance with the terms and conditions prescribed under these guidelines"

6. The above-quoted downlinking guideline dated 5th Dec 2011 was amended on 9th November 2022, wherein the intention remained the same. **The key clauses of the guidelines which outline the requirements for any channel to be transmitted for public viewing in India along-with a brief description of the violations that FAST channels are indulging in are listed below**:

S. No.	Clause No. of Uplinking and Downlinking Guidelines	Clause Details	Violation of Downlinking Guidelines by FAST Channels
1	Clause 4(3)(d)	4. Grant of permission - ... *(3) The Grant of permission to a company/LLP under sub-para (1) shall be subject to the following conditions:* ... *(d) It uplinks from the permitted* ***teleport only those TV channels which have been permitted/ approved by the Ministry, and stops up linking a TV channel as soon as permission/ approval for such channel is withdrawn or suspended by the Ministry****, or on specific order of the Ministry to stop such uplinking for such time period as may be specified in that order;*	The logic behind grant of permission for uplinking and downlinking of any channel was to restrict the delivery of content with respect to Public Viewing. However, with the introduction of FAST services by TV manufacturers like Samsung, LG etc., the basic concept of permission is altogether violated. Therefore, Downlinking guidelines need to be amended to include FAST services in the same.
2	Clause 8(1)(a)	*8. Special conditions for up linking a satellite TV channel –* *(1) The company/LLP which is granted permission to uplink a TV channel under para 7 shall, in addition to the conditions laid down therein, also comply with the following: -* *(a)* ***Up linking may be done in the Frequency Band specified by the applicant, after due approval of the Ministry and other concerned authorities, subject to the further condition that up linking in any band*** *(other than C band) shall only be in encrypted mode;*	The guidelines clearly specify the requirement of due approval from the Ministry, which is conveniently being avoided by FAST channels.
3	Clause 10 (1)(viii)	***10. Furnishing of Application –*** *viii) The downlinked channel must be licensed or permitted for being broadcast by the regulatory or licensing authority of the country of transmission, proof of which would have to be submitted at the time of application.*	Several FAST services are retransmitting foreign channels in India that are uplinked from other countries without securing the mandatory downlinking permission from the MIB because the required proof of licensing or permission from the regulatory authority in the country of origin is not being submitted to MIB.

			As a result, unregistered and unverified foreign channels are being transmitted in India without any regulatory oversight.
4	Clause 11(3)(f)	***11. Grant of permission –*** … *(3) The Grant of permission to a company/ LLP shall be subject to the following conditions:* … *(f) It shall provide Satellite TV Channel signal reception decoders to MSOs/Cable Operators registered under the Cable Television Networks (Regulation) Act 1995 or to a DTH operator registered under the DTH guidelines issued by Government of India or to an Internet Protocol Television (IPTV) Service Provider duly permitted under their existing Telecom License or authorized by Department of Telecommunications or to a HITS operator duly permitted under the policy guidelines for HITS operators issued by the Ministry;*	As per downlinking guidelines the satellite channel decoders can only be provided to DTH, HITS, IPTV and MSOs. Delivery of FAST services/channels without the need for any decoders effectively defeats the purpose and intention behind the relevant clause incorporated in the uplinking and downlinking guidelines.
5	Clause 11(3)(h)	*(h) It shall ensure that any of its channels, which is unregistered or prohibited from being telecast or transmitted or re-transmitted in India, under the Cable Television Networks (Regulation) Act 1995 or the DTH guidelines or* ***any other law for the time being in force, cannot be received in India through encryption or any other means***	Several TV channels, which are neither registered with MIB nor have been granted license for broadcasting, are being illegally broadcast in the country as FAST services. **Detailed list of such 'unregistered TV channels' being transmitted illegally in the form of FAST services on prominent platforms such as Distro TV, Yupp TV, Samsung TV Plus, LG WebOS is highlighted in the Annexures below in red font colour.**
6	Clause 20(1)	***20. Name and logo of a TV Channel*** *(1) A company/ LLP shall display on the permitted TV channel only that name and logo which has been approved by the Ministry.*	The name and logo of a TV channel is approved by MIB and use of the same Name and logo on FAST services is a clear violation of the Downlinking guidelines.

		Provided that display of name/ logo other than that permitted or display of dual logo would be treated as a violation of the Guidelines inviting penal action.	**Detailed list of such 'licensed TV channels' being transmitted illegally in the form of FAST services, using the same name and logo on prominent platforms such as Distro TV, Yupp TV, Samsung TV Plus, LG WebOS is highlighted in the Annexures below in black font colour.**

7. The combined reading of the respective clauses indicates that individual TV channels which are licensed to broadcasters by the Ministry, after being uplinked to satellites in encrypted form, can only be downlinked and retransmitted by authorized licensed service providers. **In other words, only 'licensed TV channels' can be distributed in India that too only through 'licensed service providers like MSO, DTH, HITS & IPTV. Any other method of distributing such channels would constitute a legal violation.**

VIOLATION OF TRAI'S REGULATIONS

8. In July 2024, TRAI amendment[2] Clause 3(2) of its Tariff Order 2017.[3] The amendment introduced a critical clarification i.e. each television channel must be distinctly categorized as either a "Pay Channel" or a "Free-to-Air (FTA) Channel." The amendment further implied that an FTA channel must remain free across all distribution platforms, and conversely, a Pay Channel cannot be offered for free, regardless of the platform or delivery mechanism.

9. However, several channels currently being retransmitted as FAST channels are categorized as "Pay Channels" on licensed distribution platforms, yet are being offered for free through unregulated FAST platforms. This constitutes a direct violation of TRAI's regulatory framework, distorting the pricing logic of channel availability and breaching the principle of uniformity mandated by the Authority.

10. Few of the pay channels, for example, that are being carried on Yupp TV, Samsung TV Plus and LG WebOS without any cost include:

Channel Name	Channel Cost (in INR)
CNBC Awaaz	0.10
CNBC Bajar	1.00
CNBC TV18	4.00
CNN News18	0.50

[2] The Telecommunication (Broadcasting and Cable) Services (Eighth) (Addressable Systems) Tariff (Fourth Amendment) Order, 2024 (No. 1 of 2024)
[3] The Telecommunication (Broadcasting and Cable) Services (Eighth) Addressable Systems) Tariff Order, 2017 (No. 1 of 2017)

India Today	1.80
NDTV Profit	1.50
NDTV24x7	3.50
News18 Bangla	0.10
News18 Gujarati	0.10
News18 Jammu Kashmir	0.10
News18 Kannada	0.10
News18 Keralam	0.10
News18 MP Chhattisgarh	0.10
News18 Odia	0.10
News18 Punjab Haryana	0.10
News18 Tamil Nadu	0.10
News18 UP Uttarakhand	0.10
Wion	1.00
Zee 24 Ghanta	0.10
Zee 24 Taas	0.10
Zee Business	0.10

LACK OF ADHERENCE TO PROGRAMME CODE AND ADVERTISING CODE

11. Moreover, the broadcast and distribution of 'unregistered TV channels' also raises serious concerns regarding non-adherence to the Programme Code and the Advertising Code prescribed under the Cable Television Networks (Regulation) Act, 1995.

12. **In the absence of any registration or regulatory oversight, the nature and content of these channels cannot be verified or monitored. This creates a significant risk, as it becomes impossible to ascertain whether the content is anti-national, anti-social, or contrary to the cultural fabric and public order of the country.**

13. The rapid and unregulated rise of these FAST services heightens the risk of undesirable content gradually infiltrating the ecosystem—if it has not already—thereby necessitating immediate policy attention and enforcement action.

