



COMMENTS ON DRAFT QoS AND CONSUMER PROTECTION ORDER 2016

By

SOCIETY OF CABLE TELECOMMUNICATION ENGINEERS, INDIA

Introduction

- 1 QoS, aimed at conformity to EoL (End of Line) received signal specifications, prescribed maintainability norms and customer protection norms (particularly since DAS was legislated for the benefit of the subscriber) have been formulated earlier also but have remained monumental in implementation.
- 2 QoS drafting tends to be a wish list unless a mechanism for its monitoring and audit emerges through QoE (Quality of Experience) by the consumer. The explanatory memorandum does NOT reveal reasons for non-implementation of earlier versions since Apr 2016.
- 3 Except for DTH, CATV and HITS inclusive deliver the digital addressable TV content into subscriber premises through a Set Top Box (STB) required to be BIS compliant, through a subscriber acquisition procedure. The interface with the subscriber primarily for such implementation remains the Cable Operators Technician (popularly called CABLE WALA) who do not seem to have any skilled performance exposures through accredited training. Nor are any qualifications laid down anywhere for engagement in this vocation at any level.
- 4 CATV networking, from inception, remained a technology entrant by stealth (encroachment of 12 to 50 ft layer in space without RoW and SOMEHOW CONNECT practices). De-facto large obligations of QoS are expected to be implemented through the Cable Wala whose mandate was to install STBs supplied by HSP(Headend Service Provider), traditionally called the MSO, so that subscriber continues to receive content pumped into networks from the headend after the demise of Analog Transmission und DAS. And they did just that.
- 5 For the subscriber, who was receiving content in analog form (i.e. in existence on the network) STB has been installed, without any appraisal whatsoever, on filling up application form, shown a rate card to select and order what to watch, be accorded an ID, receive STB paired with ID and receive an itemised bill for the service. This has remained so because the MIB task force, of which TRAI is also a member since 2012, reckoned progress of DAS installation on reported numbers of STBs sent out of HSP's ware house.

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- 6 The end result is that nothing has changed for the subscriber, except for installation of an STB, expected enhancement in tax mopping has not resulted and installed SMS at Headends does NOT function, MoPs have NOT been issued to subscribers and subscriber neither knows DAS nor MSO or Broadcaster.
- 7 Customer Care is a dynamic concept, evolving constantly primarily through empathetic attitudes engineering and reflecting in the QoE.
- 8 This draft does not seem to be aiming at that in absence of any enforcement mechanism.

Comments on the Draft order

- 9 Some definitions revision may be required in the draft, regulations, act and rules which can be undertaken through constitution of a revision meeting involving experienced persons from the industry who have designed, installed tested and commissioned DTH or HITS head ends.
- 10 It must also be realised that all such orders have to be implemented by Cable Operators (estimated over 70000) who, de-facto, eclipsed DAS implementation so effectively that SMS at the headends cannot function and generate bills. The end result is that HSPs have now reportedly resolved to bill the Cable Operator, NOT THE SUBSCRIBER, based upon the number of STBs despatched from the Headend.
- 11 In such a scenario, SMS, as a DAS component does not see Subscriber as an entity. And, therefore, DAS implementation is a deemed failure.
- 12 Hence it is felt that the order may not be implementable unless :-
 - (a) Scrutiny of DAS registration applications is revised to be more revealing at MIB desk levels prior to registration or provisions made for selective audits .
 - (b) Subscriber appraisal on vision media is more meaningful.
 - (c) Focus in task force changes to QoE against QoS.
 - (d) Arrangements are made for training of Cable Wala and certification of skills mandated.
 - (e) Conformity to technical specifications for EoL are enforced.
 - (f) Periodic audit of HSPs and a percentage of their Cable Operators networks too is incorporated.