

COMMENTS ON CONSULTATION PAPER 11/2019 ON PLATFORM SERVICES OFFERED BY DTH OPERATORS

Lt Col VC Khare (Retd) Cable TV Industry Observer

1. Programme, according to Cable Act , means' Any television broadcast, and includes (a) exhibition of films, features, dramas, advertisements and serials through video cassette recorders or video cassette players (would include servers in present era) and (b) any audio or visual or audio-visual live performance or presentation '.
2. Programs, not channels, are essentially produced in studios or video labs. They are then transported to the aggregation station, i.e. Headend, for aggregation in the multi-program, multi channel multiplexed mode for modulation (QAM for wireless systems and QPSK for satellite modes. As far as hardware inputs in headend are concerned, there is no difference. DTH operators seek content for satellite distribution from broadcasters (PAY or FTA) The permissions/consent for such aggregation at headends are largely confined to Broadcasters for real time broadcasts whether for PAY or FREE Content. Server based SVOD content is specific for a particular STB (Set Top Box) with a specific subscriber
3. Programs can be produced in content factories (such as serials), live on site gatherings (such as news, sports and current affairs), narrations , tutorials, games and so on.
4. Program factories , generally, are not broadcasters of the content.
5. Broadcasters source the content and arrange its broadcast (one point to multi-point) by RF communications to be received by viewers, with appropriate receiving electronics. Broadcaster, generally, is not supposed to know the viewer , or their location, in conventional broadcast.
6. Historically all broadcasts were supposed to be 'Free to Viewer'. However around 1997, the concept of PAY TV content crept in India. Initially it was described as one for which viewer paid to the broadcaster but is now moderated to signify that for which Headend Service Provider(HSP) pays to Broadcaster.
7. At present HSP sub-systems are found in CATV, HITS, DTH and TELCO Central offices (for TVoIP)
8. Present consultation paper pertains to services offered by DTH operators. Program (NOT channels) distribution platforms receive video programs, from broadcasters holding registration with MIB, to downlink programs to frontend facilities, ie headends, established by CATV and DTH services DPOs. The syndicated programs received at one single place, i.e. the headends, and are then re-purposed and broadcasted(wireless), or netcasted(wireline), for distribution over wireless(DTH) or wireline(CATV) mediums. Both these media are supposed to dwell in real time broadcast content. music, movies, news, devotional, entertainment, local news, live events, teleshopping, kids programs, serials, documentaries, regional programs, local plays, infotainment, market news, educational, and interactive games.

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9. Server stored content falls under the CDN category and encompasses DRM to discourage its copying and viewing without authorization . This consultation seems to be concerned about programs whose origin is different from those registered with MIB for down linking. This category is being referred as PROGRAMMING SERVICES which are not registered as such with the MIB. 'Platform services (PS)' are deemed to be programs sourced and transmitted by Distribution Platforms Operators (DPOs), exclusively, to their own subscribers and does not include Doordarshan channels and other registered TV channels.. Such programs may NOT be real time broadcasts, they are generally ingested and stored for unicasts or multi-casts.

10. Thus, such programming services are essentially NOT obtained from Broadcasters. Provisioning of such services also results in an additional source of revenue for the DPOs, as they earn revenue not only from their subscription but also from the advertisements transmitted along with such PS. PS is deemed to be exclusive i.e. NOT to be shared with other broadcasters. However PS when re-purposed are expected to conform to Program/Advertisement codes when broadcasted by DTH operator and hence would also have to be recorded in low resolution and such recordings preserved for 90 days by the DTH operator. However logs pertaining to such content need to be preserved for 1 year.

11. PS, if produced by the DPO, for own subscribers would desire exclusivity. But if such PS is offered to several DTH operators, the same shall no longer remain exclusive and should, therefore, need registration wit MIB.

12. Once ICO is signed, the DPO must carry the content in the program stream. Should there be any capacity constraint, the DPO should not seek the ICO conclusion

13. Authority should specify genre types restricted to 8+1. Broadcast content should be packed in slots of 100 fay 1-99,101-199.....801-899 and so on. 901 to 999 should be called PS programs and reflected thereat.

Answers to Issues for Consultation

Q 1: Do you think programmes of the PS should be exclusively available on one single DTH operators' network only to qualify as a PS channel for the DPO ? Should there be any sharing of such programmes with other DPOs ? If yes, please provide justification and if no, the reasons thereof.

In the policy making mind set PS is NOT Broadcaster's real time broadcast content.. This is generated and transported to a Headend in the Earth Station for reception by subscribers of that particular DTH Operator. This content may NOT have registration with MIB for downlinking, but gets uplinked for reception by subscribers of that particular DTH Operator. If such program is confined only to single DTH operator, it may NOT appear in the list of programs of Broadcasters with the MIB.

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PS must stand alone only as specific to a particular DTH operator. Hence it should NOT be shared with other operators.

Q 2: In case answer to Question 1 is no, how it can be ensured that programmes of the PS are exclusively available only on single DTH operators' network? What conditions are to be imposed in registration/license/guidelines ?

In DAS Headends, programs are listed in PAT(Program Allocation Table) and PMT(Program Mapping Table). Such lists pertain to programs being uplinked by the Earth Station for reception by subscribers of that particular DTH Operator. 90 days recording of all programs uplinked and logs for all programs, uplinked from the earth station, are required to be maintained for one year. Default if any, when reported, should be investigated against such records. This may be amplified and incorporated in guide lines.

Q 3 : Is there a need to revisit/review the earlier recommendations of the Authority dated 11th November, 2014, relating to keeping recording of all PS channel programs for a period of 90 days and maintaining a written log/ register of such program for a period of 1 year by the DPO from the date of broadcast and the role of Authorised Officer and the State/ District Monitoring Committee and MIB as monitoring authorities.

No

Q 4: What should be the Registration fee/Annual fee for PS per channel? And how it is to be estimated ?

Registration fee for PS should be Rs 10000/- and annual fee of rs 50000/-. Annual fee should be 5 times registration fee.

Q 5: How many PS channels are to be allowed to DTH operators ? and Why ?

This will depend upon transponder capacity available on the satellite and compression factor into the transponder 1:24,1:36, 1:54 or 1:72. Capacity, if any, after mapping all committed programs to Broadcasters only, can be used for such exclusive PS, if any.

Q 6: Whether PS channels should be placed separately on EPG to distinguish them from regular TV channels ? If yes, how these channels are to be placed ?

By creating a PS genre.

Q 7: Should there be any provision for displaying name and sequence number of PS channels in a particular font size under the heading 'PS' or 'Value Added Services' on TV screen so as to distinguish them from the regular TV channels ? If yes, please provide justification.

PS when listed in separate category will be self explanatory to the viewer.

Q 8: Should PS channels be also categorised in specific genre such as 'Devotional' or 'General Entertainment' or 'Infotainment' or 'Kids' or 'Movies' or 'Music' or 'News and Current Affairs' or 'Sports' or 'Miscellaneous'? Please provide proper justification for your answer.

No ! it should be separate genre christened PS.

Q 9: Stakeholders may also provide their comments on any other issue relevant to the present consultation.