REQUEST FOR POLICY ACTION AND INTERIM RELIEF

14. **In light of the above, we respectfully urge the Hon'ble Ministry to:**

    a. **make a timely reference to TRAI for including the aforementioned issue in their forthcoming consultation process reg. broadcasting sector to suitably amend the up linking & downlinking guidelines dated 9th November 2022 for inclusion of FAST services.**

b. **also bring FAST channels under similar regulatory framework as applicable to other DPOs, so as to ensure a level playing field and parity among the stakeholders.**

15. Meanwhile, till the formation of policy guidelines over FAST services, we would request Hon'ble Ministry, to issue an immediate direction to stop transmission of these FAST channels, as they are a potential risk in their current unregulated form.

16. We hope that our request will merit your kind consideration in the interest of a comprehensive and future ready regulatory framework.

Yours Sincerely,
For, **ALL INDIA DIGITAL CABLE FEDERATION**

Manoj P. Chhangani
Secretary General -AIDCF

Copy to:

1. Shri Sanjay Jaju, Hon'ble Secretary, Ministry of Information and Broadcasting, Shastri Bhawan, New Delhi.

2. Shri Gauri Shankar Kesarwani, Hon'ble Director, Ministry of Information and Broadcasting, Shastri Bhawan, New Delhi.

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The channels in Red Font are not "Licensed channels". Moreover, Channels in Black Font are using the same logo and name as approved under downlinking guidelines for being a satellite channel.

Annexure 1: List of Channels on Distro TV

List of Channels on Distro TV (As on 15-Apr-25)						
4ACETV	Balle Balle	Entrepreneur	Indian Yoga & Wellness TV Telugu	News9Live	Sports Connect	TV9 Bharatvarsh
4ACETV AFROBEAT	Bark TV	Euronews	IndieBox	NewsX	Sports First TV	TV9 Gujarati
4ACETV CLASSIC HITS	Bhakthi Siri	Euronews Español	Inside Investigations	NewsX World	SportsGrid	TV9 Kannada
4ACETV RNB	Black Enterprise	Everyday Heroes	Island Escape	Nigbati TV	Sportskool TV	TV9 Marathi
4K TRAVEL TV	Blaw Football	FEVA MUSIC	Jyotish Duniya	NOMADrlew TV	Sports TVPlus	TV9 Telugu
9X Jalwa	Bless TV	FEVA TV	Kalaasy	OAN Plus	Spring Escape	United Fight Alliance
9XM	Bollywood Masala	Fireplace Lounge	Kalyan TV	Old West TV	Study Lounge	Urban Action Channel
Aaj Ki Khabar	Bowery Classics	Fish Tank	Kartavya TV	OurVinyl	Sudarshan News	Us Weekly TV
ABP Ananda	Box Cinema	Fitness Rewind	Kids TV - Nursery Rhymes and Baby Songs	Outside	Sundrani TV	Vidjar TV
ABP Asmita	Box Gamers	FloRacing 24/7	Kids TV Español Latino	Pitaara TV	Surf Roots TV	Vikatan TV
ABP Ganga	Boxing TV	FLOU Detonacion	Kids TV India - Nursery Rhymes and Baby Songs	PLL Network	Swar Shree	WaopTV
ABP Majha	BritAsiaTV	FUEL TV	KOZOOM TV	PNC Drama	Sword & Shield	Watchit Kid!
ABP News	Business Rockstars	fw.tv by Firework	KwelTV	Powersports World	Tabbar Hits	Wild Nature
ABP Sanjha	CampusLoro Sports	Galaxy TV	La Bocina Latina	Punjabi Hits	Tara TV	Wild TV
ACI On The Go	Cartoon Classics	Garv Punjab Gurbani	Lakshya TV	TFO	Tatvik TV	WiredZilla TV
ACL Cornhole TV	Channel Divya	Ghost Dimension	Life Style by Triptic	Real Life TV	Teton Gravity Research	World Poker Tour
Adventure Sports TV	ChopperTown	GlewedTV Spanish	LifeFit by Triptic	Real Vision	The Boat Show	XFC TV
Africanews	Cinema Hausa	GlewedTV The Vault	Living India News	Relaxing Rain	The Holiday TV Channel	Young Hollywood
Afriwood Blockbuster	Cinegride	GlewedTV Yoga & Fitness	Lone Star	Relaxing WinterScapes	The Unmute	YRF Music
AfroLandTV	Colorized.TV	Goalcast	M+	Revry	Tidflix Authentically African	Zoomer TV
Al Arabiya	Comedy Classics	Green Chillies TV	Maiboli	Revry Her	Titanic TV	
Al Jazeera	Comercio TV	Gusto TV	Masala Entertainment Plus	Revry News	Toon Goggles en Español	
Al Jazeera English	Cooking Panda	Hare Knocks	Mastii - India's No.1 Music and Youth Channel	Right Now Tv	ToonziKids	
Always Funny	CraftsyTV	Hare Krsna	Mediacorp Entertainment – English	Rockola Television	ToonziKids Attal	
Always Funny en Español	Crafty Panda	Haryana Beat	Mediacorp Entertainment – Tamil	ROI TV	ToonziKids niños	
Always Funny: Pranks & Fails	crema.tv	Hip Hop TV	Military Times	Rotana Aflam+	TR Rodeo	
Ambient Channel	Dabangg	HITS MEXICANOS	MMA Junkie	Saga Music	TRACE Brazuca	
Arré	Defiance Media	Horizon Sports	MomCave	Sanmarg TV	TRACE Latina	
Asianet News Live	Divya	Humor Mill	Monarch	Schwab Network	Trace UK	
Asianet Suvarna News	Documentary+	IDG	MotorRacing	Screendreams by Invincible	TRACE Urban	
Atmadarshan TV	Dot Esports	India News	MTRSPT1	Shemaroo Bollywood	Tranquil Thunderstorms	
Autumn Escape	Drone TV	India News Gujarat	Nakshatra Digital TV	Shemaroo Filmgaane	TronTV	
AWE Plus	Dungeon TV	India News Haryana	Namma Bangalore	Skull Bound TV	True African	
a+e Best Classic TV	Eartho TV	India News Punjab	NatureStream.tv	SKWAD	True History	
a+e Classic Flix	El Conflicto TV	India News UP /UK	Negocios TV	Slogos TV	TV Punjab	
a+e Western Grit	ENCORE+	Indian Yoga & Wellness TV Hindi	News Nation	SoniCentric	TV9 Bangla	

