Consultation Paper No.: 4/2023

TELECOM REGULATORY AUTHORITY OF INDIA

Consultation Paper

on

Issues related to FM Radio Broadcasting

9th February 2023

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Jawahar Lal Nehru Marg
New Delhi-110002
Website: www.trai.gov.in

Written comments on the Consultation Paper are invited from the stakeholders by 9th March 2023. Counter comments, if any, may be submitted by 23rd March 2023.

The comments and counter comments may be sent, preferably in electronic form to Shri Anil Kumar Bhardwaj, Advisor (B & CS), Telecom Regulatory Authority of India, on the e-mail: advbcs-2@trai.gov.in and jtadvbcs-1@trai.gov.in.

Comments and counter comments will be posted on TRAI's website www.trai.gov.in.

For any clarification/ information, please contact Shri Anil Kumar Bhardwaj, Advisor (B & CS) at Tel. No.: +91-11-23237922.

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Chapter I
Introduction

1.1 Radio is one of the most popular and affordable means for mass communication, largely owing to its wide coverage, terminal portability, low set up costs and affordability. In India, radio coverage is available in Amplitude Modulation (AM) mode (Short Wave /Medium Wave) and Frequency Modulation (FM) mode.

1.2 On account of its versatility, FM Radio broadcasting is considered as one of the popular mediums to provide entertainment, information and education. Because of this, the Government of India, during the Ninth Five Year Plan (1997-2002), adopted a policy for improving variety of content and quality of radio broadcasting that allowed private sector Indian companies to set up private FM radio stations in a phased manner.

1.3 The first phase of FM radio broadcasting (Phase-I) was launched by the Ministry of Information and Broadcasting (MIB) in 1999. During Phase-I auction, a total of 108 channels in 40 cities were offered to private agencies in the FM spectrum band (88 – 108 MHz). A multiple round auction mechanism was followed to award these permissions. The permission for operation of the channel was awarded for a period of 10 years. Out of 108 channels, bid amount was paid only for 37 channels. Of these 37 channels, 21 channels became operational.

1.4 The Government announced the policy for Phase-II of FM Radio Broadcasting on 13th July 2005. In Phase-II, a two-stage bidding process i.e., eligibility and financial bidding was followed. A total of 337 channels were put on bid across 91 cities having population equal to or more than 3 lakhs. Of 337 channels, 284 were successfully bid and after scrutiny, permission was given for 245 channels spanning 87 cities. In Phase-II 222 channels became operational. All the 21 operational channels of Phase-I also migrated to Phase-II after payment of a migration fee. In total, 243 FM Radio channels became operational in 86 cities in Phase-II.

1.5 To expand the reach of FM Radio broadcasting in the country, the Government embarked upon Phase III to enable the setting up of private FM Radio channels in all cities with a population of more than 1 lakh. Further, 11 other cities having a population less than 1 lakh in the border areas of Jammu & Kashmir (J&K) and the North East (NE) region are also proposed to be included in the expansion. Policy Guidelines for Phase-III of FM Radio Broadcasting were issued by the Government on 25th July 2011[1].

1.6 As per the decision of the Empowered Group of Ministers (EGoM), MIB vide its letter dated 9th April 2013, sought recommendations of TRAI on the migration fee to be charged from existing Phase II operators on their migration to the Phase-III regime of FM Radio Broadcasting. In response, the Authority sent its Recommendations on 'Migration of FM Radio Broadcasters from Phase-II to Phase-III' on 20th February 2014. MIB accepted TRAI's recommendations. Subsequently, 231 operational channels of Phase-II migrated to Phase-III after payment of a migration fee as recommended by TRAI.

1.7 MIB through its letter dated 16th December 2014, sought TRAI's recommendations on Reserve Prices (RP) for FM Radio channels in 264 new cities. The 831 FM Radio channels in these cities were made available for ascending e-auction process. In response, the Authority sent its Recommendations on 'Reserve Price for auction of FM Radio channels in New Cities' on 24th March 2015.

1.8 MIB commenced the e-auction of the first batch of Private FM Radio Phase-III channels on 27th July 2015 wherein 135 channels in 69 existing cities were put up for auction. In accordance with the rules mentioned in Phase-III policy,

[1] http://www.mib.nic.in/WriteReadData/documents/PolicyGuidelines_FMPhaseIII.pdf

reserve price for these cities were fixed as the highest bid price received for that city in Phase-II by bidding process. As per information available on MIB's website, 96 out of 135 private FM Radio channels in 55 cities were successfully auctioned.

1.9 Subsequently, MIB commenced the e-auction of the second batch of Private FM Radio Phase-III channels on 20th June 2016. In this second batch 266 channels in 92 cities were offered including 227 channels in 69 new cities and 39 channels in 23 existing cities. The reserve prices fixed by MIB for 69 new cities differed from the reserve prices recommended by the Authority in its recommendations dated 24th March 2015. Only 66 channels in 48 cities were successfully bid in e-auction of second batch of FM Radio.

1.10 MIB vide its letter dated 22nd August 2019 sought TRAI's recommendations on fresh reserve prices for 283 cities (260 new + 23 existing), under FM Phase-III Policy, factoring in various issues like inflation, indexation of reserve prices worked out in the years from 2011 to 2015. In response, the Authority sent its Recommendations on 'Reserve Price for auction of FM Radio channels' on 10th April 2020. The recommendations are pending with MIB.

1.11 As on 30th June 2022, 386 private FM Radio channels were operational in India. Figure 1 depicts the growth of operational private FM Radio channels.

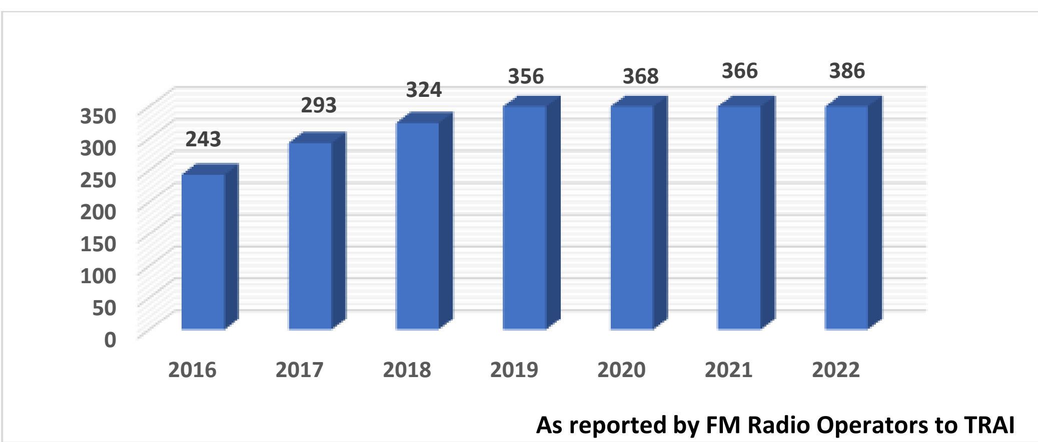


Figure 1: Number of operational Private FM Radio channels

1.12 A reference dated 30th November 2021 (**Annexure-I**) was received from MIB forwarding copy of the letter dated 29th September 2021 received from Association of Radio Operators for India (AROI) on "Review of guidelines for FM radio broadcasting services through private agencies (Phase-III)". MIB sought recommendations of TRAI on the issues raised by the AROI.

1.13 As per Section 11 of the TRAI Act, the Government has to seek recommendations from the Authority for the terms and conditions of license to a service provider. However, no such recommendations of the Authority were sought under Section 11(1)(a)(ii) of the TRAI Act. Further, MIB did not provide its comments on the issues raised in the letter of AROI.

1.14 Accordingly, a letter dated 30th December 2021 (**Annexure-II**) was sent to MIB requesting them to seek TRAI's recommendations for amending the terms and conditions in the existing policy guidelines for FM Radio (Phase III), in accordance with the provisions contained under Section 11(1)(a)(ii) of the TRAI Act, as deemed fit. Further, Ministry's was also requested to provide its own input/views/remarks on the issues raised by the AROI.

1.15 In response to TRAI letter dated 30th December 2021, MIB vide its letter dated 11th May 2022 (**Annexure-III**), sought recommendations of TRAI on the following two issues:

(a) Remove the linkage to Non-Refundable One Time Entry Fee (NOTEF) in the formula for annual fee as prescribed in the FM Ph-III Policy Guidelines dated 25.07.2011.

(b) Extend the existing FM license period of 15 years by 3 years.

1.16 In order to discuss various issues related to FM Radio broadcasting, the Authority held a meeting with representatives of AROI on 5th August 2022.

Representatives of AROI, *inter-alia*, raised the following issues for consideration of the Authority:

(i) Permitting private FM Radio channels to broadcast independent news bulletins.

(ii) Availability of FM Radio Receivers in Mobile Handsets.

1.17 Accordingly, this Consultation Paper has been prepared to solicit comments and views of stakeholders on the issues raised in MIB's reference dated 11th May 2022 and representatives of AROI. Chapter II discusses the issues related to FM radio broadcasting. A summary of the issues for consultation is provided in Chapter III.

Chapter II
Issues related to FM Radio Broadcasting

2.1 The Government opened the FM radio broadcasting for private sector in 1999 in a phased manner. Different phases of private FM radio broadcasting and their salient features are discussed in paras to follow.

Phase-I of FM Radio Broadcasting

2.2 The first phase of FM radio broadcasting (Phase-I) was announced by the Government in 1999. The salient features of the Phase-I policy for FM Radio broadcast were as follows:

- License issued on a non-exclusive basis
- Only one license per city permitted for one entity
- Validity period of license - 10 years
- Annual license fees escalated at 15% per annum over the first-year fees arrived through bidding
- News and Current affairs program not permitted
- Networking of FM broadcasting stations was not permitted
- Metro operators required to form a consortium and co-locate their transmitters and transmit with same power

2.3 During the Phase-I auction, a total of 108 channels in 40 cities were offered to private agencies in the FM spectrum band (87 – 108 MHz). A multiple round auction mechanism was followed to award these permissions. Out of 108 channels, bid amount was paid only for 37 channels. No bidders expressed interest for other 71 channels. Of these 37 channels, 22 channels became operational, of which one channel had closed down subsequently.

