

CABLE OPERATORS SANGRAM ASSOCIATION.

REGISTERED UNDER WEST BENGAL SOCIETIES REGISTRATION ACT 1961

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To,

Mr. Sunil Kumar Singhal,

Advisor (B&CS)

TELECOM REGULATORY AUTHORITY OF INDIA

Government of India

Mahanagar Doorsanchar Bhawan, Jawahar Lal Nehru Marg

New Delhi – 110011

Respected Sir,

COMMENTS ON TRAI CONSULTATION PAPER No 1

Once again, we are proud to utilize the chance to elucidate our comments to you on the subject of STB is said to be interoperable of STB.

We the Association of Cable TV Operators of West Bengal take this opportunity to sending our comments as a brief form. We on behalf of our members we humbly request you to add our name in your regular mailing list of the consultation papers and enable us to participate in time.

At very outset, it can say that the definition of Television changed to “MAGIC BOX” from “IDIOT BOX” with the help of course of Cable Television and yet to change “INTERACTIVE BOX” in near future with the mission of our beloved Prime Minister “DIGITAL INDIA”.

However the poetical matter of routine to get pleasure in the program of Cable Television suddenly break with the edict of Govt. of India to introduce Set Top Boxes to have the benefit of the program of Cable Television. At first Indian Cable Television viewer feels that they are not at liberty to gather information or enjoy Cable Television program as they privileged since 1990. Ultimately, the Indian Cable Television households segregated according to their affordability.

It is a great pleasure that TRAI has take program of **interoperability of Set Top Boxes**, which gives the subscriber an option to take the STB on rent or hire purchase basis giving him enough flexibility to be able to switchover from one operator to another at least cost, alternately STB is said to be interoperable if it can receive any service from any network.

Apologetic to say sir, we on behalf of the Cable TV Operators neither trying to earn sympathy on the emotional ground nor advocating as a political leader as we are not in any way in the arena of politics, every day we expertise with the ground realities but we have no remedies to get rid of the adverse situation.

The mandate of Set Top Boxes especially become burden of the people of middle and lower income group, because of the additional investment of hardware ,unknown durability, additional consumption of Electricity, preference of purchase the hardware not substantial according the households , they compel to tolerate with reticent the perseverance of supplier of Set Top Boxes. They failed to receive even if a copy of receipt of purchase. The scheme involving guaranty and/or warranty of Set Top Boxes not so far their knowledge, even more they do not know

the competency of Set Top Boxes whether harmonized with the climate of topical country like India.

We welcome the opportunity to respond to the Telecom Regulatory Authority of India (TRAI) in the form of a comment on consultation paper “Technical Interoperability of Set Top Boxes.” Please find our response to the consultation paper. We would definitely like to participate if any further opportunity provided to us to discuss on this issue and looking forward to the new consultation papers in future.

To achieve technical interoperability of Set Top Box a Common Interface (CI), unit is necessitate in STB, which can support different Conditional Access Module (CAM) for different operators.

However, to get advantages of interoperability of Set Top Box Subscribers have to bear additional cost of CAM's, therefore it will not beneficial for the Subscribers when they have already pay money for the STB with additional payment of CAM. The market price of CAM is close to Rs900 so customer would still prefer to buy a STB rather than buying a CAM.

Through Technical Interoperability subscriber can only use the service of other head end service provider by changing the CAM. But the other modules of STB like Electronic Program Guide (EPG), the basic text that help to find the way the labyrinth of channel on offer, will remain the same which bring under control customers from using several other services provided by the new head end service provider.

In the technical aspect, though technical interoperability is potential. Nevertheless, it is beneficial either the customers or the head end service providers. It will not reduce the cost for customers because of hardware and will only add to the complexity from head end service provider's point of view.

There is no need to mandate any particular standard to achieve technical interoperability because of the following reasons

1. In order to improve the flexibility of STB cost of the same will increase and operators will be bound to charge more from customers.
2. If we follow a particular standard for manufacturing all STB then we need to change our whole system even for the minute change in the technology.
3. Following a mandated technology will hinder further adoption of new technology.
 4. Presently the original cost of the Set Top Box is more than what is offering to the customer. If any technology is mandated, then all the operators will use same STB architecture that will lead to increase the churn rate and operator may have to suffer loss. Thus in order to compensate the losses they will charge higher amount initially.

If technical interoperability for STB is possible but impractical, is there any other mechanism to safeguard the interests of the subscriber.

Since Technical, interoperability is not a viable option for the subscriber as well as head end service provider. The head end service provider may go for the Commercial interoperability. In this case, it can be said that if any subscriber wants to move from one head end service provider to another then he can return the STB to the previous head end service provider and get back the money that not agreed upon even after about three years of inception of Digitization in the different part of country. Commercial interoperability will also benefit the customer if he wants to move to cable TV or IPTV in future. For this purpose there should be a mandate law that ensure that customer get a fixed portion of amount back which incurred in buying the CPE earlier.

The other option is to get STBs designed as described above. The CAM shall have to be provided by the preferred head end service provider to insert alternate CAM in the CI slot.

The interest of Subscribers in this regard can be protected through the provision for commercial interoperability of STB, as well as viable exit option to the Subscribers in case they want to switch operator platform.

Thanking You

Yours faithfully

Apurba Bhattacharya

Secretary

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