

ब्रॉडकास्ट इंजीनियरिंग कंसल्टेंट्स इंडिया लिमिटेड

(सूचना एवं प्रसारण मंत्रालय के अधीन-भारत सरकार का उद्यम) (मिनि रत्न कम्पनी) (CIN - U32301UP1995GOI017744)

BROADCAST ENGINEERING CONSULTANTS INDIA LIMITED

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16th September 2019

Sub: BECIL Comments in respect of consultation paper dated 27th August 2019

This is with reference to the consultation paper dated 27th August 2019 released by TRAI in respect of the amendment proposed in the schedule III of TRAI interconnection regulations of 2017. In this regard, BECIL proposed that one additional clause in respect of content security and to counter piracy of unauthorized channels and unencrypted channels under section E "Set TOP Box" on page 6 of the consultation paper should be included. The mandated provision should be:

"STB must ensure that only encrypted services of respective DPO are allowed /visible on viewing device implying no other digital content other than encrypted service of DPO can be displayed through the STB on any viewing device".

It has been observed during the audit experience of BECIL over the years that insertion of unauthorized unencrypted channel on STB deployed in ground is common practice of piracy. In such cases, any rogue DPO or LCO etc can insert unencrypted channels directly through STB deployed in the ground to re-transmit any unauthorized content. Even if such piracy cases are reported through complaints or any other means than too it is difficult to held any one accountable for piracy as both DPO and LCO starts blaming each other and in some instances also accused competitor (other DPO) in the respective area for framing them. Therefore, it is important that STB deployed in the ground must have mandatory security provisions so that it will not be possible to insert any unencrypted content directly or through any other means in STB other than encrypted content inserted by the Headend of respective DPO.

In our opinion, if the above recommendation of BECIL is amended in the TRAI Interconnection regulations of 2017 than it will certainly help to address the issues regarding piracy caused by the insertion of unauthorized unencrypted channels in ground.

Thanking You,

Yours Sincerely,

प्रतीक कटोच / PRATEEK KATOCH

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