Phase-II of FM Radio Broadcasting

2.4 The Government announced the policy for Phase-II of FM Radio Broadcasting on 13th July 2005. The salient features of the Phase-II policy for FM Radio broadcast were as follows:

a. All the cities considered were having population equal to or more than 3 lakhs. These cities were divided into five categories, i.e. A+, A, B, C and D, based on the population.
b. Two stage bidding process was followed. Eligibility (Technical bids) and financial bidding were the two parts of this phase.
c. Permission was granted on the basis of One Time Entry Fees (OTEF) quoted by the bidders.
d. Reserve OTEF for a city was kept at 25% of the highest valid bid received in that city and all bids with the amount below reserve OTEF were rejected.
e. Every applicant, and its related entities, was allowed to bid for only one channel per city provided that the total number of channels allocated to an applicant and its related entities would not exceed the overall limit of 15% of the total Channels allocated in India.
f. The Permission Holder requires to pay an Annual Fee @ 4% of Gross Revenue for each year or 10% of the reserve one-time entry fee (OTEF), whichever is higher.
g. The validity period of license was 10 years.
h. The Permission was envisioned for free to air broadcasts of audio on main carrier and data on sub-carriers, both excluding News and Current Affairs.
i. The Permission Holder would require to comply with the audio and transmission standards for FM sound broadcasting at each centre conforming to the ITU-R (International Telecommunication Union) Recommendations.
j. A Permission Holder was permitted to network its channels in C & D category cities within a region only. No two Permission Holders shall be permitted to network any of their channels in any category of cities.

k. It has been made mandatory for all Phase II operators to co-locate transmission facilities in all the cities except where new towers shall be got constructed by the Ministry. Pending creation of co-location facility, the successful bidders in these cities were permitted to operationalise their Channels on individual basis for a period of two years or till the co-location facility is commissioned, whichever is later, at the end of which they shall shift their operations to the new facilities.

2.5 The major change in the Phase-II policy was that the fixed annual license fee in Phase-I, which increased 15% per annum over the license fee paid in the preceding year, was replaced with a revenue share mechanism. In Phase-II, a two-stage bidding process i.e., eligibility and financial bidding was followed. A total of 337 channels were put on auction across 91 cities having population equal to or more than 3 lakhs. Successful bids were received for 284 channels out of 337 channels., After scrutiny, permission was given for operationalization of 245 channels covering 87 cities. Out of these 245 channels, 222 channels became operational.

2.6 The private FM Radio industry under Phase-I reported losses largely because of the high bid amount at the time of auction. Phase-I FM operators sought relief by way of migration to a revenue share regime in Phase-II. The government accepted the proposal and allowed all 21 operational channels of Phase-I to migrate to Phase-II after payment of a migration fee. Therefore, a total of 243 channels became operational in 86 cities in Phase II.

Phase-III policy of FM Radio Broadcasting

2.7 Government notified the Policy Guidelines for Phase-III of FM Radio Broadcasting on 25th July 2011. The salient features of the Phase-III policy guidelines are as under:

- Permission for the channels shall be granted on the basis of a Non-Refundable One Time Entry Fee (NOTEF).
- NOTEF shall be arrived at through an ascending e-auction process, on similar lines as followed by Department of Telecommunications (DoT), Government of India in the auction of 3G and BWA spectrum in 2010.
- The Reserve Price was decided in the following manner:
  - For new channels in existing FM Phase-II cities, the highest bid price received for that city in Phase-II.
  - For fresh (new) cities, the highest bid price received during FM Phase-II for that category of cities in that region.
  - In case the benchmark from Phase-II for a particular region is not available, then the lowest of the highest bid received in other regions for that category of cities.
  - For new cities in border areas with a population less than one lakh the reserve price shall be Rs. 5 Lakh.
- The Validity of the license is 15 years from the date of operationalization of the channel.
- Annual License Fee will be charged as follows:
  - 4% of Gross Revenue (GR) of the FM radio channel for the financial year or 2.5% of NOTEF for the concerned city, whichever is higher.
  - For the permission holders in the States of the North East, Jammu & Kashmir (J&K) and Island territories (i.e., Andaman and Nicobar Islands and Lakshadweep) - 2% of Gross Revenue for each year or 1.25% of NOTEF for the concerned city, whichever is higher, for an initial period of three years from the date from which the annual license fee becomes payable and the permission period of 15 years begins.
- GR would be the gross inflow of cash, receivables or other consideration arising in the course of ordinary activities of the FM Radio Broadcasting enterprise from rendering of services and from the use by others of the

enterprise resources yielding rent, interest, dividend, royalties, commissions etc.

- GR is calculated, without deduction of taxes and agency commission, on the basis of billing rates, net of discounts to advertisers.
- Each applicant is allowed to own more than one channel but not more than 40% of the total channels in a city subject to a minimum of three different operators in the city.
- FDI limit of 26% is permitted in a private FM radio broadcasting company.
- Networking of channels is permissible within a private FM broadcaster's own network across the country subject to the condition that 20% of the total broadcast in a day is in the local language of the city and promotes local content.
- The permission holder is permitted to carry the news bulletins of All India Radio in exactly same format (unaltered) on such terms and conditions as may be mutually agreed with Prasar Bharati.
- No other news and current affairs programs are permitted under the Policy.
- The following categories are treated as non-news and current affairs broadcast and will be permissible:
  - (a) Information pertaining to sporting events excluding live coverage. However, live commentaries of sporting events of a local nature may be permissible.
  - (b) Information pertaining to Traffic and Weather.
  - (c) Information pertaining to and coverage of cultural events and festivals.
  - (d) Topics pertaining to examinations, results, admissions, career counseling.
  - (e) Availability of employment opportunities.
  - (f) Public announcements pertaining to civic amenities like electricity, water supply, natural calamities, health alerts and other essential issues as provided by the local administration.

(g) Such other categories not permitted at present, that may subsequently be specifically permitted by the Ministry of Information and Broadcasting from time to time.

- The permission holder is required to follow the Programme and Advertisement Code as followed by All India Radio as amended from time-to-time or any other applicable code, which the Central Government may prescribe from time to time.

A. Linkage to Non-Refundable One Time Entry Fee (NOTEF) in the formula for annual fee as prescribed in the FM Ph-III Policy Guidelines dated 25.07.2011.

2.8 In Phase I of private FM broadcasting, the annual license fees were increased at 15% per annum on the base of the first-year license fee paid for award of the license through auction. The outcome of Phase-I was not very encouraging as only about 20% of the licenses became operational. Subsequently, the Government decided to reformulate its policy for the 2nd phase of private FM Radio and constituted a Radio Broadcast Policy Committee on 24.7.2003 to make recommendations. The Committee was headed by Dr. Amit Mitra, the then Secretary General, FICCI and it submitted its Report in November 2003. The Committee recommended restructuring of the FM broadcast industry and the Phase-I licenses. It recommended, inter alia, revision of annual license fee structure and migration of the license terms from fixed annual license fee basis to a one-time entry fee with an annual revenue sharing arrangement. The Committee recommended an entry fee decided through a tender process and a 4% share of gross revenues as annual license fees.

2.9 On 12th February 2004, MIB sent the report of the Radio Broadcast Policy Committee, headed by Dr. Amit Mitra, to TRAI to make appropriate recommendations on the 2nd Phase of private FM Radio broadcasting.

2.10 In response TRAI sent its recommendations on Licensing Issues Relating to 2nd Phase of private FM Radio Broadcasting to MIB on 11th August 2004. In its recommendations TRAI agreed with the recommendations of the Committee that the annual fees should be fixed as a percentage of the annual revenues and that this percentage should be 4%.

2.11 Following provisions were prescribed by MIB in Policy guideline for Phase II of private FM Radio:

"5. <u>Fee and duration:</u>

5.1 Annual Fee shall be charged @ 4% of gross revenue, for the year or @ 10% of the Reserve OTEF limit for the concerned city, whichever is higher. Gross Revenue for this purpose would be the gross revenue without deduction of taxes.
……"

2.12 MIB, vide its letter dated 13.11.2007, sought the recommendations of TRAI on issue of modifications to be incorporated in policy for FM Radio broadcast Phase III.

2.13 TRAI sent its Recommendations on 3rd Phase of Private FM Radio Broadcasting to MIB on 22nd February 2008, wherein following recommendations were made on the issue of annual license fee:

"1.9.6 Annual fee structure

The Authority recommends:

- *The method of calculation of reserve one time entry fee (OTEF) and annual fee may be same as prescribed for FM Radio broadcasting Phase-II.*

1.9.7 Relaxation of fee structure for North-East and J&K

The Authority recommends:

- *The rate of Annual fee may be reduced to 50% of what is being charged from all existing permission holders in other areas for private FM Radio broadcasters in North East (NE) and Jammu & Kashmir (J&K) region for an initial period of three years from the date of issue of Letter of Intent (LoI)* *to give such operators time to setup their network and start operations. This will ensure more FM Radio broadcasters, better program and viable business model for private FM Radio broadcasters in these regions."*

2.14 MIB, vide its letter dated 27th January 2011 forwarded recommendations of Group of Ministers (GoM) constituted for deciding the methodology for FM Phase-III seeking recommendations of TRAI on the same **(Annexure-IV)**. The gist of recommendations of GoM is as under:

"(i) The GoM recommended that the ascending e-auction methodology as followed in 3G auctions may be adopted for award of license in FM Radio Phase-III.

(ii) For Phase-III, the reserve price of new channels in existing FM Phase-Il cities may be fixed at the highest bid received for that city in Phase-II. In cities which were being taken up afresh, the reserve price could be pegged at the highest bid received during FM Phase-II for that category of cities in that region. In case the benchmark from Phase-II for a particular region was not available, then the lowest of the highest bid received in other regions for that category of cities may be taken as the reserve price. In case of non-availability of any benchmark on the basis of the above for a particular city, the Ministry of I&B could take a suitable decision.

