Digital Addressable System (DAS) Audits- DPO's Perspectives

ALL INDIA DIGITAL CABLE FEDERATION

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About AIDCF

1. All India Digital Cable Federation (AIDCF) is India's apex body and official voice for Digital Multi System Operators (MSOs).

2. AIDCF interacts with Government and Regulator with the objective of bringing orderly growth of the Industry with active involvement and suggestions with respect to formulation of policies, acts, to support government.

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DAS Audit – Objective, Scope and Relevance

Objectives

1. Protection of Consumer Interest and Business Interest
2. Transparency & Accountability, Driven by technology and Innovation
3. Operational efficiency with absolute Regulatory compliance

Scope

1. Subscriber Data and Declaration validation
2. CAS/SMS/CMS/DRM Synchronization & Reconciliation
3. Inventory Management for STB, Smart Card etc.
4. Logical access – System and Security Logs Verification
5. Infrastructure and Compliance Audits
6. Absolute compliance of QoS Norms

Relevance

1. Independent Assurance – Trust building across Value Chain - Consumer, Broadcasters, Regulatory Bodies and other Stakeholders
2. Supports to Fair Broadcasters Settlement
3. Confidence Building - Consumer Protection and Business interest Protection – Billing accuracy, activation/deactivation, channel authorization integrity, Subscriber date accuracy (Consumer perspective) and Revenue Assurance, Regulatory compliance (DPO's Perspective)
4. Comprehensive Audit Trail availability – in the event of disputes and litigations

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Operational Challenges currently faced by DPOs & Recommended Solutions

Operational Challenges	Recommended Solutions
Legacy System, Regulatory Restrain on hardware and CAS/SMS • Leading to Data mismatch • QoS Non-Compliance due to no/weak support from Manufacturer-Technology and System Upgrade	1. Old STB (procured Pre-2015) may be considered for exclusion w.r.t Certification from manufacturer. 2. STB/SMS/CAS/SRM restrained for use by Regulatory Bodies may be considered for exclusion w.r.t Certification from Manufacturer.
Validation Issues - Due to migration • Subscriber Status Mismatch (Active/Inactive/Change in Packs etc.) • Difficulty in Inventory Reconciliation	1. Detailed Pre and Post Audit Migration Reconciliation- Mandatory Reporting 2. Random Sampling Validation of One o One between Subscriber ID, STB, VC
Manual Process • Human error probability • Information Mismatch	1. Focus on AI, Machine Learning and Automated Process in phase manner is proposed to be laid.
Vendor Integration Challenges • CAS/SMS/DRM Synchronization Issues	1. Automated reconciliation between CAS/SMS/DRM to be persuaded

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AIDCF's Recommendations for Audit Excellence

1. Empaneled Auditors to be persuaded for:
    1. Risk based audit rather than Compliance focused audit.
    2. Scope to be expanded to cover and report on revenue assurance/leakages, Independent verification of IRDs being issued by broadcaster to DPO etc.
    3. Audited based on standardized checklist.
    4. Regulatory to publish Uniform Interpretation to avoid disputes and litigation between stakeholders.
    5. Auditors to be held responsible for Professional Misconduct.
2. Audit approach to be more API driven for automated subscriber validation.
3. Innovation to be recognized and appreciated in the DAS audits
4. Pre-audit engagement
5. Special focus on Auditors Capacity building / Broadcasters DPO workshops/ Knowledge sharing sessions with all stakeholders
6. Infra audit to be made on a 3 Years span rather than annual – In cases of No Change or Modification in Technical, Infrastructure system of DPO
7. All CAS/SMS/DRM Vendors to be made mandatory – Submission of list of the DPOs to whom the CAS/SMS/DRM has been issued/sold by them – Periodical basis

AIDCF's Request from TRAI

1. Presently there are 736 MSOs as per published data by MIB dated 31st May 2026. We would request TRAI to

    a. Publish list of MSOs with their subscriber base for transparency and accountability.

    b. Publish list of MSOs who have completed their audit and of the MSOs who are non-compliant.

    c. Under the current regulation, MSOs having less than 30,000 subscribers are exempted from Audit.

       Release a mechanism to cross verify the same.

Thank You!