

RESPONSE BY SITI NETWORKS LIMITED

With reference to

Consultation paper on The Telecommunication (Broadcasting and Cable) Services Digital Addressable Systems Audit Manual

At the outset we would like to congratulate the Authority for the hard work and efforts being put in to streamline the Broadcasting and Cable TV Sector in the country. The Authority has put in sincere effort on implementation of Tariff Order, 2017, Interconnection Regulation and Quality of Service Regulations, 2017 covering most of the aspect of the Sector and has taken care the interest of all the stake holders. We hope that the Authority will keep this momentum and ensure the growth of this sector in the country.

The present consultation on The Telecommunication (Broadcasting and Cable) Services Digital Addressable Systems Audit Manual is a further effort to regulate the Audit Process of the DPOs. Our point wise response to the present consultation is as below;

Q1. Whether it should be mandatory for every DPO to notify the broadcasters (whose channels are being carried by the DPO) for every change made in the addressable system (CAS, SMS and other related systems1)?

Response : The change in the CAS and SMS, which has commercial significance like, change in Make or Model of the CAS / SMS should be

informed to the concerned broadcasters. However, regular update in the version of CAS/SMS which is a routine matter need not to be reported.

Q2. Whether the Laptop is to be necessarily provided by the Auditee DPO or the Audit Agency may also provide the Laptop? Please provide reasons for your comment.

Response : Yes. The Laptop has to be necessarily provided by the Auditee DPO as the Audit Agency may not delete the entire data from its laptop or may create a back up of the data being administrator of the laptop. In case the Laptop is provided by the DPO, the Audit Agency can analyze the data and take copy of the relevant reports / data as may be required for the purpose of Audit. However, In case DPO is not able to provide the laptop with the required configuration, the Audit Agency may use its own laptop.

Q3. Whether the Configuration of Laptop vide Annexure 1 is suitable? If not, please provide alternate configuration with reasons thereof.

Response : Yes. The given configuration is suitable as per the requirement of audit and does not require any change in the same.

Q4. Do you agree with the provisions regarding seeking of TS recording and ground sample information from IBF/ NBA for verification/ checking by the Auditor?

Response : No. We do not agree to the said provisions as the samples provided by third party will be difficult to verify and there would be counter claims which may create unnecessary disputes in the process.

Q5. Do you agree that Data Dump may be cross-checked with weekly data of sample weeks basis? If yes, do you agree with checking of random 20 % sample weeks? Please support your comments with justification and statistical information.

Response : Yes.

Q6. Do you agree with the proposed Data extraction methodology? If not, suggest alternates with reasoning thereof.

Response : No. we have objection to clause a) and b) of the extraction methodology which is detailed below. Rest of the clauses are okay.

- a) DPO should not be mandated to provide Admin/Super Admin login access to the Audit Agency because of the sensitivity of the rights in the Admin/Super Admin ID..*

- b) No. DPO should not be mandated to give the direct access of the database to the auditors instead DPO should depute a dedicated resource to the auditors for extraction/dump of data from the live system as per their requirement in their presence for working on the laptop provided by the DPO for audit purpose. Any access of live system is strongly opposed and the same was also accepted in the final draft of the audit manual submitted to TRAI under reference Section III of general guidelines and we do not agree to any modification/changes proposed in the final draft with regard to data*

extraction to avoid any risk or failure to the live system which may result in service disruption to the consumers.

Q7. Do you agree with verification and reporting of City-wise, State-wise and Head-end wise subscription report? Please provide supporting reasons/ information for your comment.

Response : No. We strongly disagree with city wise/state wise verification and reporting of subscription report. There is no purpose to get it verified at the city level when there is no specific term for a particular City or State. It can be relevant only in case of agreements with restricted geography, which does not have any place in the new regime.

Apart from the above, we strongly object to sharing of IP credential as this is related to sensitive business information sharing of which is vulnerable and can be of a to potential threat of security to the data, information and system to the DPO.

Insertion of watermarking network logo for all channels from encoder should not be made mandatory as it will not be possible for the DPOs operating with existing headends which are non-complying to this condition and they will have to replace the existing equipment with heavy investment to comply with this condition.

Schedule III A-15 is compliance with respect to SMS whereas once a STB and VC is blacklisted from the SMS, it cannot be reactivated from the SMS. The CAS system does not differentiate between a blacklisted box and a

deactivated box. Therefore, it will appear under deactivated list in the reports generated from the CAS.

Q8. Do you agree with the tests and procedure provided for checking covert and overt fingerprinting? Provide your comments with reasons thereof?

Response: Covert fingerprinting should not be made mandatory as many boxes including some of our boxes are not compliant to the covert fingerprinting. This will not be feasible to replace the huge quantity of old boxes in the ground. As submitted in the final draft of audit manual, this should be applicable for the boxes procured after the implementation of New Interconnection Regulations 2017.

Q9. Any other suggestion/ comments on the provisions or methodology proposed in the Audit Manual.

The Audit Agency should be restricted to share the data to the broadcasters for their channels only and should not be allowed to share the data to any other party other than the concerned broadcasters.