(iii) With regard to the determination of annual license fee for Phase-III, the GoM recommended that the same formula used for calculation of annual license fee for FM Phase-II should be followed in FM Phase-III as well i.e., @4% of Gross Revenue (GR) or 10 % of Reserve One Time Entry Fee (25% of the highest bid) for the city, whichever is higher. For e-auction, this will translate to 4% of GR or 2.5% of the Bid price, whichever is higher, since every permission holder will be paying the same bid price.

(iv) The period of permission in FM Phase-III could be 15 years. The Ministry of Information and Broadcasting would formulate a separate policy for the license period from the present 10 yrs to 15 yrs for FM (Phase-II) operators."

2.15 TRAI, vide its letter dated 9th February 2011, accepted the proposal of MIB. **(Annexure-V)**.

2.16 Subsequently, MIB notified the Policy Guidelines for Phase-III of FM Radio Broadcasting on 25th July 2011, wherein the following provisions regarding Annual License Fee have been prescribed:

"6. Annual Fee:

6.1 (a) Subject to the provisions contained in sub-para (b), the Permission Holder shall be liable to pay an Annual Fee to the Government of India every year charged @ 4% of Gross Revenue of its FM radio channel for the financial year or @ 2.5% of NOTEF for the concerned city, whichever is higher.

(b) The permission holders in the States of North East (i.e. Arunachal Pradesh, Assam, Meghalaya, Manipur, Mizoram, Nagaland, Sikkim and Tripura,) and Jammu & Kashmir (J&K) and island territories (i.e, Andaman and Nicobar Islands and Lakshadweep) will be required to pay an Annual Fee to the Government of India charged @ 2% of Gross Revenue for each year or 1.25% of NOTEF for the concerned city, whichever is higher, for an initial period of three years from the date from which the annual license fee becomes payable and the permission period of 15 years begins. The revised fee structure will also be applicable to existing operators in these States/ UTs to enable them to effectively compete with the new operators. The three year period for the existing operators shall be reckoned from the first day of the commencement of the next quarter (refer para 6.3) subsequent to the date of issuance of these guidelines.

6.2 Gross Revenue for this purpose would be the gross inflow of cash, receivables or other consideration arising in the course of ordinary activities of the FM Radio Broadcasting enterprise from rendering of services and from the use by others of the enterprise resources yielding rent, interest, dividend, royalties, commissions etc. Gross Revenue shall, therefore, be calculated,

without deduction of taxes and agency commission, on the basis of billing rates, net of discounts to advertisers. Barter advertising contracts shall also be included in the gross revenues on the basis of relevant billing rates. In the case of a permission holder providing or receiving goods and services from other companies that are owned or controlled by the owners of the permission holder, all such transactions shall be valued at normal commercial rates and included in the profit and loss account of the permission holder to calculate its gross revenue.
………"

2.17 As per the policy guidelines, permission holders are required to pay an Annual License Fee to the Government @ 4% of Gross Revenue of its FM radio channel for the financial year or @ 2.5% of NOTEF for the concerned city, whichever is higher.

2.18 As indicated earlier, 243 private FM Radio channels became operational in 86 cities in Phase-II. In some cities most of the channels became operational in Phase II e.g., Delhi, Mumbai, Bengaluru, Pune, Ahmedabad. Operators in these cities were paying annual license fee higher of the 4% of GR or 2.5% of highest bid in that city. The remaining 1 or 2 channels in these cities were auctioned in Batch 1 of Phase III. Reserve prices were fixed at the highest bid price received in Phase II in a city.

2.19 As an example, in the city of Delhi the highest bid price received in Phase II was Rs. 31.42 Crore. As a result, the reserve price in Delhi for auction of one vacant channel in Phase-III was fixed at Rs. 31.42 Crore. In Phase III auction, successful bid price in Delhi was Rs. 169 crore (**Annexure-VI**). Thus Rs. 169 crore became the new NOTEF for Delhi. All the operators, including those who did not participate in the auction, are required to pay an annual license fee on the NOTEF of Rs.169 crore. A similar situation prevailed in some other cities including Mumbai, Bangalore, Pune and Ahmedabad. Details of annual license fee paid by the FM Radio broadcasters in Delhi, Mumbai, Bangalore, Pune and Ahmedabad from FY 2017-18 to FY 2021-22 are presented at **Annexure-VII**. In general, the FM Radio broadcasters in these cities have been paying the annual license fee as 2.5% of NOTEF. However, a few times, when revenues have been higher the licensees have paid as 4% of GR.

2.20 On the other hand, in some cities all the channels became operational in Phase II e.g., Kolkata, Indore, Bhopal. No auction was conducted in these cities in Phase III. As a result, FM Radio broadcasters in these cities continue to pay annual license fee @ 4% of GR or highest bid of Phase II. Stakeholders have represented that the issue of linkage of annual license fee with NOTEF should be reviewed.

Amendments in Policy guidelines

2.21 A question also arises as to whether the provisions regarding the license fee can be amended for existing FM Radio operators. The extant provisions in the document for Phase III auctions have been reviewed by TRAI.

2.22 Clause 1.1.7 of the Notice Inviting Applications dated 2nd March 2015 and 20th June 2016 is reproduced below:

"Clause 1.1.7: Ministry has placed a copy of the FM Phase-III Policy Guidelines dated 25.07.2011 along with its amended paragraph 31 dated 21.01.2015 (together the "Policy") on the MIB website. The permission holders under Phase-III shall be governed by the Policy, as amended from time to time."

2.23 Permission holders are governed by the FM Phase-III Policy Guidelines dated 25.07.2011, as amended from time to time. As of now all the FM Radio operators have migrated as per policy guidelines of Phase III.

2.24 Clause 30.3 of the FM Phase-III Policy Guidelines dated 25.07.2011 which empowers the government to modify the provisions of the guidelines, is reproduced below:

"Clause 30.3: The Government shall have the right to modify at any time the provisions of these guidelines and/or the terms and conditions of permission, if in the opinion of the Government it is necessary or expedient to do so in public interest or in the interest of the security of the State. The decision of the Government shall be final and binding in this regard."

2.25 From the above one can infer that the provision exists for review of license fee and other terms anytime during the license period. The extant provisions provide the government to review and revise the license fee and other terms & conditions of the license.

International Scenario

2.26 In UK, Annual license fees for national and local radio licenses are calculated as a percentage of the annual Relevant Turnover obtained from the license for the calendar year as given in table below[2]:

Annual Turnover	% of Turnover for calculating ALF
£0m – £1m	0.119%
£1m – £5m	0.178%
Over £5m	0.267%

2.27 In the US[3], Annual license fees for FM radio station licensees are based upon class of station and population served. FM class is based on Transmitter power and area covered.

Population Served	FM Classes A, B1 & C3	FM Classes B, C, C0, C1 & C2
<=25,000	$1,070	$1,220
25,001 - 75,000	$1,605	$1,830

[2] https://www.ofcom.org.uk/__data/assets/pdf_file/0027/216666/tariff-tables-2021-22.pdf

[3] https://docs.fcc.gov/public/attachments/DOC-366740A1.pdf

75,001 - 150,000	$2,410	$2,745
150,001 - 500,000	$3,615	$4,125
500,001 - 1,200,000	$5,415	$6,175
1,200,001 - 3,000,000	$8,130	$9,270
3,000,001 – 6,000,000	$12,185	$13,895
>6,000,000	$18,285	$20,850

2.28 Apropos the above discussions, stakeholders are requested to provide their comments on the following question with appropriate justifications:

Issue for Consultation:

Q1. Are provisions related to Annual License Fee prescribed in the extant Policy guidelines for FM Radio broadcasting reasonable? If not, please provide methodology and criteria for arriving at Annual License Fee for private FM Radio channels with detailed justification.

B. Extension of the existing FM Radio permission period of 15 years by 3 years.

2.29 The Policy Guidelines for Phase-III of FM Radio Broadcasting dated 25th July 2011 has the following provisions regarding period of permission for FM Radio:

"3. Period of Permission:

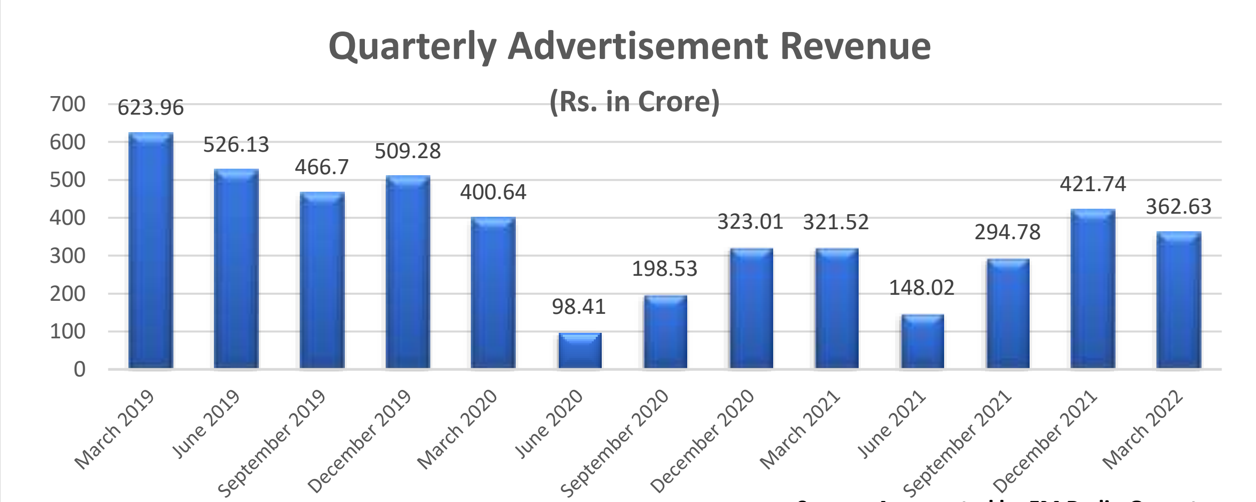
3.1 The Permission shall be valid for a period of ***fifteen (15) years*** *from the effective date as defined below. There shall be no extension and the Permission, unless cancelled or revoked earlier, shall automatically lapse and expire at the end of the aforesaid fifteen years' period and the Permission Holder shall thereafter have no rights whatsoever to continue to operate the Channel after the date of expiry of the Permission. Government at the appropriate time shall determine procedure for issue of fresh permissions."*

2.30 As per Policy guidelines for FM Radio Phase III, there is no provision for extension of permission granted to an FM radio broadcaster.

