Telecom Regulatory Authority of India

Consultation Paper

on

Inputs for formulation of
National Broadcasting Policy-2024

02nd April 2024

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Written Comments on the consultation paper are invited from the stakeholders by 30.04.2024. Please support your comments with detailed reasons and justifications. Comments will be posted on TRAI's website: www.trai.gov.in. The comments may be sent, preferably in electronic form, to Shri Tejpal Singh, Advisor (B&CS), Telecom Regulatory Authority of India, on the email advbcs-2@trai.gov.in and jtadvisor-bcs@trai.gov.in. For any clarification/ information, Shri Tejpal Singh, Advisor (B&CS) may be contacted at Tel. No.: +91-11-23664516.

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CHAPTER I
INTRODUCTION

A.   Reference from MIB

1.1   The Ministry of Information and Broadcasting (MIB) vide its letter dated 13th July 2023, inter-alia, informed that MIB is in the process of formulating a National Broadcasting Policy [hereinafter referred to as 'NBP']. MIB had mentioned that consultations with stakeholder ministries have been carried out. The Broadcasting Policy needs to identify the vision of a functional, vibrant, and resilient broadcasting sector which can project India's diverse culture and rich heritage and help India's transition to a digital and empowered economy.

1.2   The NBP aims at stipulating the vision, mission, strategies, and the action points that could set the tone for a planned development and growth of the broadcasting sector in the country in the era of new and emerging technologies. Through the said letter dated 13th July 2023, MIB has requested TRAI to provide its considered inputs under Section 11 of the TRAI Act, 1997 for formulation of the National Broadcasting Policy.

B.   Pre-Consultation Paper by TRAI

1.3   Accordingly, as the first step, TRAI had floated a pre-consultation paper on 21st September 2023, to elicit the issues which are required to be considered for the formulation of 'National Broadcasting Policy'. Written comments on the pre-consultation paper were invited from the stakeholders by 10th October 2023, which was further extended up to 7th November 2023, on the request of the stakeholders. TRAI received 28 comments from various associations, companies, service providers, individuals and consumer advocacy groups.

1.4   Further, to seek inputs for formulation of the NBP, TRAI had also conducted meetings with the various stakeholders including

Broadcasters, Direct-to-Home (DTH) operators, Multi System Operators (MSOs), Community Radio Stations (CRS) operators, Content Providers, Producers etc. as well as held discussions with eminent experts from government bodies, consulting organizations, industry associations etc., for detailed deliberations on the subject matter. The meetings were held in TRAI HQ and across several places in eastern, western and southern regions of the country in the months of December 2023 and January 2024.

1.5   The Authority, after carefully examining various issues emanating from the written submissions of the stakeholders, discussions and submissions received from various meetings across the country, has come out with this Consultation Paper (CP) for formulation of the National Broadcasting Policy.

C.   The Broadcasting sector in India

1.6   The broadcasting sector is a sunrise sector having huge potential to contribute towards the growth of the Indian economy. The industry is a vibrant, dynamic, and fast evolving sector that showcases India's technological expertise and rich cultural diversity. With the advent of digital revolution and advancements of technologies, the broadcasting sector has been phenomenal in attracting investments, fostering creativity and significantly elevating India's image globally. The broadcasting sector is today the cultural ambassador of the country and has conferred a unique identity to India.

1.7   As per the International Telecommunication Union (ITU) definition[1], *'Broadcasting (Service)' is radiocommunication in which transmissions are intended for direct reception by the general public; these may include sound transmissions, television transmissions and other types of transmission.* TRAI Regulations and Tariff Order[2] has defined *'Broadcasting services' as dissemination of any form of communication*

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[1] https://www.itu.int/dms_pubrec/itu-r/rec/v/R-REC-V.662-2-199304-S!!PDF-E.pdf
[2] https://www.trai.gov.in/sites/default/files/Tariff_Order_English_3%20March_2017.pdf

like signs, signals, writing, pictures, images and sounds of all kinds by transmission of electro-magnetic waves through space or through cables intended to be received by the general public either directly or indirectly and all its grammatical variations and cognate expressions shall be construed accordingly. The proposed Broadcasting Services (Regulation) Bill, 2023[3] has defined *'Broadcasting' as one-to-many transmission of audio, visual or audio-visual programmes using a broadcasting network, intended to be received or made available for viewing, by the general public or by subscribers of the broadcasting network, as the case may be, and the expression "broadcasting services" shall be construed accordingly.*

1.8 From the above definitions, in general terminology, broadcasting may be understood as the dissemination/transmission of information in the form of audio, video or both to a wider audience via any distribution medium. Traditionally, broadcasting encompassed television and radio services. With technological disruptions and device upgradation, the definition and the scope of broadcasting has become broader and more diversified. Presently any form of programmes like films, music and animated shows that are broadcast to a larger audience base simultaneously using different mediums/platforms and made available on various devices, may also be considered as broadcasting.

1.9 Various industry reports have been providing the projections of the Media and Entertainment (M&E) industry as a whole. Different reports present different estimates. As per an industry projection[4], the M&E sector, constituting of varied segments like television, digital media, print, films, online gaming, animation and visual effects (VFX), live events, music, radio, and Out-of-Home media (OOH) grew by ₹173 billion from 2022 to reach ₹2.32 trillion in 2023. It is estimated that the sector is expected to reach ₹3.08 trillion by 2026 at a CAGR of around

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[3] https://prsindia.org/files/parliamentry-announcement/2023-12-09/Draft_Broadcasting_Services_(Regulation)_Bill,_2023.pdf

[4] https://assets.ey.com/content/dam/ey-sites/ey-com/en_in/topics/media-and-entertainment/2024/ey-in-india-s-media-entertainment-sector-is-innovating-for-the-future-03-2024-v1.pdf

10%. Among all segments, the growth of digital media and online gaming is observed to be significant. Figure 1.1 depicts the growth of the Indian M&E sector by 2026.

Figure 1.1: The Indian M&E revenue growth
[Source: FICCI EY March 2024 Report]
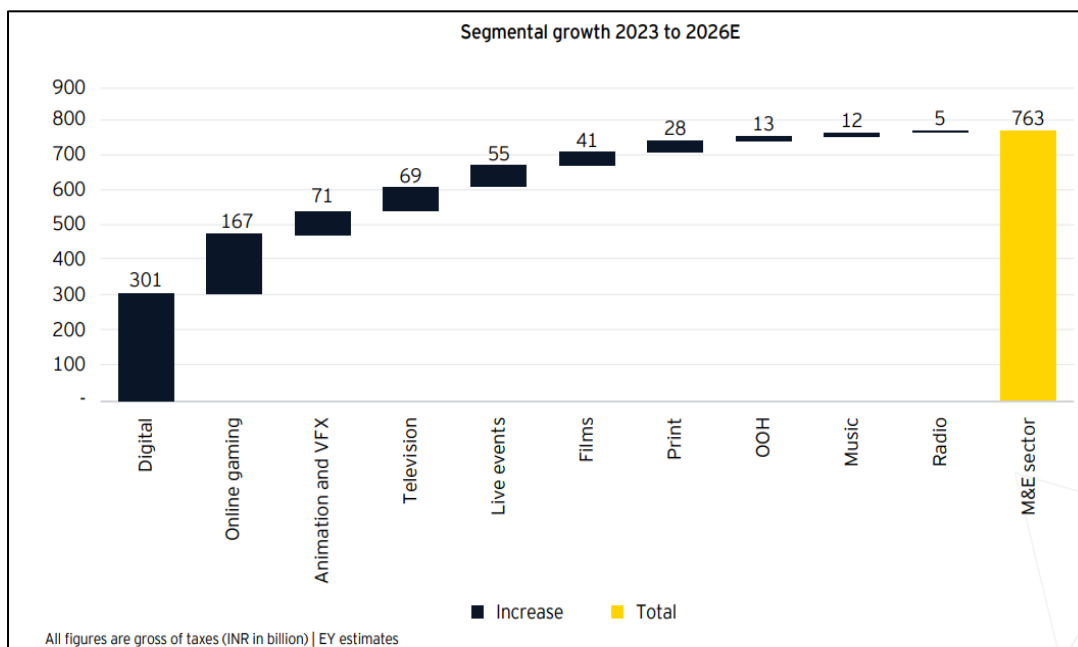
1.10 MIB has undertaken several initiatives for the growth of the broadcasting sector in the recent past. These initiatives include consolidating the uplinking/downlinking guidelines which eased out the compliances for the permission holders and enabled ease of doing business. It revamped the BroadcastSeva[5] portal which further facilitated the online application process. A promotion task force on Animation, VFX, Gaming, Comics & Extended Reality (XR) together termed as Animation, Visual Effects, Gaming and Comics (AVGC) segment of the M&E industry, was constituted in MIB. The report[6] emphasized on 'Create in India' campaign with exclusive focus on content creation, In India, For India & For World, realising the AVGC segment potential in India.

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[5] https://new.broadcastseva.gov.in/digigov-portal-web-app/

[6] https://mib.gov.in/sites/default/files/AllFlipBooks/AVGC-3-2022/index.html

1.11   The rapid evolution in broadcasting sector coupled with emergence of new technologies, notably the rise of the metaverse, convergence of devices, roll-out of faster 5G services, evolving use-cases and lowering of data tariff brings opportunities for growth in the sector. However, such opportunities bring in certain threats and challenges too. Hence, there is a need for addressing the issues of the sector, inter-alia, related to needs of skilling of manpower, research, infrastructure and funding; prevention of piracy, ensuring content-security and copyright protection.

1.12   The consultation paper seeks to come out with inputs for a robust policy roadmap in the broadcasting sector for achieving the following high-level strategic objectives:

   i. **Attracting Investment** by ensuring business continuity, policy and regulatory certainty, providing ease of doing business and expanding consumer base.

   ii. **Fostering Innovation** through enabling policies, focus on research and development (R&D) by enhancing expenditure to innovate, encouraging local manufacturing, following technology neutral approach and adopting international best practices.

   iii. **Facilitating Job Creation and Nurturing Skill Development** by achieving quality national and regional content production, post-production processing and by funding and facilitating start-ups and developing institutional mechanisms to nurture skill development.

   iv. **Strengthening the Public Service Broadcasting** by supporting modernized infrastructure development, enhancing R&D capabilities for quality content production and dissemination and promotion of Indian content through Doordarshan (DD) and All India Radio (AIR) globally and through digital media platforms.

D. Scope of the Consultation

1.13   This consultation paper aims to enable formulation of a national policy that would unleash the scope and reach of the broadcasting sector to

become a torch bearer of 'Create in India' and 'Brand India'. The consultation intends to target broad roadmap for next 10 years with special focus on next 5 years.

1.14 A robust, competitive landscape is central for growth of the sector with commensurate contribution in the Gross Domestic Product (GDP), productivity and creation of new jobs in the economy. For consumers, access to new technologies, improved quality and wider choices of content and accessibility at affordable prices is among their major preference. The policy should also seek to promote and protect fair competition across the sector.

1.15 As technology advances, developing the latest generation of broadcasting equipment has also become an imperative. There is a need to encourage indigenous research and development (R&D), nurturing talent and fostering partnerships between industry and academia. Also, as the demand for high quality and personalized content accessible from anywhere, anytime is surging, embracing innovative options need to be explored.

1.16 The policy should aim to address the challenges posed due to technological advancements, security issues, particularly in content distribution by implementing measures to combat piracy, unauthorized distribution and ensure copyright protection.

1.17 The diverse programming of DD and AIR has informed, educated and entertained generations of Indians. From the analog era to the dynamic digital landscape of today, the India's public service broadcaster have traversed a path marked by resilience, innovation, and unwavering commitment of promoting India's rich diversified culture and heritage. Strengthening the viability and scope of the Public Service Broadcasting to provide quality content that caters to the diverse needs of the nation, is indeed a subject of paramount importance.

1.18 Further, responsibility towards the environment and embracing sustainable practices in broadcasting operations is not just a moral imperative but a strategic necessity also. Minimizing carbon footprint,

reducing waste and to lead global initiatives like Asia-Pacific Broadcasting Union (ABU)[7] 'Green Broadcasting' project need due consideration in the policy. Also, addressing social issues like gender equality, workplace diversity and raising voices for the marginalized sections through media can prove to be a powerful method.

1.19   The purpose of the consultation paper is to delve into the existing issues of the sector, highlighting their trends and projections, initiatives taken by the Government, exploring the international best practices and to come out with inputs for policy formulation with focussed strategies and achievable targets to position India's broadcasting sector at the global stage.

1.20   The consultation paper aims to gather inputs from the stakeholders regarding the formulation of a resilient and a long-term policy for the Indian broadcasting sector. Chapter I of the consultation provides the introduction whereas Chapter II discusses the issues for consultation for formulating the policy objectives, goals and strategies. Chapter III provides the summary of issues for consultation. It may be noted that no counter-comments are being invited in this Consultation Paper, as this paper intends formulation of inputs for the broadcasting policy.

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[7] https://www.abu.org.my/

CHAPTER II
ISSUES FOR CONSULTATION

2.1 The role of media and broadcasting in shaping public discourse, fostering national unity and promoting democratic values is indispensable. Moreover, there are social or behavioral changes in viewing patterns and viewers' way of consuming content. A comprehensive National Broadcasting Policy will enable planned development and further growth of the broadcasting sector in India.

2.2 Digital infrastructure and services are increasingly emerging as key enablers and critical determinants for different sectors of the economy. World class telecommunications infrastructure is the key to rapid socio-economic growth of the country. The Indian telecom sector has been shaped by the following policy statements viz.

　　　i. National Telecom Policy, 1994
　　　ii. New Telecom Policy, 1999
　　　iii. Broadband Policy, 2004
　　　iv. National Telecom Policy, 2012
　　　v. National Digital Communications Policy, 2018

2.3 It is widely believed that the telecom policies have acted as a catalyst for enabling such growth. TRAI has provided important inputs for the formulation of 'National Digital Communication Policy 2018'.

2.4 A policy framework for the broadcasting sector can be a good catalyst for realizing full potential of broadcasting sector especially in generation of employment, socio-economic development, promoting Indian heritage, culture, tourism and thus increasing overall contribution to GDP. It should deal with all the aspects related to content creation, content integration, distribution that resonates with diverse audiences and evolving the different institutional mechanisms for the growth of the sector, involving the participation of different stakeholders for the growth of sector. A channelized approach for the broadcasting sector

and appropriately investigating the aspects of capacity building, skilling and training, future frameworks etc. would postulate the right objective and strategies to fill in the gaps through the policy.

2.5   In an era where the boundaries between traditional and digital media are blurring, the policy should acknowledge the importance of creating a level playing field for all stakeholders, irrespective of their size or technology being used. Additionally, the policy should place significant emphasis on expanding and strengthening public service broadcasting. In a world filled with an ever-expanding array of information, the policy should be committed to provide a roadmap to enrich the knowledge, culture, and entertainment experiences of our society.

2.6   Government had released several policies in the recent past, benefitting the various sectors, thereby envisioning the growth and progress of India. Policies like National Education Policy (NEP) 2020[8], National Policy on Software Products (NPSP) 2019[9] and National Policy on Electronics (NPE) 2019[10] are a few to name.

2.7   The 'National Broadcasting Policy' stipulates Vision, Mission and Objectives. Against each objective, possible goals, and the probable strategies for achieving those goals need to be identified. It is understandable that the Government releases a policy which intends to achieve some measurable targets within a certain duration. Considering this, the National Broadcasting Policy may be formulated to fulfill certain achievable goals by mitigating the identifiable gaps and limitations following certain set of strategies for the broadcasting sector for the next 5 to 10 years.

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[8] https://www.education.gov.in/nep/about-nep#:~:text=National%20Education%20Policy%2C%202020&text=The%20NEP%202020%20is%20founded,the%20present%20and%20the%20future

[9] https://www.meity.gov.in/national-policy-software-products-npsp-%E2%80%93-2019#:~:text=The%20National%20Policy%20on%20Software,growth%20of%20the%20IT%20industry

[10] https://www.meity.gov.in/esdm/policies#:~:text=The%20National%20Policy%20on%20Electronics%202019%20(NPE%202019)%2C%20prepared,chipsets%2C%20and%20creating%20an%20enabling

Q1. **Stakeholders are requested to provide their inputs in framing the Preamble, Vision, Mission and Broad Objectives for the formulation of the National Broadcasting Policy (NBP).**

2.8 Issues emphasized by MIB as highlighted in the pre-consultation paper and basis the comments received on the paper and the meetings held with the stakeholders, the broad issues that have emerged which are relevant from the policy perspective are suitably factored-in and categorised accordingly. The same are discussed in detail in the paras to follow.

A. Measuring and Increasing the Sector's contribution to the Indian Economy

2.9 India is the fifth largest economy in the world. India's nominal GDP is forecasted to rise from USD 3.5 trillion in 2022 to USD 7.3 trillion by 2030 as per S&P Global ratings forecasts[11]. The Indian economy is classified into three sectors viz., primary sector which is related to agriculture, secondary sector which is related to industry and tertiary sector related to services. The broadcasting sector, which is the part of the services sector, is constantly evolving and expanding. Being a sunrise sector, it has immense potential to contribute towards the growth of the economy of the country.

2.10 With the expansion of the sector, it also becomes necessary to estimate its impact on the nation's economic development. As per a report[12], the media and entertainment sector in India accounts for about 0.9% of GDP, compared to 3 to 4% for many of the developed countries.

