



PAKISTAN ELECTRONIC MEDIA REGULATORY AUTHORITY

Consultation Paper No. LRP/1-2017

**Consultation on Dubbing of Foreign Content in Urdu or
other Local or Regional Languages on Landing Rights and
Satellite TV Channels**

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(www.pemra.gov.pk)

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Section 1: Definitions

1.1. Dubbing:

Dubbing is a post-production process used in filmmaking and video production in which the original soundtrack in one language is replaced by a soundtrack in another language. Simply dubbing can be defined as the replacement of a soundtrack of a video recording, film etc. in one language by a soundtrack in a different language.

1.2 Subtitles:

Subtitles are derived from either a transcript or screenplay of the dialog or commentary in films, television programs, video games, and the like, usually displayed at the bottom of the screen, but can also be at the top of the screen if there is already text at the bottom of the screen. They can either be a form of written translation of a dialog in a foreign language, or a written rendering of the dialog in the same language, with or without added information to help viewers who are deaf or hard of hearing to follow the dialog, or people who cannot understand the spoken dialogue or who have accent recognition problems. (Source: Wikipedia)

1.3 Closed captioning (CC):

Closed captioning is a process of displaying text on a television, video screen, or other visual display to provide additional or interpretive information. It is typically used as a transcription of the audio portion of a program as it occurs (either verbatim or in edited form), sometimes including descriptions of non-speech elements.

The purpose of closed captioning is to aid hearing-impaired people, but it is useful for a variety of situations. For example, captions can be read when audio cannot be heard, either because of a noisy environment, such as an airport, or because of an environment that must be kept quiet, such as a hospital. Other uses have been to provide a textual alternative language translation of a presentation's primary audio language that is usually burned-in (or "open") to the video and unselectable.

HTML5 defines subtitles as a "transcription or translation of the dialogue ... when sound is available but not understood" by the viewer (for example, dialogue in a foreign language) and captions as a "transcription or translation of the dialogue, sound effects, relevant musical cues, and other relevant audio information ... when sound is unavailable or not clearly audible" (for example, when audio is muted or the viewer is deaf or hard of hearing). (Source: Wikipedia)

1.4 Landing Rights Permission:

“Landing Rights” means permission (LRP) or license issued by the Authority (PEMRA) to downlink /distribute / market a foreign satellite TV channel, having foreign language content and foreign principal, in Pakistan through licensed distribution network operators (i.e. cable TV etc.). Examples of LRP channels are CNN, Cartoon Network, Discovery, Animal Planet, CCTV News, Cinemachi Kids, Tens Sports etc. **The LRP channels cannot uplink from within Pakistan and can only be downlinked / distributed by the licensed company within the territory of Pakistan. LRP channels are required to carry 100% of the foreign content during its 24 hour transmission which also include repeats.**

1.5 Satellite TV channel:

Satellite TV (STV) channel means a TV channel licensed by the Authority (PEMRA) for uplinking/ originating from within Pakistan for distribution (through cable TV etc.) to the viewers of Pakistan carrying at least 90% of the indigenous (of Pakistani origin) programmes/content and a maximum of 10% foreign content (excluding Indian content) during the 24 hour transmission including repeats. Examples of STV channels are Hum TV, Geo News, Samaa TV, AVT Khyber, ARY News etc.

1.6 Prime Time:

“Prime time” is the time from 7-11 PM where the viewership of television is the highest during the 24 hours.

During prime time, due higher viewership, advertising revenue of the TV channels is higher compared to other parts of the day or night. This is the main reason for the high ratings for TV programming at this time. Advertisers also focus on prime time for publicity of their products for the obvious reason of increased viewership, hence higher probability of increase in sale.

Section 2: Regulatory Provisions for Dubbing in PEMRA laws:

Regulation 5 of the Landing Rights Permission Regulations-2016 notified in the official gazette on December 31, 2016 provides for dubbing of content on a satellite TV channel having landing rights permission. The said regulation is reproduced as under:

5. Dubbing of content: Dubbing of foreign content in national language (Urdu & other Pakistani languages only) shall be allowed in all genres except film, drama, soap operas, life style and fashion; however, there would be no restriction of subtitling.

