

## **GTPL Comments:**

**Item:** (C) 1 - it is proposed that the distributor of television channels shall ensure that the current version of the CAS, in use, do not have any history of hacking and a written declaration available with the distributor from the CAS vendor, in this regard, shall be construed as compliance of this requirement.

**Comment:** The Authority needs to consider and address the usage of legacy CA Systems by various distributors. For such CA Systems a written declaration of the distributor should suffice. The Authority may also prescribe a reasonable time period for phasing out such legacy CA Systems.

**Item:** (C) 4 – it is suggested that the distributor of television channels shall validate that the CAS, in use, do not have facility to activate and deactivate a Set Top Box (STB) directly from the CAS terminal and that all activation and deactivation of STBs shall be done with the commands of the SMS.

**Comment:** This aspect was discussed at length during the various meetings held for concluding the draft audit manual and it was agreed that such facility though present in the CAS shall not be used by the distributor for purpose other than testing and the same shall be certified by the distributor.

**Item:** (C) 5 – it is stated that the SMS and the CAS should be integrated in such a manner that activation and deactivation of STB happens simultaneously in both the systems.

**Comment:** The SMS and the CAS should be integrated in the manner prescribed in Schedule III. However, for all practical purposes it requires to be noted that there is always a system lag of few minutes which the Authority needs to acknowledge.

**Item:** (C) 6 – it is prescribed that the distributor of television channels shall validate that the CAS has the capability of upgrading STBs over-the-air (OTA) so that the connected STBs can be upgraded.

**Comment:** The term OTA is applicable mainly for DTH service providers. For cable platform it would mean over the cable (OTC) and such term should be recognized and included into the regulation.

**Item:** (C) 10 – it is mentioned that the CAS and SMS should be capable of individually addressing subscribers, for the purpose of generating the reports, on channel by channel and STB by STB basis.

**Comment:** The term “subscriber” should be replaced by “STB” in this context since CAS contains details of only STBs and VCs (if applicable) and not of the subscribers.

**Item:** (C) 12(a) & 12(c) – it is mandated that amongst other things SMS should also be capable of viewing and printing of historical data in terms of the activations and the deactivations of STBs and generating historical data of changes in the subscriptions for each subscriber and the corresponding source of requests made by the subscriber.

**Comment:** It has been observed in the past audits that the auditors have demanded generation of such historical data for all subscribers and from inception which has put undue stress on the systems of the distributors and the resultant inconvenience to the customers. It is suggested that the Authority limit the generation of historical data to reasonable percentage of the total as a sample size. We suggest a sample size of 5% of the active sub base for platforms which have more than 5,00,000 average active subscribers while for platforms which have a lesser active subscriber base the sample size can be 25%.

**Item:** (C) 14 – it is suggested that the CAS shall be independently capable of generating recording, and maintaining logs, for the period of at least immediate preceding two consecutive years, corresponding to each command executed in the CAS including but not limited to activation and deactivation commands issued by the SMS.

**Comment:** Most of the latest CA Systems are capable of generating recording and maintaining logs for the period mentioned above. However, some of the legacy CA systems have been configured in such a way that they push generated reports / logs on a predefined interval into a secured storage server. Such reports / logs can be provided from such storage server for the purpose of audit. The Authority therefore would require to suitably amend the language of the above item by considering replacing the term “generating” with “available”.

**Item:** (C) 15 – it is mandated that the CAS shall be able to tag and blacklist VC numbers and STB numbers that have been involved in piracy in the past to ensure that such VC or the STB cannot be re-deployed.

**Comment:** Since the phenomena of blacklisting exists in SMS and not CAS, it is proposed that the term “CAS” be replaced with “SMS”.

**Item:** (C) 16 – It is stated that it shall be possible to generate the following reports from the logs of the CAS viz. (i) STB-VC Pairing / De-Pairing; (ii) STB Activation / De-activation; (iii) Channels Assignment to STB; and (iv) Report of the activations or the deactivations of a particular channel for a given period.

**Comment:** We suggest here as well that the term “generate” should be replaced with the term “available” for the same reasons as mentioned in comment (C)14 above.

**Item:** (C) 18 – it is stated that the distributor shall ensure that the CAS and SMS vendors have the technical capability in India to maintain the systems on 24x7 basis throughout the year.

**Comment:** We would like to bring to the attention of the Authority that some of these vendors are based outside of India. The control of the systems are managed by these offices. Hence, the condition that the vendors shall have the technical capability in India should be

re-worded as suggested - *“The distributor shall ensure that the CAS and SMS vendors have the technical capability to maintain the systems on 24x7 basis throughout the year.”*

**Item:** (D) 12 – it is mandated that the scroll messaging should be only available in the lower part of the screen.

**Comment:** In the erstwhile regulatory regime the mandate was for on screen display (OSD) to be available across all STBs which was duly adhered to. However, by way of a direction dated 2<sup>nd</sup> February, 2016 the Authority mandated that all distributors were to stop full or partial OSD with immediate effect. The new regulatory regime which was notified on 3<sup>rd</sup> July, 2018 required scroll messaging to be implemented. For certain legacy STBs the said facility of scroll messaging is not possible to be implemented since some of the STB vendors are not in business and hence unable to give support for upgrades. Hence, it is suggested that there should be provision for exclusion of scroll messaging requirement for STBs installed before 2019.

**Item:** (D) 13 – mentions that the STB should have a provision that fingerprinting is never disabled.

**Comment:** The above clause should be clarified that the applicability of the above should be only during the power-on mode. Suggested change in the clause is *“The STB should have a provision that fingerprinting is never disabled while it is in power-on mode.”*

**Item:** (E) 10 – states that the STBs should be addressable over the air to facilitate OTA software upgrade.

**Comment:** The term OTA is applicable mainly for DTH service providers. For cable platform it would mean over the cable (OTC) and such term should be recognized and included in the regulation.

**Item:** (F) 6 – it is prescribed that the distributor of television channels shall validate that the DRM has the capability of upgrading STBs over-the-air (OTA) so that the connected STBs can be upgraded.

**Comment:** The term OTA is applicable mainly for DTH service providers. For cable platform it would mean over the cable (OTC) and such term should be recognized and included in the regulation.

**Item:** (F) 7 – it is mentioned that the DRM and the SMS should be able to activate or deactivate services or STBs of at least 10% of the subscriber base of the distributor within 24 hours.

**Comment:** it is suggested that the requirement of activation / deactivation of services be limited to 5% as mandated in clause C (8) of Schedule III.