2.11 As per the Statistical Handbook on Media and Entertainment Sector[13] issued by MIB for 2021-2022, the export and import in the M&E sector w.r.t. the total for service sector is provided below:

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[11]https://www.spglobal.com/marketintelligence/en/mi/research-analysis/india-seizes-crown-of-fastest-growing-g20-economy-dec23.html

[12] https://www.ciiblog.in/indian-media-entertainment-industry/#:~:text=The%20Media%20%26%20Entertainment%20sector%20remains,are%20much%20below%20global%20levels

[13] https://mib.gov.in/sites/default/files/Statistical%20Handbook.pdf

A. <u>Statistics on export of goods and services</u>

   i. Total export of goods and services: ₹ 50.96 lakh crore

   ii. Export of service sector: ₹ 18.97 lakh crore

   iii. Export of M&E sector: ₹ 11.825 thousand crore, which is 0.62% of the exports of the service sector

B. <u>Statistics on import of goods and services</u>

   i. Total import of goods and services: ₹ 57.09 lakh crore

   ii. Import of service sector: ₹ 10.96 lakh crore

   iii. Import of M&E sector: ₹ 7.506 thousand crore, which is 0.68% of the imports of the service sector

2.12 The Foreign Direct Investments (FDI) inflows in the information and broadcasting sector (including print media) stood at ₹ 3301 crore in 2022[14], which was 0.81% of the total FDI equity inflow among all the sectors. Considering TRAI's Recommendations dated 22nd August 2013[15] on 'FDI in Broadcasting Sector in India', the consolidated FDI Guidelines[16] issued by Department for Promotion of Industry and Internal Trade (DPIIT) w.e.f. from 15th October 2020, has supported this sector's growth by increasing FDI limit from 74% to 100% in cable, DTH and HITS broadcasting services. The details of FDI capping limit and the entry route are attached as **Annexure I**.

2.13 The various segments of M&E industry considered in this Consultation Paper are estimated to reach around ₹ 2.6 trillion by 2026 at a CAGR of 10.31%, as per an industry projection[17]. The predicted revenues of individual segments are indicated below:

   i. Television expected to grow at a CAGR of 3.2% to reach ₹ 765 billion

   ii. Digital media expected to reach ₹ 955 billion at a CAGR of 13.5%

   iii. Films estimated to generate ₹ 238 billion at a CAGR of 6.5%

   iv. Online gaming expected to reach ₹ 388 billion at a CAGR of 20.7%

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[14] https://mib.gov.in/sites/default/files/Statistical%20Handbook.pdf

[15] https://trai.gov.in/sites/default/files/FDI%20reco%2020130822.pdf

[16] https://dpiit.gov.in/sites/default/files/FDI-PolicyCircular-2020-29October2020_0.pdf

[17] https://assets.ey.com/content/dam/ey-sites/ey-com/en_in/topics/media-and-entertainment/2024/ey-in-india-s-media-entertainment-sector-is-innovating-for-the-future-03-2024-v1.pdf

     v. Animation, VFX and Post-Production expected to grow at a CAGR of 17.5% to reach ₹ 185 billion

   vi. Music expected to grow at a CAGR of 14.7% to reach ₹ 37 billion

  vii. Radio expected to grow at a CAGR of 6.6% to reach ₹ 27 billion

2.14   It is pertinent to note here that there is inadequate coordinated data in the sector. The sector relies on various industry reports for estimation and prediction of parameters like revenue generation, contribution to the GDP, employment creation, numbers of workforce to name a few. However, different industry reports show varied projections and estimations which makes it challenging to take informed decisions. Availability of proper and accurate data helps in making right decision for the sub-sectoral growths and in setting the targets like contribution to GDP of the Indian economy.

2.15   The parameters that may be considered to increase the sector's contribution to the Indian economy are as follows:

    i. Provisioning of affordable television services in 'TV Dark' homes

   ii. Augmenting R&D capabilities and promoting indigenous manufacturing in broadcasting equipment

  iii. Employment generation with emphasis on skill development

  iv. Promotion of innovation led Start-ups and small and medium-sized enterprises (SMEs)

A1. Provisioning of affordable television services in 'TV Dark' homes

2.16   India's broadcasting landscape comprises of 326 broadcasters, 887 registered MSOs, 1 HITS operator, 4 pay DTH operators as on today. Besides, a free-to-air DTH service named 'DD Free Dish', owned and operated by the public service broadcaster of the country namely 'Prasar Bharati'. Further, a few IPTV service providers are also providing a variety of options to consumers to access TV and radio channels.

2.17   The cable television and distribution sector has been digitized since March 2017 and there is a comprehensive regulatory framework in force for the addressable system since December 2018. Presently there are

around 63.52 million[18] total active DTH subscribers, approx. 62 million cable TV subscribers, 2 million HITS subscribers and around 45 million subscribers of DD Free Dish. It is also estimated[19] that total television screens (including linear and bi-directional) are expected to touch 202 million by 2026 from 182 million in 2023.

2.18 From a broader perspective, to understand the potential, considering an average household size to be at 4.4 (as per Census of India 2011) and assuming the current population of India to be at 140 crore, which calculates to around 320 million households in India. As per a report, India had 302.4[20] million households in 2021. Now, the industry estimates says that about 182 million households have access to television sets (including linear and non-linear TV services). Therefore, there exists potential of provisioning televisions to more than 100 million 'TV Dark' homes in the country.

2.19 The factors that may be attributable for the unconnected TV households in India include lower income levels among households that may not be able to afford television sets along with other ongoing expenses. Also, remote and rural areas may lack the necessary cable TV broadcasting infrastructure to support households with TV connections.

2.20 It is to be noted that in remote, rural, hilly and inaccessible areas, the provision of television broadcasting services may be commercially unviable. The costs of reaching these areas are more in relation to commercial return. But the social cost of remaining unserved is high and growing. Therefore, there is a need to explore and suggest strategies and implement policies to connect the unconnected households.

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[18] As reported to TRAI by service providers. Total active subscriber base also includes subscribers who have been inactive or temporarily suspended for not more than last 90 days.

[19] https://assets.ey.com/content/dam/ey-sites/ey-com/en_in/topics/media-and-entertainment/2024/ey-in-india-s-media-entertainment-sector-is-innovating-for-the-future-03-2024-v1.pdf

[20] https://www.globaldata.com/data-insights/macroeconomic/number-of-households-in-india-2096149/#:~:text=302.4-,Number%20of%20Households%20in%20India,2010%2C%20between%202010%20and%202021.

A2. Augmenting R&D capabilities and promoting indigenous manufacturing in broadcasting equipment

2.21 The Government of India has accorded the highest priority to transform India into a global design and manufacturing hub. Prominent programs under flagship initiatives include 'Make in India' and 'Digital India'. However, in the broadcasting sector, such programs are still at an evolving stage, and there is a huge potential for contribution from indigenous local manufacturing of broadcasting equipment.

2.22 The Standing Committee on Information Technology in the 25th Report of (2020-2021)[21] has mentioned a submission made by MIB on the issue of local manufacturing. MIB submitted that most of the broadcast equipment are not available in the Indian market and are imported. Also, Indian firms are not competitive on account of pricing and quality. It may be due to the challenges faced by Indian broadcasting manufacturing industry for indigenous production of broadcast equipment.

2.23 Some of the major concerns afflicting the Indian broadcast manufacturing sector as highlighted by TRAI in its Consultation Paper dated 22nd December 2021[22] on 'Promoting Local Manufacturing in the Television Broadcasting Sector' are summarized below:

   i. **Heavy reliance on components from other countries:** Import of components of broadcasting industry dominated the supply. The imported product becomes available at a lower cost. This affects the scalability of local production and the cost competitiveness of domestic products.

   ii. **Competing nations offer high incentives/subsidies:** Manufacturers in other countries, e.g., China, have the advantage of the availability of finance at convenient terms for components used in the electronics sector. Although the STB manufacturing ecosystem is fairly established in India, with only about 40% of components being obtained locally, manufacturers face production cost challenges.

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[21]https://loksabhadocs.nic.in/lsscommittee/Communications%20and%20Information%20Technology/17_Information_Technology_25.pdf

[22] https://trai.gov.in/sites/default/files/CP_22122021.pdf

iii. **Dependence on foreign Conditional Access System (CAS):** CAS is a proprietary component, whose manufacturing has been historically dominated by large foreign vendors from the US, Europe and China. The development of Indian CAS (iCAS) was expected to break this dependence and enable the adoption of local STBs. However, due to techno-commercial reasons, the availability of local CAS has so far not been able to boost the demand for Indian STBs as anticipated.

iv. **Impact of trade agreements with other countries:** India being a party to ITA (Information Technology Agreement), World Trade Organization (WTO) treaties, and Foreign Trade Agreements (FTA), the import duty protection is not available to the local manufacturing for many products such as electronics hardware, STBs etc. This, in turn, required the domestic manufacturers to become more cost competitive.

2.24 The above analysis highlights the fact that there is a need to focus on the R&D activities for manufacturing of broadcasting equipment in India. Further, strategies and policies need to be designed and implemented for developing state-of-the-art R&D capabilities, technology development, standardization and manufacturing ecosystem of the various broadcasting equipment and software development in India.

A3. Employment generation with emphasis on skill development

2.25 Skill development is one of the essential factors for the growth of the sector and economy. The National Skill Development Council (NSDC) was set up by the Ministry of Finance via Public-Private Partnership (PPP) model. The Ministry of Skill Development & Entrepreneurship (MSDE) holds 49% of the share, while the private sector has 51% of the share capital. NSDC has further formed 36 Sector Skill Councils, of which the Media and Entertainment Skill Council (MESC) has been specifically created for the M&E sector. The NSDC in collaboration with an industry partner highlighted the challenges[23] of skill development in the M&E sector. The challenges are discussed in the paras to follow.

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[23] https://skillsip.nsdcindia.org/sites/default/files/kps-document/Media-Entertainment.pdf

2.26   Despite being a highly important sector, training and education remains a challenge for many industry players. Students graduating from M&E courses often compete with graduates from general streams for entry-level positions. This is because the industry continues to hire general graduates in media specific streams also, who acquire the necessary skills on the job, and thus not giving larger preferences to media-trained individuals.

2.27   Furthermore, there exists unfavorable societal ideas and trends surrounding M&E careers, particularly on the creative side, which brings difficulties for the media graduates in securing stable employment. Job security is further compromised by the prevalence of freelancers and varying company sizes within the industry. Also, salaries are unattractive as compared to other industries and absence of clear career path for students.

2.28   Moreover, even if the training institutes have proliferated due to high demand, many of them lack quality education and are unable to meet industry needs. Similarly, in-house training at production houses often creates a limited talent pool which does not benefit the broader industry. This overall lack of quality training and skill development opportunities hampers the growth of the media sector, making it less attractive as a career option compared to more established industries. Also, in terms of overall vocational skill-sets development, the macro environment within the media industry isn't as evolved and conducive as mature industries like IT, manufacturing, engineering or pharmaceutical industries have. The sector holds vast unrealized potential in training, education and employment generation.

2.29   Another factor is the limited numbers of recognized institutes of eminence for the broadcasting sector. Premier institutes provide opportunities for internships, apprenticeships and training from recognized organizations that help in understanding the skills required for the industry. There are limited recognised institutions in the field of films, television and mass communication. Further, there are around 55

universities offering courses in animation and 38 universities in VFX[24] in India.

2.30   Further, the employment landscape in the sector is predominantly informal and lacks a standardized record-keeping and reporting system. Unlike other industries, this industry often engages a significant portion of its workforce on an informal basis. This makes it cumbersome to gather information about the amount of employability in the different segments of the sector and predict the number of workforces to be added in the future. This data gap also makes it difficult to analyse the manpower required with appropriate skill sets.

2.31   In terms of employment, 6 lakh jobs were actually added in the sector between 2017-2022, while the requirement of incremental human resources was for 13 lakh as per the skill action plan[25] of MSDE. The possible reason behind lesser employment is due to the inadequate skills in the different segments of the sector, details provided in **Annexure II**.

2.32   Another interesting parameter is the employment impact multiplier which is 3.6[26] for the M&E industry. This means creating one job in M&E creates 3.6 jobs for the economy. It illustrates the significant effect of job creation within the industry, reflecting its importance as a driver of economic activities and employment opportunities. Figure 2.1 also depicts the economic impact multiplier of the M&E industry is third highest after software industry and legal services.

2.33   It seems evident that the sector possesses huge potential for job creation and employment generation and there is a need to upskill the existing workforce. Strategies and policy framework to narrow down the skill gap and prospects for education and training may be suggested.

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[24] https://economictimes.indiatimes.com/industry/media/entertainment/centre-mulling-increasing-filming-incentives-for-global-production-says-ib-secretary/articleshow/102527676.cms

[25] https://www.msde.gov.in/sites/default/files/2023-09/Final%20Skill%20AR%20Eng.pdf

[26] https://www.financialexpress.com/opinion/for-job-creation-in-india-media-and-entertainment-matters-in-brief-read-all-about-it/966890/

Figure 2.1: Comparison of economic impact multiplier across varied sectors [Source: BCG report[27]]
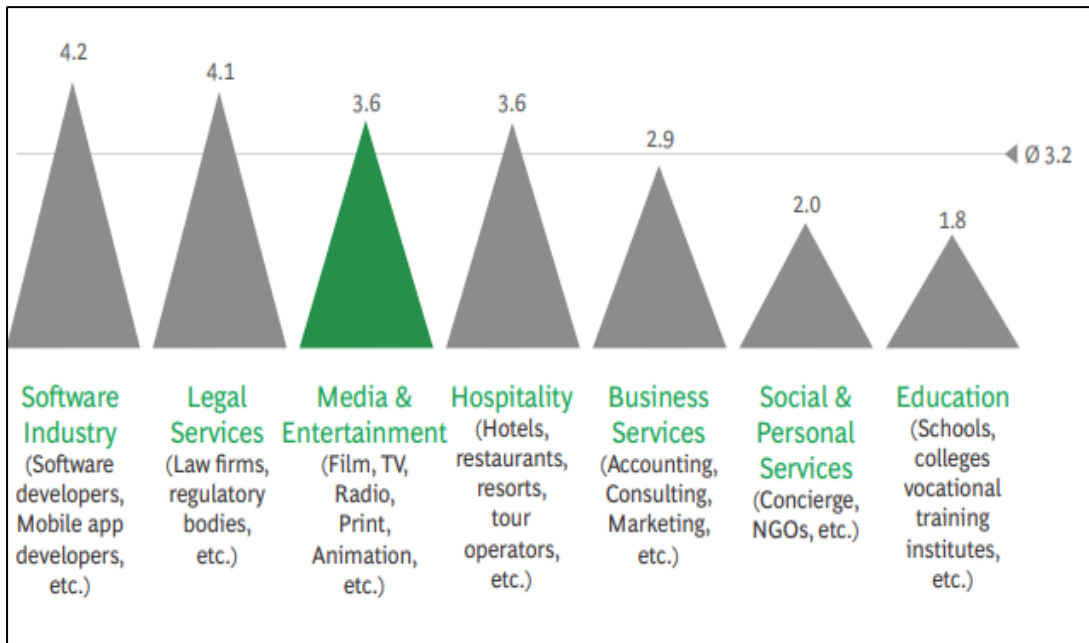
A4. Promotion of innovation led Start-ups and SMEs

2.34 As the sector is undergoing transformation, start-up models are expected to create new job opportunities. Promoting start-up culture may leverage technology and utilize innovative business models to gain a foothold in the market. Till March 2023[28], out of 97561 startups recognized by DPIIT, 1483 startups are from M&E Sector i.e., 1.52% of total Indian startups ecosystem.

2.35 Also, a report[29] highlights the economic growth and job creation due to startups in tier-II and tier-III cities as provided below:

i. 50% of India's acknowledged startups hail from Tier-II & Tier-III cities and 50% of India's total employment is generated by Tier-II & Tier-III cities small businesses and startups

ii. 2.5 million jobs created by service sector in Tier-II & Tier-III cities in India in 2022

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[27] https://india.mom-gmr.org/uploads/tx_lfrogmom/documents/421-1592_import.pdf

[28] https://mib.gov.in/sites/default/files/Statistical%20Handbook.pdf

[29] https://primuspartners.in/docs/documents/3TItYKVMbQ3JtiQzpuQh.pdf

iii. 45% contribution of Tier-II & Tier-III cities to India's GDP in the future

2.36 Therefore, expansion of the network of incubators and accelerators are desired for providing start-ups and small and medium size enterprises with mentorship, resources, networking opportunities and infrastructure development for the broadcasting sector. Also, focus on provisioning of startup ecosystems in segments like animation, VFX, online gaming, etc. may be looked upon. As discussed earlier about the potential of the sector in line with job creation and contribution to economy, possible prospects need to be deliberated to encourage the startup culture in the broadcasting sector.

2.37 Delving into the pressing issue of the demand-supply gap, strategic interventions are required to bridge this disparity, emphasizing the importance of proactive talent development initiatives. In today's fast-paced world, the broadcasting sector is evolving rapidly. To thrive, there is a need for skilled individuals with the latest know-how of running the start-ups.

2.38 Based on the discussions above from A1 to A4, stakeholders are requested to provide their comments on the following set of questions.