2.31 The AROI in its representation has mentioned that due to pandemic, there have been restrictions on business for the last two years. They have mentioned that theaters, retail, restaurants, educational institutes, malls among others are core advertisers of Radio. It is further stated that most of the advertisers reduced their advertising spends during pandemic. Growing popularity of Music Apps like Gaana, Spotify, Saavan is also affecting FM radio. As per AROI, the impact of pandemic is expected to continue for at least one more year. It is not until FY 24 that radio is expected to regain and surpass the revenue levels as achieved in FY20. Therefore, almost 4 years out of the 15 years license period has been affected by the pandemic. AROI has requested to extend the existing FM permission period by 3 years.

2.32 In this regard, the details of advertisement revenue of private FM radio broadcasters, as reported to TRAI, for the last 11 quarters are given in figure 2 below. It is observed that the FM Radio sector did see a dip in revenues during the COVID period. However, the revenue trends indicate that the private FM Radio sector seems to have recovered after COVID.

Figure 2: Quarterly growth in Advertisement Revenue of private FM Radio broadcasters



Source: As reported by FM Radio Operators

2.33 In the US, Federal Communications Commission (FCC) provided assistance to its regulated service providers, who experienced financial hardship arising from the pandemic, by providing waiver and /or deferral of payment of regulatory fees for financial year 2020 and 2021[4]. For obtaining this relief, a regulated service provider had to apply to FCC along with financial documentation demonstrating the financial hardship.

2.34 The Government of Canada also provided additional relief to eligible television and radio stations by waiving broadcasting license fees in 2020-21, which are collected annually by the Canadian Radio-television and Telecommunications Commission (CRTC)[5]. The relief did not include cable, satellite and IPTV providers (also known as broadcasting distribution undertakings) as their revenues are not as dependent on advertising. Beneficiaries from this measure were required to meet certain conditions, including confirming a minimum 25 percent reduction of revenues due to the pandemic, and continuing to operate in compliance with their regulatory obligations regarding Canadian content for at least two years.

2.35 In Nigeria, the Federal government provided a two-month license fee waiver for terrestrial broadcast stations[6].

2.36 Apropos the above discussion, stakeholders are requested to provide their comments on the measures required to assist private FM Radio broadcasters to overcome the impact of the pandemic.

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[4] https://www.fcc.gov/document/fy-2021-waiver-public-notice

[5] https://www.canada.ca/en/canadian-heritage/news/2020/12/covid-19-government-of-canada-provides-additional-relief-to-the-broadcasting-sector.html

[6] https://guardian.ng/news/covid-19-fg-grants-a-two-month-licence-fee-waiver-to-broadcast-stations/

Issue for Consultation:

Q2. Is there a need to extend the permission period for existing FM Radio licensees?

a. If yes, what should be the revised permission period? Please prescribe the period with detailed reasoning/ justification.

b. If not, is there a need to extend any other assistance to private FM Radio broadcasters to overcome the impact of the pandemic? If so, please suggest suitable measures with quantified parameters and justification.

C. Broadcast of independent news bulletins by private FM Radio channels

2.37 In Policy guideline for Phase II of private FM Radio broadcasting, following provisions regarding transmission of news and current affairs were prescribed by MIB:

"10. <u>News and current affairs programs:</u>

10.1 No news and current affair programs are permitted under the Policy (Phase II)."

2.38 TRAI is its Recommendations on 3rd Phase of Private FM Radio Broadcasting dated 22nd February 2022, wherein following recommendations were made on the issue news and current affairs:

"1.9.9 News and Current affairs on FM Radio

The Authority recommends:

- *FM Radio broadcasters may be permitted to broadcast news taking content from AIR, Doordarshan (DD), authorized TV news channels, United News of India (UNI), Press Trust of India (PTI) and any other authorized news agency without any substantive change in the content. No other source of news is permitted at present.*
- *The News broadcast should be based on the facts and sourced to any permitted agency only. Broadcasting of news contents having speculative, anticipatory or based on rumours/ hearsay is not permitted.*

- *Ministry of I&B may clarify areas which do not come under restrictions of news such as traffic bulletin, results of international games such as cricket scores, etc.*
- *The FM Radio broadcasters shall be responsible for misrepresentation of news and current affairs from identified sources and shall be acted upon in case of any violation.*
- *Ministry of I&B may prescribe broad guidelines to ensure that any news broadcast may not negatively impact general law and order of the area and basic features of social cohesiveness and constitutional framework are maintained."*

2.39 The Policy Guidelines for Phase-III of FM Radio Broadcasting dated 25th July 2011 has the following provisions regarding broadcasting of news and current affairs programs by private FM Radio broadcasters:

11. News and Current Affairs Programs:

11.1 The permission Holder will be permitted to carry the news bulletins of All India Radio in exactly same format (unaltered) on such terms and conditions as may be mutually agreed with Prasar Bharati. No other news and current affairs programs are permitted under the Policy (Phase-III).

11.2 The broadcast pertaining to the following categories will be treated as non-news and current affairs broadcast and will therefore be permissible:

(a) Information pertaining to sporting events excluding live coverage. However live commentaries of sporting events of local nature may be permissible.
(b) Information pertaining to Traffic and Weather.
(c) Information pertaining to and coverage of cultural events, festivals.
(d) Coverage of topics pertaining to examinations, results, admissions, career counselling.
(e) Availability of employment opportunities.
(f) Public announcements pertaining to civic amenities like electricity, water supply, natural calamities, health alerts etc. as provided by the local administration.
(g) Such other categories not permitted at present, that may subsequently be specifically permitted by Ministry of Information and Broadcasting from time to time.

2.40 As per provisions of Phase III policy guidelines, private FM radio broadcasters are allowed to carry the news bulletins of All India Radio in exactly same format (unaltered). No other news and current affairs programs are permitted. Stakeholders have represented that FM radio broadcasters must also be allowed to broadcast news and current affairs as is allowed on private TV channels, Internet etc. They mentioned that availability of TV sets and Newspapers is limited in the rural areas. In addition, electrical connections are also limited. Thus, for the poor and under-privileged, the only available medium of news and entertainment is FM radio broadcast.

2.41 In USA[7], UK[8], Canada[9] and Australia[10] there is no bar on broadcasting news on Radio with a condition that they have to follow certain guidelines. News, in whatever form, must be reported with due accuracy and presented with due impartiality. There is a restriction on misleading information and news distortion.

2.42 Apropos the above discussion, stakeholders are requested to provide their comments whether there is a need to permit News and current affairs on private FM radio stations.

Issue for Consultation:

Q3. Is there a need to review the present Policy guidelines as regards the News and current affairs on private FM radio stations? If so, please provide detailed justification, including the additional compliance/ reporting (if any), duration of news and current affair programmes and method of effective monitoring.

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[7] https://www.fcc.gov/media/radio/public-and-broadcasting#JOURNALISM

[8] https://www.ofcom.org.uk/__data/assets/pdf_file/0016/132073/Broadcast-Code-Full.pdf

[9] https://www.cbsc.ca/codes/cab-code-of-ethics/, https://www.cbsc.ca/codes/journalistic-independence-code/

[10] https://www.legislation.gov.au/Details/C2022C00079

D. Availability of FM Radio Receivers in Mobile Handsets

2.43 Initially for listening to FM Radio channels, standalone radio receivers were used. With the advancement of technology, FM radio receivers were integrated with Mobile handsets doing away with the need for standalone radio receivers. This helped in expanding the reach of the FM Radio channels and hence resulted in the growth of the FM Radio sector. Stakeholders have represented that '*with the introduction of 4G handsets, device manufacturers and operating system (iOS, Android) are turning the FM tuners off, possibly to support their own paid music streaming services'*.

2.44 Stakeholders have further mentioned that during disasters, one of the critical requirements is speedy, timely and reliable communication with the public. Passing critical information to large populations in time is critical for ensuring their safety. Communication using mobile phones can happen either via text messages using the internet, or via SMSS for phones without internet connectivity. Since mobile phones are always readily available with the people, it ensures instant communication.

2.45 However, mobile networks may not be fully functional during big scale natural disasters. During disasters like floods, tsunamis, earthquakes, hurricanes, mobile networks have been known to go down. Power cuts during disasters cause mobile tower sites to stop functioning when the back-up power runs out. Further, due to a sudden spike in call volumes, mobile networks often get jammed and cannot connect people to each other. Hence, during disasters, it often becomes impossible to use mobile networks for communicating with people.

2.46 During disasters or to communicate with larger public during emergencies, local FM radio broadcasting facilities become a reliable means of communication. FM broadcasting is amongst the most reliable of services available that can cater to broader public use. Countries worldwide have realized the utility and reliability of private FM broadcasting services in reaching people during critical times. However, on receiver side, mobile handset is most pervasive. In view of these observations, FM Radio operators have requested to make it mandatory to have active FM radio receivers in mobile handsets.

2.47 Radio continues to remain the device that connects the masses. Availability of radio receiver on the Mobile handset enables the poorest of poor as they could connect to radio without needing to spend on an additional device. Therefore, it enables inclusion of marginalised sections too. Moreover, as regard the issue of disseminating information regarding Agriculture extension, education extension, heath etc., Radio plays an important role. In India, proliferation of Community radio is also negligible with less than 400 Community radio stations. Availability of Radio Receiver on Mobile Handset is expected to enable expansion of community radio services in a big way. Radio reception is available free of cost to the user without necessitating subscribing to data plan from Telecom Service Providers. Therefore, availability of Radio will enable use of radio by the poorest of poor at no cost.

2.48 TRAI has also looked into the issue from Mobile Handset manufacturers' perspective. It is observed that until 2018-19 quite-a-few mobile handsets included an FM Radio App. Such FM Radio App was either provided by Mobile Handset Manufacture or available for download. However, such apps are not available on Google Play-Store or Apple App-Store since last three-four years.

