From: **Manjari Sheela** <manjari.sheela@digicable.in>
Date: Jun 22, 2016 3:41:59 PM
Subject: Response of Digicable for Pre-consultation paper on Infrastructure sharing in Broadcasting TV distribution sector
To: sksinghal@trai.gov.in, gs.kesarwani@trai.gov.in
Cc: Jagjit Singh Kohli <jsk@digicable.in>

Dear Sir,

Please find below the inputs/comments from Digicable Network (India) Ltd on "Pre-consultation Paper on Infrastructure sharing in Broadcasting TV distribution sector" which was published on 23rd May 2016.

(a) In addition to infrastructure sharing possibilities discussed in pre-consultation paper what more can be shared by the DPOs (MSOs, HITS, DTH) for better utilization of infrastructure?

In case of HITS, the guidelines clearly provide for infrastructure sharing under the passive infrastructure sharing option. This is a brilliant concept which has not been allowed to take off so far purely due to non-co-operation by some major pay broadcasters. These broadcasters keep citing the reason that in case of default of payments by any one service provider sharing the infrastructure, they will have to shut off the IRD which means all other service providers on the same platform will also face a blackout of that particular channel in spite of no defaults on their part. This issue is easily addressed by using the conditional access and SMS of the HITS infrastructure platform provider. One can easily create different subsets of STBs/subscribers as per the number of service provider on that platform and it is easily possible to shut down the entire subscriber base of one particular subscriber who is a defaulter without deactivation of the IRD by the broadcaster. In fact SMS control can be remotely provided to the broadcasters through suitable handle to enable them to implement this action. This solution is possible even when different service provider are using conditional access systems from separate vendors by using a process known as simulcrypt. All the broadcasters are well aware of this technical solution but are intentionally creating hurdles to block the implementation of this concept. In fact exactly the same process can be implemented for a DTH player as well as, as an MSO to achieve infrastructure sharing thereby saving huge amount of capital. If implemented correctly, this policy can free up a lot of transponder space specially in DTH which will result in higher capacity of channels being delivered to the subscribers. It can go up from the current 350 odd to more than 1,000 thereby benefitting the broadcasters who are forced to pay huge amount of carriage fees (when more than 800 channels are vying for space when only 350 can be accommodated, carriage fees will remain high) as well as subscribers who will get to watch a larger variety.

(b) What could be the operational, commercial, technical and regulatory issues which require to be addressed at the time of developing policy and regulatory framework for enabling infrastructure sharing in the broadcasting TV distribution space?

We need to issue clear cut regulatory guidelines such that no pay broadcaster can deny content for infrastructure sharing as detailed above. Operational and technical issues can easily be addressed by using solutions offered by simulcrypt of CAS and SMS. Commercial issues can be left unregulated to be mutually decided between parties.

(c) Do you envisage any requirement for change in the existing licensing / registration framework laid for DTH, DAS and HITS broadcasting services? If yes, please specify those changes clearly for each platform?

The above can be easily implemented without any major change in the existing licensing framework. There are two clear options – 1. Grant of a new license to every additional service provider on the same platform and 2. Using the Virtual Network Operator(VNO) concept.

(d) What could be the implications of allowing separation of network and service provider functions at

(d) What could be the implications of allowing separation of network and service provider functions at distribution level? How the responsibilities can be divided between the network and service providers?

These implications have been discussed in while implementing the VNO concept in the telecom sector. The same would be relevant here as well.

(e) Any other issue which you feel will be relevant for enabling the infrastructures sharing and separation of network and service provider functions in TV distribution sector?

None

Regards,

Manjari Sheela

Digicable Network (India) Ltd