Issues for Consultation

Q2. There exist data gaps in ascertaining contribution towards economy, revenue generation, employment generation, subscription figures etc. in the broadcasting sector which relies heavily on industry studies to carry out research and estimates. What should be the parameters, targets and institutional framework for measurement? Provide your comments with detailed justification. Also provide the indicative metrics used for calculating the targeted figures, if possible.

Q3. Please suggest the strategies to be adopted by the Government and industry for propelling the growth of broadcasting sector w.r.t. the following:

  i. **Provisioning of affordable television services in 'TV Dark' households;**

  ii. **Augmenting R&D capabilities and promoting indigenous manufacturing of broadcasting equipment;**

  iii. **Employment generation with emphasis on skill development;**

  iv. **Promotion of innovation led Start-ups and SMEs;**

  v. **Any other related area/strategy**

Please elaborate with detailed reasoning.

B. Encouraging production and promotion of Indian Content for making India 'Global Content Hub' & 'Uplinking Hub'

2.39 Indian regional/local content creation and its promotion is to be one of the key focus areas of NBP. It is the opportune time for the players of the broadcasting ecosystem of India to take the onus to create and carry Indian content to the world. To achieve this objective, the focus has to be on skills, creativity, technology, infrastructure and market dynamics. As a result, the GDP contribution of the sector in the overall economy may be increased significantly.

2.40 Technologies like animation, VFX and XR are desired in the creation of animated educational, cultural, historical and scientific content. This will promote Indian content at global stage and act as a rich source of edutainment and informational content for Indian youths/students. The Indian broadcasting sector may disseminate universally accepted content through international television channels, quality digital media platforms, etc.

2.41 There are various examples of international practices which may be studied as key takeaways to promote Indian content locally and globally. A lead may be taken from France[30], where at least 60% of the audiovisual works and films broadcasted by licensed television broadcasters are required to be produced in EU and 40% should be produced originally in

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[30] https://www.lexology.com/library/detail.aspx?g=4de7b143-e33f-411d-a7ca-862694e31ce5

French. Private radio broadcasters are also required to dedicate at least 40% of their musical programmes to French music. With the implementation of Audiovisual Media Services Directive (AMSD), French Government issued an Order on 23rd June 2021 specifying additional rules applicable to on-demand services. On-demand services and video sharing platforms are obligated to devote at least 20% of their revenue generated in France to the financing of European or French works, of which a certain proportion must be reserved for European, French, and independent works.

2.42   In Brazil, SeAC Law[31], which regulates the cable TV sector, imposes local content quotas of at least 210 minutes at prime time to certain cable TV channels, half of whose programmes must be produced by independent Brazilian producers. Moreover, the same law imposes quotas for local cable TV channels that have to be offered by the cable TV operators and programmers. Further, the Audiovisual Sector Fund (FSA)[32] is a federal fund that plays a vital role in supporting audiovisual industry by investing in all stages and activities, including project development, production, distribution, exhibition, and infrastructure.

2.43   South Korea[33] is one such country that has always dominated in promoting its local content worldwide. Under an initiative namely Hallyu Industry Support Development Plan, the Government aimed to increase the value of South Korea's cultural industry, including music, movies, and more, to $290 billion within two years. South Korea has also used PPP model to boost the content production of popular culture. Since 2017, the Government has maintained support for cultural production with tax incentives and subsidies. In 2019, the cultural exports reached $12.3 billion, from $189 million in 1998.

2.44   Reference may be taken from such global practices to promote and increase the outreach of Indian content. It may also be understood that

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[31] https://www.lexology.com/library/detail.aspx?g=4331d9b4-0d13-4f74-88d5-fb0de753b00f

[32] https://www.storyproductions.com/brazilian-film-agency-public-policies-growth-audiovisual

[33] https://www.foreignaffairs.com/articles/south-korea/2021-10-14/korean-invasion

provisioning of proper funding, infrastructure support and training may be of utmost priority to the content producers and talents to develop world class content. Further, initiatives may be taken in improving the infrastructure and easing out the permission process for content development and shooting at tourist spots so that these Indian places gets showcased at the international stage, thereby boosting the tourism in India.

2.45   It is also to be noted that MIB has revised its Uplinking/Downlinking Guidelines in 2022[34] to ease out restrictions of uplinking with an aim to make India a hub for uplinking of satellite TV from the country. This move was also intended to help broadcasters for other countries and neighbouring countries like Nepal, Bangladesh, Bhutan, and Sri Lanka to uplink channels from India. The clause 33(2) of the Guidelines is stated below:

> *"33. Television channels for viewing only in foreign Countries —*
> *…*
> *(2) A channel owned by a foreign company/ entity may be allowed to uplink its content for being downlinked and viewed outside India by using the facility of a permitted teleport operator by way of an online application on Broadcast Seva furnished on its behalf by the concerned teleport operator.*
>
>> *Provided that permission for use of such facility shall be granted only after clearance from Ministry of Home Affairs, Ministry of External Affairs and Department of Space."*

2.46   India aspires to become an uplinking hub which is possible if the uplinking activity is cost-competitive and the satellite footprint covers a larger geography. By maintaining competitive pricing, India can attract international broadcasters to choose Indian teleports for their uplinking purposes. Similarly, geographical coverage provided by satellites is crucial. A broader footprint ensures that signals can be transmitted across a larger area. Leveraging extensive satellite coverage, Indian

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[34]https://mib.gov.in/sites/default/files/Guidelines%20for%20Uplinking%20and%20Downhinking%20of%20Satellite%20Television%20Channels%20in%20India%2C%202022.pdf

teleports may efficiently serve broadcasters targeting diverse audiences worldwide. Presently, 11 TV channels[35] are uplinked from India and are downlinked abroad.

2.47   It is also necessary to emphasize that satellites are an important infrastructure crucial for uplinking/downlinking of television channels. It is also an opportune moment to explore possibilities such that more of Indian satellites capacities be utilized for uplinking of both Indian/ foreign/international channels.

2.48   Apropos to the above, stakeholders are requested to provide their comments to the question given below.

Issues for Consultation

Q4. **What other policy and regulatory measures should be adopted in the policy for creation and expansion of quality Indian content to make India the 'Global Content Hub'? Further, suggest how to extend support to local talents and content developers in terms of training, infrastructure and incentives. Provide your comments with detailed explanation.**

Q5. **Suggest the measures to promote the uplinking of television channels owned by foreign companies from India, which is now permitted by the Government to make India an 'Uplinking Hub'.**

C. Strengthening of Public Service Broadcasting for quality content production and dissemination

2.49   Prasar Bharati operates its broadcasting network under the Prasar Bharati (Broadcasting Corporation of India) Act, 1990 to fulfil its mandate of public service broadcasting. It is the primary duty of Prasar Bharati to organise and conduct public broadcasting services to inform, educate and entertain the public in general and to ensure a balanced development of broadcasting in the country. Prasar Bharati through DD and AIR is among the largest public broadcasters in the world reaching

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[35] https://www.trai.gov.in/sites/default/files/QPIR_09022024_0.pdf

out to the entire populace of India and registering its prominence in more than 150 countries[36] across the globe.

2.50   DD Free Dish, the DTH arm of Prasar Bharati offers a variety of TV channels including channels in regional languages without any subscription fee. Leveraging DTH technology, it reaches every corner of the country and comprises approx. 45 million active connections, as gathered through various industry reports. On the radio front, AIR, the radio vertical of Prasar Bharati operates 479 stations located across the country, reaching 92% of the geographical area and over 99% of India's population[37].

2.51   It would be prudent to mention here that MIB reference mentioned about the issue of prominence of public service broadcasters' channels on the Electronic Programme Guide (EPG) with respect to other private TV channels under specific policy for the consideration of the Authority. TRAI has taken up this issue in its Consultation Paper on 'Review of Regulatory Framework for Broadcasting and Cable services' dated 8th August 2023[38]. Since, this issue is being dealt separately, it has not been considered as a part of this consultation process.

2.52   The public service broadcaster has made efforts to make its reach and popularity in several countries across the globe. Its radio and television channels contain content from almost all the regions of the country. Also channels of Bangladesh and South Korea are now available on DD's platforms. It is also expected that DD India channel will also be made available on the respective platforms of these nations.

2.53   Another aspect that may be considered for Prasar Bharati is the creation of its own digital media platform for the promotion of Indian content. There are many countries that have their own public broadcaster digital platforms. For example, CBC/Radio-Canada[39], the public broadcaster of

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[36] https://mib.gov.in/sites/default/files/I%26B%20Brochure_0.pdf

[37] Homepage AIR | Prasar Bharati

[38] https://www.trai.gov.in/sites/default/files/CP_08082023_0.pdf

[39] https://www.gov.wales/sites/default/files/publications/2023-08/a-new-future-for-broadcasting-and-communications-in-wales-review-of-the-broadcasting-powers-and-responsibilities-in-selected-countries.pdf.pdf

Canada has a 'freemium' Broadcast Video on Demand (BVOD) platform namely CBC Gem. CBC Gem offers free access to live and on-demand CBC content. Similarly, Danish Broadcasting Corporation, one of the public service broadcasters in Denmark operates its own BVOD service, DRTV, offering live and on-demand content.

2.54 Modernization of infrastructure and growth of digital technologies has witnessed improvement in transmission technologies, video quality, and wider coverage of broadcasting services. The Section 12(2)(o) of the Prasar Bharati Act, 1990 specifies about promotion of R&D activities as one of the objectives of the public service broadcaster. It states as - "*promoting research and development activities in order to ensure that radio and television broadcast technology are constantly updated.*" Although, Prasar Bharati, has been actively working to enhance its R&D capabilities, more focus may be made on exploring emerging technologies for enhancing storytelling techniques. Further, specialised R&D teams may be required to work on streaming services, mobile apps for seamless content delivery.

2.55 In terms of reach in India, DD Free Dish is being used in several households particularly in semi-urban areas/towns/rural areas. Being a Free-to-Air DTH service, it requires only a one-time investment of about Rs. 2000 for purchasing of STB[40] and small sized Dish Antenna with accessories. Though the amount seems to be reasonable, it may be unaffordable for some of the marginalized or economically weaker sections of society. In this regard Section 12(2)(j) of the Prasar Bharati Act, 1990 states the following as one of the objectives of Prasar Bharati:
  "*serving the rural and weaker sections of the people and those residing in border regions, backward or remote areas.*"

2.56 In view of the above, stakeholders are requested to provide their comments with proper reasoning and justification to the question given below.

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[40] https://prasarbharati.gov.in/free-dish-4/

Issues for Consultation

Q6. **What broad guiding principles, measures and strategies should be considered in the NBP to strengthen India's public service broadcaster (i.e. Prasar Bharati) to promote quality content creation, dissemination of DD and AIR channels and maximizing its global outreach? Also suggest, what support and measures should be provided for the proliferation of television and radio broadcasting services provided by the public service broadcaster in fulfilment of its mandate?**

D. Propelling the growth of the various segments of the sector

2.57 Interactivity, digitization, multiple distribution platforms, multiple devices and globalization of services-based landscape has revolutionized the several segments of the sector over the last decade. However, trends and drivers for each of the segments vary across sub-segments, geographies, and consumer. This makes the sector unique, since these segments compete, compliment, and combine to fulfil the ever-increasing demand for entertainment and information globally. The subsequent sections of the consultation paper discuss some of these segments like digital media (OTT platforms), films, online gaming, animation, visual effects (VFX) & post-production, music, radio. The largest segment i.e. television has been discussed already.

D1. Promoting Indian content by utilizing OTT platforms

2.58 The internet services are growing at a rapid pace and the digital media services utilizing the Over-the-Top (OTT) platforms are attracting customers with a diverse range of content, including movies, web series, and live coverage of news and sports. The qualitative factors that have been instrumental in the adoption of OTT platforms include convenience to access wider variety of content, personalized content, flexibility of time, device compatibility, and user generated content. Similarly, quantitative factors like internet affordability, smartphone penetration, fixed line

broadband penetration etc. have also led to adoption and proliferation of digital media services.

2.59 Digital media services may be considered pivotal for the promotion of Indian languages and culture. Beyond entertainment, these platforms have the potential to promote Indian content to the broader audience globally that are often neglected in mainstream media.

2.60 Industry study[41] reveals that the share of regional language OTT platforms increased from 47% in 2021 to 52% in 2023. Content has started to travel across language barriers, where 20%-50% of consumers now consume content in more than one language using sub-titles and dubbed versions. OTT platforms desirous of national reach require focus on dubbing/sub-titles in various Indian languages.

2.61 Internationally, in European Union[42], Member States ensure that the media service providers of on-demand audiovisual media services secure at least 30% share of European works and ensure prominence of those works. Also, digital media services are required to contribute financially on a proportionate and non-discriminatory basis for the production of European works. Similarly, the Online Streaming Act[43] of Canada ensures the Canadian music and stories are widely available on streaming platforms for the benefits of local artists and creators.

2.62 Along with promotion of Indian content via OTT platforms, measures are also required to support the growth of emerging Indian OTT platforms. It is observed that such platforms have been facing challenges from established players in terms of retaining subscribers. Beyond creation for original new content, lack of resources and funding for technological support, content acquisition, platform maintenance and marketing efforts led to financial difficulties. Implementation of proper strategies to

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[41] https://assets.ey.com/content/dam/ey-sites/ey-com/en_in/topics/media-and-entertainment/2024/ey-in-india-s-media-entertainment-sector-is-innovating-for-the-future-03-2024-v1.pdf

[42] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L1808&rid=9

[43] https://www.canada.ca/en/canadian-heritage/services/modernization-broadcasting-act.html

minimize the challenges and supporting the growth of regional OTT platforms are required to be addressed in the policy.

2.63 Another aspect that may be considered as a part of the policy is finding out possibility of carrying certain DD channels on registered[44] OTT platforms. As already discussed in the previous section that DD channels comprise variety of content in regional languages. Carrying these contents on OTT platforms enables promotion and prominence of such DD channels. For instance, in 2022[45], Prasar Bharati had signed a Memorandum of Understanding (MoU) with one of the OTT platforms to carry 'DD India' on its platform. The channel thereby is available in US, UK, Europe, Middle East, Singapore, Australia and New Zealand.

2.64 On the regulatory front, MIB has proposed a draft Broadcasting Services (Regulation) Bill, 2023[46]. The draft Bill provides for a consolidated framework and extends its purview to cover the OTT services and digital news along with the other broadcasting services under a single umbrella framework. The bill introduced definitions for OTT and classified 'OTT broadcasting service operator' as 'Broadcasting network operator' along with LCO, MSO, DTH, HITS, IPTV, radio and terrestrial broadcasting operators. However, OTT services are presently not covered in the regulatory framework of TRAI.

2.65 Apropos above, stakeholders are required to provide their comments to the question given below:

Issues for Consultation

Q7. What policy measures and regulatory aspects should be adopted in the NBP to nudge the growth of Indian regional content through OTT platforms?

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[44] https://mib.gov.in/sites/default/files/List%20of%20OTT%20Platforms_0.pdf

[45] https://pib.gov.in/PressReleasePage.aspx?PRID=1803511

[46] https://prsindia.org/files/parliamentry-announcement/2023-12-09/Draft_Broadcasting_Services_(Regulation)_Bill,_2023.pdf

D2. Ramping up the Indian films and making India a preferred filming destination

2.66   The Indian film segment is one of the oldest in the world and stands above most other national cinemas due to its local focus yet enormous size. In the year 2023[47], 1796 movies were released in theatres, 11% higher than 2022. Also, 339 Indian films were released in 38 countries which generated gross box office collection of USD 337 million. The average ticket prices also saw an increase from ₹ 119 in 2022 to ₹ 130 in 2023.

2.67   There had been several initiatives undertaken by the Government and the industry to promote the films in India and abroad. For instance, nearly 70%[48] of the rural population in India does not have ready access to theatres. In this regard, the Common Service Centre (CSC) initiative[49] of Ministry of Electronics and Information Technology (MeitY), brings cinema/theatre services to the rural areas. The Government has also granted Industry Status to the film industry for easy access to institutional finance. Further, the Government on 20th November 2023[50] has enhanced the incentive for foreign film production from 30% to 40% with an increased cap limit of Rs. 30 crore (which was earlier capped at Rs 2.5 crore) and an additional 5% percent bonus for 'Significant Indian Content'. This step intends to provide impetus to attract medium and big budget international film production projects to the country. The sunrise industries like AVGC and post-production services are also expected to benefit from the recent initiatives in the film sector.

2.68   National Cinema Day, an industry initiative, was observed on October 13, 2023, offered discounted tickets and special promotions across theatres nationwide significantly boosting net collections. Additionally,

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[47] https://assets.ey.com/content/dam/ey-sites/ey-com/en_in/topics/media-and-entertainment/2024/ey-in-india-s-media-entertainment-sector-is-innovating-for-the-future-03-2024-v1.pdf

[48] https://www.livemint.com/news/india/csc-partners-with-october-cinemas/amp-11675880238613.html

[49] https://csc.gov.in/

[50] https://pib.gov.in/PressReleseDetailm.aspx?PRID=1978313

Film Bazaar, organized by the National Film Development Corporation (NFDC) alongside the International Film Festival of India (IFFI) in Goa, serves as a premier platform for South Asian and international filmmakers, producers, sales agents, and festival programmers to foster creative and financial collaboration, and promote world cinema in the South Asian region[51].