From the above provisions, it is evident that dubbing of content in Urdu and other regional languages of Pakistan is allowed in all genres of the landing rights permission (given as under) except general entertainment:

S. No.	Categories of Landing Rights Permission
i.	News & Current Affairs
ii.	Sports
iii.	Environment, Wildlife, Weather, Climate Change, Documentary, Health & Nutrition, Agro, Science & Technology, Energy Conservation, Travel & Tourism, History, Education etc.
iv.	Children
v.	Music, Film, Drama, Soap, Fashion, Lifestyle, Cooking, etc. (General Entertainment) (dubbing not allowed)
vi.	Teleshopping & Property

Thus all programs on a landing rights channel in sports, children, education, teleshopping & property can be dubbed in Urdu or other regional languages, however, entertainment programs e.g. music, film, drama, soap, fashion, lifestyle etc. can only be aired in original foreign language but cannot be dubbed at all.

Section 3: Dubbing of Programs-International Practices

3.1 Canada:

As per Broadcasting Regulatory Policy 2010-905, the CRTC has awarded an additional time credit of 25% to Canadian programs dubbed in Canada in one of the official languages of Canada or in a Native Canadian language.

As per the stance of CRTC, the additional 25% credit would:

- encourage broadcasters to have Canadian programs dubbed in Canada;
- recognize the contribution of the artists and production resources in Canada's dubbing industry to the production of Canadian content and reinforce the identification of Canadian viewers with dubbed Canadian programs; and
- increase the number of exchanges between the country's two linguistic markets and bring them closer together (i.e., an English- or French-language program, once dubbed in the other language, can be rebroadcast in another market, find a new audience and gain visibility nationally and internationally).

As per the stance of CRTC, dubbing provides Francophones with a window into the English-language programming produced in Canada, in addition to programs produced internationally; and conversely, it provides Anglophones with access to French-language programming produced in Canada and abroad.

As per CRTC's Broadcasting Regulatory Policy for 2015 (i.e. Broadcasting Regulatory Policy CRTC 2015-86), the additional time credit awarded for Canadian and foreign programs dubbed in Canada has been raised to 33% in order to ensure that Canadian television services continue to use Canadian dubbing companies,

The Commission is confident that this measure will allow Canadian television services to continue to make maximum use of Canadian dubbing services in the creation and presentation of programming to Canadians, in accordance with section 3(1)(f) of the Act.

3.2 Vietnam:

Cable and Subscription TV Subscription/Pay TV under Decision No. 20 includes cable TV (e.g. analog, digital or IPTV), digital terrestrial TV (e.g. DVB-T), direct-to-home TV (DTH) and mobile TV. Businesses providing pay TV service are categorized into five groups: (i) pay TV content providers, (ii) agents for foreign TV channels, (iii) pay TV editors and translators, (iv) pay TV service providers, and (v) pay TV network infrastructure providers. Companies planning to be parts of these groups must be established legally under the laws of Vietnam. Business activities with respect to pay TV must be licensed by the Authority of Broadcasting and Electronic

Information (the ABEI) under the MIC. Pay TV content providers, pay TV editors and translators are required to obtain a visual press license.

In addition, the TV channels broadcast in Vietnam must be edited and translated into Vietnamese by licensed pay TV editors and translators. Exceptions to this requirement include live reports on sports events, and live coverage of opening and closing ceremonies of world and regional sports competitions. Notably, Decision No. 20 requires that pre-programmed commercials aired on foreign TV channels be removed when the foreign TV channels are broadcast in Vietnam. It further specifies that advertisements (if any) must be made in Vietnam and must comply with the advertising law of Vietnam.

3.3 Indonesia:

The Broadcasting Law requires that at least 60% of material broadcast by public and private broadcasting organizations be of Indonesian origin. In addition, programs which are broadcast in foreign languages are also subject to restrictions. **Specifically, public, private and subscription broadcasters must have at least 30% of their material which in its original form is in a foreign language dubbed into Indonesian as opposed to subtitled. Foreign films must be subtitled or dubbed.** Indonesian broadcasters that enter into a content supply agreement with a foreign entity must comply with local content regulations.

3.4 Japan:

No specific rules for dubbing.

