



FASTWAY Transmissions Pvt. Ltd.

5th Floor, Grand Walk Mall, Opp. Gurdev Hospital,
Ferozepur Road, Ludhiana - 141 002 (Punjab)
Tel. : 0161-4044444, Email : fastway@fastway.in
CIN : U64202CH2007PTC030966

July 2, 2016

To,
Mr. S.K. Singhal
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, Old Minto Road,
New Delhi – 110002

Subject: Fastway Transmissions Pvt. Ltd. response to Pre-consultation Paper on Infrastructure Sharing in Broadcasting TV distribution sector

Fastway would like to express sincere gratitude to the TRAI for taking up the Consultation Paper on Infrastructure sharing. Post digitalization, the cost of running the network especially in case of MSO's has gone up substantially. Infrastructure sharing will result in economies of scale and will also result in optimum utilization of the network. Infrastructure sharing will be best answer to the problems faced by MSO in covering the areas falling in Phase IV. Moreover this will result in healthy competition and the end subscriber will be benefitted as MSO's and DTH will compete among themselves to provide better content at reasonable subscription. Additionally it will become an extra source of revenue for the companies who are investing heavily in Infrastructure.

Please find below the point wise reply to the questions raised in the consultation papers

(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?

Fastway – Fastway feels that there are three more areas where the Infrastructure can be shared. The areas that can be covered are Conditional Access System (CAS), Subscriber Management System (SMS) and Call Centre. The service provider can take the managed services from the Network Provider and has to invest only in last mile network and CPE, thus substantially reducing the cost of starting up the operations. This will promote new service providers to enter the market.

(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?

Fastway – As per Fastway the operational, commercial and technical issues should be sorted out mutually between Network Provider and Service Provider and there is no need of regulatory framework for the same.



FASTWAY Transmissions Pvt. Ltd.

5th Floor, Grand Walk Mall, Opp. Gurdev Hospital,
Ferozepur Road, Ludhiana - 141 002 (Punjab)
Tel. : 0161-4044444, Email : fastway@fastway.in
CIN : U64202CH2007PTC030966

With entry of new service providers the cost of network maintenance will automatically go down. This will promote new network providers to enter the domain and the competition among network providers will result in lower cost to service providers.

(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?

Fastway – As per Fastway no changes are required in existing licensing / registration framework laid for DTH, DAS and HITS broadcasting services.

(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?

Fastway – In current circumstances MSO / HITS are dividing their networks internally. MSO is acting as a Network provider and is carrying the signal to the LCO who is acting as a Service Provider. Post the separation of network provider and service provider, Network Operators will be able to carry the signal of multiple MSO's based on the commercial deal. The service provider will buy the CPE from the respective MSO / HITS Operator and will install the same at customer premises based on the demand from the subscriber.

Responsibilities of Network Provider

1. To carry the signal of other MSO / HITS Operator to the service provider based on commercial agreement.
2. The maintain signal quality as per agreed terms.
3. The ensure network uptime as per agreed terms.
4. Give required access of Subscriber Management System to service provider for servicing their subscribers.
5. Fulfill SMS and CAS audit requirements of broadcasters.
6. Switch off Channels of Broadcasters in case of failed negotiations / outstanding as per regulations.

Responsibilities of Service Provider

1. To lay last mile from the point of delivery of services in case of MSO.
2. To deal with Broadcasters directly
3. To manage the services provided to the subscribers.
4. Buy and install CPE directly from the approved vendors.



FASTWAY Transmissions Pvt. Ltd.

5th Floor, Grand Walk Mall, Opp. Gurdev Hospital,
Ferozepur Road, Ludhiana - 141 002 (Punjab)
Tel. : 0161-4044444, Email : fastway@fastway.in
CIN : U64202CH2007PTC030966

(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?

Fastway – The pre consultation paper is quite elaborative and as per Fastway no more issues needs to be highlighted

Thanks & Regards

A handwritten signature in blue ink, appearing to be 'J. D. Singh'.

Authorized Signatory

(For Fastway Transmissions Pvt. Ltd.)