2.69   The Standing Committee on Information Technology in the 46th Report of (2022-2023)[52] highlighted about the various initiatives taken by MIB to boost films shooting in India. This includes incentive policy for foreign film production, creation of a special category of visa viz., Film (F) visa to enable cast and crew for film production and establishing of Film Facilitation Office (FFO)[53] which act as single window clearance system by working with state governments.

2.70   The report also highlights that since 2017, FFO has helped States/UTs to set up their Film Offices in Film Bazaar to connect them to the industry and also enable them to showcase their incentives and policies. Continuous engagement with nodal officers through workshops & film offices have resulted that 19 states have a film policy, 17 states have an online single window filming ecosystem and 18 states have incentives for film makers.

2.71   The Government recently notified the Cinematograph (Certification) Rules, 2024[54] to comprehensively improve the film certification process for enhanced transparency, efficiency & ease of doing business for the Film Industry. The other key aspects of the rule include reduction in time-lines for the processing of film certification and adopting complete digital processes for eliminating all transactional time, provision of Accessibility features for certification to make watching films inclusive for disabled persons, providing age-based certifications to protect

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[51]https://filmbazaarindia.com/

[52]https://loksabhadocs.nic.in/lsscommittee/Communications%20and%20Information%20Technology/17_Communications_and_Information_Technology_46.pdf

[53] https://ffo.gov.in/en

[54]https://mib.gov.in/sites/default/files/Final%20Cinematograph%20Certification%20Rules%2014032024-Accessible.pdf

vulnerable audiences, such as children, with the principles of freedom of expression and consumer choice and system for Priority Screening of Films for enhancing transparency and eliminating all discretions. It further grants greater representation of women in the Central Board of Film Certification (CBFC) and CBFC's Advisory Panels.

2.72   Despite the several efforts, there exists challenges for the film industry in India. Regional films are not being able to significantly widen their content reach. One of the major bottlenecks for the regional films may be that they have limited market outside of their own state. Also, while the budgets have gone into crores, there may be little support from overseas satellites and OTT markets.

2.73   Furthermore, infrastructural development in the tier II and tier III cities is still at nascent stage. In so far, there are three film cities in India at Mumbai, Hyderabad and Noida and most of the film production and distribution houses[55] are located in the metro/tier I cities. Therefore, initiatives are desired to extend infrastructural support in other cities to encourage the local content creation by local talent and promote tourism.

2.74   Facilitating film production in India will enable FDI inflows for the sector. Additionally, initiatives may also be explored to establish film shooting ecosystem at places of heritage to boost Indian tourism. According to the FFO brochure, 18 cities[56] have emerged as the filmmaking centres of India.

2.75   In this regard, example of international practice that can be referred is German Federal Film Fund (DFFF)[57] which is a vital source of funding for German and international cinema projects, administered by the Federal Government Commissioner for Culture and the Media. DFFF subsidies attract filmmakers worldwide to collaborate with German partners and film in Germany. It also boasts high quality, diverse locations, modern studios, innovative technology and a skilled talent pool. The DFFF

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[55] https://en.wikipedia.org/wiki/List_of_film_production_companies_in_India
[56] https://ffo.gov.in/uploads/ffo_publication/FFO_Brochure.pdf
[57] https://dfff-ffa.de/index.php?grusswort-bkm-engl

scheme promotes large, medium and small sized projects, making German producers competitive in the global market.

2.76 As per industry survey, production houses indicated that the issue being faced by them is the shortage of quality writing and directing. It mentioned that the film industry needs to develop the required talent through funding writers' rooms, crowdsourcing stories and sourcing directors from smaller towns and not just metros.

2.77 Internationally, the French National Centre of Cinema (CNC)[58], a public administrative institution placed under the authority of Ministry of Culture and headed by the President, provides support for training, creation, distribution, exportation, etc. The CNC also encourages and facilitate the creative pursuits of filmmakers, authors, and screenwriters by offering various forms of assistance, including financial aid for writing, production, distribution, market exploitation, and exportation.

2.78 While several initiatives and continued support are being provided, the Government and the industry are required to come forward with an optimum solution that address the existing challenges and opens a wider horizon in the sector, thereby making India a preferred filming destination. Film piracy is also one big concern, which is detailed out separately under combating piracy section. In view of above, stakeholders are requested to provide their comments on the question given below.

Issues for Consultation

Q8. What new strategies and measures should be envisaged in the policy for the film industry to enhance audience engagement, infrastructure development, upskilling artists, reduce piracy, increase foreign direct investment or any other aspect? What steps are required to make India a preferred filming destination? Provide your comments with detailed justification.

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[58] https://www.cnc.fr/web/en/about

D3. Promising a growth trajectory for Indian online gaming segment

2.79 The Indian online gaming segment poses potential to contribute to the nation's economy encompassing FDI inflows, employment opportunities, and revenue generation for the government. According to industry reports, the online gaming community in India comprised of 42.5[59] crore gamers in FY 2023, which was second largest after China. The year wise projected growth of online gamers in India has been depicted in the Figure 2.2.

Figure 2.2: Number of gamers (in crore) [Source: EY report, December 2023]
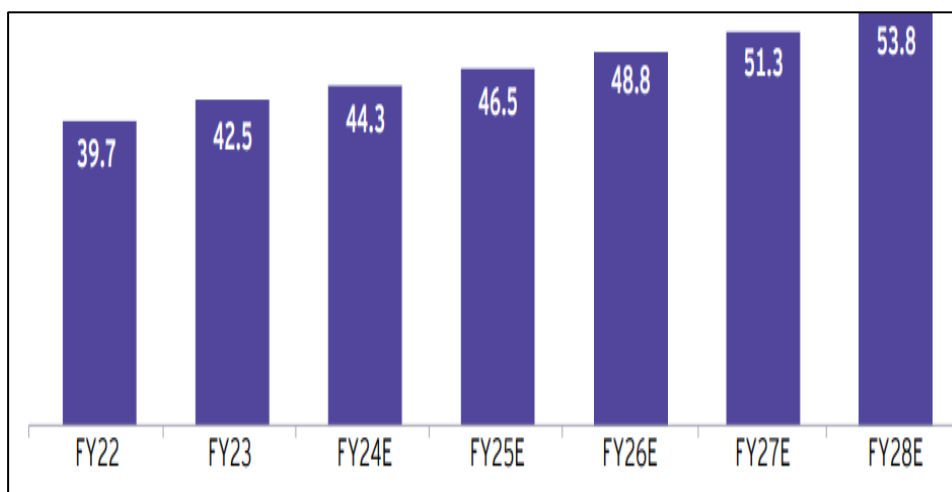
2.80 From FY20 to FY23, the online gaming segment in India experienced a notable CAGR of 28% culminating in a market size of ₹ 16,428 crore in FY23. It is suggested that it will reach ₹ 33,243 crore in FY28, at a 15% CAGR.

2.81 Before getting into the intricacies of the online gaming sector, it would be imperative to understand the difference between online gaming and online gambling. In online gaming, players participate in gameplay through the internet irrespective of physical location. Whereas online gambling involves participating through the internet by placing bets or wagers on games and events to win money. The distinction between gaming and gambling depends on the element of skill involved. If an online activity does not require skill, it will be considered gambling, else

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[59] https://assets.ey.com/content/dam/ey-sites/ey-com/en_in/news/2023/12/ey-new-frontier-online-gaming-report.pdf

gaming. Hence, gaming activities are dependent on skill, while gambling activities rely on chance.

2.82   Access to the internet and the increased use of smartphones in urban as well as in rural areas have taken a paradigm shift in the gaming industry. But the lack of adequate regulation has allowed illegal offshore gambling markets to thrive, causing harm to users and substantial losses to the exchequer.

2.83   The gambling in India is governed by the Public Gambling Act 1867[60], which handles the challenges of gambling and Common gaming house. Under the Information Technology (IT) Act 2000[61], Rules have been made for the online gaming activities in India.

2.84   The Intermediary Guidelines and Digital Media Ethics Code Rules, 2021 (online gaming rules)[62] for online gaming issued by MeitY, lays out a comprehensive framework for online gaming ecosystem and deals with fact checking related to online content pertaining to Government. These rules are aimed at addressing the challenges of catalyzing and expanding online gaming innovation and at the same time protecting citizens from illegal betting and wagering online. Industry participating Self-Regulatory Organizations (SRO) are the core of the enabling framework which certifies permissible Online games.

2.85   Further, there exists a gap between game developers and publishers in India. For small and mid-tier game developers in India, the lack of independent publishers poses a significant challenge. These developers often struggle with upfront marketing costs and limited resources or expertise to handle marketing, distribution and community management on their own. Without independent publishers to support them, these developers face difficulties in reaching their target audience and

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[60] https://www.indiacode.nic.in/bitstream/123456789/2269/1/AAA1867___03.pdf

[61] https://eprocure.gov.in/cppp/rulesandprocs/kbadqkdlcswfjdelrquehwuxcfmijmuixngudufgbuubgu bfugbububjxcgfvsbdihbgfGhdfgFHytyhRtMjk4NzY=

[62] https://www.meity.gov.in/writereaddata/files/Information%20Technology%20%28Intermediary%20 Guidelines%20and%20Digital%20Media%20Ethics%20Code%29%20Rules%2C%202021%20%28upda ted%2006.04.2023%29-.pdf

generating revenue from their games. In this regard, it may be noted that majority of the popular online games are developed in foreign countries.

2.86 Several concerns have also been raised about the increased usage of online gaming. Like, lack of clear definitions between skill-based gaming and gambling introduces regulatory ambiguity, sparking ethical debates and diverse interpretations about the nature of these gaming activities. Also, there are several cases of illegal advertisements on these platforms. In FY23, Real Money Gaming (RMG)[63] segment was amongst the leading segment running advertisements that were not in compliance with the Advertisement Standards Council of India (ASCI) guidelines. MIB, vide its letter dated 25th August 2023[64], has issued advisory to all the stakeholders including media entities, online advertisement intermediaries and social media platforms to immediately refrain from showing direct and indirect advertisements of betting and gambling platforms.

2.87 Another concern related to online gaming is underage participation and becoming victims of money laundering. Moreover, there are growing concerns surrounding the addictive nature of certain online gaming activities, leading to psychological and negative impacts on mental health. There is a need for a closer examination of these effects of prolonged gaming. Also, ways to promote responsible and healthy gaming by safeguarding user safety are required to be explored. Further, there is a potential for quality education through gaming as it aims to remain and grow to upskill many youth.

2.88 In view of above stakeholders are requested to provide their views to the following question:

Issues for Consultation

Q9. Online gaming being a rising sector holds potential for contributing to economy, what policy and regulatory aspects should be adopted

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[63] https://inc42.com/buzz/real-money-gaming-led-in-violation-of-advertising-guidelines-in-fy23-asci/

[64] https://mib.gov.in/sites/default/files/Advisory%20dated%2025.08.2023%20with%20enclosures.pdf

for the orderly growth of online gaming in India? Further, suggest measures to support local game developers to compete and grow. Also suggest safeguards to protect general public (especially underage players) from negative and psychological side effects, while promoting healthy gaming.

D4. Developing a support ecosystem for Animation, VFX and post-production

2.89   The Indian AVGC-XR sector is growing at a rate of 30 or 35% annually[65]. As per estimates, the industry currently employs 2.6 lakh people across the country and is expected to create 23 lakh direct jobs by 2032, and most of these jobs are likely to be created for content developers, animators, pre-production and post-production artists, pre-visualisation artists, compositors, etc.

2.90   Data suggests that the country has more than 4000 studios. Over 100 of them develop high quality AVGC-XR content for full-length feature films by Hollywood and Bollywood production houses and pre-and post-production studios from North America and Europe. Further, Mumbai has the highest number of studios at 600-700, followed by 500 in Bengaluru, 300-400 each in Hyderabad and Pune, 300 in Chennai, 150 each in Noida and Gurgaon, 100 each in Kolkata and Indore, and the rest in Bhopal, Ahmedabad, and Kochi. Also, a good number of studios are coming up even in small towns.

2.91   The Government of India (Department of Commerce) has designated audio-visual services as one of the 12 Champion Service Sectors[66] and announced key policy measures aimed to nurture sustained growth of the identified sectors. Further, in the 46th Report[67] of 2022-2023 of the Standing Committee on Information Technology, it was highlighted that

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[65] https://www.thehindu.com/business/indias-avgc-xr-sector-to-become-26-bn-industry-by-2030/article67832231.ece

[66]https://www.pib.gov.in/PressReleasePage.aspx?PRID=1898023#:~:text=Centre%20has%20formulated%20'Action%20Plan,Transport%20%26%20Logistics%20Services%2C%20Accounting%20and

[67]https://loksabhadocs.nic.in/lsscommittee/Communications%20and%20Information%20Technology/17_Communications_and_Information_Technology_46.pdf

an AVGC promotion taskforce was setup to recommend strategies to provide impetus to the AVGC sector.

2.92 The AVGC Taskforce Report released by MIB in 2022[68], identifies the potential limitations that the sector is witnessing. It mentions that AVGC education in the country strongly needs standardization of content and delivery modes. Similarly, for skilling and vocational training there is a requirement of dedicated vocational training modules for various other skills required by the sector. Apart from challenges on the academic front, the other challenges of the sector that needs to be addressed are regulatory framework, infrastructure, financing, skilling, R&D and Intellectual Property.

2.93 The recommendations[69] of the AVGC Taskforce by MIB are broadly categorized under 4 categories which are as follows.

a. *Domestic Industry Development for Global Access*

   i. *A National AVGC-XR Mission with a budget outlay to be created for integrated promotion & growth of the AVGC sector.*

   ii. *Launch of a 'Create in India' campaign with exclusive focus on content creation, In India, For India & For World!*

   iii. *With a goal to make India the global hub for AVGC, institute an International AVGC Platform, along with a Gaming Expo) with focus on FDI, Co-production treaties and Innovation.*

   iv. *Establish a National Centre of Excellence (COE) for the AVGC sector to become an international reference point across Skilling, Education, Industry Development and Research & Innovation for the AVGC sector. Regional COEs will be instituted in collaboration with the State Governments to provide access to local industries and to promote local talent and content.*

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68 https://mib.gov.in/sites/default/files/Final%20AVGC-XR%20Task%20Force%20Promotion%20Report%20-%202022_16th%20Dec-AG%20Edit.pdf

69 https://pib.gov.in/PressReleasePage.aspx?PRID=1886679

b. ***Developing Talent ecosystem to realize Demographic Dividends***

    i. *Leverage NEP to develop creative thinking with dedicated AVGC course content at school levels, to build foundational skills and to create awareness about AVGC as a career choice.*

    ii. *Launch AVGC focused UG/ PG courses with standard curriculum and globally recognized degrees. Standardize admission tests for AVGC related courses (viz, MECAT by MESC).*

    iii. *With an eye on the demand of 20 Lakh skilled professionals in AVGC sector in this decade, augment skilling initiatives for AVGC sector under MESC. Enhance Industry participation to ensure employment opportunities and absorption for students from non-metro cities and NE states.*

    iv. *Establish AVGC Accelerators and Innovation hubs in academic institutions, on lines of Atal Tinkering Labs.*

c. ***Enhancing Technology & Financial Viability for Indian AVGC Industry***

    i. *Democratize AVGC technologies by promoting subscription-based pricing models for MSME, Start-Ups and institutions.*

    ii. *Made in India for AVGC technologies through incentive schemes for R&D and IP creation. Evaluate PLI scheme to incentivize AVGC hardware manufacturers.*

    iii. *Enhanced Ease of Doing Business in AVGC sector i.e tax benefits, import duties, curbing piracy, etc.*

    iv. *Leverage Start-Up India to provide technical, financial and market access assistance to AVGC entrepreneurs to promote culture of R&D and local IP Creation.*

d. ***Raising India's soft power through an Inclusive growth***

    i. *Establish a dedicated Production Fund for domestic content creation from across India to promote Indian culture & heritage globally. Evaluate Reservation for high-quality indigenous content by broadcasters.*

ii. For an Inclusive India, target skilling and industry outreach for youth in Tier 2 & 3 towns and villages in India. Establish Special incentives for women entrepreneurs in AVGC sector.

iii. Promote local Children's channels for raising awareness on rich culture and history of India among children and youth

iv. Establish framework to ensure Child Rights Protection in the digital world

2.94   With the skilled and innovative IT talent pool, India has potential to become a global leader in Animation, Visual Effects, Gaming, Comics, and Extended Reality (AVGC-XR) technology, but high costs and reliance on foreign technology are few of the barriers. To overcome these challenges, focusing on creating India-centric content, access to technology more affordable, and investing in local research and development are crucial. Collaboration between industry, government, and academia is necessary to realize the sector's potential. Various Indian states like Telangana and Karnataka has supported the growth of AVGC sector in their states through various incentives.

2.95   The state of Telangana[70] supports the growth of AVGC sector by providing necessary infrastructural support through a relevant PPP model. Establishment of Telangana Animation and Gaming city which include providing an ideal environment for businesses in the AVGC industry, setting up of training and skilling academics and promoting AVGC courses in collaboration with the industry.

