

Date: 23/6/2016

To,
Mr. S.K.Singhal
Advisor
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg, (Old Minto Road),
New Delhi-110002.

Dear Sir,

**Subject: Comments on Pre Consultation On Infrastructure Sharing in
Broadcasting TV Distribution Sector, dated 23rd May , 2016**

Please find our brief response on the above subject.

We request a detailed discussion alongwith stakeholders on same

Yours Faithfully,

For INDUSIND MEDIA & COMMUNICATIONS LTD.

Subhashish Mazumdar

Authorized Signatory

TRAI's Pre Consultation -On Infrastructure Sharing in

RESPONSE OF IMCL and GIL

(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?

ANSWER:

Head end in the Sky Service (HITS) provides genuine solution of sharing infrastructure for timely and systematic implementation of digitalisation of cable in the country...

HITS : SHARING OF INFRASTRUCTURE

There are several MSOs/LCOs in the country who find it difficult to make huge investments in order to digitalize their networks and constantly invest to upgrade to fight competition in the market.

Apart from that, there is a need for highly skilled manpower to manage the sophisticated Head-end.

TWO MODELS OF SERVICE:-

1. Full Service:

a) Active : Where HITS provides all services of content, SMS/CAS etc. for a fee and pays broadcasters based on SMS reports (HITS has a digital agreement with Broadcasters) for LCOs

b) Active "White Label " :

- *In this case the operator (MSO/LCO) has a DAS license and has agreements with broadcasters. The HITS platform provides all services on above and provides the SMS reports to broadcaster/MSO/LCO. The MSO/LCO , based on these report pays to the broadcasters.*
- *Very often MSO's have operations in different markets, but find it uneconomical to set up a new infrastructure (Digital Headend etc.). In such cases, HITS provides a White Label service. Since operator has "commercial deal" with the broadcaster for his entire market and the said area is also covered by the agreement; which he wants to pay*

directly.

- *In this case, the commercial terms are confidential between Broadcaster and the concerned MSO; HITS Operator need not to be provided any of this information .*

2. Passive Service:

- *MSO/LCO has its own agreement with broadcasters and seeks HITS support to avail of the broadcaster channels by downlinking the HITS services; but uses its own CAS/SMS, simulcrypting same . In this case HITS is a passive supplier of the content. Payment is made to broadcasters by the MSO based on its own SMS reports.*
- *In many cases, MSOs or aggregation of MSOs create their own content and want to provide this content to their own networks at different locations or to other MSOs across the country. In this case MSO provides the encrypted feed to the HITS earth station, who then decrypt the same and then encrypts the channels and uplinks the same on to its transponders in the normal course of activity of HITS business. (In this case it is assumed that the MSO has all the necessary approvals required for such channels)*

Quoting From TRAI's Pre consultation paper :

“ The efficient utilization of HITS Infrastructure may be ensured when the common feed aggregated by HITS operator is shared with multiple MSOs. It may save the transponder space and avoid establishment of multiple head-ends. This may result in saving of CAPEX and OPEX for operators.”

We feel this should be the right approach...

(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?

ANSWER:

On the issues of operational, commercial, technical and regulatory, the following is suggested:-

- *On operations, it should be mandated to be fully encrypted at any point of time in case of infrastructure sharing (say from HITS to a MSO). HITS can provide ID for each MSO, from which the active subscriber reports can be generated every month by the MSO and can be verified by the broadcaster for commercial purposes.*

- *For technical issues also, the SMS & CAS of HITS can be utilised from HITS platform to a MSO and necessary additions in the regulatory framework for interconnection / tripartite agreement can be formalised.*

(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?

ANSWER:

We feel that the DAS licensing/ registration for a MSO can be done at regional level, instead of everything done at the central MIB. For DTH & HITS, it is fine to be at central level for licensing.

Also , we feel that in the licensing & registration conditions for HITS, the clarification should be made regarding that HITS operator can share the same feed which has been aggregated by him for its active operations (white label)with desirous MSOs as a passive infrastructure provider .

(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?

ANSWER:

The customer responsibilities should be to the service provider who finally handles the customer at the last mile level. The functions up to network level will continue to be of the network / HITS provider.

(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?

ANSWER:

Need a thorough discussion with TRAI team before the consultation paper is announced