2.49 The issue was discussed with Indian Cellular and Electronics Association (ICEA)[11]. On the issue of allowing the FM radio in Mobile Handset, ICEA submitted that the issue has arisen due to non-availability of Antenna for FM

[11] As per ICEA, they are apex industry body representing the entire electronics ecosystem, with a vision to establish India as the global electronics manufacturing hub. ICEA suggest that they represent Mobile Manufacturers also in addition to other large electronics manufacturer.

spectrum (88 MHz to 108 MHz) in Mobile Handset. To fulfil the same quite-a-few handsets depended upon the wire connecting the earphone with handset through 3.5 mm audio jack. As per ICEA, '*This 3.5 mm jack is primarily used for the dual purpose connecting the handsfree, and this handsfree acts as an Antenna for receiving the FM Radio signal. A majority of the handsets inbuilt with FM radio facility, require 3.5 mm Jack. However, certain phones can work without 3.5 mm Jack, as they have in-built extra antennas for FM which is not popular because the extra antennae increases cost of such devices.*

Mobile phones had adopted FM as an integral part of the "Feature" phones, since most of the chipsets for feature phones supports FM transmission.

As, there is a requirement of Antenna to receive FM radio frequency on mobile handset. Bluetooth can be a replacement to the handsfree, but still there will be a need of an inbuilt Antennas. Hence, Bluetooth is an audio reception device and not a substitute for Antennae.'

2.50 Therefore, the issue of availability of FM Radio receiver and appropriate Mobile Application for the same entails both Hardware and Software related issues.

2.51 To expand FM radio reach, few countries have made it compulsory for mobile handsets to come with the FM tuners. In 2017, Federal Telecommunications Institute of Mexico mandating smartphone manufacturers to activate the FM chip embedded in all modern mobile devices[12]. Mexico passed an order all mobile phone devices must keep FM tuners on. In 2021, Brazil also mandated mobile phones manufactured to integrate FM radio, to allow those in areas not served by the internet to get information for free[13].

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[12]https://www.insideradio.com/free/mexico-is-first-country-to-require-fm-chip-activation/article 4a6e2a4e-4cd5-11e7-a834-cbb238541a35.html

[13] https://blog.radioreporter.org/brazil-fm-tuner-mandatory-on-mobile-phones

Issue for Consultation:

Q4. Is there a need to mandate that all the Mobile Handset manufactured/ sold in India will require to have an in-built FM Radio receiver? Please provide detailed justification for your comments.

Any other issue

Q5. Stakeholders may also provide their comments/ suggestions on any other issue that may be relevant to the present consultation.

Chapter III

Summary of issues for Consultation

<u>Please elaborate your response with justification.</u>

Q1. Are provisions related to Annual License Fee prescribed in the extant Policy guidelines for FM Radio broadcasting reasonable? If not, please provide methodology and criteria for arriving at Annual License Fee for private FM Radio channels with detailed justification.

Q2. Is there a need to extend the permission period for existing FM Radio licensees?

a. If yes, what should be the revised permission period? Please prescribe the period with detailed reasoning/ justification.

b. If not, is there a need to extend any other assistance to private FM Radio broadcasters to overcome the impact of the pandemic? If so, please suggest suitable measures with quantified parameters and justification.

Q3. Is there a need to review the present Policy guidelines as regards the News and current affairs on private FM radio stations? If so, please provide detailed justification, including the additional compliance/ reporting (if any), duration of news and current affair programmes and method of effective monitoring may be suggested.

Q4. Is there a need to mandate that all the Mobile Handset manufactured/ sold in India will require to have an in-built FM Radio receiver? Please provide detailed justification for your comments.

Q5. Stakeholders may also provide their comments/ suggestions on any other issue that may be relevant to the present consultation.

List of Acronyms

Abbreviation	Description
AM	Amplitude Modulation
AIR	All India Radio
AROI	Association of Radio Operators for India
BECIL	Broadcast Engineering Consultants India Limited
BWA	Broadband Wireless Access
CTI	Critical Telecom Infrastructure
CRTC	Canadian Radio-television and Telecommunications Commission
DD	Doordarshan
DoT	Department of Telecommunication
EGoM	Empowered Group of Ministers
FCC	Federal Communications Commission
FDI	Foreign Direct Investment
FICCI	Federation of Indian Chambers of Commerce and Industry
FM	Frequency Modulation
FY	Financial Year
GOPA	Grant of Permission Agreement
GR	Gross Revenue
IPTV	Internet Protocol Television
ITU-R	International Telecommunication Union- Radiocommunication Sector
J&K	Jammu & Kashmir
LTI	Land & Tower Infrastructure
MIB	Ministry of Information and Broadcasting
NE	North East
NOTEF	Non-refundable One Time Entry Fee
OTEF	One Time Entry Fee
PTI	Press Trust of India
RP	Reserve Prices
TRAI	Telecom Regulatory Authority of India
UK	United Kingdom
UNI	United News of India
US/USA	United States/ United States of America
UTs	Union Territories
WPC	Wireless Planning & Coordination

Annexure I

MIB letter dated 30th November 2021

संजीव शंकर, (भा.रा.से.)
संयुक्त सचिव (प्रसारण)
SANJIV SHANKAR, IRS
Joint Secretary (Broadcasting)

सत्यमेव जयते

भारत सरकार
सूचना एवं प्रसारण मंत्रालय
शास्त्री भवन, नई दिल्ली - 110115
GOVERNMENT OF INDIA
MINISTRY OF
INFORMATION & BROADCASTING
SHASTRI BHAWAN, NEW DELHI - 110115

D.O. N-38032/43/2021-FM/556

Date: 30th November, 2021

Dear Shri Raghunandan,

Please find enclosed a letter dated 29.09.2021 received from the Association of Radio Operators for India (AROI) wherein it has requested for two urgent steps required to save the FM Radio industry which has come under great financial stress over the last two years. These two steps are as mentioned below:

i) Remove the linkage to Non-Refundable One Time Entry Fee (NOTEF) in the formula for annual fee as prescribed in the FM Ph-III Policy Guidelines dated 25.07.2011.

ii) Extend the existing FM license period of 15 years by 3 years.

2. AROI has argued that despite two years of poor performance, the radio industry had to face an outgo of up to Rs 150- 200 crore in the form of excess license fees in FY20 and FY21 as the license fee is linked to NOTEF. AROI has also placed emphasis on the FICCI-EY report of March 2021, according to which it is not until FY 2024 that radio is expected to go ahead of its FY 2020 revenue levels. Further, advertising spends on radio industry have fallen owing to the pandemic, FM radio listenership has also fallen due to popularity of music OTTs coupled with lack of FM tuners in present-day mobile handsets.

3. In view of the above, TRAI is requested to give its recommendations on the above two steps mentioned by the FM radio industry.

4. This issues with the approval of Secretary, I&B.

Warm Regards,

Yours sincerely,

(Sanjiv Shankar)

Shri V. Raghunandan
Secretary
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawaharlal Nehru Marg (Old Minto Road)
New Delhi 110 002

सूचना का अधिकार

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Tele No. (O) : +91 11 2338 4453, Fax No. : +91 11 2338 7823
E-mail : jsb-moib@gov.in

ASSOCIATION OF RADIO OPERATORS FOR INDIA

29th September 2021

Shri Apurva Chandra
Secretary
Ministry of information & Broadcasting
Government of India

JS(B)
HMIB has desired a feedback in a week

Office of Minister of Information & Broadcasting
Govt. of India
Shastri Bhawan, New Delhi

Dear Apurva ji,

Sub: Two urgent steps required to save the FM radio industry

D(FM)

O/o Additional Director (FM)
Dy. No. 50660.3
Date 6/10/21

1.1 This letter is in continuation with our letter dated 20 September 2021. While the earlier letter talked about the long-term major issues facing the FM radio industry, this letter is more urgent because it deals with the short-term issues that will drive the survival of the industry. Suffice it to say that the FM radio industry is very sick today and this has happened over a period of the last two years. If the short-term issues are not resolved quickly by the Government, the long-term issues may hardly matter. The FM radio industry just wont survive unless these two steps are taken.

1.2 **There are only two simple steps that the Government needs to take to alleviate the immediate and deep pain points and return the FM industry to health. These are i) removing the linkage of the Annual License Fee (ALF) to the Non-refundable One Time Entry Fee (NOTEF) and ii) extending the license period by 3 years.** These are explained in detail in the remainder of this letter.

i) Removing linkage of ALF with NOTEF

1.3 The first request is related to the ALF that every FM broadcaster pays annually for every station that it operates. It is calculated as per the formula: higher of a) 4% of revenues of the station in that city and b) 2.5% of the NOTEF of that city.

1.4 There is a serious problem with the second part of this formula linking ALF with NOTEF. The most important reason why this linkage must be removed is because it rebels against the principle of natural justice. NOTEF was determined by a set of bidders. But it's repercussions are being felt by those who took no part in its determination. An example will illustrate this point. They are suffering for the action of others.

AD(GS)

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संयुक्त सचिव(प्रसारण)का कार्यालय
O/o Joint Secretary (Broadcasting)
डा. सं./Dy. No. P-506603/2021
दिनांक/Date 05-10-2021

सूचना एवं प्रसारण मंत्री का कार्यालय
O/o HMIB
डा.सं./Dy. No. 506603
दिनांक/Date 01.10.21

1.5 There was just one frequency that was put up for auction in the 1st batch of Phase-3 auctions in the city of Delhi. Now it is well known that Delhi is the biggest radio market in the country. Naturally, there was a lot of interest amongst bidders, both new and old, in acquiring this frequency. The Reserve Price was at about Rs 37 crores. As the rounds of the auction progressed, the bid values kept climbing, until eventually bidding stopped at Rs 169 crores approximately. This is the NOTEF for Delhi. And all broadcasters – including those who did not even bid – are now being weighed down by this huge NOTEF.

1.6 Delhi is just an example. The same is true of almost all cities.

1.7 The major reason why the NOTEF became so big is that there were very few frequencies put up on auction. This scarcity of spectrum created what is commonly called "scarcity premium". The scarcity led to a wrong determination of the true economic worth of the license. Even the winner suffered because of the irrational bidding that it undertook.

