



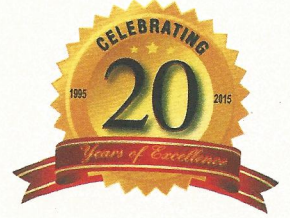
ब्रॉडकास्ट इंजीनियरिंग कंसल्टेंट्स इंडिया लिमिटेड  
(सूचना एवं प्रसारण मंत्रालय के अधीन-भारत सरकार का उद्यम) (मिनि रत्न कम्पनी) (CIN - U32301UP1995GOI017744)

**BROADCAST ENGINEERING CONSULTANTS INDIA LIMITED**

(A Government of India Enterprise - Under Ministry of Information & Broadcasting) (A Mini Ratna Company)

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A. **BECIL Comments on the relevant issues mentioned in the TRAI Consultation Paper on Interconnection framework for Broadcasting TV Services distributed through Addressable Systems dated 4th May, 2016**

Issue 11: MINIMUM TECHNICAL SPECIFICATIONS [3.63 - 3.67]

- 11.1 Whether the technical specifications indicated in the existing regulations of 2012 adequate?

**BECIL Comments:** *The technical specifications indicated in the existing regulations of 2012 are not adequate.*

- 11.2 If no, then what updates/ changes should be made in the existing technical specifications mentioned in the schedule I of the Interconnection Regulations, 2012?

**BECIL Comments:** There are certain ambiguities in the interpretation of existing schedule I guidelines which in BECIL opinion needs to be rectified. These ambiguities are mentioned point-wise below:

- Para A point no. 3 of Schedule I of TRAI Regulations regarding "The STB and VC should be paired from the head-end to ensure the security".

**BECIL opinion:** *It is observed that some of the MSOs give SMS access / rights to their LCOs to pair the STB and VC at the LCO premises. It may be specified whether it is permissible or not to ensure security of the system.*

- Para A point no. 8 of Schedule I of TRAI Regulations regarding the reporting module of SMS.

**BECIL Opinion:** *We suggest that the format template of reports generated through SMS should be standardized. It may contain the Header of Report, Run date and Run time, Name and Logo of MSO, along with the information filters using which the report is generated.*

- Para A point no. 10 of Schedule I of TRAI Regulations regarding "Both the CA & SMS systems should be of reputed organization and should have been currently in use by other pay television services that have and aggregate of at least one million subscriber in the global pay TV market".

*Pratap*



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**BECIL Opinion:** This requirement constrains the choice of the product for the operator in the global PAY TV market despite being compliant with Schedule I of TRAI regulations. It may also lead to monopolistic business practices as it will not allow new player to enter into the market. The DPO must have the options to choose the best product with affordable price and compliance to the regulations.

- Para A point no. 11 of Schedule I of TRAI Regulations regarding “The CAS system provider should be able to provide monthly log of the activations on a particular channel or on the particular package”.

**BECIL Opinion:** It should be suggested that concerned operator should be able to generate monthly log of the activations on a particular channel or on the particular package or both through the CAS . It may also be mentioned that it’s the responsibility of DPO to maintain these records for at least 2 years for reconciliation of logs with SMS in case of any dispute arises regarding the subscriber base.

It has been observed in case of centralized CAS system DPO generally segregates the subscriber data in CAS system on the basis of package IDs to indicate subscriber numbers at different locations. In our opinion it is not a full proof mechanism for segregation of subscriber numbers based on region/location as it is technically possible to use the same package Id for other location as well. Keeping in view of the same, it is suggested that TRAI may advise CAS operators to devise a proper mechanism to maintain the region/location wise segregation of subscriber data in case of centralized CAS architecture.

- Para A point no. 14 of Schedule I of TRAI Regulations regarding “CAS and SMS should have provision to tag and blacklist VC numbers or the STB numbers that have been involved in piracy in the past to ensure that the VC or the STB cannot be re-deployed”.