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List of Channels on Yupp TV

List of Channels on Yupp TV (As on 14-Apr-25)							
24	Bhakti TV	DRIVE IN MOVIE CHANNEL	insync	Mana TV International	NTV	Seithigal TV	TV5 Kannada
10TV	Bharat Samachar	DROOL	Ippi Aruvi	Mangalamtv TV	OAN PLUS	Shalom TV	TV9 Bangla
4K TRAVEL TV	BIG TV	Dy 365	Jai Maharashtra	Manorama News	OM CVR	Shanam TV	TV9 Bharatvarsh
6TV	BOLLYWOOD 4U	EDGY TV	Jaihind TV	Mantavya News	OUTER VISION TV	Sirippoli TV	TV9 Gujarati
9X Jalwa	Boogie Bollywood	EDGY URBAN	Jan TV	MarianTV	Paivasi TV HD	Sivan Temple TV	TV9 Kannada
9x Jhakaas	Brahmin Kumaris	ENCORE	Janam TV	Mastii	PASAND	Songdew	TV9 Marathi
9x Tashan	BRAT TV	ENGLISH TV	Jantantra TV	Mathrubhumi News	Peace of Mind	SPACE SERIES	TV9 News
9XM	Calcutta News	ESCAPE TV	Jeevan TV	Mazhavil Manorama	People TV	SPORT FISHING TV	UNCHAINEDTV
A1 TV	Calvary TV	FIGHT TV	Jinvani Channel	Mazhavil Manorama HD	Peppers TV	Sri Sankara Kannada	URBAN ACTION
Aajtak	CARTOON TV CLASSICS	God TV	JUPITER TV	MediaOne TV	Pitaara Comedy	Sri Sankara Tamil	V6 News
Aastha Bhajan	Channel Win	Good News Today	JUST FOR LAUGHS GAGS	MERCURY	Pitaara TV	STAR VISION	Vanitha TV
Aastha TV	Chardikala Time TV	Goodness TV	Kairali TV	MMA TV	PMC	Subharti TV	Vedic
ABP Anando	Chithiram TV	Hamdard TV	Kalaignar TV	Moon TV	Polimer News	Sudarshan News	VendharTV
ABP Asmita	CHRONO TV	Hare Krishna TV	Kalinga TV	MOTOR RACING	PolimerTV	Surya Samachar	VOA News
ABP Majha	COEUR OCEAN TV	Harvest TV 24*7	Kanak News	MUNDO SERIES	Power Vision TV	Suvarna News India	VOYAGES
ABP News	COLOUR BLIND	Haryanvi Hits	Kappa TV	Murasu	Prag News	SVBC	VTV Gujarati
AGE TV	COMEDY TADKA	HD TRAVEL TV	Kashish News	Nambikkai	Prime News	SVBC 2	Wah Punjabi
AMERICAS BOATING CHANNEL	COWBOY MOVIE CHANNEL	HEARTFELT TV	Kaumudy TV	Nandighosha TV	Protidin Time	SVBC 3	We TV
Anaadi TV	CTVN AKD Plus	HERITAGE	Kerala Vision	NDTV 24x7	Puthiya Thalaimurai	SVBC 4	WESHORT
ANB News	CUISINE & CULTURE	HERITAGE TOURISM TV	Khabrain Abhi Tak	NDTV GoodTimes	Ramdhenu	Swaraj Express SMBC	WILDEST WISH TV
Angel TV	CVR English News	Hindi Khabar	KIDOO	NDTV INDIA	Rang	Swasthik TV	Wion
APN News	CVR Health	Hindu Dharmam	KOZOOM	NDTV MP	Rengoni TV	T News	XTREM SPORTS
ARAB HERITAGE TV	CVR News	HMTV	Krishna Vani	NDTV Profit	Reporter TV	TANA Prapancha Sahitya Vedika	YUPPTV VEDA
Arodana TV	Dabangg	HOLY GOD TV	KUNG FU	NDTV Rajasthan	Republic Bangla	TENSIONS TV	Zee Business
Argus News	DANGER VISION TV	Hornbill TV	LaksmyaTV	Nepal 1	Republic Bharat	THALAA TV	Zee News
Arihant	DarshanaTV	HORROR TV	LATINO CLASSIC CHANNEL	Network 10	Republic Kannada	Thanthi TV	
Asianet News India	DD INDIA	Hosanna	LOL TV	News 1 India	Republic TV	THE CHUKKER CHANNEL	
Astroscience	DEFIANCE MEDIA	Hosanna TV Hindi	LOVE 2 HATE TV	News 11 Bharat	Rupashi Bangla	THE EXPLORERS	
Athavan TV HD	Desi TV	IBC Bakthi	LUXURY DREAMS TV	News 1st	Saam TV	TOLLY TV	
AWE PLUS	DheeranTV	IBC Radio	Madha TV	News Live	SafariTV	Total TV	
Ayush TV	Dhoom Music	IBC Tamil	Madhimugam TV	News Nation	Sakshi TV	TRUFA	
Balle Balle	Disha TV	India Today News	Mahaa TV	News Time	Sandesh News	T-SAT Nipuna	
BANG BANG TV	Divya Bhajan	India Voice	Maiboli	News7 Tamil	Sansad TV	T-SAT Vidya	
Bansal News	Divya TV	IndiaTV	Makkal TV	News9Live	Santwani	Turito IIT JEE	
BEST ACTION TV	DIY ART	iNews	MAMA BENZ TV	NITRO TV	Sarv Dharm Sangam	Turito NEET	
BEST CLASSIC TV	DOCUVISION	INH 24X7	Mana TV	North East Live	SCIFI WORLD	TV5	

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List of Channels on Samsung TV Plus

List of Channels on Samgsung TV Plus (As on 10-Apr-25)					
9X Jalwa	Colors Infinity Lite	History TV18 Hindi	Motorvision	People are Awesome	TV9 Bangla
9X Jhakaas	Comedy King	Hollywood Desi	Music India	Pitaara	TV9 Bharatvarsh
9X Tashan	Cook & Bake	Hooray Kids	Nazara	Powerkids Kartoon Channel	TV9 Gujarati
9XM	Cricket Gold	Hooray Rhymes	NDTV 24X7	Qwest TV	TV9 Kannada
Aaj Tak	Crime Tak	House of Crime	NDTV GoodTimes	R Bangla	TV9 Telugu
ABP Ananda	Dabangg	India Today	NDTV India	Republic Bharat	WeatherSpy
ABP Asmita	Divya	India TV Aap Ki Adalat	NDTV Profit	Republic Kannada	Wheel World
ABP Majha	Divya Bhajan	India TV News	News Nation	Republic TV	Wild Flix
ABP News	E24	India TV Speed News	News State BR JH	RiC+	WION
Animax	Epic	India TV Yoga	News State MP CG	Sangeet Bangla	Xplore
Astro Tak	FailArmy	InFast	News State PUN HAR HIM	Sangeet Bhojpuri	XXTreme Jobs
Baby First	Fashion TV	InTrouble	News18 Bangla	Sangeet Marathi	Zee 24 Ghanta
Balle Balle	Fifa+	InWild	News18 Gujarati	South Station	Zee 24 Kalak
Best Action TV	Fight TV	InWonder	News18 India	Superhit Beats	Zee 24 Taas
Bhakti Play	Foodie Hub	Jack Hanna	News18 Jammu Kashmir	Tastemade	Zee Business
Billiard TV	Foodxp	Kaan Phod Music	News18 Kannada	TeluguOne TV	Zee News
Bloomberg Originals	Fully Faltoo	KCM	News18 Keralam	The Jungle Book	
Bloomberg TV	Good News Today	KidDo MATIX	News18 Odia	The Lallantop	
Boxing TV	GoUSA TV	Korean TV	News18 Punjab Haryana	The Movie Club	
CNBC Awaaz	Gusto TV	K-POP by CJ ENM	News18 Tamil Nadu	The Pet Collective	
CNBC Bajar	HD Travel	Maiboli	News24	Times Now Navbharat	
CNBC TV18	Heritage	Mastiii	News9 Live	Toon Goggles	
CNN News18	History TV18	MAVTV Motorsports Network	Nosey	Travelxp HD	

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List of Channels on LG WebOS:

List of Channels on LG WebOS (As on 10-Apr-25)				
@K-MUSIC	CNBC TV18	IndiaTV Yoga	News18 Gujarati	TV9 Bharatvarsh
123 GO!	CNN News18	IndiaTVSpeedNews	News18 India	TV9 Gujarati
4k Travel	Color Blind	INFAST	News18 MP Chhattisgarh	TV9 Kannada
52 Channel	Comedy Tadka	INWONDER	News18 Tamil Nadu	TV9 Marathi
5-minute Crafts	Cowboy Movie	Jelly Jam	News18 UP Uttarakhand	TV9 Telugu
AajTak	Dabbang	Just For Laugh	News24 Live	YRF Music
ABP Ananda	Divya	K-ASMR	News9 Live	Zee 24 Taas
ABP Asmita	Divya Bhajan	K-POPCORN	Nightmare Network	Zee Business
ABP Majha	Docuvision	KungFu Action	OUTDOOR TV	Zee News
ABP News	E24 Live	La La Life	Pitaara Comedy	Zee Wion
Automotions	essential;	Maiboli	Pitaara Movies	
B4U Kadak	Euro News	Mango Mobile TV	Saam TV	
B4U Movies	Fight TV	Mastii	Saga Music Haryanvi	
B4U Music	Fit Dance	MMA TV	Saga-Music	
Baby First	Ghaint Punjab	Motor Racing	Slick Slime Sam	
Best Action TV	Good News Today	MTRSPT1	Smart Healthy Green Living	
Best Thriller	Heritage	Music Box TV	Space Series	
Bollywood 4U	Horror TV	NDTV Marathi	SportsGrid	
Bollywood TV	India Today	NDTV Profit	TeenVee	
Brat	India Yoga & Wellness Hindi	NDTV24x7	Telugu One	
Cartoon TV	India Yoga & Wellness Telugu	NDTVIndia	Thalla TV	
Clubbing TV	IndiaTV Aap Ki Adalat	News Nation	Tolly TV	
CNBC Awaaz	IndiaTV News	News18 Bangla	TV9 Bangla	