2.96   Furthermore, to enhance the start-up ecosystem in the state, the Government of Telangana in association with Software Technology Parks of India (STPI) has created an Incubation Center dedicated for AVGC start-ups and early-stage companies. The state government also plans to coordinate with the Government of India to implement the reservation of at least 5-15% of airtime on channels (both foreign and domestic) to promote locally created content to provide level-playing field for domestic

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[70] https://invest.telangana.gov.in/avgc/

content development and foster competition between domestic players, foreign companies that set up base in Telangana as well as start-ups. Various fiscal incentives are also offered like reimbursement of production cost of animation films, cartoon series, and games, exemption from entertainment taxes, reimbursement of internet bandwidth charges, etc.

2.97   The state of Karnataka[71] also released a draft policy for Animation, Visual Effects, Gaming, Comics, and Extended Reality (AVGC-XR). As per the draft, the State proposes to set up Centres of Excellence and Innovation Hubs across the State. These centres are expected to create a collaborative environment involving academia, the private sector and government agencies. They would also serve as focal points for skill development, fostering innovation, and translating research into market-ready products and services. The policy includes a range of fiscal incentives, a streamlined regulatory environment, and the development of cutting-edge infrastructure.

2.98   Based on above discussions, stakeholders are required to provide their comments to the question given below.

Issues for Consultation

Q10.   What further steps and initiatives should be adopted by the Central and State Governments and the industry for the growth of animation, VFX and post-production segment? Provide your comments with detailed reasoning and justification.

D5.   Amplifying and facilitating the Music industry segment

2.99   Music is integral to streaming, films, television, radio, gaming and social media. Industry report[72] reveals that India produces 20,000 to 25,000 original songs annually, generating over ₹ 12,000 crore revenue, which constitutes to approx. 6% of the M&E industry revenue. The music

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[71] https://itbtst.karnataka.gov.in/storage/pdf-files/DraftAVGCPolicy.pdf

[72] https://www.ey.com/en_in/media-entertainment/the-music-economy-creator-the-rise-of-music-publishing-in-india

industry provides direct employment to approximately 40 lakh individuals in music creation and nearly 36,000 individuals indirectly across various sectors. Additionally, around 14 million people are employed through informal means such as DJs, brass bands, and sound engineers.

2.100   Despite its popularity worldwide, there are certain limitations in the industry that need to be addressed. Some of the challenges that pertain to this industry are promotion of Indian music content, training and skill development, need of infrastructural support and need of strengthening social security to artists. These issues are elaborated in the following paras.

2.101   It is to be noted that Indian content is watched/listened in 160 countries and interestingly majority of them are musical content. Apart from film music, folk, classical and devotional music too have gained a significant value to the global listeners. Industry report further suggests that India ranks 14th in recorded music revenues, while publishing revenues are ranked 23rd due to various issues.

2.102   Quality education, training and robust skill development amongst the workforce are one of the most important factors in determining the growth of the sector and the economy. As per the report, formal music education in India is still at a nascent stage with only 3% penetration, compared to 40% penetration in the developed nations. While the number of institutions available for training has increased over time, it is neither adequate nor is it accessible for everyone.

2.103   Another important area of focus this industry requires is the availability of infrastructure and equipment for training and skill development. It is observed from industry analysis that only 56% creators had access to the equipment and infrastructure required to produce music. 35% re-invested more than 50% of their earnings from music on equipment, gear, software, and other infrastructure required to create music.

2.104 Another aspect that requires due consideration is providing social support to music authors. These authors rely on on-call opportunities such as session work, live performances and creating content for music labels or film producers, as the primary sources of income, which are not available frequently.

2.105 Various countries have implemented schemes to ensure the healthcare and social security of artists. For example, in France, under its Social Security Code Article L.382-1 on authors and artists, funding for a flexible mechanism for unemployment protection for artists and technicians under fixed-term contracts is provided. The scheme also offers an old-age pension, sickness benefits, healthcare insurance, disability allowance, survivor's pension, and maternity cover, which allows self-employed authors and artists to obtain the same benefits as regular employees. These provisions are implemented by the Authors' Society.

2.106 Similarly, in the Republic of Korea, the Ministry of Culture, Sport and Tourism took several ad-hoc measures including loans at low-interest rates, a creative funds program, an artists' employment insurance scheme, etc.

2.107 Based on the discussions above, stakeholders are requested to provide their comments to the question given below.

Issues for Consultation

Q11. What strategies and measures should be included in the policy for the music segment to enhance infrastructure development, upskilling artists, financial certainty and to resolve other challenges being faced by artists? What steps should be taken to encourage the global promotion of Indian music and artists? Please provide your comments with detailed reasoning.

D6. **Utilizing Radio and CRS for informing, educating and entertaining the masses**

2.108 Radio, due to its extensive coverage, ease of portability, low setup costs, and affordability, is widely regarded as one of the most popular and cost-effective mass communication mediums. In India, radio coverage is available in Amplitude Modulation (AM) mode (Short Wave /Medium Wave) and Frequency Modulation (FM) mode. While AM mode is only used by AIR, the versatility of FM Radio broadcasting makes it a favoured medium for providing entertainment, information, and education by both AIR and private players. To improve the variety and quality of radio broadcasting, the Government introduced a policy during 1997-2002 that allowed private sector Indian companies to establish FM radio stations within the FM spectrum band (88-108 MHz).

2.109 India has today 388 operational private FM Radio channels spanning 113 cities. Government had planned to establish 1200 FM Radio channels in approx. 350 cities. This highlights the vast potential of expansion of FM radio stations in smaller cities having population less than 3 lakh including hilly and border areas. Such areas often fall under the information dark regions due to non-availability of media coverage and communication infrastructure. By identifying such cities and establishing the FM radio stations there, it can be ensured that these areas gain access to vital information, entertainment and educational content. This would stimulate economic growth by creating opportunities for local employment, talent development and entrepreneurship. This would also attract investment from advertisers and sponsors interested in reaching these underserved markets, thereby bolstering the local economy.

2.110 Further, the current FM radio infrastructure primarily supports analog broadcasting technologies, lacking provisions for the integration of digital FM radio. However, digital radio technologies offer numerous benefits when compared to analog systems contributing to enhanced audio quality, functionality and efficiency. Data transmitted in digital

transmissions are less susceptible to interference and distortion than analog signals. Furthermore, digital radio technologies offer increased spectrum efficiency, allowing broadcasters to transmit more channels and services within the same bandwidth thus addressing the issue of limited bandwidth.

2.111 TRAI in its recommendations on 'Issues related to Digital Radio Broadcasting in India' issued on 1st February 2018[73] has endorsed the need to facilitate digital radio broadcasting in India and recommended the Government to notify the policy framework for the same. Some trial runs[74] by Digital Radio Mondiale (DRM) in collaboration with AIR have been conducted, however no provisions for digital FM have been prescribed.

2.112 Another issue being faced by the radio sector is that it has been experiencing a decline in listenership and advertisement revenues. This trend is attributed to the audience's shift towards alternative platforms such as OTT services. Further, TRAI in its recommendations dated 5th September 2023[75] on 'Issues related to FM Radio Broadcasting' recommended to de-link the license fee from the Non-Refundable One-Time Entry Fee (NOTEF) to provide financial support to radio stations.

2.113 Apart from All India Radio and private FM radio players, another significant contributor to the Indian FM radio broadcasting landscape is Community Radio Station (CRS). In December 2002, the Government of India initially approved a policy granting licenses for the establishment of CRS to well-established educational institutions, including IITs/IIMs. However, recognizing the importance of broader community participation in issues related to development and social change, the Government reconsidered the policy in 2006. Consequently, the policy was expanded to include non-profit organizations such as civil society organizations and voluntary organizations.

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[73] https://trai.gov.in/sites/default/files/Recommendation_Digital_Radio_01022018.pdf
[74] https://www.drm.org/wp-content/uploads/2021/09/2021-09-16_Results-of-DRM-FM-Trial-Delhi-Jaipur_v1.0.pdf
[75] https://www.trai.gov.in/sites/default/files/Recommendation_05092023.pdf

2.114 Reflecting upon the evolving needs and developments the policy guidelines were subsequently amended in 2017, 2018, 2022 and 2024. Adopting most of the recommendations from TRAI's 'Recommendations on Issues related to Community Radio Stations' dated 22nd March 2023, MIB released revised Policy Guidelines for setting up CRS in India on 13th February 2024. The new guidelines allowed a single institution to set up a maximum of six stations in different districts of operation, increased advertising time from 7 to 12 minutes per hour, and increased rate of advertisement from ₹52 per 10 seconds to ₹74 per 10 seconds. The said measures will help in financial sustainability of the stations and further growth of the CRS.

2.115 In addition to empowering marginalized groups and communities, CRSs play a significant role in developmental efforts by broadcasting programs that address a wide range of local issues, including agricultural concerns, education, women's empowerment, health, sanitation, and local culture, among others, in the local language or dialect. As of January 2024, India has 479 operational community radio stations. There is a potential for further expansion and utilization of CRSs to better serve the diverse needs of the population. Table 2.1 depicts the number of CRSs in various countries.

Table 2.1: CRS count in various countries

S. No.	Country	No. of CRS
1.	India	479[76]
2.	USA	1500[77]
3.	UK	316[78]
4.	Australia	450[79]
5.	Brazil	4727[80]

[76]https://mib.gov.in/sites/default/files/List%20of%20Commissioned%20Community%20Radio%20Stations%20in%20India%20as%20of%2008-Jan-24_0.pdf

[77] https://www.pewresearch.org/short-reads/2016/09/19/number-of-u-s-low-power-fm-radio-stations-has-nearly-doubled-since-2014/#:~:text=More%20than%20750%20new%20low,the%20U.S.%20and%20its%20territories.

[78] https://static.ofcom.org.uk/static/radiolicensing/html/radio-stations/community/community-main.htm

[79] https://www.infrastructure.gov.au/media-technology-communications/radio/community-radio

[80] https://www.ceicdata.com/en/brazil/number-of-television-and-radio-station/broadcasting-number-of-radio-station-community

2.116 Additionally, TRAI in its recommendations dated 21st September 2023[81] on 'Low Power Small Range FM Radio Broadcasting' has allowed low power small range FM services to serve geographical area with a maximum range of 500-meter radius to seamlessly envelop extensive open spaces, provide reliable coverage for drive-in theatres, and adequately serve the seating areas of stadiums, building, expo area etc. Similarly, through various other recommendations and policies, TRAI and Government has always worked towards the betterment and growth of the radio sector in the country.

2.117 Therefore, apropos to the above discussion, stakeholders are requested to discuss measures related to the questions below. These discussions are aimed at developing objectives and strategies for the radio sector within the context of the National Broadcasting Policy.

Issues for Consultation

Q12. What measures and strategies should be included in the National Broadcasting Policy to encourage expansion and ensure orderly growth and sustainability of FM Radio Stations and Community Radio Stations in the various cities of country including hilly and border areas? In what ways the policy can facilitate the integration of digital radio technologies into the existing FM radio infrastructure to improve audio quality, functionality and spectrum efficiency?

## E. Fostering growth-oriented Policy and Regulatory environment

2.118 It is a well-known fact that India's creative economy is continuously evolving. Investment in content and technological progress are two forces that have led to the transformation of this sector.

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[81] https://www.trai.gov.in/sites/default/files/Recommendations_21092023.pdf

E1. Policy and Regulatory Framework

2.119   Prior to 1991, during the pre-liberalization era, the television industry in India was largely controlled by the Government. Doordarshan, the state-owned broadcaster, was the sole broadcaster. After 1991 (post-liberalization era) private broadcasters were allowed to enter the market. The Prasar Bharati Act was enacted in 1990, leading to the establishment of the Prasar Bharati Corporation. It aimed to grant autonomy to Doordarshan and All India Radio from Government control.

2.120   The Cable Television Networks Rules, 1994 and thereafter the Cable Television Networks (Regulation) Act, 1995, was introduced to regulate the operation of cable television networks in the country. It addressed issues related to quality of service, content regulation and licensing of cable operators.

2.121   TRAI was established in the year 1997. The Central Government notified the broadcasting and cable services to be telecommunication services in the year 2004. Ever since then, in discharge of the said functions, TRAI has been providing enabling regulatory framework for the carriage side of the broadcasting sector through Tariff Orders, Interconnection Regulations and Quality of Service and Consumer Protection Regulations.

2.122   The Government issued the uplinking guidelines in 2011 to regulate the process of transmitting television channels from India for global distribution. These guidelines were aimed for companies seeking permission to set up uplinking hubs, teleports, for uplinking of TV channels from India. The uplinking/downlinking guidelines have been consolidated and revised in 2022.

2.123   Based on TRAI's recommendations on digital addressable cable TV system in 2010, the Government issued notification in 2011, which laid down the roadmap for implementation of digitalization in cable television sector. Completion of the process of digitalization necessitated a new set of regulations. Therefore, TRAI notified the regulatory framework in March 2017. The key objectives of the regulatory framework are to ensure

level-playing field, transparency, non-discrimination, non-exclusivity for all stakeholders in the value chain, providing adequate and real choice to subscribers. The flowchart below summaries the regulations of broadcasting services in India as depicted in Figure 2.3. The draft Broadcasting Services (Regulations) Bill, 2023 is also proposed by MIB to cater the needs of broadcasting services in India.

Figure 2.3: Chronology of Broadcasting Guidelines/Regulations in India

2.124 Broadcasting sector in India is continuously witnessing shifts, trends and disruptions owing to new market entrants and changing consumer demands and habits. The technological advancements, primarily the

convergence of content and devices require attention of policy makers and regulatory regime. Today, the same content is available on television, smart connected screens as well as smartphones. Owing to the difference in the distribution mechanism on these platforms, they pose a regulatory challenge.

2.125 It has been observed that India's Linear TV viewership has shown a decline. This fall is due to a combination of factors, including changes in the media landscape. In terms of viewership and consumer engagement, there is still a gap between TV and digital media, TV being the medium that delivers the maximum reach. Therefore, it is important to foster harmonized growth of different broadcasting platforms through converged regulatory approach.

2.126 With the advent of technology, services of Information Technology (IT), telecommunications and broadcasting are rapidly converging. The regulatory regime in the broadcasting sector has been a dynamic and an evolving process. TRAI has been regulating the telecommunications and broadcasting sectors and is well-versed with the latest policies, practices, licensing framework, and other relevant information. Worldwide, several countries like USA, UK, Australia, Canada, Korea, Malayasia, etc. have also resorted for a single converged regulator covering telecom and media.

2.127 As discussed above, the viewers of television programs are opting for alternate available possibilities. It would be prudent to highlight that although the broadcasting services offered by different mediums are comparable, presently they are governed by separate rules, regulations, and guidelines. The challenge is to maintain the level playing field for the service providers irrespective of the distribution methodology being adopted by them, to have an orderly growth of the broadcasting and distribution sector comprehensively.

2.128 While the traditional service providers of broadcasting services are required to adhere to the regulatory provisions of TRAI and MIB, the social media intermediaries, digital media (OTT), and publishers of online

news are regulated by the IT Rules 2021, issued by MeitY, with more focus on self-regulation and a three-tier grievance redressal mechanism to handle consumer complaints.

2.129 Apparently, it may be understood that with the technology advancements the existing regulatory frameworks needs to evolve. The sector needs to explore prospects to support the provision of fixed line broadband services using the Cable TV fixed line infrastructure and cloud-based storage of content, by adopting a technology neutral approach. To remain relevant in this dynamic environment, content regulation also needs careful consideration.

2.130 Further, to ensure the continuous growth of the sector, MIB has taken initiatives like revising the Uplinking/Downlinking Guidelines in 2022 to ensure ease of doing business (EoDB) in the sector and bringing out the draft Broadcasting Services (Regulation) Bill, 2023. The sector being technology intensive, measures like granting 'Infrastructure Status' to the broadcasting sector for raising capital to invest in newer technologies needs to be looked upon. The same has been recommended by TRAI in its recommendations dated 2nd May 2023[82] on 'Ease of Doing Business in Telecom and Broadcasting Sector'.

2.131 MIB maintains a single window online portal 'BroadcastSeva' in place, which has now been revamped to onboard different permissions/approvals and the concerned ministries/departments making it end-to-end online ensuring transparency and convenience of the service providers ensuring timelines.

2.132 It is to be noted that EoDB is not a one-time activity. It is a continuous process. Therefore, considering stakeholders involvement to identify the impediments as there is always a possibility of removing some of the non-relevant compliances and introduce new requirements as expedient. Further effective stakeholder enablement is likely to unlock more

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[82] https://www.trai.gov.in/sites/default/files/Recommendations_02052023.pdf

potential in Indian broadcasting space especially at a time when the world is seeking new investment opportunities.

E2. Infrastructure Sharing

2.133 Rapid development of new-generation of services demands up-gradation of the distribution network infrastructure to meet customer requirements. Infrastructure sharing is a process wherein competitors join hands to share their resources for faster expansion - in terms of the geography as well as the capacity, and to lower the cost of servicing their subscribers. This provides scope for the service provider to invest in new technologies to provide better services. The decisions relating to sharing of infrastructure are usually commercially driven process rather than mandated process.

