

Annexure-1

Bharti Telemedia Limited (“Airtel’s”) Response to TRAI’s (Draft Regulation, “The Telecommunication (Broadcasting And Cable) Services Interconnection (Addressable Systems) (Amendment) Regulations, 2019 dated 27th August 2019.

Section C Clause 2.

The SMS shall be independently capable of generating, recording, and maintaining logs, for the period of at least immediate preceding two consecutive years, corresponding to each command executed in the SMS including but not limited to activation and deactivation commands.

Airtel’s Response:

From the perusal of the above clause, we understand that the above requirement is applicable for activity logs on a customer account. Trust the understanding same is aligned with the intent of the above clause.

Section C Clause 8:

The CAS and the SMS should be able to activate or deactivate services or STBs of at least Five percent (5%) of the subscriber base of the distributor within 24 hours.

Airtel’s Response:

In this regard, we submit that the capacity of the CAS and SMS should be linked to the volume of transactions rather than the subscriber base. The rationale for the same is that each subscriber can generate multiple volumes of transactions and hence to handle these transactions of a single customer, the system is equally consumed and therefore, the correct assessment of the system capacity should be linked to the transaction count instead of subscriber base. The subscriber base may not be the appropriate criteria to assess the capacity of CAS and SMS, more so, in the current framework when a single customer can generate more than one transaction in terms of activation/deactivation of channel, recharge etc. We therefore, suggest that the criteria of 5% should be measured in context to total volume of transactions.

Section C Clause 10:

The CAS and SMS should be capable of individually addressing subscribers, for the purpose of generating the reports, on channel by channel and STB by STB basis.

Section C Clause 13:

The SMS should be capable of generating reports, at any desired time about:

- (i) The total number of registered subscribers.*
- (ii) The total number of active subscribers.*
- (iii) The total number of temporary suspended subscribers.*
- (iv) The total number of deactivated subscribers.*
- (v) List of blacklisted STBs in the system.*
- (vi) Channel and bouquet wise monthly subscription report in the prescribed format.*
- (vii) The names of the channels forming part of each bouquet.*
- (viii) The total number of active subscribers subscribing to a particular channel or bouquet at a given time.*
- (ix) The name of a-la carte channel and bouquet subscribed by a subscriber.*

(x) *The ageing report for subscription of a particular channel or bouquet.*

Airtel's Response

The generation of reports (as referred to in above clauses) by the SMS and CAS is the functionality available for a date which is prospective. Therefore, with a prior reasonable notice, the data may be extracted. Any extraction of data for the past period is only possible for such times and frequencies as has been pre-defined in the system.

Section C Clause 15:

The CAS shall be able to tag and blacklist VC numbers and STB numbers that have been involved in piracy in the past to ensure that such VC or the STB cannot be re-deployed.

Airtel's Response

All the VC and STB numbers identified and involved in piracy are deactivated from the CAS and they reflect as "Deactivated" cases in the CAS. We submit that the intent of the clause is that CAS should be equipped to deactivate VC and STB as an action against piracy. Therefore, CAS supports this requirement and also ensures that such deactivated VC or STB's are not re-deployed. We trust that the same is aligned with the spirit of the clause.

Section C Clause 17:

The SMS shall be capable of generating bills for each subscriber with itemized details such as the number of channels subscribed, the network capacity fee for the channels subscribed, the rental amount for the customer premises equipment, charges for pay channel and bouquet of pay channels along with the list and retail price of corresponding pay channels and bouquet of pay channels, taxes etc.

Airtel's Response

We submit that the requirement of generation of bills is applicable for the post-paid services and we therefore, suggest that clause must specify the same to avoid any confusions.

Section C Clause 20:

Upon deactivation of any subscriber from the SMS, all programme/ services shall be denied to that subscriber.

Airtel's Response

Apart from linear channels, there are some of the channels which contains customer care related information /features being played viz; customer care programming channels. Once the subscriber is deactivated, while it is ensured that all the channels/services are discontinued however, these consumer related channels may continue even post deactivation.