1.8 As evidence of this, take the case of HT Media, which won the Delhi and Mumbai frequencies at NOTEF of Rs 169 crores and Rs 123 crores. A few years later, in FY 20, HT took an "impairment" of nearly Rs 234 crores in its books. It wrote this amount off, largely on account of its exuberant bidding. While HT cleaned up its book, other broadcasters are still paying their ALF basis the NOTEF decided by HT. Likewise, ENIL also bid excessively in various A category towns, and it was forced to take an impairment of Rs 98 crores in FY 21. Again, other broadcasters are still paying their ALF basis the NOTEF set by ENIL.

1.9 Even the Government is aware of the dangers of NOTEF. When it was deciding the "migration fees" – called Non-refundable One Time Migration Fees (NOTMF) for Phase-2 broadcasters interested in moving on to Phase-3 policy, it consulted with TRAI. TRAI said clearly that "*...where channels available for auction are one-third or less of the total channels in that city, i.e., the number of channels available for auction in such cities are scarce and thereby the auction-determined prices in such cases may not represent the fair underlying value of the resource as such prices would be determined under a supply constraint and using these prices as a reference price for determining the migration fee ... may not be reasonable*".

1.10 MIB accepted TRAI's recommendations regarding the unsuitability of using auction discovered prices insofar as the NOTMF was concerned. However, when it came to ALF, it still went ahead and linked it to NOTEF.

1.11 In cities, where no frequencies were available, auctions were not conducted. Eg. Kolkata. There was thus no determination of NOTEF in Kolkata. The ALF in Kolkata is thus calculated only by the first part of the formula i.e. 4% of revenues. There are approximately 25 such cities across the country. In these cities, broadcasters have been spared the burden that has been put on others across the other cities.

1.12 For the sake of parity, there should logically be no NOTEF linkage in any city at all. Except for those bidding in the auctions, no one else had a clue what the NOTEF would emerge as. Why then should they have to pay basis that NOTEF?

1.13 Even before the pandemic hit India in March 2020, the radio industry had been suffering from a slowdown. In FY20, the radio industry's revenues had dropped by 10% approximately. In FY21, as a result of the pandemic, radio industry's revenues dropped a further 50% or so. Had only the revenue share part of the ALF formula been, the industry would have got automatic relief. Unfortunately, in most cities, the NOTEF linked part of the formula came into play. As a result, the radio industry got very little relief in ALF, despite two poor years of industry performance, and despite the crippling impact of a once-in-a-century pandemic.

1.14 It is estimated that because of this, the radio industry has lost up to Rs 150-200 crores in the form of excess license fees in FY20 and FY21.

1.15 The radio industry has urged the Government to look into this anomaly several times. But to no avail. Out of desperation, one broadcaster petitioned the Hon'ble Delhi High Court. AROI has intervened in this petition. Unfortunately, the pandemic has derailed the hearings of this petition also. And the radio industry is still suffering.

1.16 We therefore urge you sir, to look into this matter at the earliest. Kindly entirely drop the linkage of ALF to NOTEF.

ii) Extension of license period by 3 years

1.17 The second immediate relief required is extension of the FM license period by 3 years.

1.18 The pandemic started in March 2020 and the Government ordered a national lock-down which lasted till the end of May. This was followed by state-level lockdowns which lasted throughout FY21. Just as FY22 began, the 2nd wave of the pandemic hit our country. State-level lockdowns were back in place, and even today, there are differing degrees of lockdowns across different states in the country.

1.19 In most parts of the country, there are continuing restrictions on business operations. Theatres are still shut in Maharashtra and some other states. Even in states where they are open, there is a limit of 50% on capacity. Restaurants are likewise under severe restrictions,

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both timing and capacity wise. The whole education sector continues to be mostly shut. There is still a night-curfew in many cities. As a result, most retail outlets are forced to shut shop early. There are other restrictions like requirement of double vaccination or a negative RT-PCR test for entering malls.

1.20 Further, there is a very real fear of the 3rd wave that is holding spending back. Retailers are holding back on spends because they are worried that their advertising investments may get wasted if lockdowns were to come again. This fear is hurting all media, but it is hurting the radio the most, given the heavy dependence of radio on retail advertisers.

1.21 Segments identified above – theatres, retail, restaurants, educational institutes, malls and others – are core advertisers of radio. All of them are cutting back on spends.

1.22 Even national advertisers are holding back on radio spends. When the retail sector is affected, national advertisers also put a lid on retail advertising. There are other factors that are pulling down advertising as well. Auto companies and consumer durables are facing a shortage of semiconductors and thus are not advertising. Big E Comm and digital companies have a national presence and are preferring to spend on TV. Even the Government is not spending on radio.

1.23 As a result, there is tremendous pressure on radio revenues. Radio broadcasters have reacted by cutting all expenditure possible. The biggest cut has been in HR costs. It is estimated that nearly 1000 direct jobs have been cut in the radio industry. Because radio companies have been forced to cancel on-ground events, thousands of more jobs in event companies have been lost. Other costs – electricity, office space, travel, repairs, etc – have also been pruned to the extent possible. Despite this, most radio companies have reported massive losses in FY21.

1.24 There is a further problem that has been looming over FM radio for a few years now. Digital broadcasters (music OTTs like Gaana, Spotify, Saavn) are growing by the day. By some estimates, their monthly reach – 400 million – is already twice of that of FM radio. They are attracting the most well-off audiences, thus pulling advertisers away from FM radio.

1.25 A key factor driving listenership away from FM radio and towards digital platforms is that many mobile phones are today coming without the FM tuner. Listeners are thus forced away from FM radio towards digital broadcasters.

1.26 As a result of all these factors – the pandemic, the digital broadcasters, the mobile devices tuner problem – radio is finding itself in a very hard place. The pandemic has

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hastened the process of digitalization. With more need for digital content, mobile devices are quickly dropping the FM tuner. None of this was known to us at the time of the Phase 3 auctions.

1.27 It can be safely said that the impact of the pandemic will continue to be felt for another year at least. As per the FICCI-EY report of March 2021, it is not until FY24 that radio is expected to go ahead of its FY20 revenue levels. Nearly 4 years of the 15-year license period has been affected by the pandemic.

1.28 The Government and its various arms have extended different degrees of relief to different businesses. The telecom business is the latest recipient of relief from the Government.

1.29 We therefore urge you to extend our license period by 3 years.

1.30 The Government is authorized to make changes in the policy. As per Clause 29.3 of GOPA: *"The Government shall have the right to modify at any time the provisions of the Policy Guidelines dated 25.07.2011 and/or the terms and conditions of permission, if in the opinion of the Government it is necessary or expedient to do so in public interest or in the interest of the security of the State."*

1.31 It is undoubtedly in public interest to save the FM industry, which not only disseminates free music and entertainment content to the remotest parts of the country, but also plays a crucial role in aiding social causes and most importantly in times of crisis like current pandemic, by creating public awareness about the crises, curbing panic situations etc.

1.32 The special importance of FM radio is evident from the confidence placed by the Hon'ble PM of India in the medium. Every month, Shri Narendra Modi addresses the nation – and the poorest and most deprived sections in particular – through his radio address. It would be very unfortunate if this medium – the primary source of entertainment and information for the poor – were to shut down because of the financial crisis caused by the pandemic.

The FM radio industry has never been treated fairly. Though it is the smallest segment of the media industry, it is usually subject to the most onerous terms of conduct. Despite its small size, it has directly contributed an estimated Rs 5000 crores to the Government in the form of NOTEF, NOTMF and ALF over the years. It is unlikely that any other media has contributed this much. Much more has been paid to the Government in the form of GST (levied at a very high 18%), corporate taxes, lease rentals (to Prasar Bharati/BECIL), fees (Wireless Operating License) and others.

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AROI

ASSOCIATION OF RADIO OPERATORS FOR INDIA

We therefore urge the government to correct this historical injustice. We desperately need these two concessions from the Government.

Regards

Warm regards

Yours sincerely

Anurradha Prasad
President
AROI

Copy to :-

Shri Anurag Singh Thakur, Honourable Minister, Ministry of Information&Broadcasting

Shri Jayant Sinha, Additional Secretary, Ministry of Information & Broadcasting

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Annexure II

TRAI letter dated 30th December 2021 to MIB

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

File No. R-11/3/ (4)/2021-B&CS **Dated: 30th December 2021**

To

The Secretary,
Ministry of Information and Broadcasting (MIB),
'A' wing, Shastri Bhawan,
New Delhi-110001

Subject: **Policy Guidelines for FM radio (Phase-III) – reg**

Kindly refer to Ministry's letter No. 38032/43/2021-FM/556 dated 30th November 2021, wherein MIB has sought recommendations of TRAI on the issues raised by the Association of Radio Operators for India (AROI).

2. It may please be noted that TRAI is a statutory body set up by the Government of India under section 3 of the Telecom Regulatory Authority of India Act, 1997. In this regard, your attention is drawn towards Section 11(1)(a)(ii) of TRAI Act, which is reproduced below:

"***11 Functions of Authority.-*** *[(1) Notwithstanding anything contained in the Indian Telegraph Act, 1885 , the functions of the Authority shall be to –*
(a) make recommendations, either suo motu or on a request from the licensor, on the following matters, namely: -
-----
(ii) terms and conditions of licence to a service provider;
-----"

3. Ministry, also, has forwarded a copy of the letter dated 29.09.2021 of AROI with the above-mentioned letter. However, the Ministry has not provided its comments on the issues raised in the letter of AROI.

महानगर दूरसंचार भवन, जवाहर लाल नेहरू मार्ग, Mahanagar Doorsanchar Bhawan, Jawahar Lal Nehru Marg
(पुराना मिन्टो रोड), नई दिल्ली / (Old Minto Road), New Delhi-110002
फैक्स/Fax : +91-11-23213294, ईपीबीएक्स नं0/EPBX No. : +91-11-23664145

4. As such as per extent provisions of the TRAI Act, the Government may seek recommendations of the Authority for the terms and conditions of licence to a service provider, as per above provisions only.

