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Subject: Safeview CAS response on TRAI consultation paper (press release No.26/2020)

With reference to the captioned subject, we are pleased to provide our comments to the consultation paper for CAS and SMS below:

ISSUES FOR CONSULTATION

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?

SAFEVIEW'S COMMENT: We agree to the Strict adherence to the Schedule III, the following should be included:

1) Pairing: RoT based.

2) Secure boot: RoT based.

3) Scrambling supported: CSA1, CSA2, CSA3.

4) Secure descrambler: RoT based.

5) SoC integrated and deployed with RoT to be mentioned and certified by SoC supplier.

6) CAS server cryptography both symmetric and asymmetric to be based on Hardware security module (HSM).

7) CAS to be certified by an accredited international agency for Hollywood studios, e.g. Farncombe or cartesian etc.

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?

SAFEVIEW'S COMMENT:

1) CAS issued certificate for the SMS deployed in that particular DPO to be made mandatory.

2) Current version of CAS deployed to be certified by an accredited international agency for Hollywood studios, e.g. Farncombe or Cartesian etc.

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?

SAFEVIEW'S COMMENT: YES.

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?

SAFEVIEW'S COMMENT: Pre-sales transparent agreements and these to be renewed annually.

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.

SAFEVIEW'S COMMENT: TRAI.

(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.

SAFEVIEW'S COMMENT: Regular monthly meetings with stake holders along with their participation as per BIS. For e.g. Safeview did not receive this communication directly even though we are actively involved in other projects with TRAO, like interoperability etc.

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.

SAFEVIEW'S COMMENT:

> 1)   There should be a government accredited testing Lab.
>
> 2)   There should be a standardization of compliance through the accredited agency.

(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?

SAFEVIEW'S COMMENT: An open an transparent hearing should be encouraged with all stake holders before implementation of any point or issuance of any certificate.

(c) What should be the oversight mechanism to ensure continued compliance? Please provide your comments with reasoning sharing the national/ international best practices.

SAFEVIEW'S COMMENT: As per our answer for the point above.

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?

SAFEVIEW'S COMMENT: IMMEDIATE.

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.

SAFEVIEW'S COMMENT: Yes, the long term economic benefits on capital expenditure and operational expenditure will ultimately improve customer viewing experience and also improve the quality of services like VAS. Etc.

Q9. Any other issue relevant to the present consultation.

SAFEVIEW'S COMMENT:

1) Control of CAS and Data centre including but not limited to user data privacy, should be hosted in India under the Indian Jurisdiction.

2) CAS, Local support centres with local language support should be made available 24X7X365 as this is an essential services, most re currently working with Monday to Friday in the time zone of the host country.

regards,
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