CLOUD TV

Replies to your questions

1. **Name : Cloud TV** (*Smart TV OS , used by 20+ Indian OEM's)*
   Country of Origin : MADE IN INDIA

2. **Brand Name(s) for Smart TV:**

   CloudTV OS powers devices for more than 300 registered and white labeled TV brands in India.

3. **Model Name(s) and Size of Screen of Smart TVs:**

   - Each OEM has their own model name ,
   - Most popular sizes are 32" & 43" followed by 55 " and 65 "

4. **Operating System in use:** CloudTV OS (android based)

5. **Play store in use for downloading of FAST channels:** CloudTV App Store.

6. **Complete list of** PRE-LOADED **FAST channels** List is attached.

7. **What is your process to verify the permission status of a channel before including it in your FAST service?**

   On on a overall level , we verify the antecedents of the Channel and their content strategy . We verify if the channel provided family friendly content and if the content is available on platforms like YouTube or Global FAST TV etc

8. **What internal systems are in place to ensure that all channels on your FAST service comply with the Programme Code and Advertising Code under the Cable Television Networks (Regulation) Act, 1995?** -

   As a Intermediatary we do not have any direct control on the content but we do keep an eye on these channels to ensure that he family friendly nature of the content does not change

9. **How is compliance with content standards monitored — do you maintain a content recording/archiving system? –**

   As a Intermediatary we do not have any direct control on the content. We do not maintain any recording / archiving system

10. **How do you handle complaints regarding objectionable content or advertising ?**

    We have provided a dedicated email for this purpose. Which is available on our Terms of Service page and within the App itself.

11. **What is the commercial arrangement between Smart TV Manufacturer and broadcasters/content owners for carrying FAST channels? –**

    Revenue -Share deal between the content broadcaster/owner and the App/Platform. Percentage varies but is always majoryi n favour of broadcaster/owner

12. **Do you share advertising revenues with broadcasters, and on what terms? –**

    Yes we do. Broadcasters are paid the majority of the advertisement revenue earned from Advertisements which are placed during the commercial breaks on their respective channels.

13. **What type of viewer data is collected through FAST services (e.g., watch time, channel preferences, demographics)? –**

    - General analytics of the Application, its performance, session time is collected to monitor application performance or bugs.
    - No PII based viewership data such as preferences and demographics is collected.

Pre-loaded FAST Channels	
Republic Bangla	Bollywood Masala
Republic Bharat	Netradio Vision
Republic Kannada	Fast Music Rising
Republic TV	Fast Music Epic
Aaj Tak	Fast Music Lo-Fi
GNT	Tzik Music
India Today	Fast Music Synthwave
News 18 Kannada	FAST Music EDM
News18 Bangla	NH BollyRaga
News18 Bihar Jharkhand	NH BollyFlix
News18 Gujrati	NH BollyGold
News18 India	Terribly Tiny Tales
News18 MP Chattisgarh	Runn Thrillers
News18 Tamil Nadu	Superfine Films
News18 UP Uttarakhand	Runn Action
News9live	Cineshorts Premiere
TV9 Bangla	Runn Short Films
TV9 Bharatvash	NuNu TV
TV9 Gujarati	Panic TV
TV9 Kannada	Zee News
TV9 Marathi	Zee Business
TV9 Telugu	Zee MP & Chattisgarh
Wion	Cooking Panda
Pocket Films	Crema TV
Chana Jor	Duck TV
Mahaa News	Motorvision
Mahaa Max	Party Tyme Karaoke
Mahuaa Play	Skwad Play
Mahuaa News	Smurfs
Rongeen TV	TG Junior
Al Jazeera	Toon Goggles
Divya TV	GameX QYou
Pitaara TV	Q Kahaniyaan
India TV Aap Ki Adalat	Q Toonz
India TV	RDC Movies
India TV Speed News	The Q

Dear Sir,

Please find below the response to the questions shared with us in the matter of Free Advertisement Supported Television (FAST):

1. **Name of TV Manufacturer**: Samsung India Electronics Pvt. Limited
   Name of the OTT Application: Samsung TV Plus
2. **Brand Name(s) for Smart TV**: Samsung Smart TVs
3. **Model Name(s) and Size of Screen of Smart TVs**: 32" and above
4. **Operating System in use**: Tizen (A basic overview of Tizen is available here)
5. **Playstore (or known by any other name) in use for downloading of FAST channels**: Samsung TV Plus is a secure OTT Application. It does not allow any modification or addition by the end-user. It is pre-installed on Samsung Smart TV Models from 2017 onwards, and on select models of Smart Monitors, Smart Refrigerators and Tablets. The Samsung TV Plus App is also pre-installed on Samsung Mobile Phones.
6. **Complete list of PRE-LOADED FAST channels/ applications for FAST channels:** As of September 5, 2025, Samsung TV Plus has over 150 linear channels (link).
7. **What is your process to verify the permission status of a channel before including it in your FAST service?** The majority of channels on Samsung TV Plus in India are already available on linear TV, DTH/ cable and OTT platforms, with established rights and permissions. We apply a careful verification process before onboarding any channel.
8. **What internal systems are in place to ensure that all channels on your FAST service comply with the Programme Code and Advertising Code under the Cable Television Networks (Regulation) Act, 1995?** As an OTT platform, Samsung TV Plus follows a careful verification process to ensure compliance. This process ensures that every channel on Samsung TV Plus has gone through a due diligence process and is appropriate for Indian audiences. Samsung TV Plus controls all advertising content by itself, and does not depend on any of its content partners for the same. We follow and comply with the Guidelines for Prevention of Misleading Advertisements and Endorsements, 2022, under Consumer Protection Act, 2019 including guidelines issued by Advertising Standard's Council of India (ASCI). The advertisements running on channels available on Samsung TV Plus are similar (in most cases identical) to the advertisements running on DTH/ Cable platforms in India.
9. **How is compliance with content standards monitored — do you maintain a content recording/archiving system?** As an OTT application, we have a due diligence process to prevent inappropriate content on Samsung TV Plus. Further, most of the content on Samsung TV Plus is already available elsewhere in India. To the best of our knowledge, there is no requirement on OTT Platforms to maintain a content recording/ archiving system.
10. **How do you handle complaints regarding objectionable content or advertising?** We handle complaints and "Voice of Customer" through a structured review process by

Samsung Customer Care. Concerns can be raised by viewers through Samsung TV Plus Platform itself. These are logged via our support channels and assessed by our internal teams. If the content or the channel is found to be non-compliant, we work with the partner to take corrective action, including removal as required. For advertising, we comply to the Guidelines for Prevention of Misleading Advertisements and Endorsements, 2022, under Consumer Protection Act, 2019 including guidelines issued by Advertising Standard's Council of India (ASCI).