2.134 Sharing of infrastructure in TV broadcasting network refers to the shared use of carriage and distribution networks and services for delivery of broadcasting services to subscribers. One approach of infrastructure sharing could be where two or more DPOs collaborate on voluntary basis to provide TV broadcasting services to consumers. While another approach could be where distribution network is established, operated, and maintained by one DPO, and another DPO delivers services to its subscribers by using the network of earlier DPO on pay and use basis. Sharing of infrastructure in TV broadcasting distribution network can reduce the cost per subscriber of network establishment, operations and maintenance, accelerate geographical expansion of services, and reduce the rural urban digital divide. Similar infrastructure sharing possibility lies in case of digital media platform especially in cloud hosting, security and digital right management.

2.135 Based on TRAI's Recommendations dated 29th March 2017[83] on 'Sharing of Infrastructure in Television Broadcasting Distribution Sector', MIB has amended the following guidelines, through which infrastructure sharing has been allowed:

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[83] https://trai.gov.in/sites/default/files/Recommendation_broadcasting_29_03_2017.pdf

i. Sharing of infrastructure by HITS operator between HITS operators and MSOs have been allowed through MIB Order dated 6th November 2020[84] amending the 'HITS Guidelines for Broadcasting Service in India dated 26.11.2009'.

ii. Sharing of infrastructure by DTH operator has been allowed vide MIB Order dated 30th December 2020[85] amending the 'Guidelines for obtaining License for providing DTH Broadcasting Services in India dated 15.03.2001 and as amended'.

iii. Sharing of infrastructure by MSO with another MSO has been allowed vide MIB Order dated 29th December 2021[86] through the subject 'Guidelines for sharing of infrastructure by Multi System Operators'.

2.136 As the technologies in broadcasting sector and telecommunication sector are moving towards the path of convergence, there are possibilities of utilizing the existing infrastructure of one by the other. Similar are the possibilities amongst the distribution platforms and also FM Radio sector and between the public and private sector in the field of programme generating facilities. For the case of radio, cities where Prasar Bharati infrastructure is available, co-location is made on the existing facilities of Prasar Bharati on prescribed terms and conditions. If suitable infrastructure of Prasar Bharati is not available, a consortium is formed for co-location of all transmitters identified for that city.

2.137 Based on the above discussions, stakeholders are requested to provide their comments on the following set questions

Issues for Consultation

Q13. With the continuous advancement of technologies and convergence of the telecom, information technology and broadcasting sectors,

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[84] https://mib.gov.in/sites/default/files/Amendment%20in%20HITS%20guidelines%20.pdf

[85] https://mib.gov.in/sites/default/files/Amendment%20in%20Guidelines%20for%20obtaining%20license%20for%20providing%20DTH%20Broadcasting%20Services%20in%20India.pdf

[86] https://mib.gov.in/sites/default/files/Guidelines%20for%20sharing%20of%20infrastructure.pdf

what policy and regulatory measures are required, beyond the existing ones, to facilitate the growth of the broadcasting sector with ease of compliance? Elaborate your comments with proper reasoning and justifications to the following issues:

   i. **To enable healthy and competitive environment amongst the existing and emerging services and ensuring parity among comparable distribution mediums, while being technology neutral.**

  ii. **To allow and encourage infrastructure sharing among the players of broadcasting and that with the telecommunication sector.**

 iii. **Any other suggestion for policy and regulatory framework.**

F.   Combatting Piracy and ensuring Content Security through Copyright Protection

2.138   The broadcasting industry in India has experienced significant growth in recent years, fuelled by technological advancements and increasing consumer demand. However, with this expansion comes the pressing issue of copyright infringement and piracy, posing substantial challenges to creators and stakeholders.

2.139   The subject matter of Indian intellectual property, or IP, relevant to this industry primarily takes the form of copyrights. Copyrights in the industry relates mainly in the production, broadcasting and use of cinematographic films (CF), music, advertising, web series, theatrical plays, televisions serials, gaming, animation etc.

2.140   As per a global advisory firm[87], there had been sizable visits to content piracy websites in the year 2022 from India. The report also states that in India, piracy can be traced to individuals as well as organised groups who can capture content through screen grabs or by recording on phones in movie theatres and distribute it further. A lot of pirated content is

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[87] https://angle.ankura.com/post/102i6m4/more-than-seven-billion-visits-to-content-piracy-websites-originated-from-india#:~:text=In%20the%20latest%20Ankura%20Piracy,99%2C071%2C291)%20visits%20through%20torrent%20sites.

available on social media-based messaging applications, which circulate information about third-party pirated sites or aggregator apps that ordinarily may not be found on the application Play Store.

2.141 It is estimated that piracy causes a revenue loss of Rs. 20,000 crore[88] annually to the film industry. Illegal dissemination of video/ film content causes loss to creators and theatre operators involved in the business. The government also incurs losses because pirate activity avoids paying taxes on entertainment at theatres, and GST at locations where goods are produced or sold legally. Economic losses from piracy leads to job cuts and reduced opportunities within the industry. Moreover, theatres depend on ticket sales and concessions for their revenue. When pirated copies of films become widely available, it results in financial losses for these businesses.

2.142 To counter the menace of piracy, the Parliament has passed the Cinematograph (Amendment) Act, 2023[89]. The amendments include penalties, such as a minimum of 3 months' imprisonment and fine of ₹3 lakh, with the potential for imprisonment of up to 3 years and fine amounting to 5% of the audited gross production cost. It prohibits carrying out or abetting unauthorized recording and exhibition of films.

2.143 With increase in digital penetration, piracy issues are on rise on OTT platforms, thereby imposing mounting revenue losses and reputational harm on the original creators. Illegal download options of film contents from third-party sources are available days before their release. Piracy impacts the consumption of original content through password and credential sharing, sending files over the internet, and purchasing illegal streaming devices and services which are available at just a fraction of the cost to the consumers.

2.144 Similarly, there are instances of piracy in music and gaming content. As per International Federation of the Phonographic Industry (IFPI)

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[88] https://www.pib.gov.in/PressReleaseIframePage.aspx?PRID=1974394
[89] https://prsindia.org/files/bills_acts/acts_parliament/2023/Cinematograph_(Amendment)_Act,_2023.pdf

research[90], almost 74% of internet users in India access unlicensed services to listen to music. According to IFPI, this kind of illegal activities create huge losses for the Indian artists who are creating content and the labels that are investing in it. Further, governing the animation and online gaming business, had been difficult for combatting piracy issues in India.

2.145   The main objective of the copyright is to protect the creator's original work from unauthorized reproduction. The Indian Copyright Act 1957 protects original literary, dramatic, musical and artistic works and cinematograph films and sound recordings from unauthorized uses. Unlike the case with patents, copyright protects the expressions and not the ideas. The Copyright Act is the primary legislation governing copyright in India. For instance, Section 55 provides for the power of the police to seize infringing copies, and Section 63 provides for criminal penalties for copyright infringement. So far, the Copyright Act, 1957, does not explicitly provide for extraterritorial jurisdiction.

2.146   Further deploying technology driven solutions helps in combatting the issues related to piracy and copyright infringement. Robust authentication mechanisms through Digital Rights Management (DRM) technologies to control access to digital content may be explored. Employing advanced encryption techniques to secure the integrity and confidentiality of digital content, making it more challenging for pirates to tamper with or reproduce copyrighted material may be looked upon. Utilizing fingerprinting algorithms to automatically detect copyrighted content across various online platforms may also be considered.

2.147   It extremely important to develop and implement a multifaceted strategy within the sector to combat the issues raised by piracy and ensure the reduction of copyright infringement to foster a sustainable and thriving creative ecosystem for the various segments of the broadcasting landscape. A thoughtfully designed policy plays a pivotal role in

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[90] https://indianmi.org/wp-content/uploads/2023/12/IMI-Annual-Report-2023.pdf

mitigating copyright and piracy issues in the Indian broadcasting sector. By establishing a robust legal framework, fostering public awareness, embracing technology, and promoting international cooperation, India can create an environment that nurtures creativity, protects intellectual property, and ensures sustainable growth in the media and entertainment industry.

2.148 Based on above discussions, stakeholders are requested to provide their comments on the question given below.

Issues for Consultation

Q14. What additional measures should be adopted to combat piracy and ensure content security through copyright protection in the broadcasting sector? How can the technology driven solutions be developed and deployed to prevent unauthorised distribution and detection of the source of original content. Provide your comments with detailed explanations.

G. Leveraging Digital Terrestrial Broadcasting

2.149 Terrestrial broadcasting refers to the distribution of audio and video content through radio waves, which are transmitted through the air to terrestrial receivers, such as televisions and radios. It is not affected by issues such as internet congestion, bandwidth limitations, or buffering. Owing to the various benefits and supported use-cases, the scope of terrestrial broadcasting may be considered as an alternative/ complimentary technology for India.

2.150 With over 300 million households in India, there are over 100 million households which have the potential to be connected/covered with television connection. Also, there are a significant number of TV households which are paying in the bracket of Rs. 200-300 per month. Adopting methodologies like Digital Terrestrial Television (DTT) may be a breakthrough for reaching the 'TV Dark' homes in the country.

2.151 Terrestrial broadcasting is the preferred method for providing free-to-air TV services in most of the countries. International scenario reveals that

despite the presence of other digital TV platforms, digital terrestrial television system (DTT) continues to provide an alternate distribution platform for the distribution of TV broadcasting services. In most countries, its penetration continues to see positive growth trends. These include the UK, Netherlands, Spain, France, USA, Canada, Japan, Australia, Russia, Hong Kong, Malaysia, and Singapore.

2.152   In India, terrestrial broadcasting is presently under the exclusive domain of Prasar Bharati. It has not been opened to the private players so far. TRAI on 31st January 2017 has issued recommendations[91] on 'Issues related to Digital Terrestrial Broadcasting in India', through which it has been recommended to introduce DTT services throughout the country in a time bound manner with participation of private players. One reason why DTT has not flourished might be that it was not expected to be economically and operationally viable as it seemed unlikely to take away subscribers already using DTH or cable TV services. Moreover, one DTT transmitter can provide 10-12 TV channels in Standard Definition (SD) format which may not offer significant value proposition to the consumers. This transmitter can also provide services such as mobile TV, radio channels, etc. However, in that case the number of TV channels provided will get reduced according to the capacity consumed by other services.

2.153   The various Digital Terrestrial Television Broadcasting Standards include 3GPP, ATSC 3.0, DVB-T2 Systems etc. India could consider utilizing any of these standards and establish its own terrestrial broadcasting ecosystem by leveraging the expertise of premier Indian research institutes like IITs and IISc, industry stakeholders based in India, and collaboration among key players in the telecommunications and broadcasting sector, including government bodies, research institutions, and industry experts. The ecosystem needs to prioritize factors such as providing better image quality, more channels, interactive features, better multimedia capabilities, and compatibility

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[91] https://www.trai.gov.in/sites/default/files/Recommendation_DTT_31Jan2017_2.pdf

with devices. India's terrestrial broadcasting standard need to align with international trends, fostering innovation and paving the way for broader acceptance on the global stage.

2.154 One of the primary pillars for terrestrial broadcasting would be the requirement of the spectrum. At present, the frequency band 526-582 MHz is being used by Prasar Bharati for providing Terrestrial TV Broadcasting. TRAI, in its 'Recommendations on Auction of Spectrum in frequency bands identified for IMT/5G' dated 11th April 2022[92], suggested that the DoT, in consultation with MIB, may explore the use of 5G terrestrial broadcast to replace MIB transmitters for efficient and effective use of the frequency range from 526-582 MHz.

2.155 The draft Broadcasting Services (Regulation) Bill, 2023 also encompasses terrestrial broadcasting services under its unified framework. Like other broadcasting services, similar regulatory requirements have also been proposed for terrestrial broadcasting services. This includes seeking permission to operate as terrestrial broadcasting network, different programme and advertising code along with Content Evaluation Committees and a Broadcast Advisory Council for self-regulation for terrestrial broadcasting services.

2.156 Based on the above discussion, stakeholders are requested to provide their comments on the question given below.

Issues for Consultation

Q15. What policy and regulatory provisions would be required in the policy to enable and facilitate growth of digital terrestrial broadcasting in India. Stakeholders are requested to provide strategies for spectrum utilization, standards for terrestrial broadcasting, support required from the Government, timelines for implementation, changes to be brought in the current ecosystem and the international best practices. Please provide your comments with detailed justification and proper reasoning.

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[92] https://www.trai.gov.in/sites/default/files/Recommendations_11042022.pdf

H. Reviewing the structure of Audience Measurement and Rating System

H1. Television Audience Measurement and Rating System

2.157 A transparent, credible, and technologically equipped television audience measurement system holds immense importance for all stakeholders involved in the media and broadcasting industry. Broadcasters, as primary content creators, benefit significantly from an accurate measurement system that enables them to optimize their programming. By understanding viewer preferences and behaviour, broadcasters can make data-driven decisions on content creation, scheduling and strategic investments. Additionally, a transparent audience measurement helps broadcasters to negotiate advertising rates effectively, showcasing the true value of their content and creating better monetization opportunities.

2.158 In India, audience measurement has evolved from limited initiatives like ORG-MARG's INTAM (Indian National Television Audience Measurement) to the formation of agencies like TAM and Audience Measurement and Analytics Limited (aMap). Concerns over credibility led to government intervention and TRAI gave its recommendations on 'Guidelines/ Accreditation Mechanism for Television Rating Agencies in India' to MIB on 11th September 2013[93]. TRAI recommended comprehensive guidelines for registration of Television Rating agencies. MIB accepted TRAI's recommendations and notified Policy Guidelines for Television Rating Agencies in India on 16th January 2014[94]. Under these guidelines, the industry-led body, Broadcast Audience Research Council (BARC) was accredited by MIB on 28th July 2015, to carry out the Television Ratings in India. BARC, comprising stakeholders like Indian Broadcasting Digital Foundation (IBDF), Indian Society of Advertisers (ISA), and Advertising

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[93] https://www.trai.gov.in/sites/default/files/FINALReco%2011Sept2013.pdf

[94] https://mib.gov.in/sites/default/files/TRP_Guidelines_16.01.2014_0.pdf

Agencies Association of India (AAAI), now serves as the sole provider of commercial television rating services in India since 2015.

2.159 The sample frame for BARC's TV panel is designed to include private households in all parts of India. The panel size, denoting the number of households where audience measurement devices are placed, plays a critical role in ensuring the accuracy and representativeness of television ratings. This panel should ideally reflect the diversity present in television viewership, encompassing factors such as age, socio-economic class, gender, working status, delivery platforms, and geographical coverage, including both urban and rural markets. The policy guidelines for television rating agencies have the following provisions regarding panel size:

> *"5.3.5 A minimum panel size of 20,000 to be implemented within 6 months of the guidelines coming into force. Thereafter, the panel size shall be increased by 10,000 every year until it reaches the figure of 50,000. The panel of homes has to remain representative of all television households in the country."*

2.160 In Recommendations on 'Review of Television Audience Measurement and Rating System in India' dated 28.04.2020[95], TRAI recommended the following:

> *"The rating agency should be mandated to increase the sample size from the existing 44,000 to 60,000 by the end of 2020, and 1,00,000 by the end of 2022 using the existing technology."*

2.161 However, the current scenario reveals that BARC India is operating with a panel size of only 55,000 households. However, this sample size falls short of accurately representing the vast landscape of 182 million TV households in the country with diverse viewing preferences. Moreover, with an anticipated growth in TV households expected to reach 202 million by 2026, the existing panel size is poised to become even more inadequate. Therefore, there's a need to establish a roadmap for

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[95] https://trai.gov.in/sites/default/files/Recommendation_28042020.pdf

incrementally expanding the sample size to meet the evolving landscape of television viewership.

2.162 Furthermore, in the dynamic realm of modern media consumption, integrating data from non-linear sources is essential for a comprehensive television audience measurement system. Viewers also turning to on-demand content via OTT services and streaming platforms, in addition to traditional linear TV metrics. However, BARC's present audience measurement mechanism incorporates data from linear television only. Cross-platform content consumption, enabled by seamless transitions between linear TV and OTT, adds complexity, necessitating a system that adeptly captures cross-device viewing habits. Advertisers seek unified data to optimize campaigns across platforms, leveraging insights to tailor strategies effectively.

2.163 Médiametrie[96] in France and Broadcasters' Audience Research Board (BARB)[97] in the UK have expanded their audience measurement approaches to include previously unaccounted segments and monitor Subscription-based Video on Demand (SVOD) and Broadcast Video on Demand (BVOD) services, reflecting the evolving nature of media consumption. Integrating data from both linear and OTT channels is imperative for adapting content strategies and optimizing ad placements in today's convergent media landscape.

2.164 Moreover, BARC being the sole provider of rating services in India, raises concerns about market behaviour, service quality, and cost inefficiencies, highlighting the need for additional players to encourage healthy competition. Introducing more agencies not only fosters competition but also has the potential to improve service quality and reduce costs, as dependency on a single agency often lack the drive to innovate and adapt to industry demands. Competition acts as a catalyst for innovation, prompting BARC and other entities to adopt new technologies and methodologies, ensuring continuous evolution in line

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[96] https://www.mediametrie.fr/system/files/2024-01/2024%2001%2008_Weekly%20Mediamat_S1.pdf

[97] https://www.barb.co.uk/the-barb-panel-2/

with media landscape changes. Additionally, a competitive environment acts as a natural deterrent against rating manipulation, as multiple agencies vie for accuracy and credibility. Independence from industry stakeholders is crucial for ensuring a neutral and unbiased approach to audience measurement. When measurement agencies are free from industry affiliations or influences, the process remains objective, transparent, and untainted by external pressures, enhancing credibility and trustworthiness.

