

**Fwd: Re: Request to comment/counter comment on consultation paper issued by TRAI on Audit related provisions of Interconnection Regulations, 2017 and Digital Addressable Systems Audit Manual - Reg.**

**SS** Sapna Sharma <jtadv-bcs@traai.gov.in>

Thu, 05 Sep 2024 3:56:43 PM +0530

To "Arvind Kumar" <interconnect-bcs@traai.gov.in>, "Amrapali saket" <amrapali.105@traai.gov.in>, "Bhupendra Singh" <bhupendra.singh78@traai.gov.in>

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==== Forwarded message =====

From: <skadyan1155@gmail.com>

To: <traajipur@gmail.com>, "Deepak Sharma" <advbcs-2@traai.gov.in>, "Sapna Sharma" <jtadv-bcs@traai.gov.in>

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Date: Mon, 02 Sep 2024 22:58:24 +0530

Subject: Re: Request to comment/counter comment on consultation paper issued by TRAI on Audit related provisions of Interconnection Regulations, 2017 and Digital Addressable Systems Audit Manual - Reg.

==== Forwarded message =====

Dear Sir,

As per the reference in your email We (jai Durga Digital Network) would like to draw your attentions on the following points and sharing our views on the same.

**Point 1 - As per TRAI regulation Audit of system once in a calendar year is mandatory.**

**Suggestions:** We would like to share our suggestion as we are struggling heavy downfall in the Cable TV industry, so to bear the audit cost every year is not possible for small base MSO and due to can't survive the network.

So there should must be such provision that can spilt into subscriber base into 2-3 category, Example - Suppose if the MSO whose base is less than 20K subscribers, there should be relesations of system audit one in the 3 years.

**Point 2 - Watermarking must be from Encoder Generated**

**Suggestions:** in this case we would like to say that most of MSOs having encoder hardware older than the this case added into TRAI audit compliance and since the hardware is old and there's no vendor support to upgrade the firmware in this case what will the small MSO do ??

A small base MSO of 5K or 10K subscriber can't offered all new hardware into their head end as per the TRAI regulation requirement and due to audit failure this reason, Firsty broadcaster doesn't provide their paid channels and if existing headend then they charge a huge penalty to the MSO due to non compliance on this case. So there should be some relexsation for the MSOs if they are operating in a limited area with honestly no chances of piracy.

Please draw your attention on these reviews and do the needful possible which can be done from TRAI regulation end on AUDIT manual.

Thanks & Regards,

Proprietor: Sandeep

Jai Durga Digital Network

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