11. **What is the commercial arrangement between Smart TV Manufacturer and broadcasters/content owners for carrying FAST channels?** Samsung TV Plus operates a FAST (Free Ad-supported Streaming TV) model. Channels are typically carried under a combination of Ads inventory sharing and revenue sharing agreements, depending on the partner or content type.

12. **Do you share advertising revenues with broadcasters, and on what terms?** Yes. Advertising Revenues from channels on Samsung TV Plus are typically shared and distributed according to the agreed-upon share between Samsung TV Plus and the content partner.

13. What type of **viewer data** is collected through FAST services (e.g., watch time, channel preferences, demographics)? Samsung TV Plus collects anonymized and aggregated viewing data from its platform. This includes metrics such as total viewership, average watch time, device type, session duration and engagement trends for channels and content.

RE: [External Mail]Re: Meeting with TV Manufacturers to Deliberate upon Authorization of Free Ad-Supported Streaming TV(FAST) Channels Distribution -regarding

Manish Jain < manish1@xiaomi.com >
Wed, 01 Oct 2025 2:17:52 PM +0530

To "Harish Kumar Roy"<sobpl-moib@nic.in>
Cc "Gaurishankar Kesarwani"<adbpl-moib@gov.in>,"Shiv Ram Meena"<usbpl-moib@gov.in>

Dear Sir,

Please note that Xiaomi Technology India Private Limited (**"Xiaomi"**) does not own or operate the FAST channels made available in India. It is being operated by Xiaomi Technologies Singapore Pte. Ltd. (**"Xiaomi SG"**). Xiaomi SG has an arrangement with a service provider by the name of Amagi (**"Amagi"**) who onboards the content service provider and pushes the content on to XTV+

1. Name of TV Manufacturer: *Xiaomi Technology India Private Limited (**"Xiaomi"**) is not a manufacturer of TVs. The TVs are manufactured by TTE Electronics India Private Limited and Dixon Technologies (India) Limited. Xiaomi merely purchases the finished products from the aforementioned manufacturers for further distribution.*

2. Main Brand Name(s) for Smart TV: *Xiaomi*

3. Model Name(s) and Size of Screen of Smart TVs: *All sizes*

4. Operating System in use: *Google TV and Android TV*

5. Play store (or known by any other name) in use for downloading of FAST channels. - *No, we can only download Xiaomi TV+ (the FAST platform) from Play Store available on the Smart TV*

6. Complete list of PRE-LOADED FAST channels/ applications for FAST channels. *Xiaomi does not onboard any FAST channels. The arrangement is between the content provider and Xiaomi SG. However, there is only one FAST channel as on date on the TV devices in India, i.e., Xiaomi Tv+.*

7. What is your process to verify the permission status of a channel before including it in your FAST service? *Amagi carries out the necessary verification before it is onboarded, post which the content is pushed onto XTV+.*

8. What internal systems are in place to ensure that all channels on your FAST service comply with the **Programme Code and Advertising Code** under the Cable Television Networks (Regulation) Act, 1995? *As stated above Xiaomi SG operates XTV+, all compliance in that regard are managed by Xiaomi SG. However, specific to the Indian territory only those channels that are allowed to be broadcasted in India are made available through XTV+.*

9. How is compliance with content standards monitored — do you maintain a content recording/archiving system? *Xiaomi does not carry out any such monitoring or recording/archiving. As stated earlier the FAST channel is provided by Xiaomi SG and the content therein is also pushed by Amagi.*

10. How do you handle complaints regarding objectionable content or advertising? In case of an Indian customer, there are 2 options:
(1) the customer may write to the grievance redressal officer, who will then forward the complaint to Xiaomi SG, or; (2) the customer may leave a feedback/write directly to Xiaomi SG and the latter will then directly take up the matter

11. What is the commercial arrangement between Smart TV Manufacturer and broadcasters/content owners for carrying FAST channels?
Xiaomi is not a manufacturer. They are merely distributors of the TV devices in India. There is no direct arrangement between the TV manufacturer and the content provider. The arrangement is between Amagi and the content service provider. Amagi has an agreement with Xiaomi SG which will broadcast the content through XTV+

12. Do you share advertising revenues with broadcasters, and on what terms?
Xiaomi does not receive any share of revenue from the FAST channels on XTV+.
13. What type of **viewer data** is collected through FAST services (e.g., watch time, channel preferences, demographics)?
Watch time, channel performance, channel favorites, anonymous device ID. No demographic information is collected.

Thanks and Regards,

Manish Jain
Associate Director - Government Relation,CSR and Product Compliance
Xiaomi Technology India Private Limited
Building Orchid. Block E, Embassy Tech Village
Marathahalli Outer Ring Road, Devarabisanahalli, Bengaluru 560103
Contact- +91 9810467072
Email :manish1@xiaomi.com

From: Harish Kumar Roy <sobpl-moib@nic.in>
Sent: Monday, September 1, 2025 4:20 PM
To: contact <contact@mait.com>; info <info@ceama.in>; sg <sg@ceama.in>; anil1.mehta <anil1.mehta@havells.com>; Manish Jain <manish1@xiaomi.com>; sonumehra <sonu.mehra@westwayelectronics.com>; vineetn <vineet.n@samsung.com>; Shalini <Shalini@ceama.in>; rajeshbhat <rajesh.bhat@dolby.com>; ganeshkumar <ganesh.kumar@dolby.com>; akshatbhatnagar <akshat.bhatnagar@havells.com>; sharatcl <sharat.cl@samsung.com>; kuldeep <kuldeep@mait.com>; abhaysharma <abhay.sharma@sony.com>; umakantvashish <umakant.vashish@sony.com>
Cc: Gaurishankar Kesarwani <adbpl-moib@gov.in>; Shiv Ram Meena <usbpl-moib@gov.in>
Subject: [External Mail]Re: Meeting with TV Manufacturers to Deliberate upon Authorization of Free Ad-Supported Streaming TV(FAST) Channels Distribution -regarding

[External Email] This message originated from outside of XIAOMI. Please treat this email with caution. If you have any questions about email security, please forward the email to misec@xiaomi.com for feedback.

Sir,

Please refer to the meeting held on 29.08.2025 regarding Free Ad-Supported Streaming Television (FAST) services. In this regard, some information/details are required in the matter so as to have a better understanding of the issue.

2. Accordingly, the Ministry has formulated some queries which are attached herewith. It is requested that the requisite information/ details may please be provided expeditiously.

Regards,

Section Officer(BP&L)
M/o Information and Broadcasting
Shastri Bhawan
Room No.110, 'A' Wing
New Delhi-110001
Tele No.011-23386884

From: Harish Kumar Roy <sobpl-moib@nic.in>
To: "contact"<contact@mait.com>, "info"<info@ceama.in>, "sg"<sg@ceama.in>
Cc: "Shiv Ram Meena"<usbpl-moib@gov.in>
Date: Tue, 26 Aug 2025 11:54:58 +0530
Subject: Meeting with TV Manufacturers to Deliberate upon Authorization of Free Ad-Supported Streaming TV(FAST) Channels Distribution -regarding

Sir,

I am directed to attach a formal communication no. 2/1/2025-BP&L-Part-I dated 26.08.2025 on the above cited subject for information and necessary action please.