3.5 India:

- i. Content regulations (Including local content quotas, censorship and content classification) are there.
- ii. No local content quotas.
- iii. Content regulation not restrictive - largely a self-regulatory approach.
- iv. Based on a published Program Code, with separate codes adopted by industry organizations.
- v. No regulations on languages, dubbing/subtitling and captioning.

3.6 Thailand:

NBTC regulations encourage, but do not mandate, dubbing or subtitling of international channels into Thai.

3.7 Singapore:

- i. Transmission of programs on channels in dialects is tightly controlled for all niche and nationwide subscription television service providers, including their OTT offers.
- ii. VOD operators are permitted to broadcast dialect content up to 50% of programming offered on any one service.

3.8 South Korea:

- i. Dubbing is not allowed on foreign retransmitted channels but subtitling is allowed.
- ii. For domestic channels only, subtitling is subject to restrictions related to timing and size of subtitling.
- iii. Pay TV providers are required to utilize sign language, closed captioning, audio descriptions, etc. to assist disabled viewers.
- iv. There are certain target percentages for disability assistance set for different types of broadcasting operators, which are implemented w.e.f. 2016, as follows: a) for General Service Program Providers (“jonghap-pyunsung” Program Providers”), 100% closed captioned, 10% audio description assistance, and 5% sign language assistance; b) for satellite TV operators, 70% closed captioned, 7% audio description assistance, and 4% sign language assistance; c) for IPTV operators and program providers, 70% closed captioned, 5% audio description assistance, and 3% sign language assistance.

3.9 New Zealand:

While there are no regulations regarding minimum levels of local content, the government broadcasting policy objectives make it clear that regular access to broadcasting representing New Zealand life is a key focus. NZ on Air, a Government broadcast funding agency receives over \$120m annually to invest in home grown television and radio programmes to sustain high levels of local content.

3.10 Philippine:

Media content control measures are laid out in several Philippine laws. Under the Republic Act No. 9006 or the Fair Election Act, candidates for political office shall have equal access to media time and space for political advertisements during the campaign period. No radio, television, or cable television station shall allow the scheduling of any program or permit any sponsor to manifestly favor or oppose any candidate or political party. Under Republic Act No. 9775 or the Anti-Child Pornography Act of 2009, internet service providers (ISPs) are given specific duties in relation to child pornography accessed through the Internet. The law requires ISPs to report any such infraction to the NBI within seven (7) days from notice of any form of child pornography is being committed using its server or facility, and preserve evidence for investigation.

For television broadcast licensees, the following are the applicable regulations:

- (i) **Free-to-air TV: Under the Children’s Television Act (Republic Act No. 8370), a minimum of fifteen (15) percent of the daily total air time of each broadcasting network shall be allotted for child-friendly shows within the regular programming of all networks granted franchises or as a condition for renewal of broadcast licenses.**
- (ii) **Presidential Decree No. 576-A provides that every radio station or television channel shall allocate at least two hours a day to a program or programs**

- rendering public service, during such broadcast hours as are normally regarded in the industry as prime time for a particular type of program and its appropriate audience.** Public service refers to news, educational, and cultural presentations.
- (iii) Cable TV: NTC Memorandum Circular No. 04-08-88 provides that cable television operators operating in a community which is within the field intensity contours of an authorized television broadcast station must carry the signals of the station. (iii) Subscription TV: Subscription TV is regulated on the same basis as CATV.
 - (iv) Radio: Under Executive Order No. 255, **all radio stations are required to broadcast a minimum of four (4) original Filipino musical compositions in every clock-hour of a program with a musical format.** Failure to comply will subject the violator to a fine or, in case of repeated violations, suspension or cancellation of the Certificate of Registration and Authority to operate as a radio station.
 - (v) Other: Direct-To-Home TV is regulated on the same basis as CATV.

3.11 ITU Policy document:

In the ITU Report on “Making Television Accessible” in 2011, it has been argued that small children are reliant on the spoken language, as they cannot yet understand captions and captioning when viewing a programme in a foreign language. Such programmes may need some kind of dubbing or voice-over to make them accessible.

