



Consultation Topic:	<i>TRAs consulting paper on THE TELECOMMUNICATION (BROADCASTING AND CABLE) SERVICES INTERCONNECTION (ADDRESSABLE SYSTEMS) (FOURTH AMENDMENT) REGULATIONS, 2022</i>
Organization	ASSISTIVE NETSPEED TECHNOLOGIES PRIVATE LIMITED DAS License No: N-45009/44/2021-DAS
Email address/contract details for clarifications:	Name: Thilak Kumar HS Mail ID: thilak@assistivenetwork.com Phone no: +91 9036220051



Dated: November 04, 2022

To,  
The Advisor (B&CS)  
Telecom Regulatory Authority of India  
Jawaharlal Nehru Marg  
New Delhi: 110 002

Respected Sir,

We are an MSO, registered under Rule 11C of the Cable Television Networks (Amendment) Rules, 2012 for operation in DAS notified areas. We have also obtained the consent from the Ministry of Information and Broadcasting, Govt of India to provide IPTV services in India vide the letter no: 16/4/2022-BP&L dated 20th April, 2022.

At the onset we wish to thank the Authority for this initiative of bringing in a formal regulation for the IPTV and DRM in the proposed Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Fourth Amendment) Regulations, 2022. We understand that this is a major change that the TRAI is trying to implement in line with the changes in the technology and we really appreciate the consultative approach adopted by the Authority.

We wish to thank the Authority and the Committee for giving us this opportunity to put forward our comments to the draft provisions. We feel that the Consultation Paper is in the right direction and gives the opportunity to all stakeholders to participate in the formalization of the regulation. We understand that an extensive work has been done by the committee to come-up with such a detailed draft covering all angles. At the same time, as an MSO focusing on the IPTV services, we feel that many provisions of the draft will put the small and medium size DPOs in an unfavourable position compared to the large enterprises. Hence, as per the opportunity give to us to put forward our observations, we are hereby submitting the comments in the prescribed format as attached.

Thanking you once again for the opportunity  
Yours Sincerely  
for Assistive Netspeed Technologies Pvt. Ltd.

Thilak Kumar HS  
Director  
mail: thilak@assistivenetwork.com

Table 1:

S no	Clause number of Draft Regulations 2022	Do you agree with the Draft Regulations proposed in this CP (Yes/No)	If you do not agree with the amendment proposed in this CP, then provide amended Clause proposed by you	Reasons with full justification for your response
1	C.a	No	IPTV shall not include any electronic delivery for receipt and viewing via (i.e., directly accessible via) the Internet / world wide web/OTT.	It is practically not feasible for any DPO to own the complete network. For the channel distribution, the DPO depends on third part last miles. However the DPO should ensure that the IPTV channels should not transmitted over Internet / world wide web or OTT
2	C.b	Yes		
3	D.1	Yes		The provided guidelines are really appreciated and the same should also be enforced to the other DPO platforms too.
4	D.2	Yes		
5	D.3	Yes		

6	D.4	Yes		
7	D.5	Yes		
8	D.6	Yes		
9	D.7	Yes		
10	D.8	Yes		
11	D.9	Yes		
12	D.10	Yes		
13	D.11	Yes		
14	D.12	Yes		

15	D.13	Yes		
16	D.14	Yes		
17	D.15	Yes		
18	D.16	Yes		
19	D.17	No		The Tariff orders need to be finalized and enforced by the authority, since there is a lot of ambiguity regarding this. The broadcasters are enforcing the tariff as per their convenience and some broadcasters are even seeking for minimum guarantee commitment to provide the IRD to the IPTV provider, which is against creating a playing field for the DPOs.
20	D.18	Yes		
21	D.19	Yes		

22	D.20	Yes		
23	D.21	Yes		
24	D.22	Yes		
25	D.23	Yes		
26	D.24	Yes		
27	D.25	Yes		
28	D.26	Yes		
29	D.27	Yes		
30	D.28.a	Yes		It is not elaborated, what is meant by "zone".

31	E.1	Yes		
32	E.2	Yes		
33	E.3	Yes		
34	E.4	Yes		
35	E.5	Yes		
36	E.6	Yes		
37	E.7	Yes		
38	E.8	Yes		
39	E.9	Yes		

40	E.10	Yes		
41	E.11	Yes		
42	E.12	Yes		
43	E.13	Yes		
4	E.14	No	DRM shall be integrated with SMS in such a way that addition / modification of channels/bouquets in SMS are automatically synced to the DRM on real-time.	
45	E.15	Yes		
46	E.16	Yes		
47	E.17	No		What is meant by "usage rules enforcement for B2C Model"



48	E.18	No	DRM should be capable of handling at least 10000 license transactions per minute. Subject to the DPO subscriber base.	There would be only a fraction of the DPOs having subscriber base over 3 million. 99% of the DPOs are MSMEs and not having the Infrastructure to manage such a volume. Enforcing this condition will put these Operators into great disadvantage as this will increase the cost of investment for the small DPOs. Hence the capacity of the DRM should be in line with the total subscriber base of the DPO not an aspirational number.
49	E.19	Yes		
50	E.20	Yes		
51	E.21	Yes		
52	E.22	Yes		
53	E.23	Yes		
54	E.24	Yes		We appreciate the efforts to have better QoS for the users and it is in the right direction. However, this should also to be enforced to other types of DPO since majority of the subscribers are still under the legacy cable TV system or