Regards,

Section Officer(BP&L)
M/o Information and Broadcasting
Shastri Bhawan
Room No.110, 'A' Wing
New Delhi-110001
Tele No.011-23386884

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Annexure-II: Terms & Conditions for Broadcasting (Grant of Service Authorisations) for 'ALTD Service'

S. No.	Terms and Conditions	Page No.
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2.	Non-exclusivity	183
3.	Framework of Authorisation for Broadcasting Services	183
4.	Scope of Service and Service Area	184
5.	Validity Period	185
6.	Eligibility Conditions	186
7.	Financial Conditions	186
8.	Process of application to obtain Service Authorisation	187
9.	Grant of Service Authorisation	187
10.	Security Conditions	188
11.	Migration of existing service providers	188

TERMS AND CONDITIONS FOR 'ALTD SERVICE' TO BE INCLUDED IN THE BROADCASTING (GRANT OF SERVICE AUTHORISATIONS) RULES

The following modifications, additions and deletions are recommended in 'The terms and conditions for Broadcasting (Grant of Service Authorisation)' as provided at Annexure-II (page 306) of the 'Framework for Service Authorisations for provision of Broadcasting Services under the Telecommunications Act, 2023' dated 21st February 2025[57] [hereinafter referred to as 'Authorisation Recommendations'] for grant of Service Authorisation for 'ALTD Service'.

1. **Definitions:**

i. The definition of "**Application-based Linear Television Distribution Service (ALTD Service)**" shall be added as under:

"***Application-based Linear Television Distribution Service (ALTD Service)***" means aggregation of linear television channels that have been approved by the Central Government, including 'Internet-native linear television channels' (with approved name and logo), along with ALTD application provider's own platform
service channels, and its distribution to the users, with or without value-added services including on-demand audio-visual content, over public Internet or other IP-based networks through applications, websites or any other similar consumer interface, accessed through Internet-enabled devices;

ii. The definition of "**Distribution Service Provider (DSP)**" shall be modified as under:

"***Distribution Service Provider (DSP)***" shall mean 'Distribution Platform Operator (DPO)' and includes Direct-to-Home (DTH) service provider,

[57] https://trai.gov.in/sites/default/files/2025-02/Recommendations_21022025.pdf

Head-end In The Sky (HITS) service provider, Internet Protocol Television (IPTV) service provider, Multi-System Operator (MSO), Application-based Linear Television Distribution (ALTD) application provider or any other service provider engaged in distribution of programmes/television channels to the users;

iii. The definition of "**Internet-native linear television channel**" shall be added as under:

"***Internet-native linear television channel***" means a linear, scheduled programming service registered with the Central Government for distribution exclusively through an 'ALTD Service' and excludes any 'Television Channel' as defined under these rules;

iv. The definition of "**Television Channel Distribution Services**" shall be modified as under:

"***Television Channel Distribution Services***" means and includes 'Direct-to-Home Service', 'Head-end In The Sky Service', 'Internet Protocol Television Service', 'Application-based Linear Television Distribution Service' or any other service as notified by the Central Government from time to time.

2. **Non-exclusivity**: Applicable to 'ALTD Service'.

3. **Framework of Authorisations for Broadcasting Services**:

A separate sub-category for 'ALTD Service' authorisation, shall be added under the category of "**Television Channel Distribution Services**".

(2) (c) Application-based Linear Television Distribution (ALTD) Service: The authorisation for 'ALTD Service' shall enable the entity to develop, deploy and manage an application to aggregate and distribute linear television channels that have been approved by the Central Government, including 'Internet-native linear television channels' (with approved name and logo), along with ALTD application provider's own platform service

channels, with or without value-added services including on-demand audio-visual content, over public Internet or other IP-based networks to the users.

4. **Scope of Service and Service Area**:

The entry for Scope of Service and Service Area for 'ALTD Service' authorisation shall be added in **Table 4.1** as under:

Table 4.1: Scope of Service and Service Area for Broadcasting Services

S.No.	Service Authorisation	Scope of Service	Service Area
Television Channel Distribution Services			
6a.	Application-based Linear Television Distribution (ALTD) Service	To develop, deploy and manage an application, website or similar consumer interface, or a combination of these, to aggregate and distribute linear television channels that have been approved by the Central Government, including 'Internet-native linear television channels' (with approved name and logo) and ALTD application provider's own platform service channels over public Internet or other IP-based networks to the users in India. The Scope excludes: a. applications or websites of broadcasters that distribute only their own channels or the channels of subsidiary company	National

		or holding company or subsidiary company of the holding company. b. live streams made available through social media intermediaries. Note 1: The definition of 'subsidiary company' and 'holding company' shall be same as assigned to them in the Companies Act, 2013. Note 2: The definition of 'social media intermediaries' shall be same as defined in the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.	

5. **Validity Period:**

The entry for applicable validity period for 'ALTD Service' authorisation shall be added in **Table 5.1** as under:

Table 5.1: Validity Period for Broadcasting Service Authorisations

S. No.	Service Authorisation	Validity Period applicable from the effective date of authorisation
Television Channel Distribution Services		
6a.	Application-based Linear Television Distribution (ALTD) Service	20 years

6. **Eligibility Conditions for the Broadcasting (Television Channel Broadcasting, Television Channel Distribution, and Radio Broadcasting) Services**:

The entry for applicable eligibility conditions for 'ALTD Service' authorisation under category 'Television Channel Broadcasting Services' shall be made in **Table 6.1** as under:

Table 6.1: Applicable clauses of Eligibility Conditions for various Service Authorisations

S. No.	Name of Service	Applicable eligibility condition(s) from the list
Television Channel Distribution Services		
6a.	Application-based Linear Television Distribution Service (ALTD) Service	(1) to (10)

List of eligibility conditions

(1) to (3): Applicable to 'ALTD Service'.

(4): The entry in **Table 6.2** for 'ALTD Service' authorisation shall be made as under:

S. No.	Applicant Entity	Net Worth (in Rs.)
Television Channel Distribution Services		
4a.	Application-based Linear Television Distribution Service (ALTD) Service	NIL

(5) to (10): Applicable to 'ALTD Service'.

(11) to (18): Not applicable to 'ALTD Service'.

7. **Financial Conditions:**

(1) to (5): Applicable to 'ALTD Service'.

(4): Entry in **Schedule-II** (page 349) applicable to 'ALTD Service' shall be made as under:

Applicable Fees for Television Channel Distribution Services

Service	Processing Fee (in Rs.)	Entry Fee (in Rs.)	Bank Guarantee (BG)* (in Rs.)	Renewal Fee (in Rs.)	Authorisation Fee**
ALTD	10,000	1,00,000	NIL	10,000	NIL

8. **Process of Application to obtain Service Authorisation:**

(1) : Applicable to 'ALTD Service'.

(2) : Not Applicable to 'ALTD Service'.

(3) to (9): Applicable to 'ALTD Service'.

(10): Not applicable to 'ALTD Service'.

9. **Grant of Service Authorisation:**

(1): Applicable to 'ALTD Service'.

The entry in **Schedule-V** (page 363) shall be made for 'ALTD Service' as under:

'Additional Information Overleaf'

5a. Application-based Linear Television Distribution Service (ALTD) Service

a. Name of the ALTD application

b. List of Board of Directors/Partners

Any other essential details as deemed necessary by the Central Government

(2): Applicable to 'ALTD Service'.

(3) and (4): Not applicable to 'ALTD Service'.

(5) Applicable to 'ALTD Service'.

Entry in **Schedule-III** (page 351) shall be made for 'ALTD Service' as under:

Roll out Obligations for The Broadcasting (Television Channel Broadcasting, Television Channel Distribution, and Radio Broadcasting) Services

S. No.	Type of Service Authorisation	Roll Out Obligation
Television Channel Distribution Services		
5a.	**Application-based Linear Television Distribution Service (ALTD) Service**	• The Authorised Entity shall make the application live/operational within one year from the date of grant of authorisation. • In case the above obligation is not fulfilled within one year from the date of grant of authorisation, the authorisation shall be liable to be withdrawn.

(6) and (7): Applicable to 'ALTD Service'.

10. **Security Conditions**: Applicable to 'ALTD Service'.

11. **Migration of existing service providers:** Not applicable to 'ALTD Service'.

