

Date: 29.4.2016

To,

Mr. S.K. Singhal,  
Advisor (B&CS)  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg, (Old Minto Road),  
Near Dr. Zakir Husain College,  
New Delhi-110002.

Dear Sir,

With reference to your recently released '**Pre-Consultation Paper On Set Top Box Interoperability**' dated 4<sup>th</sup> April, 2016, we are updating the responses to the mentioned questions as follows: -

**Q.1. In your opinion, what are the concerns that should be taken care of at the time of development of framework of interoperable of STBs?**

**Response :**

- In principle, we believe that the technical interoperability should be considered. At the same time, an operator may choose his own CAS and National CAS or only National CAS. There should be on National CAS which should be simulcrypted with all the different CAS of various operator/platform.
- This can be started from a cutoff date for all the new STBs, being seeded now. Also all future STBs should be MPEG4.
- The process of Sharing of infrastructure must be permitted like in mobile and electricity supply.

- There should be clear policy of rules and regulations for all the commercial issues for the shifts being done by customer/LCO.

**Q. II. What are the techno-commercial reasons for non-interoperability of STBs other than those mentioned above? Please provide reasons with full details.**

**Response:**

Simulcrypt only, is not sufficient; all STBs have a middleware in order to provide quality digital services in terms of customer's ease of browsing, Program Guide, Broadcast messages etc. Also other Value added services are provided by Platform service providers, which TRAI should consider for any technical interoperability issues.

**Q.III. What are the plausible solutions for technical interoperability of STBs and their impact on the sector growth?**

**Response:**

Already some TV companies have initiated TV with embedded STB of a particular make. Based on further deliberations on technical interoperability, the solutions of middleware and simulcrypt should be considered simultaneously .

The easy option of interoperability within platforms ( DTH to cable and Vice versa) can be the most ideal best for consumers.

Technical interoperability on the lines of telecom (mobile) sector can have a tremendous advantage for the end customers and can surely see this sector grow possibly in geometric progression, as far as overall digitalization of TV services is concerned.

**Q. IV. Any other issue which you feel will be relevant for development of technical interoperability of the set top boxes?**



**Response:**

We feel that there should be a taskforce formed for this exercise, which should include industry stakeholders, TRAI & Government stakeholders and customer groups. Needless to say any such policy should be common for all digital platform of TV services. (i.e. Digital Cable MSO, HITS operator, DTH operator and IPTV operator).

Yours Faithfully,

For INDUSIND MEDIA & COMMUNICATIONS LTD.

*(Subhashish Mazumdar)*

Authorized Signatory