2.165 Furthermore, in today's diverse media landscape, traditional audience measurement methods struggle to capture the complexity of viewer behaviour. The integration of modern technologies like Big Data, Artificial Intelligence (AI), and Wearable meters may be explored. Return Path Data (RPD) can also be used as a transformative tool, offering real-time insights into viewer interactions with content, empowering broadcasters and advertisers to adjust strategies promptly. Big data AI-driven algorithms may analyse vast datasets in real-time, refining the accuracy of audience measurement and empowering stakeholders with actionable insights. Moreover, there are digital set top boxes which have hardware and software that makes them two-way, that is, they have a return path. The return path data may be used for audience measurements through such set top boxes.

2.166 Wearable meters, such as Portable People Meters (PPM), enhance data granularity by measuring viewership patterns on the go, facilitating adaptability in a rapidly changing media landscape. Numeris[98] in Canada employs PPM technology, offering precise individual measurement and reliable station identification, ensuring continuous audience measurement for both radio and TV at the local level while minimizing human error in the monitoring process. The strategic incorporation of new era technologies into audience measurement strategies is pivotal for achieving a more accurate, responsive, and

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[98] https://buyandsell.gc.ca/cds/public/2020/06/29/2a387a910e4a1b2e629563574fb99435/21-0021 - acan - numeris - meter.pdf

comprehensive understanding of audience engagement across diverse platforms.

H2.   Radio Audience Measurement System

2.167   The importance and need for a credible, transparent and representative radio audience measurement system is recognized world over. Continuance with an inadequate radio rating system is likely to hamper the growth of radio industry as financial decisions are largely influenced by radio ratings. Presently there is no framework for conducting radio audience measurement in India.

2.168   Revenue from advertisements is the only revenue source for the radio segment. Advertising revenues of the radio broadcasting sector depend on the advertisement duration and the rates per unit time. The duration as well as the advertisements rates depends upon numbers and demographic profile of the radio listeners. Accordingly, there is a need for radio audience measurement data which can be used to assess the popularity of a channel or a program for the advertisers and advertising agencies. This will assist them in selecting the right channel or program at the right time to reach the target listeners. Further, it will also help the radio channels in improving their programs (both quality and content variety) for attracting more listeners.

2.169   Earlier, radio audience measurement in India was conducted by several agencies like AIR, TAM India and Media Research Users Council (MRUC). These agencies used to conduct RAM as a part of Indian Readership Survey (IRS). AIR used to conduct measurements for its radio stations only, TAM conducted measurement only in four cities with limited sample size, MRUC did not conduct any measurement after 2019. This is indicative that there is no integrated listenership data available either for AIR or private FM radio channels.

2.170   TRAI in its recommendations dated 15th September 2016[99] on 'Issues related to Radio Audience Measurement and ratings in India'

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[99] https://www.trai.gov.in/sites/default/files/Recommendations_15_September_2016.pdf

recommended the framework for RAM under the guidelines to be notified by MIB. The recommendations included:

  i. Guidelines for rating system to be notified by MIB

  ii. Registration is required with MIB for doing the rating work

  iii. Guidelines to cover registration, eligibility norms, cross-holding, methodology for conducting rating, complaint redressal, sale & use of ratings, audit, disclosure, reporting requirements and penal provisions

  iv. All rating agencies including industry led body are required to comply with the guidelines

2.171 In order to enhance the television and radio audience measurement ecosystem in India, it is imperative to identify objectives and strategies for the same within the framework of the National Broadcasting Policy. Therefore, based on the above discussion the stakeholders are requested to provide their comments on the question below.

Issues for Consultation

Q16. How the strategies with respect to audience measurement and rating system in National Broadcasting Policy can ensure, address and encourage:

  i. Establishment of a transparent, credible, and technologically equipped television audience measurement system that accurately reflects viewer preferences and behaviour

  ii. Expansion of the sample size to adequately represent the diverse landscape of television viewership, considering the anticipated growth in TV households

  iii. Integration of data from non-linear sources from digital media to cover cross-platform content consumption habits

  iv. Establishing a policy framework for conducting radio audience measurement in India

  v. Encouraging multiple agencies to ensure healthy competition and enhancing service quality of measurement and methodologies

vi. Adoption and utilization of modern technologies

I.   Establishing effective Grievance Redressal Mechanism

2.172   A robust grievance redressal mechanism is essential to address complaints and concerns from the viewers, listeners, gamers and other stakeholders. Such a mechanism ensures transparency, accountability, and fairness within the sector.

2.173   There exist grievance redressal mechanisms for content across different platforms. For television, there are self-regulatory bodies like the News Broadcasting Standards Authority (NBSA) and the Broadcasting Content Complaints Council (BCCC), while the Digital Publisher Content Grievances Council (DPCGC) and the Digital Media Content Regulatory Council (DMCRC) exist for OTT platforms in line with the 2021 IT Rules. The 2022 amendments to the IT Rules have also led to the formation of a Grievance Appellate Committee for intermediaries.

2.174   The Cable Television Networks (Regulation) Act, 1995 addresses grievances and complaints related to contents through a three-level structure: self-regulation by broadcasters, self-regulating bodies, and oversight by the Central Government. The Cable Television Networks (Amendment) Rules, 2021[100], further institutionalizes a statutory mechanism for redressal. For the consumer complaints against distributors, the Centralized Public Grievance Redress and Monitoring System[101] (CPGRAMS), can be availed to cater to the needs of consumers in relation to cable TV networks.

2.175   As per draft Broadcasting Services (Regulation) Bill, 2023, to ensure compliance to the Programme Code and the Advertisement Code and to address the grievance or complaint, a three-tier redressal mechanism has been proposed:

   i. Self-regulation by broadcasters and broadcasting network operators

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[100] https://mib.gov.in/sites/default/files/227661.pdf
[101] https://pgportal.gov.in/

ii. Self-regulatory organisations of broadcasters and broadcasting network operators

   iii. Broadcast Advisory Council

2.176 A similar three-tier grievance redressal mechanism has also been specified in the IT Rule 2021 for social media intermediaries, digital media (OTT), and publishers of online news. Further, in 2023, the amended IT Rule[102] also included online gaming as an intermediary. The three-tier grievance redressal mechanism include:

   i. Level I - Self-regulation by the publishers

   ii. Level II – Self-regulation by the self-regulating bodies of the publishers

   iii. Level III - Oversight mechanism by the Central Government

2.177 In view of above, stakeholders are requested to provide their comments on the question given below.

Issues for Consultation

Q17. **What other strategies should be adopted in the policy document for ensuring a robust grievance redressal mechanism to address and resolve complaints with respect to content as well as services effectively? Provide your comments with proper explanation.**

J. Ensuring socio-environmental responsibilities and recognizing the role of broadcasting during disasters

J1. Social Goals

2.178 It is essential for the policy to ensure that the broadcasting sector serves the broader interests and social goals of the society. In this regard, recognizing the significance of areas of national importance and of social relevance, the MIB in its Uplinking/Downlinking Guidelines 2022 has specified that TV broadcasters may undertake public service broadcasting for a minimum duration of 30 minutes a day. The themes

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[102] https://www.meity.gov.in/writereaddata/files/244980-Gazette%20Notification%20for%20IT%20Amendment%20Rules%2C%202023-%20relating%20to%20online%20gaming%20%26%20false%20information%20about%20Govt.%20business.pdf

identified by MIB are related to the socio-environmental aspects, which on displaying may raise awareness amongst the viewers. The clause 35(1)[103] of the Guidelines is reproduced as under:

*"**35. Obligation of public service broadcasting** — (1) As airwaves/frequencies are public property and need to be used in the best interest of the society, a company/LLP having permission under these guidelines for uplinking a channel and its downlinking in India (other than foreign channels only downlinked in India) may undertake public service broadcasting for a minimum period of 30 minutes in a day on themes of national importance and of social relevance, including the following, namely —*

(i)   education and spread of literacy;

(ii)   agriculture and rural development;

(iii) health and family welfare;

(iv)   science and technology;

(v)   welfare of women;

(vi)   welfare of the weaker sections of the society;

(vii) protection of environment and of cultural heritage; and

(viii) national integration

…"

2.179 One of the essential social facets that requires due consideration is the assurance of gender equality at workplace by providing equal opportunities to female employees through recruitment, transparent pay scale and work-life balance. There is a need to encourage gender equality in the broadcasting sector in India. As per a report[104], women hold only 13% of senior leadership roles in Indian broadcasting companies in 2022. While this figure is slightly higher than the 10% reported in 2021, the report underscores that there prevails a persistent gender gap in the industry.

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[103]https://mib.gov.in/sites/default/files/Guidelines%20for%20Uplinking%20and%20Downhinking%20of%20Satellite%20Television%20Channels%20in%20India%2C%202022.pdf

[104] https://www.ormaxmedia.com/data/library/OWomaniya2023.pdf

2.180 Another important area that the broadcasting sector need to consider is the safety risks and challenges prevalent for both women and children. Creating safer environments necessitates the knowledge and awareness of rights in the existing regulatory frameworks, including Protection of Children from Sexual Offences Act (POCSO) and Prevention of Sexual Harassment (POSH), and their effectiveness in mitigating safety challenges. There is a requirement to explore strategies to make aware and empower women and children through educational content and awareness campaigns.

2.181 To empower Persons with Disabilities (PwD), the Government had initiated the Accessible India Campaign or Sugam Bharat Abhiyan in 2015. The Government have enacted Rights of Persons with Disability Act, 2016 for PwD to get universal access, equal opportunities for development, independent living and participation in all aspects of life. Section 29(h) of the Rights of Persons with Disability Act, 2016[105] stipulates that persons with hearing impairment have access to television programmes with sign language interpretation or sub-titles. Section 42(ii) of the Act facilitates that persons with disabilities have access to ICT like electronic media by enabling audio description, sign language interpretation and close captioning.

2.182 The draft Broadcasting Services (Regulations) Bill, 2023 also mentions about the accessibility guidelines for PwDs. The provision in the Bill states that broadcasting network operator and broadcaster may make their programmes, platform and equipment accessible for persons with disabilities by taking certain mandatory measures under the Accessibility Guidelines and endeavour to take certain directory measures to make broadcasting services incrementally more accessible.

2.183 The broadcasting sector needs to consider and deliver content that addresses and raises awareness on social issues like poverty, addressing gender stereotypes and child labour. Through content production and dissemination, this industry needs to promote educational shows and

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[105]https://www.indiacode.nic.in/bitstream/123456789/15939/1/the_rights_of_persons_with_disabilities_act%2C_2016.pdf

content for children and life skills programmes for adolescents. The industry also needs to create content in multiple languages that raises awareness and addresses issues of marginalized tribal communities, minorities and LGBTs.

J2. Environmental Goals

2.184 The environmental goals that require due attention include public health and safety standards, improved energy consumption efficiencies, promoting research and development of green sources of energy and solar powered broadcasting equipment, etc. It is crucial to foster sustainable practices, minimizing environmental impact, and promoting eco-friendly strategies within the broadcasting sector.

2.185 It may be noted that in addition to production and distribution, consumption of content is also an issue because 2%[106] of global Green House Gas (GHG) emissions result from Information and Communication Technology (ICT). Therefore, embracing sustainable practices in broadcasting operations is of strategic necessity. Possible measures need to be looked upon for reducing carbon footprints and waste, to make India lead in the global initiatives like Asia-Pacific Broadcasting Union's (ABU) Green Broadcasting Project[107].

2.186 The sector needs to implement energy-efficient technologies and practices in broadcasting facilities, studios, and transmission infrastructure to reduce energy consumption. One of the probable approaches is to explore solar-powered broadcast equipment and energy-efficient studios. Further, establishing comprehensive waste management programs that include recycling, waste segregation guidelines, and responsible disposal methods for electronic waste and hazardous materials are of utmost importance.

2.187 The broadcasting sector needs to encourage content creators to produce documentaries/content that highlight and raise awareness on the importance of responsible and sustainable use of natural resources,

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[106] https://greenfilmshooting.net/blog/en/2013/07/29/green-broadcasting/
[107] https://www.abu.org.my/

renewable energy, conservation practices, environmental protection and climate change mitigation.

2.188 The broadcasting sector can contribute significantly to environmental conservation efforts, raise public awareness, and foster a more sustainable and eco-conscious environment. Broadcasting, as a powerful medium, can play a pivotal role in shaping public attitudes and behaviours toward environmental responsibility and conservation.

J3. Role of Broadcasting during disasters

2.189 Broadcasting plays a crucial role in disaster management by providing timely, accurate and reliable information to the public before, during, and after disasters. Broadcasters should ensure public safety through real-time information and delivering safety protocols and standards that are required to be followed.

2.190 Both satellite and terrestrial broadcasting can play a paramount role at the time of emergencies like disasters. Terrestrial broadcasting is an important communication tool for disaster management including emergency response due to its localized nature of services and ability to provide reception without being impacted by weather conditions. Similarly, satellite-based broadcasting, due to its ability to provide services from space, when terrestrial networks on the ground is damaged or destroyed makes it reliable tool for emergency responders during disaster relief.

2.191 In addition, radio broadcasting has been regarded as the most reliable medium for disaster updates by International Telecommunication Union (ITU)[108]. Radio broadcasting operates effectively even when other infrastructure is destroyed. The broadcast infrastructure for radio is highly robust and usually remains operational even when other communications technologies such as two-way voice and data services becomes non-operational.

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[108] https://www.itu.int/hub/2023/02/broadcast-radio-the-most-reliable-medium-for-disaster-updates/

2.192 Also, CRS plays an immense role to help people for disaster preparedness. Community radio specialises in providing local information to the local people thereby mitigates disaster risk, especially in pre-disaster preparedness and raising awareness targeting different community groups.

2.193 It is to be mentioned here that Department of Telecommunications (DoT) in collaboration with the National Disaster Management Authority (NDMA) is conducting comprehensive testing of the Cell Broadcast Alert System in TV and Radio. The Cell Broadcast Alert System succeeded in providing timely dissemination of disaster management messages to all mobile devices within specified geographical areas. Broadcasters need to explore the possibilities for implementing emerging technologies for emergency situations.

2.194 In view of the above, stakeholders are requested to provide their comments on the questions below.

Issues for Consultation

Q18. **What role the broadcasting sector should play to fulfil social and environmental responsibilities? Provide in detail the key focus areas and the strategies the sector should consider. Also provide strategies on the following specific issues:**

  i. **To empower Person with Disabilities (PwDs) to access the information and entertainment programmes**
  ii. **To encourage gender equality w.r.t. the participation and safety of the women workforce**
  iii. **To raise awareness about the issues of marginalized tribal communities, minorities and LGBTs**
  iv. **To adopt green broadcasting practices**

Q19. **Keeping in mind the immense role of broadcasting during disasters, how can the latest technologies be effectively utilized to provide disaster alerts and timely updates on television/mobile/radio during disasters? Elaborate with proper justifications.**

2.195 Stakeholders may comment on any other issue/topic along with the required strategies, which seems to be relevant to be included as a part of National Broadcasting Policy.

Q20. Stakeholders may provide their comments with full details (measures/ strategies) and justification on any other subject matter which may be considered to be incorporated as the inputs for the National Broadcasting Policy.

CHAPTER III

SUMMARY OF ISSUES FOR CONSULTATION

Q1. **Stakeholders are requested to provide their inputs in framing the Preamble, Vision, Mission and Broad Objectives for the formulation of the National Broadcasting Policy (NBP).**

Economy Measures and Contribution

Q2. **There exist data gaps in ascertaining contribution towards economy, revenue generation, employment generation, subscription figures etc. in the broadcasting sector which relies heavily on industry studies to carry out research and estimates. What should be the parameters, targets and institutional framework for measurement? Provide your comments with detailed justification. Also provide the indicative metrics used for calculating the targeted figures, if possible.**

Universal Reach, Indigenous Manufacturing, Skill development and Startups ecosystem

Q3. **Please suggest the strategies to be adopted by the Government and industry for propelling the growth of broadcasting sector w.r.t. the following**:

> i. **Provisioning of affordable television services in 'TV Dark' households;**
>
> ii. **Augmenting R&D capabilities and promoting indigenous manufacturing of broadcasting equipment;**
>
> iii. **Employment generation with emphasis on skill development;**
>
> iv. **Promotion of innovation led Start-ups and SMEs;**
>
> v. **Any other related area/strategy**

Please elaborate with detailed reasoning.

India as a Content and Uplinking Hub

Q4. **What other policy and regulatory measures should be adopted in the policy for creation and expansion of quality Indian content to make India the 'Global Content Hub'? Further, suggest how to extend**

support to local talents and content developers in terms of training, infrastructure and incentives. Provide your comments with detailed explanation.

Q5. Suggest the measures to promote the uplinking of television channels owned by foreign companies from India, which is now permitted by the Government to make India an 'Uplinking Hub'.

Public Service Broadcasting

Q6. What broad guiding principles, measures and strategies should be considered in the NBP to strengthen India's public service broadcaster (i.e. Prasar Bharati) to promote quality content creation, dissemination of DD and AIR channels and maximizing its global outreach? Also suggest, what support and measures should be provided for the proliferation of television and radio broadcasting services provided by the public service broadcaster in fulfilment of its mandate?