**BECIL Opinion:** It should be clarified whether the CAS and SMS should be able to blacklist STB & VC independently or SMS and CAS should be integrated for blacklisting process from SMS to be simultaneously done through both the system. In case of Carded CAS it should also be clarified whether both the STB and VC need to be blacklisted or blacklisting of either STB or VC would meet the aforesaid purpose.

- Para C Point No. 9 of Schedule I of TRAI Regulations regarding the “The STB must be BIS compliant”.

**BECIL Opinion:** There are many BIS standards for STBs such as performance requirements (Digital Cable TV STB IS: 15245) and for safety requirements (IS: 13252). It should be specified separately that which BIS compliance is mandatory for DTH STB, CABLETV/HITS STB and IPTV STB.

*Pratish*



- 11.3 Should SMS and CAS also be type approved before deployment in the network? If yes, then which agency may be mandated to issue test certificates for SMS and CAS?

**BECIL Comments:** SMS and CAS should not be type approved before deployment in the network as it will not serve the purpose because even after type approved both the CAS and SMS may not comply with TRAI regulations when are put in particular DPO and operate in an integrated manner along with STB.

- 11.4 Whether, in case of any wrong doing by CAS or SMS vendor, action for blacklisting may be initiated by specified agency against the concerned SMS or CAS vendor.

**BECIL Comments:** Yes, in case of any wrong doing by CAS or SMS vendor, action for blacklisting must be initiated by specified agency (TRAI or MIB) against the concerned SMS or CAS vendor.

**Issue 12:-TECHNICAL AUDIT OF ADDRESSABLE SYSTEMS [3.68-3.72]**

- 12.1 Whether the type approved CAS and SMS be exempted from the requirement of audit before provisioning of signal?

**BECIL Comments:** As mentioned above, the SMS and CAS should not be type approved and therefore this request would not arise.

- 12.2 Whether the systems having the same make, model, and version, that have already been audited in some other network and found to be compliant with the laid down specifications, need not be audited again before providing the signal?

**BECIL Comments:** Every SMS or CAS having the same make, model and version should be audited irrespective of being audited in some other network and found to be compliant. The manner of operations used by DPOs for CAS & SMS having same make, model and versions are different by different DPOs. Moreover, the integrations of CAS and SMS and its features supporting TRAI regulations also depends of the type of STB models which again are different for different DPO.

In view of this, simple audit of CAS and SMS in any other system will not serve the purpose. These have to be audited in the particular system when they are put to ensure proper compliance.

- B. **BECIL Comments on the observation made in section “Technical audit of addressable systems” in point 3.69 of page 42 in the TRAI consultation paper dated 4th May, 2016**

*It has been mentioned in the referred consultation paper that “many MSOs have raised the issue regarding delay in completion of audit by BECIL”.*

**BECIL Comments:** In this regard, we would like to apprise that till date there has been no delay in all the audits conducted by BECIL. It may be mentioned that, BECIL conducts two types of audits, these are:





1. The audit in the matters under dispute in Hon'ble TDSAT. These cases are referred to BECIL by Hon'ble TDSAT and as per its directions BECIL conducts audit and submits reports within stipulated time frame.
2. BECIL conducts the audit after getting the request from DPOs in reference to TRAI regulations. In these cases, BECIL conducts the audit visit and communicates the observations/findings within 7 working days to the client. After communicating these findings, it is the responsibility of DPO/client to rectify the same in order to ensure compliance to TRAI regulations. As soon as the client confirms that all the voids pointed out by BECIL have been duly addressed, BECIL again conducts the audit and if the system meets the regulatory requirements then BECIL immediately issues the certificate of compliance to client. The delay in audit process if any is only from the client end and is generally due to the time taken to rectify the shortcomings pointed out by BECIL.

Since, it has been mentioned that many MSOs have raised the issue regarding delay in completion of audit, BECIL would like to know the specific cases where there were delays on account of BECIL have been reported, so that BECIL can counter such comments and convey correct position.

  
Prateek Katoch 2/06/2016  
(Assistant Manager, BECIL)