5. In view of the above, MIB is requested to seek TRAI's recommendations for amending the terms and conditions in the existing policy guidelines for FM Radio (Phase III), in accordance with the provisions contained under Section 11(1)(a)(ii) of the TRAI Act, as deemed fit. Further, Ministry's own inputs/views/remarks on the issues raised by the Association of Radio Operators for India (AROI) may also be explicitly mentioned.

This letter is issued with the approval of the Authority.

(V. Raghunandan)
Secretary
Tel: 23237448
Email : secretary@trai.gov.in

Annexure III

MIB reference dated 11th May 2022

संजीव शंकर, (भा.रा.से.)
संयुक्त सचिव (प्रसारण)
SANJIV SHANKAR, IRS
Joint Secretary (Broadcasting)

सत्यमेव जयते

भारत सरकार
सूचना एवं प्रसारण मंत्रालय
शास्त्री भवन, नई दिल्ली - 110115
GOVERNMENT OF INDIA
MINISTRY OF
INFORMATION & BROADCASTING
SHASTRI BHAWAN, NEW DELHI - 11011

D.O.N-38032/43/2021-FM/329

Date:11th May, 2022

Dear Shri V. Raghunandan,

Please refer to this Ministry's letter of even no. dated 30th November, 2021 seeking recommendations of TRAI on the following two issues raised by the Association of Radio Operators for India (AROI) in its letter dated 20.09.2021.

i. Remove the linkage to Non-Refundable One Time Entry Fee (NOTEF) in the formula for annual fee as prescribed in the FM Ph-III Policy Guidelines dated 25.07.2011.

ii. Extend the existing FM License period of 15 years by 3 years.

2. TRAI in its reply vide Letters No. R-11/3/(4)/2021-B&CS dated 30th December, 2021 and 21st March, 2022 has requested MIB to seek TRAI's recommendations for amending the terms and conditions in the existing policy guidelines for FM Radio (Phase-III), in accordance with the provisions contained under Section 11(1)(a)(ii) of the TRAI act, as deemed fit.

3. As indicated, AROI has flagged two urgent and short - term issues which according to them will drive the survival of the FM radio industry. AROI has also cited the FICCI-EY report of March, 2021 according to which it is not until FY 24 that radio is expected to go ahead of its FY 20 revenue levels. It is claimed that nearly 4 years of the 15-year license period has been affected by the pandemic.

4. In this context, it may be stated that though the Revenue levels of Private FM radio operators had dipped in FY 2020-21 compared to FY 2019-20, these levels started showing an upward trend from Q3 FY 21 onwards, once the Government eased the COVID-19 induced lockdown conditions and economy gradually started returning to normal. The Ministry vide its letter of even no. dated 24th February, 2022 has already provided TRAI with data on Gross Revenue and license fee paid by FM operators, city wise, during the past five years as well as NOTEF amount for each city.

5. Regarding extension in FM Ph-III License period of 15 years by 3 years, para 3.1 of the FM Phase-III policy inter-alia states as follows:

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E-mail : jsb-moib@gov.in

"..There shall be no extension and the Permission, unless cancelled or revoked earlier, shall automatically lapse and expire at the end of the aforesaid fifteen years' period and the Permission Holder shall thereafter have no rights whatsoever to continue to operate the Channel after the date of expiry of the Permission. Government at the appropriate time shall determine procedure for issue of fresh permissions."

It may be mentioned that the FM Phase-III permissions began roll-out in late 2015 and only six years out of 15 years permission period have lapsed.

6. In view of the above, TRAI, is requested to examine the two issues raised by AROI and give its recommendations under section 11(1)(a) of TRAI act.

7. This reference to TRAI is being made after the approval of HMIB.

With Best Regards,

Yours sincerely,

(Sanjiv Shankar)

Shri V. Raghunandan
Secretary,
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg (Old Minto Road),
New Delhi 110 002.

Annexure IV

MIB letter dated 27th January 2011

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(156)

रघु मेनन
सचिव
RAGHU MENON
SECRETARY
Tel. : 011-23382639
Fax. : 011-23383513

सत्यमेव जयते

भारत सरकार
सूचना और प्रसारण मंत्रालय
नई दिल्ली-110115
GOVERNMENT OF INDIA
MINISTRY OF INFORMATION & BROADCASTING
NEW DELHI-110115

D.O.No.104/02/2008-FM (Vol-IV) 27th January, 2011

Dear Dr. Sarma,

Please refer to the then Chairman's, TRAI D.O letter No. 7-1/2007 –CN dated 22nd February 2008 forwarding therewith TRAI recommendations on 3rd Phase of Private FM Radio Broadcasting and subsequent letter of even number dated 28th November,2008 in response to the Ministry's views on these recommendations which were sent as per provisions of Section 11(1) of TRAI Act,1997 .

2. The Government, while considering FM Phase-III Policy, has constituted a Group of Minister (GoM) under the chairmanship of Finance Minister to examine appropriate methodology for FM Phase-III. The GoM, in its meeting held on 19.01.2011, considered three issues pertaining to FM Phase-III viz. (i) appropriate licensing methodology (ii) determination of reserve price and annual license fee and (iii) Permission period for Phase-III. The gist of the recommendations of the GoM is as under:

(i) The GoM recommended that the ascending e-auction methodology as followed in 3G auctions may be adopted for award of license in FM Radio Phase-III.

(ii) It has been recommend that for Phase-III, the reserve price for new channels in existing FM Phase-II cities may be fixed at the highest bid received for that city in Phase-II. In cities which were being taken up afresh, the reserve price could be pegged at the highest bid received during FM Phase-II for that category of cities in that region. In case the benchmark from Phase-II for a particular region was not available, then the lowest of the highest bid received in other regions for that category of cities may be taken as the reserve price. In case of non-availability of any benchmark on the basis of the above for a particular city, the Ministry of I&B could take a suitable decision.

(iii) With regard to the determination of annual license fee for Phase-III, the GoM recommended that the same formula used for calculation of annual license fee for FM Phase-II should be followed in FM Phase-III as well i.e @ 4% of Gross Revenue (GR) or 10 % of Reserve One Time Entry Fee (25% of the highest bid) for the city, whichever is higher. For e-auction, this will translate to 4% of GR or 2.5% of the Bid price, whichever is higher, since every permission holder will be paying the same bid price.

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DA-II (BC&S)

Dia./No. 222
Date: 2.2.11

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(iv) The period of permission in FM Phase-III could be 15 years. The Ministry of Information and Broadcasting would formulate a separate policy for the license period from the present 10 yrs to 15 yrs for FM (Phase-II) operators.

3. In the light of the above, the Authority may kindly furnish their further recommendations on the above issues in accordance with the provisions of the Section 11(1)) of TRAI Act, 1997 so as to enable us to seek the approval of the Cabinet in the matter.

With regards,

Yours sincerely

(Raghu Menon)

Dr. J. S. Sarma
Chairman
The Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawaharlal Nehru Marg
New Delhi- 110 002

Pr. Adv (B&PA)

ns
28/1

Annexure V

TRAI letter dated 9th February 2011 to MIB

भारतीय दूरसंचार विनियामक प्राधिकरण
महानगर दूरसंचार भवन, जवाहर लाल नेहरू मार्ग,
(पुराना मिन्टो रोड), नई दिल्ली-110002

TELECOM REGULATORY AUTHORITY OF INDIA
Mahanagar Doorsanchar Bhawan, Jawahar Lal Nehru Marg,
(Old Minto Road), New Delhi-110002
Tel. : 91-11-23237448, Fax : 91-11-23222816
E-mail : secretary@trai.gov.in

सत्यमेव जयते

आर.के. आर्नोल्ड, भा.दू.से.
***R.K. ARNOLD,** I.T.S.*
सचिव / *Secretary*

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D.O. No. 7-2/2008-B&CS
February 9, 2011

Dear Shri Menon,

Please refer to your D.O. No. 140/02/2008-FM (Vol. IV), dt. 27.01.2011 addressed to Chairman, TRAI, forwarding the recommendations of the GoM constituted by the Government for the FM Phase-III policy and requesting the Authority to furnish further recommendations on the same.

2. The Authority has accorded careful consideration to each of the issues raised in para 2(i) to 2(iv) of your letter and the responses of the Authority to these issues are as follows:

(i) Ascending e-auction methodology:

Keeping in view the experience of multiple round auction methodology that was followed in the first phase as well as the recommendations of a committee under Dr Amit Mitra, the then Secretary General, FICCI; TRAI had recommended in 2008 the 'closed tender process' for the award of licenses in the second phase of Private FM Radio Broadcasting.

However, in the context of the successful conduct of auctions for allocating 3G spectrum in 2010 and the recommendation of GoM mentioned in your letter, TRAI would have no objection regarding adoption of the 3G ascending e-auction methodology '*mutis mutandis*' for awarding licenses for FM Radio Phase III. It is also suggested that the Ministry of Information and Broadcasting may ensure that all related administrative issues are duly addressed while finalising the ecosystem and procedures for the e-auction process.

(ii) Reserve price for new channels:

The GoM has recommended reserve prices for new channels based on the actual prices received during the second Phase for comparable cities. The Authority has no objection to the proposed action.

(iii) Annual Licence fee:

This is in line with the Authority's earlier recommendations. The Authority agrees to the same.

23

: 2 :

(iv) **Period of licence**:

The Authority had earlier recommended issue of licenses for a period of ten years with a provision for its renewal for another ten years. Now the GoM has recommended a permission period of fifteen years. The Authority has no objection to this validity period of the licenses.