For children, consider the use of dubbing or lecturing. Children watching a programme in a language other than their own and who cannot yet read can be helped by dubbing (voice-overs) or lecturing (partial voice-overs). – Dubbing (voice-overs) involves the replacement of the original soundtrack with an audio track in the official language of the territory where the programme is to be shown. The speech is synchronous with the original and the lip-movements correspond approximately to those of the original language.

For adults watching a programme in a language other than their own and who can read, consider the use of dubbing, lecturing (partial voice-overs) or captioning. – Captioning (intra-lingual/same language subtitles for the deaf and heard-of-hearing or interlingual subtitling/foreign language subtitling) exists in a variety of forms. Depending on the territory and the captioning traditions, the captions in the official language may be a verbatim transcription of what is said or a linguistically condensed version. The captions may use colour-coding to indicate that two or more people are speaking. The captions may contain what is said, or may also include mention of features central to the understanding of the programme, e.g. names, reactions of the speakers and noises heard on the sound track.

In dubbing countries, however, where captioning is uncommon, captions are associated with hearing impairments. Until attitudes towards captioning become more relaxed, potential users and their families may have to overcome prejudice and resistance in order to benefit from same-language captions.

3.12 Spanish-speaking countries

In majority of the Spanish-speaking countries, the foreign-language programs, films, cartoons and documentaries shown on free-to-air TV networks are dubbed into Standard Spanish, while broadcasts on cable and satellite pan-regional channels are either dubbed or subtitled. In theaters, children's movies and most blockbuster films are dubbed into Standard Spanish or Mexican Spanish, and are sometimes further dubbed into regional dialects of Spanish where they are released.

3.13 The EU Audio Visual Directive

Article 16 of the EU Audiovisual Media Services Directive states that "Member States shall ensure, where practicable and by appropriate means, that broadcasters reserve for European works a majority proportion of their transmission time".

The Directive has not provided anything about the possibilities of subtitling/dubbing foreign programs and movies. It is a controversial issue and on one side, to the objective of multilingualism, which supposes to encourage subtitling, and, on the other side, to the will of protecting national identity, for which the dubbing is an appropriate way. The article has been interpreted differently in different EU countries.

3.13.1 Romania

Romani recently excluded dubbing of foreign programs.

3.13.2 France

In France, a 1994 act provided that television and radio shall use French in their programs, with some exceptions for foreign programs. The problem is that the scope of these exceptions is very limited or not defined at all. So, most of the foreign programs have been dubbed in French media.

3.13.3 Spain

The Spanish Act on audiovisual communication (Ley 7/2010, de 31 de marzo, General de la Comunicación Audiovisual) promotes the knowledge and diffusion of the official languages in Spain. The use of subtitles in Spanish TV is common, but they are used for deaf people, not for translations into Spanish. Spain is clearly a "dubbing country", although, many young people are used to watching movies/series/documentaries in original version with subtitles -or even without them- thanks to the Internet.

Section 4: Pros & cons of airing foreign content dubbed in Urdu language by foreign entertainment channels

4.1 Advantages of Dubbing:

Dubbing is a means of enabling viewers to understand a foreign language program as if translated into national or local language. With a literacy rate of around 60%, it would not be difficult for the viewers in urban areas to understand programmes in English language. However, the majority of rural viewers would find it difficult to understand even English language programmes. Moreover, programmes in other foreign languages like Chinese, French, Spanish, Russian, German etc, if not dubbed or sub-titled in Urdu or Pakistani regional languages, would not be understood by majority of the viewers. This is especially true for children programmes where the fact that the foreign language cartoons etc. are not dubbed in Urdu or Pakistani regional languages has given rise to the availability of pirated beams of the foreign channels with Hindi dubbing.

Due to CPEC, it is likely that the number of Chinese language foreign channels will make way into Pakistan making the need for dubbing all the more important.

It is also evident from section 3 above that majority of the Asia Pacific countries either require foreign programming to be dubbed into national / local languages or there are no specific laws that prohibit dubbing of foreign language content into national or local languages. Moreover, subtitling and closed captioning are encouraged by regulators around the world to help understand the programmes by special or handicapped viewers.

