

Consultation Paper On Framework for Technical Compliance of Conditional Access System (CAS) and Subscriber Management Systems (SMS) for Broadcasting & Cable Services

Q1. List all the important features of CAS & SMS to adequately cover all the requirements for Digital Addressable Systems with a focus on the content protection and the factual reporting of subscriptions. Please provide exhaustive list, including the features specified in Schedule III of Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017?

Answer-A general process of establishing a testing framework follows different modes, including the following, amongst others:

- a. Emergence as de facto framework/ standard: tradition, market domination etc.
- b. Developed by a common industry body:
 - in a closed consensus process: Restricted membership and often having formal procedures for due process among voting members.
 - in a full consensus process: Open to all interested and qualified parties and with formal procedures for due-process considerations.

Q2. As per audit procedure (in compliance with Schedule III), a certificate from CAS / SMS vendor suffices to confirm the compliance. Do you think that all the CAS & SMS comply with the requisite features as enumerated in question 1 above? If not, what additional checks or compliance measures are required to improve the compliance of CAS/SMS?

Answer-The standards process in India is largely government led by Bureau of Indian Standards publishing majority of products and services related Standards. The Bureau of Indian Standards (BIS) is the National Standards Body of India established under an Act of Parliament (The Bureau of Indian Standards Act, 1986, revised as The Bureau of Indian Standards Act, 2016) and represented as the India member on ISO

Q3. Do you consider that there is a need to define a framework for CAS/ SMS systems to benchmark the minimum requirements of the system before these can be deployed by any DPO in India?

Answer-Product Certification by BIS has been put into place since July 2013 and is intended to guarantee quality, safety and reliability. BIS Certification is provided in India under different types of schemes as follows: a. Product Certification b. Systems Certification c. Foreign Manufacturers Certification Scheme (FMCS)

Q4. What safeguards are necessary so that consumers as well as other stakeholders do not suffer for want of regular upgrade/ configuration by CAS/ SMS vendors?

Answer-QCI is an apex body responsible for establishing a transparent and credible accreditation system. QCI is governed by a Council comprising of 38 members and has an equal representation of Government, Industry and other Stakeholders.

Q5. a) Who should be entrusted with the task of defining the framework for CAS & SMS in India? Justify your choice with reasons thereof. Describe the structure and functioning procedure of such entrusted entity.

(b) What should be the mechanism/ structure, so as to ensure that stakeholders engage actively in the decision making process for making test specifications / procedures? Support your response with any existing model adapted in India or globally.

Answer-Telecommunication Engineering Centre (TEC) is a technical body representing the interest of Department of Telecom (DoT), Ministry of Communications, Government of India. The main services of TEC include: • Standardisation Prepare specification of common standards about Telecom network equipment, services and interoperability. Published specifications of TEC are of three types namely Generic Requirements (GRs), Interface Requirements (IRs) and Service Requirements (SR)

Q6. Once the technical framework for CAS & SMS is developed, please suggest a suitable model for compliance mechanism. a) Should there be a designated agency to carry out the testing and certification to ensure compliance to such framework? Or alternatively should the work of testing and certification be entrusted with accredited testing labs empanelled by the standards making agency/ government? Please provide detailed suggestion including the benefits and limitations (if any) of the suggested model. (b) What precaution should be taken at the planning stage for smooth implementation of standardization and certification of CAS and SMS in Indian market? Do you foresee any challenges in implementation? (c) What should be the oversight mechanism to ensure continued compliance? Please provide your comments with reasoning sharing the national/ international best practices.

Answer-There are different framework and standards that are used globally for creating and administering television broadcast standards. Some of the major standards are listed below: 1. European Standards 2. Digital Video Broadcast (DVB) Standards 3. Integrated Services Digital Broadcasting (ISDB) Standards 4. Advanced Television Systems Committee (ATSC) Standards

.Q7. Once a new framework is established, what should be the mechanism to ensure that all CAS/ SMS comply with the specifications? Should existing and deployed CAS/ SMS systems be mandated to conform to the framework? If yes please suggest the timelines. If no, how will the level playing field and assurance of common minimum framework be achieved?

Answer-The extant regulatory framework vide Schedule III, only ensures conformity with Regulations, under the provisions of Audit of the DPO systems that entail testing of the relevant features, whereby if in the opinion of a broadcaster the addressable system being used by the distributor does not meet requirements specified in the Schedule III, he is permitted to disconnect signals of television channels, as per proviso to Sub-Regulation (2) of Regulation 15. There is no regulatory requirement for checking conformity to Indian Standards.

Q8. Do you think standardization and certification of CAS and SMS will bring economic efficiency, improve quality of service and improve end-consumer experience? Kindly provide detailed comments.

Answer-NO

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