

To,
Sh. Anil Kumar Bhardwaj,
Advisor (B&CS)
Telecom Regulatory Authority of India

Reference: Consultation Paper No.12/2022.

Subject: Our response and comments on issues related to Draft Regulations 2022 raised in this CP with detailed reasons and Justifications including supporting Annexures.

Dear Sir,

We are an I.S.P operating since 1999 in the states of Andhra Pradesh, Telangana and Karnataka.

We are distributor of IPTV Services as a Value Added Service (VAS) to our broadband consumers.

We are submitting our response related to Consultation Paper No.12/2022 by TRAI

Table-2 Sl.No.33

IPTV transmission has to be in multicast mode only just like cable TV transmission. There cannot be any such case where unicast is allowed.

Our Response to the above Clause with Reasons and Justification:

All Broadband distribution networks are unicast only and if unicast is not allowed for IPTV we need to build an exclusive network for IPTV and there is no business case to implement.

If IPTV is allowed in unicast transmission, we can use our existing broadband distribution network and participate in the growth of internet broadband penetration including rural areas.

Multicast Networks does not support Point to Point Wireless links and home WiFi devices.

If IPTV service need to be restricted within our network we can use private internet address range which have been reserved by IANA as per below table.

The Private IP address ranges have been documented in RFC 1597 and RFC 1918

S No.	Reserved IP Address Range	Network Class
1	10.0.0.0 — 10.255.255.255	Class A
2	172.16.0.0 — 172.31.255.255	Class B
3	192.168.0.0 — 192.168.255.255	Class C

The Internet Assigned Numbers Authority (IANA) is a standards organization that oversees global IP address allocation.

Table-2Sl. No.34

IPTV transmission should not be allowed to configure any content delivery network (CDN) in their system to deliver linear content to STBs.

Our Response to the above clause with Reasons and Justification:

CDNs help in overcoming the bandwidth bottlenecks in the distribution trunk lines.

If CDNs are not allowed in the distribution network all the customers have to be connected only to the source from the MSO and the cost of network bandwidth will be much higher than the NCF charges fixed by TRAI.

We are already hosting CDN Servers provided by Netfilx, Akamai, Facebook and Google and saving huge network bandwidth and passing the cost benefit to our broadband consumers.

To provide equal quality services to our IPTV consumers we need to host CDN Servers from the MSO/IPTV service providers.

Our Comments and additional amendments proposed

Smart TV as Virtual Set-top-Box

SMART Televisions are rapidly increasing their market share in television sales in India and global market.

Major Broadband service providers currently are bundling OTT applications along with broadband plans. Popular OTT Applications in India are including content from Indian broadcasters including live TV channels. Since the pricing and content is currently unregulated for these OTT Players some of the big ISP providers are having undue advantage of the pricing from these OTT players.

We are interested to promote IPTV services which are regulated by TRAI and offers level playing field for all distributors.

Investment for Set-top-Box from the MSO is a stumbling block for promotion of IPTV service.

In this regard we request you to consider use of MSO Application in Smart TV as Virtual Set-top-Box which helps in migration of consumers to their preferred service providers without any upfront additional investments for the distributor or the consumer.

IPTV Service in Smart TV enables Television Distribution Services in India to catch up with Global Television industry in standards and quality.

Thanking You

Regards,

S. Raghava Rao
Chairman & Managing Director
City Online Services Limited