



BY HAND/ELECTRONIC MAIL

25th August, 2017

To,

Advisor (B&CS)
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
Old Minto Road,
New Delhi - 110 002

JA - T
28/8/17

Dear Sir,

Re: Submissions to Telecom Regulatory Authority of India ("TRAI") in response to the Consultation on "Solution Architecture for Technical Interoperable Set Top Box", 2017.

At the outset, we would like to thank the Authority for giving us an opportunity to tender our views on the Consultation on "Solution Architecture for Technical Interoperable Set Top Box", 2017.

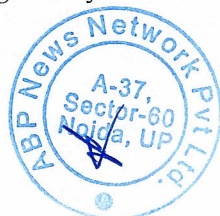
In regard to the present consultation process, we submit that we have perused the said paper highlighting the intricacies of the draft carefully. We hereby submit our comments attached as Annexure. The said comments are submitted without prejudice to our rights and contentions, including but not limited to our right to appeal and/ or any such legal recourse or remedy available under the law.

The same are for your kind perusal and consideration.

Yours Sincerely,

Kishan Singh Rawat
Head of Admin & Regulatory Affairs

Encl: As above



सलाहकार (वी.एण्ड सी.एस.-II)
आयरी सं. 1726
दिनांक 28.8.17

भारतीय दूरसंचार विनियामक प्राधिकरण
महानगर प्रसंचार भवन, नई दिल्ली-2
25 AUG 2017
आयरी सं. 16017

Advisor (B&CS)
By No. 1717
Date 28/8/17



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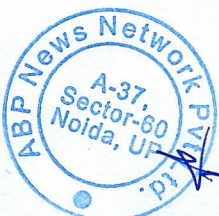
Re: Submissions to Telecom Regulatory Authority of India ("TRAI") in response to the
Consultation on "Solution Architecture for Technical Interoperable Set Top Box"

Kind Attention:

Advisor (B&CS)
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
Old Minto Road,
New Delhi - 110 002

At the outset, we would like to thank the Regulator for initiating an exercise on facilitating the provision of solution architecture toward interoperability of Set Top Boxes ("STBs") in the Broadcasting space and we are glad that the initiative is being guided towards a logical conclusion. In this regard we state that given the need for increasing measures in order to facilitate interoperability of STBs in the Broadcasting Sector, the intent of launching such an exercise is wholly and solely supported by us.

The importance of STBs is impossible to overlook and it has played the role of tremendous importance in improving the quality of services offered by the Broadcasters. Having usage in cable television, satellite television, and over-the-air television systems, it plays the crucial role of facilitating dissemination of quality content from the Broadcasters to the end users. The role of STBs further becomes crucial as rightly pointed out by TRAI in the present Consultation as *"the STB receives TV signals from distribution network and decodes them into viewable form on a TV set. STB enables the subscriber to view only those TV channels which he/she*



has subscribed" and thus is at the helm of consumer centric innovations in the Broadcasting Sector.

As rightly pointed out by the Regulator, lack of technical interoperability of STBs between different service providers and a non-availability of STB in an open market are major challenges that have to be addressed at the Regulatory as well as market level to provide better services to the consumers. As in Sim-Card portability which has been tried and experimented in the past and to successful results, STB inter-operability will lead to less e-waste and maximum utilization of resources alongwith making things easy for consumers which is an objective both Regulator and players in the industry strive for.

Thus, we feel that the present consultation being an exercise to introduce interoperability of STBs in India will make the eco system of STB flexible and much more efficient. The need of the hour is a technological shift that can break the barrier of manufacturing of end-to-end verticals of STB Manufacturer, Chip designer, CAS manufacturer, middleware, and DPO exclusively resulting in STB being specific to the combination of DPO, CAS provider and STB manufacturer resulting has to be broken to usher the dissemination of Broadcasting signals through Digital Addressable Systems into a new era of interoperable STBs.

A demystification of Set Top Box manufacturing in India done by this article- <http://cablequest.org/index.php/articles/digitization/item/7973-demystifying-set-top-box-manufacturing> published in Cable Quest is quite revealing of the present scenario of the Set Top Box manufacturing in India.

Given that market for manufacture of STBs is dominated by foreign players, it is imperative that more and more Indian players are encouraged to get into the market which will fulfil the dual goal of the present Government to further strengthen both "Make in India" via manufacturing of STBs in India which will not only create jobs and revenue while saving foreign exchange but also further the Prime Minister's mantra of "Digital India" through Digitization of Television Services.

It is imperative that the Government wastes no time in granting requisite approvals toward the project of interoperability so that we all can experience the fruits of its benefits at the earliest possible.

We thank the Authority for their initiative in attempting to review the existing market with the objective of introducing interoperability of STBs to the Broadcasting Industry and the encouragement to produce the same in India.