Annexure-III: Terms and Conditions for the service provision of 'ALTD Service' under Television Channel Distribution Services

INDEX

Part	Description	Page No.
Part-I	**Common Terms and Conditions for The Broadcasting (Television Channel Broadcasting, Television Channel Distribution, and Radio Broadcasting) Services**	190
Part-II	**Specific Terms and Conditions for provision of Broadcasting Services**	195

PART-I

SECTION 1: COMMON TERMS AND CONDITIONS FOR THE BROADCASTING (TELEVISION CHANNEL BROADACSTING, TELEVISION CHANNEL DISTRIBUTION, AND RADIO BROADCASTING) SERVICES

The following modifications, additions and deletions for provision of service for 'ALTD Service' are recommended in 'Part-I, Section 1: Common Terms and Conditions for the Broadcasting (Television Channel Broadcasting, Television Channel Distribution, and Radio Broadcasting) Services' as provided at Annexure-III (page 364) of the 'Authorisation Recommendations'.

1. Definitions:

i. The definition of "**Application-based Linear Television Distribution Service (ALTD Service)**" shall be added as under:

"***Application-based Linear Television Distribution Service (ALTD Service)***" means aggregation of linear television channels that have been approved by the Central Government, including 'Internet-native linear television channels' (with approved name and logo), along with ALTD application provider's own platform service channels, and its distribution to the users, with or without value-added services including on-demand audio-visual content, over public Internet or other IP-based networks through applications, websites or any other similar consumer interface, accessed through Internet-enabled devices;

ii. The definition of "**Distribution Service Provider (DSP)**" shall be modified as under:

"***Distribution Service Provider (DSP)***" shall mean 'Distribution Platform Operator (DPO)' and includes Direct-to-Home (DTH) service provider, Head-end In The Sky (HITS) service provider, Internet Protocol Television

(IPTV) service provider, Multi-System Operator (MSO), Application-based Linear Television Distribution (ALTD) application provider or any other service provider engaged in distribution of programmes/television channels to the users;

iii. The definition of "**Internet-native linear television channel**" shall be added as under:

"***Internet-native linear television channel***" means a linear, scheduled programming service registered with the Central Government for distribution exclusively through an 'ALTD Service' and excludes any 'Television Channel' as defined under these rules;

iv. The definition of "**Television Channel Distribution Services**" shall be modified as under:

"***Television Channel Distribution Services***" means and includes 'Direct-to-Home Service', 'Head-end In The Sky Service', 'Internet Protocol Television Service', 'Application-based Linear Television Distribution Service' or any other service as notified by the Central Government from time to time.

2. Assignment and use of Spectrum

(1) to (5): Not Applicable to 'ALTD Service'.

3. Equity Holding and Management Control

(1) to (5): Applicable to 'ALTD Service'.

(6): Not Applicable to 'ALTD Service'.

4. Renewal of Authorisation

(1): Applicable to 'ALTD Service'.

The entry in **Table 4.1** shall be made for 'ALTD Service' as under:

Table 4.1: Period (in years) and Renewal Fee (in Rs.) for Renewal of Service Authorisation

S. No.	Service Authorisation	Renewal period (in years)	Renewal Fee (in Rs.)
Television Channel Distribution Services			
5a.	Application-based Linear Television Distribution Service (ALTD) Service	10	10,000

(2) to (4): Applicable to 'ALTD Service'.

5. **Modifications in the Terms and Conditions of Service Authorisation**: Applicable to 'ALTD Service'.

6. **Creation of Security Interest**: Applicable to 'ALTD Service'.

7. **Restrictions on 'Transfer of Service Authorisation'**

(1) to (4): Applicable to 'ALTD Service'.

8. **Provision of Service**

(1) to (6): Applicable to 'ALTD Service'.

(7) shall be modified for 'ALTD Service' as under:

The entity shall broadcast only such television channels, which have been authorised or registered (as Internet-native linear television channel) by the Central Government, and stop broadcasting a television channel as soon as authorisation or registration for such a channel is withdrawn or suspended by the Central Government, or on specific order of the Central Government to stop such broadcasting for such time period as may be specified in the order.

9. Monitoring & Inspection

(1) to (3) Applicable to 'ALTD Service'.

10. Reporting Requirements: (1) to (4) Applicable to 'ALTD Service'.

11. Adherence to Programme Code and Advertisement Code

(1) to (3): Applicable to 'ALTD Service'.

12. Sharing of Infrastructure

(1) to (3): Not Applicable to 'ALTD Service'.

(4) shall be added for 'ALTD Service' as under:

For 'ALTD Service' the authorised entity may share cloud infrastructure, Content Delivery Network (CDN), servers, encoding/transcoding infrastructure, storage systems and other similar information technology infrastructure with other authorised entities of 'ALTD Service', subject to compliance with the applicable laws, regulations, standards and directions issued by the Central Government or the Authority from time to time.

13. Financial Conditions: Applicable to 'ALTD Service'.

The entry in **Schedule-II** (page 460) for 'ALTD Service' shall be made as under:

Applicable Fees for Television Channel Distribution Services

Service	**Processing Fee** (in Rs.)	**Entry Fee** (in Rs.)	**Bank Guarantee (BG)*** (in Rs.)	**Renewal Fee** (in Rs.)	**Authorisation Fee****
ALTD	10,000	1,00,000	NIL	10,000	NIL

14. Commercial Conditions

(1) and (2): Applicable to 'ALTD Service'.

15. Security Conditions

(1) to (7): Applicable to 'ALTD Service'.

16. Technical Conditions

(1) to (4): Applicable to 'ALTD Service'.

17. Confidentiality: Applicable to 'ALTD Service'.

18. Force Majeure

(1) to (3): Applicable to 'ALTD Service'.

19. Disputes with Other Parties: Applicable to 'ALTD Service'.

20. Dispute Resolution and Jurisdiction

(1) and (2): Applicable to 'ALTD Service'.

21. Surrender of Authorisation

(1) and (2): Applicable to 'ALTD Service'.

22. Contravention of Rules/Regulations and Violation of Orders/Directions/Codes

(1) to (5): Applicable to 'ALTD Service'.

23. Offences: Applicable to 'ALTD Service'.

24. Termination of Authorisation

(1) to (3): Applicable to 'ALTD Service'.

25. Obligations imposed on the Authorised Entity: Applicable to 'ALTD Service'.

26. Residual Clause: Applicable to 'ALTD Service'.

Part-II: Specific Terms and Conditions for provision of Broadcasting Services

Section 1 and **Section 3** are not applicable for 'ALTD Service' authorisation.

Section 2: Television Channel Distribution Services

The following modifications, additions and deletions for provision of service for 'ALTD Service' are recommended in 'Part-II, Section 2: Specific Terms and Conditions for provision of 'Television Channel Distribution Services' as provided at Annexure-III (page 425) of the 'Authorisation Recommendations'.

The heading of Section 2.1 shall be modified to add 'ALTD Service' as under:

Section 2.1: Specific Terms and Conditions for Direct-to-Home (DTH) Service, Head-end In The Sky (HITS) Service and 'Application-based Linear Television Distribution Service (ALTD) Service'

1. **Prohibition of certain activities**

(1) Applicable to 'ALTD Service'.

(2) (a) shall be modified for 'ALTD Service' as under:

refused access on a non-discriminatory basis to another Distribution Service Provider contrary to the Regulations of TRAI;

(b) Applicable to 'ALTD Service'.

(3) Applicable to 'ALTD Service'.

(4) shall be modified for 'ALTD Service' as under:

An Authorised Entity for 'ALTD Service' shall not carry or include in its application or website any programme or television channel which has not been permitted/authorised/registered by the Central Government for being viewed within the territory of India:

Provided that, notwithstanding any agreement entered into between the Authorised Entity and broadcaster(s)/television channel owner(s), it shall be the responsibility of the Authorised Entity to immediately stop carrying/including in its application or website, such television channel(s), whenever such authorisation or permission or registration is withdrawn.