Pertinently Regulation 5 of the Landing Rights Permission Regulations-2016 allow dubbing of content in all genres except Music, Film, Drama, Soap, Fashion, Lifestyle, Cooking, etc. (General Entertainment). It is also relevant to mention that under Regulation 2 (2) of the Landing Rights Permission Regulations-2016, landing rights is only be awarded to a Foreign Satellite TV Channel having foreign language content and whose principal should be foreign nationals.

4.2 Hurdles / Impediments in the way of allowing dubbing:

Some foreign satellite TV channels having landing rights permissions (foreign TV channels allowed to be downlinked / distributed in Pakistan) in Entertainment genre started airing Turkish content i.e. dramas dubbed in Urdu. The United Producers Association (UPA) as well as some local industry players, TV channels etc. reacted strongly against the dubbing in Urdu language of foreign content by TV channels having landing rights permission of the Authority (PEMRA).

The Turkish & Spanish dramas aired by the landing right channels became popular and soon satellite TV channels (local TV channels being uplinked from Pakistan) also started airing foreign language dramas dubbed in Urdu in the rat race for rating. The main attraction for the dubbed dramas is easy availability, low cost and high quality of production, when compared with the cost and quality of local production. Channels mostly aired these foreign dramas dubbed in Urdu during the prime time (7 to 11 pm).

While there were no regulations prohibiting or otherwise the dubbing of foreign content in Urdu language by TV channels having landing rights, there are restrictions on airing of foreign content by satellite TV channels. The relevant provision of the terms & conditions of satellite TV channels is reproduced as under:

7.2 *The Licensee shall be allowed 10 % foreign content, the break up of 10 % is as follows:*

- i. 40% of the 10% (4% of the overall) may be English content.*
- ii. 60% of the 10% (6% of the overall) may be Indian or other content.*

However, the Authority in its 120th Meeting held on 19th October, 2016 withdrew its earlier permission granted for allowing broadcast of 6% Indian content of overall content. Therefore, the 10% foreign content which may be aired by STV channels can be foreign content excluding the Indian.

4.2.1 Views against the Dubbing:

The United Producer Association (UPA) has time and again spoken against the influx of foreign language dramas dubbed in Urdu. It is of the view that dubbing of foreign content (i.e. Turkish & Spanish Dramas etc.) into Urdu language has a devastating effect on the drama industry of Pakistan as these dramas are against our social & cultural values and this has encouraged local entertainment channels to replace our local dramas with dubbed foreign content. According to UPA the future of local actors, writers and

producers is at stake. UPA has presented their case at various forums including the meetings of the Standing Committees of National Assembly & Senate on Information & Broadcasting. The demands of the UPA at these forums can be summarized as under:

- i. foreign content, dubbed in Urdu or any language spoken in the country should not be aired on TV channels and cable networks during the prime time;
- ii. foreign content should be allowed in its original language with subtitles in Urdu / English;
- iii. PEMRA should review all its rules and regulations which are adversely affecting the local Dram industry; and
- iv. PEMRA should keep a close eye on the foreign content telecast on TV channels granted licences / landing rights in terms of censorship.

4.2.2 Views in favor of Dubbing:

Broadcasters (especially the landing rights permission holders) are of the view that if sub-titling instead of dubbing in Urdu for foreign entertainment programmes e.g. dramas, soaps, films etc. is used, the channels will lose viewers. Any regulation prohibiting dubbing of programmes in Urdu will have a direct impact on entertainment genre channels. They are of the view that the channels are promoting the local drama & dubbing industry and that they have revived the dubbing industry and currently hundreds of people are engaged by various channels & companies for dubbing of foreign content into Urdu. Now, the trends of the local media industry has also shifted and many satellite TV channels have also started dubbing of foreign content in Urdu language. The broadcasters argue that because of the dubbed content, the quality of local content has improved.

Section 5: Issues for Consultation:

A. For Foreign TV channels having Landing Rights Permission of PEMRA:

Note: Foreign TV channels having Landing Rights Permission of PEMRA (**hereinafter referred to as landing rights channels in short**) can only be downlinked / distributed within the territory of Pakistan and cannot be uplinked from within Pakistan. These channels are required to have 100% of foreign content only during 24 hour transmission including repeats. Examples of LRP channels are CNN, Cartoon Network, Discovery, Animal Planet, CCTV News, Cinemachi Kids, Tens Sports etc.

