

We at VOICE as part of our advocacy initiative in Telecommunications & Broadcasting continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks.

As registered CAG with TRAI we are in forefront of providing inputs to TRAI related to consumer concerns and interests.

In continuation of this effort on behalf of Broadcasting consumers we at VOICE have following response to the questions posed in the consultation paper:

### **Issues for Consultation:**

#### **Q1. In view of the implications of non-interoperability, is it desirable to have interoperability of STBs? Please provide reasoning for your comment.**

Yes, it is desirable or rather must to ensure healthy competition between service providers and legal recourse to consumers to change his service provider.

At the outset we foresee following un-addressed consumer issues if interoperability is not provided-

1. DAS is not an option for the consumer
2. Consumer is buying a service i.e. broadcasted signal on his viewing equipment either TC/Computer or any other similar device.
3. Hence all the equipment including CPE are incidental to the service being contracted.
4. So CPE if at all required has to be provider's
5. At the most there can be a minimum contract period to defray initial installation costs incurred by the DTH operator.
6. This automatically will put a cost on interoperability to the consumer except in the case of bad service for which QOS rules need to be framed.
7. What happens if technology changes/upgraded requiring the CPE/STB to be changed before its end of life?
8. Is the cost of CPE/STB considered for this consultation retail market price or bulk purchase cost of the service providers?
9. So even if a consumer wants to change the service provider for bad-service he still has to compensate for this bad service

**Q2. Looking at the similar structure of STB in cable and DTH segment, with difference only in the channel modulation and frequency range, would it be desirable to have universal interoperability i.e. same STB to be usable on both DTH or Cable platform? Or should there be a policy/ regulation to implement interoperability only within a platform, i.e. within the DTH network and within the Cable TV segment? Please provide your comment with detailed justifications.**

From consumer interest, it should be platform agnostic – as explained above for a consumer CPE is of no consequence as he is buying a service for which this equipment is incidental.

Ideally we should strive for this equipment to be integrated with the TVs.

**Q3. Should interoperable STBs be made available through open market only to exploit benefits of commoditization of the device? Please elaborate.**

Please refer to answers above – in the short run it should be provided free by Service Providers, in the long term it should be standard fitment for TVs sold in Indian market.

By making STB facility part of a TV will also reduce its costs drastically and additional power consumption of the TV (if at all) will be negligible compared to current power consumption or a standard STB.

**Q4. Do you think that introducing STB interoperability is absolutely necessary with a view to reduce environmental impact caused by e-waste generated by non-interoperability of STBs?**

Yes, this is additional reason why STB interoperability is absolutely necessary in the short run and making it part of standard fitment for TVs sold in Indian market in the long run.

**Q5. Is non-interoperability of STBs proving to be a hindrance in perfect competition in distribution of broadcasting services? Give your comments with justification.**

Yes, it is an hinderance for consumers – many a time consumers are stuck with bad service as cost of changing a service provider is high – specially for low-end consumers in a price sensitive Indian market.

A possible way to judge impact of imperfect competition is to analyse the data of no. of consumers changing their Service Provider whenever a service provider runs a scheme of free equipment for new connections – data which can be easily accessed by TRAI.

**Q6. How interoperability of STBs can be implemented in Indian markets in view of the discussion in Chapter III? Are there any software-based solution(s) that can enable interoperability without compromising content security? If yes, please provide details.**

Again, VOICE reiterates its stand stated earlier, namely-

- CPE is incidental to the service being subscribed by the consumer; consumers are not bothered if the same service is provided without any CPE. So this anomaly of consumers paying for CPE should be done away with, Service Provider should be liable to provide any equipment required at consumer end to enjoy services subscribed for.
- We should also explore how other similar service/video content providers are managing their subscribers – like Hotstar, Netflix etc. With the available technology, we are sure a solution can be found to manage content delivery from Service Providers' end specifically to replace CAS.
- We consumers feel that Ministry and Regulator both have fallen in the trap laid out by Dish/Cable TV service providers to make consumers their captive.. If it is mandated that CPE is entirely their responsibility and nothing can be charged from subscriber we feel the Service Providers will adopt a suitable alternative almost overnight.
- For the current options available, a software based open solution can be opted for.

**Q7. Please comment on the timelines for the development of eco-system to deploy interoperable STBs for your recommended/ suggested solution.**

Timeline can not be too far away and absolutely fixed drawing from past experience.

A 1 year timeline at most can be provided as subscribers will continue to be fleeced till then.

**Q8. Do you agree that software-based solutions to provide interoperability of STBs would be more efficient, reduce cost of STB, adaptable and easy to implement than the hardware-based solutions? If so, do you agree ETSI GS ECI 001 (01-06) standards can be adopted as an option for STB interoperability? Give your comments with reasons and justifications.**

As stated above, a software solution at the moment should only be adopted. As a consumer it is neither feasible nor required for us to get into the technical part.

But in the longrun, Service Providers have to eliminate CPE or at the most a managed CPE, otherwise we will end up into a situation very similar to Telecom—Voice vs VOIP.

**Q9. Given that most of the STB interoperability solutions become feasible through a common agency defined as Trusted Authority, please suggest the structure of the Trusted Authority. Should the trusted authority be an Industry led body or a statutory agency to carry out the mandate? Provide detailed comments/ suggestion on the certification procedure?**

It can be something in line of the agency managing MNP or UCC. But ultimately, as per comments above, there will not be a need for any such agency.

**Q10. What precaution should be taken at planning stage to smoothly adopt solution for interoperability of STBs in Indian market? Do you envisage a need for trial run/pilot deployment? If so, kindly provide detailed comments.**

In the present case, we are afraid that if not mandated with a definite timeline the Industry will continue to exploit Government, Regulator and subscribers. So no pilot, just implement with strict monitoring of timeline.

**Q11. Interoperability is expected to commoditize STBs. Do you agree that introducing white label STB will create more competitions and enhance service offerings from operator? As such, in your opinion what cost reductions do you foresee by implementation of interoperability of STBs?**

Definitely there will better and healthier completion. It is not possible for us to guess the costs but we do understand that substantial economies of scale will kick in and due to removal of a captive subscriber, quasi-monopolies will disappear.

**Q.12 Is there any way by which interoperability of set-top box can be implemented for existing set top boxes also? Give your suggestions with justification including technical and commercial methodology?**

As suggested above, just make Service providers liable to provide CPE free of cost to subscriber. They will immediately start implementing technologies already available for subscriber management from Service Providers' end.

**Q13. Any other issues which you may like to raise related to interoperability of STBs.**

Already enumerated above.

**Hemant Upadhyay**

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**Advisor- IT & Telecom**

**Consumer VOICE**

**O-45, Basement, Lajpat Nagar II, Ring Road**

**New Delhi-110024**

**Ph. 011-24370455 / 47331025 Fax 011 24379081**

**<http://www.consumer-voice.org>**