2. **Value Added Services (VAS)**

For 'ALTD Service', following shall be added:

An Authorised Entity for 'ALTD Service' shall provide value-added services, if any, in its application or website, including on-demand audio-visual content, in accordance with the applicable law.

3. **Vertically Integrated Entity: Reservation of Operational Channel Capacity:** Not applicable to 'ALTD Service'.

4. **Platform Services (PS) Channels for DTH Service and ALTD Service**
[*The heading shall be modified to include 'ALTD Service'*]

(1) and (2): Applicable to 'ALTD Service'.

(3): Not Applicable to 'ALTD Service'.

(4) to (9): Applicable to 'ALTD Service'.

5. **Mandatory sharing of Sports Broadcasting Signals with Prasar Bharati**: Not applicable to 'ALTD Service'.

6. **Compulsory transmission of certain channels**: Not applicable to 'ALTD Service'.

7. **Interoperability of Set Top Box (STB)**: Not applicable to 'ALTD Service'.

8. **Miscellaneous**

(1): Not applicable to 'ALTD Service'.

(2): Not applicable to 'ALTD Service'.

The following terms and conditions, numbered 9, 10, 11 and 12 shall be added for 'ALTD Service'.

9. **Channels distributed through ALTD applications**

The Authorised Entity shall ensure that every television channel distributed through its application or website including linear television channel, Internet-native linear television channel and platform service channel, has obtained the requisite permission, authorisation or registration, as applicable, from the Central Government.

10. **Security assessment requirements**

The Authorised Entity shall undertake appropriate pre-deployment and, thereafter, periodic security assessments, including vulnerability assessment and penetration testing, and further, shall undertake appropriate re-assessment, in case of any material changes are made to the ALTD application or associated digital infrastructure. The Authorised Entity shall comply with all applicable requirements relating to security assessments prescribed by the Indian Computer Emergency Response Team (CERT-In) or any other agency designated by the Central Government, at such frequency and in such manner as may be prescribed from time to time.

11. **Data Localisation**

The Authorised Entity shall ensure that all servers and associated information technology infrastructure used for storage or processing of

user data for provision of 'ALTD Service' are located within the territory of India. The data should include service details, transaction details and any information pertaining to service related transactions and content consumed. This may, *inter alia*, include user data (Name, mobile number, email, Aadhaar/PAN number etc); Payment sensitive data (customer and beneficiary account details; payments made etc.); and, service consumption data (content preferences, content recommendations by the application provider, content consumed, time of consuming content, and analytics on content consumption etc.). All such data, records and logs shall be securely stored and maintained within India and shall be made available to the Central Government or any other competent authority, as and when required under applicable law.

12. **Grievance Redressal and Consumer Protection**

The Authorised Entity shall prominently display and adequately publicise the communication details of its Grievance Redressal Officer(s) located in India through its application/website or any other suitable means to facilitate easy and transparent access to the consumers. The grievance redressal mechanism, including the benchmarks and timelines for redressal of grievances, shall be governed by the regulations, directions or orders issued by the TRAI from time to time.

Annexure-IV: Registration Format for 'Internet-native linear television channel'

Subject: Grant of Registration for 'Internet-native linear television channel' under the 'Application-based Linear Television Distribution (ALTD)' Authorisation Framework

The Ministry of Information and Broadcasting, having considered the application submitted by _____, hereby grants registration for the 'Internet-native linear television channel' detailed below, subject to the applicable registration framework and the terms and conditions specified herein.

Registration Details

Particular	Details
Name of the Channel	
Approved Name and Logo	
Registration Number	
Name of the Content Owner/Broadcaster	
Validity of Registration	
Mode of Distribution	
List of Board of Directors	

Conditions of Registration

1. The applicant entity should have a distribution agreement with an Indian company for the purpose of application and compliance.

2. The channel shall comply with the Programme Code and Advertising Code prescribed by the Central Government.

3. The channel shall be categorised as a 'Non-News and Current Affairs' channel.

4. The registration shall not be transferred or assigned without prior approval of the Ministry.
5. Any change in the approved name, logo, ownership, or editorial control shall require prior approval/intimation as prescribed.
6. The channel shall be distributed only through authorised ALTD Applications.
7. The registered entity shall comply with all applicable Rules/Orders/ Directions issued by the Central Government from time to time.
8. The registered entity shall furnish such information and documents as may be required by the Ministry from time to time.
9. The registered entity shall maintain records of programmes for a period of 90 days and make them available to authorised Government agencies whenever required.
10. The registered entity shall apply for renewal at least six months prior to expiry of the registration.
11. Registration does not confer any exclusive right over distribution. Distribution shall be subject to commercial agreements with authorised ALTD Application Providers.
12. The Ministry may suspend or revoke the registration in the interest of national security, public order, or for violation of the applicable laws or registration conditions.
13. The Ministry reserves the right to modify the registration conditions in public interest.
14. All other applicable laws, rules, regulations and Government directions shall apply.

Ministry of Information & Broadcasting

Government of India

Annexure–V: Format of annual compliance report to be submitted by OEMs and OS Providers

(*To be submitted to the Central Government within thirty days from the end of the calendar year*)

Part A: Details of the Entity (OEM/OS Provider)

S. No.	Particulars	Details
1.	Reporting Period	Jan-Dec YYYY
2.	Category of Reporting Entity (Device Manufacturer/Operating System Provider)	
3.	Name of the Entity	
4.	Registered Office Address	
5.	Name of Authorised Signatory	
6.	Designation	
7.	Contact Details (Email & Mobile No.)	
9.	Device Models/OS Version	
8.	BIS Registration Number(s), wherever applicable	

Part B: Details of ALTD Application(s) made available

S. No.	Name of ALTD Application(s)	'ALTD Service' Authorisation No.	Date from which ALTD app is pre-installed	Present Status
1.				
…				
…				

Part C: Declaration

1. Information furnished in this report is true and correct to the best of my knowledge and belief.
2. Only authorised applications of authorised entities of 'ALTD Service' have been made available through the devices, operating systems or application stores.
3. No application authorised to provide 'ALTD Service' has been blocked, gated, restricted, or otherwise subjected to discriminatory treatment with respect to its availability, installation, access, or discoverability on the relevant devices, operating systems, or application stores.

Name of Authorised Signatory: _____

Designation: _____

Date: _____

Place: _____

Annexure-VI: Format for half-yearly compliance report to be submitted by the application provider of 'ALTD Service'

(*To be submitted to the Central Government within thirty days from the end of each half-year, i.e., for the periods from 1st January to 30th June by 30th July and from 1st July to 31st December by 30th January*)

Part A: General Information

S. No.	Particulars	Details
1.	Reporting period	Jan-Jun YYYY/ July-Dec YYYY
2.	Name of authorised entity	
3.	Unique Service Authorisation Number (USAN)	
4.	Name of ALTD application(s)	
5.	Details of the OEM, if coming pre-installed	
6.	OS provider	
7.	Application Store(s), where available for download	

Part B: Channel details available on ALTD App

S. No.	Particulars	Number
1.	List of Permitted/Authorised TV channels distributed through 'ALTD App' during 1st Jan-30th June YYYY/1st July-31st Dec YYYY	
2.	List of Registered Internet-native linear channels distributed through 'ALTD App' during 1st Jan-30th June YYYY/1st July-31st Dec YYYY	

Part C: Non-Compliant Channels Identified and Action Taken

S. No.	Channel name	Manner of identification (self-audit/ Government direction/complaint)	Date removed
1.			
2.			

Declaration

i. only television channels holding valid permission, authorisation or registration issued by MIB have been carried on the ALTD application during the reporting period.

ii. the information furnished in this report is true and correct to the best of my knowledge and belief.

Signature: _____

Name & Designation: _____

Date: _____

Place: _____