Question 1:

Whether dubbing in Urdu or Pakistani local or regional languages of foreign entertainment content e.g. film, drama, soap, fashion, lifestyle, cooking, music etc. (i.e. Entertainment genre of landing rights permission (refer to section 4 of PEMRA Landing Rights Permission Regulations-2016 available on www.pemra.gov.pk) be allowed on foreign TV channels having landing rights permission of PEMRA ?

Question 2:

If Answer to Question 1 is Yes, should dubbing be allowed at all times without any restriction during the 24 hour transmission (fresh & repeats) including the Prime Time (7 to 11 PM) on a landing rights channel or otherwise?

Question 3:

If dubbing in Urdu or Pakistani local or regional languages of foreign content is to be allowed on landing rights channels, should there be a capping or restriction on the maximum time allowed for dubbing of foreign content i.e. say 30-50% of the total transmission in 24 hours including repeats?

Question 4:

If answer to question 3 is Yes, should the allowed time or percentage of dubbing of foreign content on landing rights channel be required to be equally distributed during 24 hours transmission including repeat rather than distributing by the landing rights channel the whole of allowed time or percentage for dubbing of foreign content during Prime Time (7 to 11 PM) only?

Question 5:

Should the landing rights channels be allowed to be uplinked from within Pakistan (as against the current restriction of being downlinked only in Pakistan while uplinking from abroad)?

Clarification for Question 5: The reasons in support of allowing landing rights channel to uplink from Pakistan is the generation of economic activity in Pakistan, inflow of foreign investment by international broadcasters which may lead to growth of the broadcasting sector, healthy competition, improved quality content for the viewers, employment generation etc. The reasons against the permission for landing rights channel for uplinking from within Pakistan include sharing the advertising revenue of the satellite TV (local TV) channels by the landing rights channels, influx of foreign content, blurring of the segregation in landing rights and satellite TV licensing categories,

B. For Satellite TV Channels (Pakistani/ Local TV channels being uplinked from within the country) licensed by PEMRA:

Note: Satellite TV (STV) channels are Pakistani TV channels licensed by the Authority (PEMRA) for uplinking/ originating from within Pakistan for distribution (through cable TV etc.) to the viewers in Pakistan. These channels (hereinafter referred to as Pakistani Channels in short) are required to carry at least 90% of indigenous (Pakistani origin) programmes/content and a maximum of 10% foreign content (excluding Indian content the airing of which was prohibited by the Authority in October, 2016) during the 24 hour transmission including repeats. Examples of STV channels are Hum TV, Geo News, Samaa TV, AVT Khyber, ARY News etc.

Question 6:

Whether dubbing in Urdu or Pakistani local or regional languages of the 10% foreign content (excluding Indian content) allowed to the Pakistani TV channels during 24 hour transmission including repeats be permitted in entertainment genre programmes e.g. film, drama, soap, fashion, lifestyle, cooking, music etc. ?

Question 7:

If Answer to Question 6 is Yes, should dubbing of the 10% foreign content be allowed at any time during the 24 hour transmission including the Prime Time (7 to 11 PM) or otherwise?

Question 8:

If dubbing in Urdu or Pakistani local or regional languages of the 10% foreign content allowed to Pakistani TV channels is to be permitted, should there be a capping or restriction on the maximum time allowed for dubbing of the 10% foreign content (excluding Indian content) i.e. say 30-50% of the 10% foreign content allowed during the total transmission in 24 hours including repeats?

Section 6: Response time/Deadline for Submission of Comments:

For any queries related to the issues of consultation elaborated above, undersigned may be contacted at telephone number, fax number or e-mail address, given below. PEMRA (Landing Rights Permission) Regulations-2016 can be downloaded from www.pemra.gov.pk. The questionnaire/ issues for consultation can also be accessed directly online by visiting <https://goo.gl/vN5DZv>

Response to the above questions and any other additional points related to the issue under consideration along with reasons & justification may be submitted in writing, through fax or e-mail latest **by 7th August, 2017 till 1600 hrs PST** at the following address:

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