3. As per procedure, a copy of this letter is being placed on the TRAI website (www.trai.gov.in).

With kind regards,

Yours sincerely,

(R.K.Arnold)

Shri Raghu Menon,
Secretary,
Ministry of Information and Broadcasting,
Shastri Bhavan,
New Dlehi – 110 001

Annexure VI

Reserve prices and Successful Bid Prices in Batch 1 auction for FM Radio Phase-III

S. No	Name of City	Region	Category	Total No. of Channels available	No. of Channels for Auction in Phase III	Phase III Reserve price per channel (Highest bid in Phase II) (Rs.)	Phase III Successful Bid Amount (Rs.)
1	Delhi	North	A+	9	1	31,42,00,000	1,69,16,89,481
2	Mumbai	West	A+	9	2	35,20,01,004	1,22,81,31,349
3	Bangalore	South	A	8	1	21,60,00,000	1,09,25,45,545
4	Ahmedabad	West	A	6	1	12,00,55,000	42,68,76,267
5	Pune	West	A	6	2	14,00,55,000	42,03,50,268
6	Jaipur	North	A	6	1	6,10,05,555	28,34,98,387
7	Chandigarh	North	C	4	2	15,61,00,590	19,04,72,374
8	Hyderabad	South	A	8	4	18,00,00,000	18,00,00,000
9	Patna	East	B	4	3	5,13,00,000	17,89,83,876
10	Varanasi	North	B	4	1	2,10,00,000	17,49,18,947
11	Cochin	South	B	4	1	10,11,69,990	15,04,83,548
12	Nasik	West	C	4	2	3,51,00,000	14,66,24,270
13	Lucknow	North	A	6	3	14,00,55,000	14,00,55,000
14	Jodhpur	North	C	4	1	1,27,00,000	11,44,39,124
15	Kolhapur	West	C	4	2	3,51,00,000	9,44,24,489
16	Kanpur	North	A	6	3	8,00,55,000	8,00,55,000
17	Nagpur	West	A	6	2	5,10,00,000	7,76,33,411
18	Bhubaneshwar	East	C	4	1	79,00,000	7,40,13,559
19	Kozhikode	South	C	4	2	7,02,00,100	7,02,00,100
20	Madurai	South	B	4	1	6,30,00,000	6,49,08,963
21	Aurangabad	West	C	4	2	2,99,00,000	6,23,39,493
22	Rajkot	West	B	4	1	3,51,00,000	6,08,08,376
23	Amritsar	North	B	4	1	3,00,00,000	6,03,97,038
24	Guwahati	East	C	4	1	37,80,090	4,11,11,343
25	Allahabad	North	B	4	2	2,10,00,000	4,08,77,024
26	Surat	West	A	6	2	3,60,00,000	3,60,00,000
27	Agra	North	B	4	2	2,56,00,050	2,56,00,050
28	Patiala	North	C	4	1	1,10,00,000	1,64,93,619
29	Jamshedpur	East	B	4	1	1,21,50,990	1,26,44,366
30	Udaipur	North	C	4	1	1,01,07,090	1,05,17,476
31	Karnal	North	D	3	1	90,00,000	1,04,18,625
32	Rourkela	East	C	4	2	26,55,000	1,02,12,651
33	Jammu	North	C	4	3	1,01,07,090	1,01,07,090
34	Kota	North	C	4	1	85,30,000	1,00,73,018
35	Hissar	North	D	3	1	61,10,000	83,84,735
36	Ajmer	North	C	4	2	76,00,000	79,08,589

37	Sholapur	West	C	4	2	66,59,000	72,03,811
38	Shillong	East	D	3	2	18,07,000	69,15,070
39	Srinagar	North	C	4	3	61,20,090	61,20,090
40	Bareily	North	C	4	2	31,00,000	52,59,650
41	Ahmednagar	West	C	4	2	37,60,000	47,13,312
42	Dhule	West	C	4	3	46,59,000	46,59,000
43	Sangli	West	C	4	2	46,59,000	46,59,000
44	Jalgaon	West	C	4	2	36,59,000	36,59,000
45	Bilaspur	West	C	4	3	32,15,000	33,45,541
46	Aligarh	North	C	4	3	31,00,000	31,00,000
47	Bikaner	North	C	4	3	31,00,000	31,00,000
48	Gorakhpur	North	C	4	3	31,00,000	31,00,000
49	Jhansi	North	C	4	3	31,00,000	31,00,000
50	Akola	West	C	4	3	29,59,000	29,59,000
51	Nanded	West	C	4	3	29,59,000	29,59,000
52	Agartala	East	D	3	2	16,20,000	16,20,000
53	Muzzaffapur	East	C	4	3	15,10,000	15,10,000
54	Itanagar	East	D	3	2	13,03,000	13,03,000
55	Aizwal	East	D	3	2	12,07,000	12,07,000

Annexure VII

Annual License Fee paid in Phase III by FM Radio operators in major cities

S. NO.	FM Radio Operator	2.5% of NOTEF	4% of Gross Revenue 2017-18	Total ALF in 2017-18	4% of Gross Revenue 2018-19	Total ALF in 2018-19	4% of Gross Revenue 2019-20	Total ALF in 2019-20	4% of Gross Revenue 2020-21	Total ALF in 2020-21	4% of Gross Revenue 2021-22	Total ALF in 2021-22
Delhi: **RP - Rs. 31,42,00,000, Highest Bid (NOTEF) – Rs. 169,16,89,481**												
1	Operator 1	42292237	8576588	42292236	8009505	42292237	9226408	42292236	6099411	42292237	4717651	42292237
2	Operator 2	42292237	27715972	42292239	29116305	42292236	24715642	42292237	12638245	42292237	17785107	42292237
3	Operator 3	42292237	36835220	42292236	33670076	42292236	30639380	42292236	12206162	42292237	17922909	42292237
4	Operator 4	42292237	29407022	42292238	28872180	42292238	23831563	42292237	7939642	42263921	13102372	42292237
5	Operator 5	42292237	8882821	42292238	8349992	42292238	7786311	42292237	1675532	42292237	2902054	42292237
6	Operator 6	42292237	21779041	42292237	24237771	42292237	20494973	42292238	9376615	42292237	13196203	42292237
7	Operator 7	42292237	8692800	42292236	8208873	42292236	8069790	42292236	1606550	42292237	2907799	42292237
8	Operator 8	42292237	17796889	42292237	18505635	42292237	15450299	42292237	7085228	42292237	10342202	42292237
9	Operator 9	42292237	7070280	42292236	7330880	42292236	3791040	42292236	1528000	42292237	6768280	42292237
Mumbai: **RP - Rs. 35,20,01,004, Highest Bid (NOTEF) – Rs. 122,81,31,349**												
1	Operator 1	30703284	23437845	30703284	25199331	30703284	17242963	30703284	7981286	30703284	9884664	30703284
2	Operator 2	30703284	2176691	30703284	2937923	30703284	2142470	30703284	444435	30703284	369121	30703284
3	Operator 3	30703284	28934710	33285518	22722142	28121048	20033143	30703285	8064946	30703284	9793422	30703284
4	Operator 4	30703284	13578809	30703284	16630494	30703286	11902832	30703284	5944095	29134248	5459382	30703284
5	Operator 5	30703284	3883702	30703284	4497808	30703286	3277464	30703284	1080541	30703284	2020617	30703284
6	Operator 6	30703284	33207891	**33207889**	32624542	**32624542**	28057982	30703283	14746687	30703284	17566381	30703284
7	Operator 7	30703284	10650520	30703284	7662105	30703284	6273775	30703284	2074055	30703284	3430470	30703284
8	Operator 8	30703284	23708250	30703284	21836297	30703284	19138173	30703284	9113039	30703284	10678537	30703284
9	Operator 9	30703284	3463920	30703284	5025720	30703284	3250160	30703284	740000	30703284	593480	30703284
Bengaluru: **RP - Rs. 21,60,00,000, Highest Bid (NOTEF) – Rs. 109,25,45,545**												
1	Operator 1	27313639	10353621	27313640	10386829	27313640	8249296	27313640	3007557	27313640	4331854	27313639
2	Operator 2	27313639	7179902	27313640	8470174	27313640	6468038	27313640	2006629	27313640	2129316	27313639
3	Operator 3	27313639	11550649	27313640	13595149	27313644	10579472	27313639	3698719	27170106	4801016	27313639
4	Operator 4	27313639	7418640	27313640	7422880	27313640	4760000	27313639	1928640	22485230	1944360	27313639
5	Operator 5	27313639	9715846	27313636	10856961	27313640	8851391	27313640	4813560	27313643	5495640	27313639
6	Operator 6	27313639	14000114	27313639	14908777	27313639	11568034	27313638	5310921	27313639	6753869	27313639
7	Operator 7	27313639	5616400	27313640	6709309	27313640	3874955	27313640	1513918	27313639	2617756	27313639
8	Operator 8	27313639	11107647	27313639	11256925	27313639	9126424	27313639	3914928	27313638	4671004	27313639

Pune: RP - Rs. 14,00,55,000), Highest Bid (NOTEF) – Rs. 42,03,50,268												
1	Operator 1	10508757	12613178	**17708245**	10558080	7518110	9384711	8502981	3985036	10459433	5096186	10508757
2	Operator 2	10508757	1774569	10508756	2183852	10508756	2000131	10508756	667971	10508756	691437	10508757
3	Operator 3	10508757	9095168	10508757	9744928	10508757	8902352	10508758	3222868	10508757	4388217	10508757
4	Operator 4	10508757	5102880	10508756	4959588	10508756	4486546	10508755	1834352	10508757	4285899	10508757
5	Operator 5	10508757	2090757	10508757	3352169	10508757	3284419	10508757	1358130	10508756	1698348	10508757
6	Operator 6	10508757	8251108	10508687	7896799	10508756	6889206	10508756	3384150	10508756	4498880	10508757
Ahmedabad: (RP - Rs. 12,00,55,000), Highest Bid (NOTEF) – Rs. 42,68,76,267												
1	Operator 1	10671907	8042058	10671908	9108998	10671908	8224380	10671907	5004321	8003939	5842789	10671907
2	Operator 2	10671907	12557735	**13721784**	10710582	**11393684**	10160552	8865824	5237924	10633233	5917637	10671907
3	Operator 3	10671907	2737600	10671908	2582083	10671908	1882799	10671908	647719	10671908	943347	10671907
4	Operator 4	10671907	6697285	10671908	7060644	10671907	5203272	10671902	2983318	10671907	3499013	10671907
5	Operator 5	10671907	2984040	10671908	2612884	10671908	2106913	10671908	1487750	10671906	2705827	10671907
6	Operator 6	10671907	5831825	10671851	5917203	10671908	5203738	10671907	3253588	10671914	3292560	10671907