				DTH
55	E.25	No		
56	E.26	Yes		
57	E.27	Yes		
58	E.28	Yes		
59	E.29	No	DRM should have the following features: (a) The entitlement end date in DRM shall be equal to the entitlement end date in SMS	As per our understanding, it is the DRM that is responsible for entitlement management and not the SMS. This clause contradicts this function.
60	E.30	Yes		
61	E.31	Yes		
62	E.32	Yes		

63	E.33	No	<p>IPTV transmission should be in a closed network circuit just like cable TV transmission. STBs with facilities for recording programs shall have a copy protection system (i.e., a feature which prevents reproduction of content and/or unauthorized copying and distribution of content) and such recorded content should not be transferable to any other device.</p>	<p>1. Multicast transmission is one to many and by virtue of that it is flooding of data in nature. Controlling the flooding requires expensive hardware and knowledge and many of the small and medium DPOs would not be in a position to invest on the expensive hardware. This is favorable only for the large DPOs which is only a fraction of the total DPOs available</p> <p>2. DPOs and their LCOs already having existing IP network for many years with extensive investments. That infrastructure is not capable of handling the multicast traffic. With this, the DPO and LCOs would be forced to reinvest on the network elements. This will make this highly unfavorable to the existing DPOs</p>
64	E.34	No	<p>IPTV transmission may be allowed to use Content Delivery Network (CDN) only in private network and should not be allowed to use any public content delivery network (CDN) to deliver linear content to STBs.</p>	<p>Private CDN helps the DPOs to transmit the content in the distributed topology for a remote LCO at lower transmission cost within India over closed network circuit. This is essential for making the services competitive and more reliable for the end user.</p>
65	E.35	Yes		
66	E.36	Yes		

67	E.37	Yes		
68	E.38	No	The Geo Blocking clause should be removed.	As per the DAS license provided by Honorable Ministry of Information and Broadcasting the DPO is free to provide the services as per the licensed territory. Hence this clause contradicts the provision.
69	E.39	Yes		
70	E.40	Yes		
71	E.41	Yes		
72	E.42	Yes		
73	E.43	Yes		
74	E.44	Yes		

75	E.45	Yes		
76	E.46	Yes		
77	E.47	Yes		
78	E.48	No	The DRM may be allowed to insert any promotion, advertisement and/or notifications in a manner that it is not interfering with the playback of the Liner Channels and the content is played with covering any portion of it.	<p>This will restrict the DPO to cross-sell or up-sell or promote the unsubscribed linear TV channels to the subscriber</p> <p>As long the original content is not modified DPO should be allowed to have the advertisements on the other services provided by DPO on the same STB</p> <p>This clause will also restrict the DPO from earning additional revenue from the operations</p>
79	E.49	Yes		
80	E.50	Yes		
81	E.51	No	The DPO shall not sub-license the DRM and/or any rights granted to the DPO by the broadcaster to any entity for re-transmission of channels to subscribers, However the DPO can appoint the Distributors and LCOs to	DPOs depend on the Local Operators to distribute the Channels to the end-users, without which it is not possible to . Hence this clause needs to be rephrased as mentioned.

			deliver the channels to the subscribers.	
82	F.1	Yes		
83	F.2	Yes		
84	F.3	Yes		
85	F.4	Yes		
86	F.5	Yes		
87	F.6	Yes		
88	F.6	Yes		
89	F.7	Yes		

90	F.8	Yes		
91	F.9	Yes		
92	F.10	Yes		
93	F.11	Yes		
94	F.12	Yes		
95	F.13	Yes		Similar security features should also be implemented for other types of DPOs
96	F.14	Yes		
97	F.15	Yes		
98	G.1	Yes		

99	G.2	Yes		
100	G.3	Yes		
101	G.4	Yes		
102	G.5	Yes		
103	G.6	Yes		
104	G.7	Yes		
105	G.8	Yes		
106	G.9	Yes		
107	G.10	Yes		



108	G.11	Yes		
109	G.12	Yes		
110	G.13	Yes		
111	G.14	Yes		
112	G.15	Yes		
113	G.16	Yes		This is a very valid point and the same to be amended for other DPO platforms like DTH Hybrid boxes
114	G.17	Yes		
115	G.18	Yes		The same to be amended for other DPO platforms like DTH Hybrid boxes
116	G.19	No	This point lacks merit	Majority of the Cable TV viewers are having Legacy TVs. It is very unlikely that the mentioned protocols would be supported by these Legacy TVs and other

				<p>devices.          Expecting the viewers to change the systems overnight would be impractical and hence this particular requirement would be a major deterrent for IPTV roll-out          All these technologies mentioned are proprietary technologies and biased in favour of particular country/countries and against self reliance.</p>
117	G.20	Yes		<p>The same to be amended for other DPO platforms like DTH Hybrid boxes</p>
118	G.21	No	<p>The DRM should allow delivering linear TV channels any protocols as desired by DPO.</p>	<p>As long the transmission is on the closed network circuit their should not be any technology limitation on the protocols.</p>
119	G.22	Yes		
120	G.23	Yes		