Various Segments of the Sector

Q7. What policy measures and regulatory aspects should be adopted in the NBP to nudge the growth of Indian regional content through OTT platforms?

Q8. What new strategies and measures should be envisaged in the policy for the film industry to enhance audience engagement, infrastructure development, upskilling artists, reduce piracy, increase foreign direct investment or any other aspect? What steps are required to make India a preferred filming destination? Provide your comments with detailed justification.

Q9. Online gaming being a rising sector holds potential for contributing to economy, what policy and regulatory aspects should be adopted for the orderly growth of online gaming in India? Further, suggest measures to support local game developers to compete and grow. Also suggest safeguards to protect general public (especially

underage players) from negative and psychological side effects, while promoting healthy gaming.

Q10. What further steps and initiatives should be adopted by the Central and State Governments and the industry for the growth of animation, VFX and post-production segment? Provide your comments with detailed reasoning and justification.

Q11. What strategies and measures should be included in the policy for the music segment to enhance infrastructure development, upskilling artists, financial certainty and to resolve other challenges being faced by artists? What steps should be taken to encourage the global promotion of Indian music and artists? Please provide your comments with detailed reasoning.

Q12. What measures and strategies should be included in the National Broadcasting Policy to encourage expansion and ensure orderly growth and sustainability of FM Radio Stations and Community Radio Stations in the various cities of country including hilly and border areas? In what ways the policy can facilitate the integration of digital radio technologies into the existing FM radio infrastructure to improve audio quality, functionality and spectrum efficiency?

Policy and Regulations

Q13. With the continuous advancement of technologies and convergence of the telecom, information technology and broadcasting sectors, what policy and regulatory measures are required, beyond the existing ones, to facilitate the growth of the broadcasting sector with ease of compliance? Elaborate your comments with proper reasoning and justifications to the following issues:

i. To enable healthy and competitive environment amongst the existing and emerging services and ensuring parity among comparable distribution mediums, while being technology neutral.

ii. To allow and encourage infrastructure sharing among the players of broadcasting and that with the telecommunication sector.

iii. Any other suggestion for policy and regulatory framework.

Combat Piracy and Content Security

Q14. What additional measures should be adopted to combat piracy and ensure content security through copyright protection in the broadcasting sector? How can the technology driven solutions be developed and deployed to prevent unauthorised distribution and detection of the source of original content. Provide your comments with detailed explanations.

Digital Terrestrial Broadcasting

Q15. What policy and regulatory provisions would be required in the policy to enable and facilitate growth of digital terrestrial broadcasting in India. Stakeholders are requested to provide strategies for spectrum utilization, standards for terrestrial broadcasting, support required from the Government, timelines for implementation, changes to be brought in the current ecosystem and the international best practices. Please provide your comments with detailed justification and proper reasoning.

Audience Measurement and Rating System

Q16. How the strategies with respect to audience measurement and rating system in National Broadcasting Policy can ensure, address and encourage:

i. Establishment of a transparent, credible, and technologically equipped television audience measurement system that accurately reflects viewer preferences and behaviour

ii. Expansion of the sample size to adequately represent the diverse landscape of television viewership, considering the anticipated growth in TV households

iii. Integration of data from non-linear sources from digital media to cover cross-platform content consumption habits

    iv. **Establishing a policy framework for conducting radio audience measurement in India**

    v. **Encouraging multiple agencies to ensure healthy competition and enhancing service quality of measurement and methodologies**

    vi. **Adoption and utilization of modern technologies**

Grievance Redressal Mechanism

Q17. What other strategies should be adopted in the policy document for ensuring a robust grievance redressal mechanism to address and resolve complaints with respect to content as well as services effectively? Provide your comments with proper explanation.

Socio-Environmental and Disaster Responsibilities

Q18. What role the broadcasting sector should play to fulfil social and environmental responsibilities? Provide in detail the key focus areas and the strategies the sector should consider. Also provide strategies on the following specific issues:

    i. **To empower Person with Disabilities (PwDs) to access the information and entertainment programmes**

    ii. **To encourage gender equality w.r.t. the participation and safety of the women workforce**

    iii. **To raise awareness about the issues of marginalized tribal communities, minorities and LGBTs**

    iv. **To adopt green broadcasting practices**

Q19. Keeping in mind the immense role of broadcasting during disasters, how can the latest technologies be effectively utilized to provide disaster alerts and timely updates on television/mobile/radio during disasters? Elaborate with proper justifications.

Any other Issue

Q20. Stakeholders may provide their comments with full details (measures/ strategies) and justification on any other subject matter which may be considered to be incorporated as the inputs for the National Broadcasting Policy.

List of Acronyms

Abbreviations	Description
3GPP	3rd Generation Partnership Project
AAAI	Advertising Agencies Association of India
ABU	Asia-Pacific Broadcasting Union
AI	Artificial Intelligence
AIR	All India Radio
AM	Amplitude Modulation
AMSD	Audiovisual Media Services Directive
ASCI	Advertisement Standards Council of India
ATSC 3.0	Advanced Television Systems Committee 3.0
AVGC	Animation, Visual Effects, Gaming and Comics
AVGC-XR	Animation, Visual Effects, Gaming and Comics-Extended Reality
BARB	Broadcasters' Audience Research Board
BARC	Broadcast Audience Research Council
BCCC	Broadcasting Content Complaints Council
BVoD	Broadcast Video on Demand
CAGR	Compound Annual Growth Rate
CAS	Conditional Access System
CBFC	Central Board of Film Certification
CF	Cinematographic Films
CNC	French National Centre of Cinema
CP	Consultation Paper
CPGRAMS	Centralized Public Grievance Redress and Monitoring System
CRS	Community Radio Stations
CSC	Common Service Centre
DD	Doordarshan
DFFF	German Federal Film Fund
DMCRC	Digital Media Content Regulatory Council
DoT	Department of Telecommunication
DPCGC	Digital Publisher Content Grievances Council
DPIIT	Department for Promotion of Industry and Internal Trade
DPO	Distribution Platform Operators
DRM	Digital Radio Mondiale
DRM	Digital Rights Management
DVB-T2	Digital Video Broadcasting-Second Generation Terrestrial
DTH	Direct to Home

DTT	Digital Terrestrial Television
EoDB	Ease of Doing Business
EPG	Electronic Programme Guide
FDI	Foreign Direct Investments
FFO	Film Facilitation Office
FM	Frequency Modulation
FSA	Audiovisual Sector Fund
FTA	Foreign Trade Agreements
FTII	Film and Television Institute of India
GDP	Gross Domestic Product
GEC	General Entertainment Channels
GHG	Greenhouse Gases
GST	Goods and Services Tax
HITS	Headend-in-the-Sky
IBDF	Indian Broadcasting Digital Foundation
iCAS	Indian Conditional Access System
ICT	Information and Communication Technologies
IFFI	International Film Festival of India
IFPI	International Federation of the Phonographic Industry
IIMC	Indian Institute of Mass Communication
INTAM	Indian National Television Audience Measurement
IP	Intellectual Property
IPTV	Internet Protocol Television
IT	Information Technology
ITA	Information Technology Agreement
ITU	International Telecommunication Union
ISA	Indian Society of Advertisers
LCO	Local Cable Operators
MeitY	Ministry of Electronics and Information Technology
MESC	Media and Entertainment Skill Council
MIB	Ministry of Information and Broadcasting
MRUC	Media Research Users Council
MSDE	Ministry of Skill Development and Entrepreneurship
MSO	Multi-System Operators
NBP	National Broadcasting Policy
NBSA	News Broadcasting Standards Authority
NDMA	National Disaster Management Authority
NEP	National Education Policy
NFDC	National Film Development Corporation
NOTEF	Non-Refundable One-Time Entry Fee
NPE	National Policy on Electronics
NPSP	National Policy on Software Products

NSDC	National Skill Development Council
OOH	Out-of-Home
OTT	Over-the-Top
POCSO	Protection of Children from Sexual Offences Act
POSH	Prevention of Sexual Harassment
PPM	Portable People Meters
PPP	Public-Private Partnership
R&D	Research and Development
RMG	Real Money Gaming
RPD	Return Path Data
SD	Standard Definition
SME	Small and Medium-Sized Enterprise
SRFTI	Satyajit Ray Film & Television Institute
SRO	Self-Regulatory Organisations
STB	Set Top Box
STPI	Software Technology Parks of India
SVOD	Subscription-based Video on Demand
TAM	Television Audience Measurement
TRAI	Telecom Regulatory Authority of India
VFX	Visual Effects
XR	Extended Reality

FDI inflows in the information and broadcasting sector

BROADCASTING CARRIAGE SERVICES

Sector/Activity	% of Equity/ FDI Cap	Entry Route
(1) **Teleports** (setting up of up-linking HUBs/Teleports); (2) **Direct to Home** (DTH); (3) **Cable Networks** (Multi System operators (MSOs) operating at National or State or District level and undertaking upgradation of networks towards digitalization and addressability); (4) **Mobile TV;** (5) **Headend-in-the Sky Broadcasting Service** (HITS)	100%	Automatic
Cable Networks (Other MSOs not undertaking upgradation of networks towards digitalization and addressability and Local Cable Operators (LCOs))	100%	Automatic
Note: **Infusion of fresh foreign investment, beyond 49% in a company not seeking license/permission from sectoral Ministry, resulting in change in the ownership pattern or transfer of stake by existing investor to new foreign investor, will require Government approval.**		

BROADCASTING CONTENT SERVICES

Sector/Activity	% of Equity/ FDI Cap	Entry Route
Terrestrial Broadcasting FM (FM Radio), subject to such terms and conditions, as specified from time to time, by Ministry of Information & Broadcasting, for grant of permission for setting up of FM Radio stations	49%	Government
Up-linking of 'News & Current Affairs' TV Channels	49%	Government
Uploading/Streaming of News & Current Affairs through Digital Media	26%	Government
Up-linking of Non- 'News & Current Affairs' TV Channels/ Down-linking of TV Channels	100%	Automatic

PRINT MEDIA

Sector/Activity	% of Equity/ FDI Cap	Entry Route
Publishing of newspaper and periodicals dealing with news and current affairs	26%	Government
Publication of Indian editions of foreign magazines dealing with news and current affairs	26%	Government

Analysis of Skill Gap in the M&E Sector

1. Television

Role	Skill Gap
Management/ Executive Roles	• Knowledge of the production process and technical concepts • Awareness of IP laws • Conceptualization skills and the ability to deliver path-breaking/differentiated content
Production	• Lack of formal training in content production, which often leads to inadequate research, planning and conceptualization • Knowledge of production workflow and processes • Ability to balance creativity and costs • Knowledge of contractual terms and agreements • Negotiation skills in order to effectively manage vendor relationships • Regional content production skills • Production skills for online and mobile platforms
Post-Production	• Knowledge of post-production concepts and techniques, limited specialization • Ability to discern/ separate relevant footage from footage that is not required • Limited upgrading of skills/ technological changes/ new techniques • Ability to work independently without supervision • Language and comprehension skills
Scriptwriters	• Understanding of screen-writing concepts and writing styles • Writing for regional productions • Writing for genres such as humor, sitcoms, satire etc. • In case of factual programming (e.g. documentary style shows), writers must add to the script, rather than narrate
Directors	• Regional content production
Camera	• Formal knowledge of video capture concepts and camera techniques, limited specialization • Language skills

Set Crafts	• Knowledge of set etiquette
	• Low productivity/ quality of output
Costume	• Understanding of design and fashion concepts, e.g. costume design for period dramas
	• Practical experience with what fabrics, styles work best for filming
	• Ability to conceptualize; originality and creativity
Stage-hands (Light men, spot-boys, assistants)	• Technical training, how to operate equipment
	• Softer aspects – Confidence and assertiveness
	• Knowledge of health and safety guidelines
	• Knowledge of set etiquette
	• Low productivity
Journalists	• Ability to use technology effectively i.e. Skype, mobile, hand-held cameras etc.
	• Copy-writing for multiple platforms – TV, online and mobile
	• How to operate editing software and cut packages for broadcast media
	• Soft-skills
	• Language and public speaking skills
Broadcast Operations	• Training and familiarity with different broadcast/play out software and systems
	• Limited upgrading of skills/ new techniques
Media Management/ Archival	• Lack of automation and use of technology
	• Knowledge of file naming conventions and meta-tagging skills

2. Films

Role	Skill Gap
Producers	• Limited planning/ pre-production skills – Indian films typically take more time in production than in pre-production, whereas in more advanced industries like Hollywood pre-production time is nearly 3 times the actual production time
	• Understanding of key production concepts and visualizing the production process (e.g. conducting location recces, seeking shooting permissions from local governments etc.)
	• Knowledge of planning and budgeting software
Director	• Understanding of key production concepts and visualizing the filming process
	• Ensuring continuity in shoots
Acting/ Voiceovers	• Formal understanding of filming concepts

	• Familiarity with various acting styles, techniques and genres • Knowledge of set etiquette
Post-production	• Ability to discern/ separate relevant footage from footage that is not required • Limited upgrading of skills/ technological changes/ new techniques • Lack of reward/ recognition for high quality talent that is trained on the latest equipment and techniques
Screen/ Scriptwriting	• Understanding of screen-writing concepts and writing styles • Writing for different genres/ movie budgets and being able to script in a style that facilitates realization of the concept
Stage-hands (Light men, spot-boys, assistants)	• Knowledge of health and safety requirements • Knowledge of how to operate technical equipment • Knowledge of health and safety requirements • Knowledge of how to operate technical equipment

3. Animation, VFX & Gaming

Role	Skill Gap
Animators	• Traditional hand drawing/ sketching skills • Particle animation/ Dynamics • Eliciting performance from characters – accurately animating facial expressions and emotions
Game Designers	• Formal education in game concept design Designing multiple levels of a game Scientific and logical thought process Cross-functional understanding (i.e. how the game will move through the production process and implications of a particular design on the workflow) • There is shortage of User Interface (UI) experts in India – this skill-set is typically sourced from abroad
Art and Design	• Conceptual design skills, ability to create original characters/ objects • Knowledge of drawing and human anatomy • Understanding of spatial aspects, architecture and geography • Communication skills

Direction	• Pitching stories and production concepts to financiers • Screening production concepts for viability • Effectively planning timelines and workflow
Modelers	• Understanding of physics and human anatomy
Post-production	• Effective understanding of principles of Rotoscopy/ fundamentals of depth • Compositing skills to accurately depict the style of content
Scriptwriting	• Writing scripts that are conducive to animation - Understanding of concepts/ themes that appeal to children
Programmers/ Testers	• Lack of specialization in coding/ testing for games • Often the generic programming skills are also not up to the mark

4. Music

Role	Skill Gap
Music Composer	• Advanced knowledge of music theory- It can help them create more complex and sophisticated compositions. • Mastery of digital audio workstations (DAWs)- Composers should be proficient in using software such as Logic Pro, Ableton Live, or FL Studio to arrange, produce, and mix their music effectively • Familiarity with different musical genres
Singer	• Training in vocal techniques • Lack of Performance experience • Interpretation skills- able to convey emotion, storytelling, and meaning through their vocal delivery, interpreting lyrics and melodies with depth and authenticity • Language proficiency- singers may need to be proficient in multiple languages
Lyricist	• Adaptability to different musical styles • Language proficiency- lyricists should be proficient in multiple languages • Versatility in themes and topics- wide range of themes and topics, from love and romance to social issues, spirituality, and beyond, to cater to the diverse tastes and preferences of audiences. • Understanding of copyright laws

Music Producer	- Understanding of music theory and arrangement- to create compelling musical compositions, including chord progressions, melodies, and song structures - Should be familiar with sound design principles and synthesis techniques to create unique and innovative sounds
Music Arranger	- Proficiency in music notation software: should be proficient in using software such as Sibelius or Finale to create and edit musical scores - Should have a solid understanding of different musical instruments, their ranges, timbres, and capabilities, to effectively orchestrate and arrange music for ensembles, bands, or orchestras - Should be able to interpret existing musical compositions and adapt them for different settings, such as creating arrangements for live performances, studio recordings, or film scores - Primarily focus on arranging music, having a basic understanding of audio production techniques such as mixing and mastering can help them create arrangements that translate well in a recording or live performance setting
Sound Engineer	- Understanding of acoustics- Knowledge of acoustics and sound physics is crucial for music engineers to optimize recording environments, minimize unwanted noise and reflections, and achieve optimal sound quality in their recordings - Problem-solving abilities- often encounter technical challenges and unforeseen issues during the recording and mixing process, so strong problem-solving skills and the ability to troubleshoot technical issues are essential for success in the field
Music Manager	- Should have a solid understanding of promotion and marketing strategies, including social media, digital advertising, and press relations - Lack in project management skills - Legal knowledge- Understanding of copyright laws, contract negotiation, and intellectual property rights is crucial for music managers to protect their clients' interests and ensure fair compensation for their work

5. Radio

Role	Skill Gap
Radio Presenters/ Radio Jockeys	• Language and diction skills • Awareness of local news and developments • Creativity and spontaneity
Producers	• Creative thinking while conceptualizing programs • Awareness of local news and developments • Good sense of music and how to schedule playlists • Progressive outlook
Copywriters	• Creative writing for radio programs
Sound Engineers	• Matching the required quality of sound
Technology	• Managing radio transmitters and IT (large networks typically outsource this function to specialist technology service providers, and the skill gap is usually felt by smaller stations that retain the function in-house)