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To

Mr. Sunil Kumar Singhal

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Mahanagar Doordarshan Bhawan,

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From:

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**Sub:- Comments on Pre-Consultation Paper on "Set Top Box Interoperability"**

**Note:- We feel regret for not Submitting it on due date.**

**Hereby, Dr. A.K. Rastogi, President, All India Aavishkar Dish Antenna Sangh on behalf of Indian Broadcasting & CATV industry would like to submit the views/comments on the Pre-Consultation paper on Set Top Box Interoperability for your perusal and further necessary action at your end:**

Before going into deep of Inter-operability of Set-Top-Boxes it is better to understand what is inter-operability in Set-top-boxes and why the Telecom Regulatory Authority of India intend to introduce it in Cable T.V. & Direct to Home T.V. services. Though two other modes of T.V. Broadcasting are Internet Protocol T.V. (IPTV) and Head-end in the Sky (HITS) but they are not so common. There are 7 DTH operators, 2 IPTV operators, 2 HITS operators and total 840 Multi system Operators (609 Provisional licence holders & 231 Permanent licence holders in which half a dozen National level MSOs, Regional MSOs and local MSOs) providing TV services through Addressable System in the country.

The reception of the Cable TV services (provided through Digital Addressable System) requires a Customer Premises Equipment (CPE) which is connected with the T.V. set. In DTH the CPE comprises of a Set Top Box (STB), a small Dish antenna along with Low- Noise block Down Converter (LNBC) and Radio Frequency (RF) whereas in Digital Cable T.V. services, the CPE comprises of STB only.



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Presently the STB of a particular operator installed at the premises of a subscriber can not be used by the subscriber for reception of signals of the other operators. In such a scenario every time when a subscriber wants to avail the services of the new operator he buys again a new STB because STB supplied by the previous service provider can not receive the signals of the new service provider. In other words we can say that STB is non transferable device. This is called non-interoperability. Now the Digital Addressable System is spreading its wings and the 31<sup>st</sup> Dec. 2016 is the last date fixed by the Information & Broadcasting Industry to implement the fourth phase of DAS. In every part of the country the Broadcasting either by cable T.V. or DTH would only be possible through the Set Top Box. Without Set Top Box a T.V. set will be a 'Dabba' because it will not catch the signal of F.T.A Channels also.

On 1<sup>st</sup> Nov, 2012 during the regime of congress led UPA Govt., the first phase of DAS was implemented in four metro cities Delhi, Mumbai, Chennai & Kolkatta. The second phase implemented on 1<sup>st</sup> April 2013 covered 38 important towns of India. During this period the MSOs invested a lot to procure the STB from foreign manufacturers because that time no manufacturing of STB were being done in India. As per report submitted by DTH operators to TRAI, as on Dec 2015, around 85 million of STBs have been either sold or provided to the subscribers in the market out of which only 55 million are in active mode. This indicates that around 30 million STBs are lying unused, mainly because of non- interoperability of STBS.

Inactive STBS can not be used for the reception of services of the operator, the money invested into the STB gone waste and it also results in e-wastage. Considering an initial capital expenditure around 25 dollar per STB, a total of 750 million dollars is lying unused. The exact data of inactive STB is not available but it may be very large.

To understand the need of STB, we will have to go back in 2003 when Cable T.V. Act 1995 was amended and ACT of conditional Access System (CAS) was passed in both the houses of parliament to shift the Broadcasting Industry from Analog System of Digital. After the signature of the president it became Law on 14<sup>th</sup> Jan, 2003. That time need of STBs was first felt and Cable industry of that time was working on Digitize Technology. So as per Analog Technology STB were to be purchased. The Cable Industry invested alot in purchasing the STBs. Most of them were installed but it was the bad luck of the cable T.V. Industry that conditional Access System could not be implemented. During that period Sushma Swaraj was the I&B minister. She also did her best in implementing the same but she failed to do so. On 1<sup>st</sup> Jan, 2007 the first phase of CAS was some how implemented after the pressure and interference of the Delhi High Court. But it was again bad luck of CAS that the govt. in the centre was changed and congress again came in power. Congress also wanted to digitalise the Broadcasting Industry. The I&B ministry divided the digitalized technology in four phases to be implemented in each & every part of India. Therefore the service providers needed STBS in big numbers which was very difficult to procure them as they were to be imported on high Cost. Already they had suffered a lot as they had purchased the STBs in bulk with heavy investment during CAS. They were now not in position to acquire more so most of the service providers don't want to invest in STBs. They went to High Courts to get stay against Govt's decision to implement the third phase from 31<sup>st</sup> Dec, 2015. The matter is still lying in many state High courts and the third phase of DAS was delayed. The Last date for fourth phase is 31<sup>st</sup> Dec, 2016 but what would be the fate of this phase nobody knows.

Meanwhile the need of inter-operability of STBs was aired. The TRAI has invited the views of all the



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manufacturers to give their views whether inter-operability is feasible or not. After receiving the views of concerning persons TRAI will make its mind to implement it or not.

If we look STB technically for inter-operability, we think that inter-operability is not possible because it is technically very complex and every service provider puts some special features in their hardware for their safety purposes, secondly the slot in the STB does not alone serve the purpose. It is not mobile. In mobile one chip issued by any company can be used in any handset. For instance if one takes the service of idea and after sometime due to any reason he wants to change the service provider, he may put the chip of any other mobile company in the same handset.

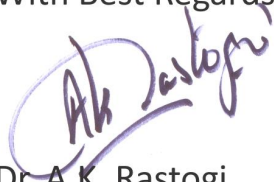
TRAI has taken up the issue relating to development of inter-operability in Digital Television Broadcasting sector that should be compatible across various platforms. STB inter-operability would empower the consumers to change their cable T.V. or DTH service providers whenever required, without changing their STBs and the without any major cost implications. This would shift the focus of the sector towards providing better quality of services to the consumers at competitive prices.

On the recommendations of TRAI for technical inter-operability of STBs, the govt. has mandated the provision of CI slot in the STBs deployed by DTH service providers the CI slot exists in the already deployed DTH STBs. However this effort has not been fruitful in the meeting the objectives of inter-operability in India due to various reasons, some of which are captured here. The availability of CI slot is not sufficient to achieve inter-operability as other modules of STB like tuner, middleware, operating system etc. also require updation on change of service provider. Most of the DTH operators have not offered to customers the option of CAM card in place of STB.

There is a big difference between Telecom & Broadcasting Industry. In telecom Industry there is no possibility of Piracy and Privacy is maintained as it is based on Audio System. In a very special circumstances phones are tapped or recorded but in Broadcasting Industry Privacy & Piracy can not be maintained as thousands of viewers watch T.V. programme. In inter-operability of STBs secrecy can not be maintained.

Under such circumstances it is very difficult to implement inter-operability as the interest of Service providers don't encourage this system. What step would be taken by the TRAI in this regard nobody knows but in present scenario lot of criticisms are being witnessed.

With Best Regards



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