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Dear Mr Singhal,

SmarDTV, a Kudelski Group company, is the international leader for the design and the manufacturing of modules enabling the reception of Pay Television. SmarDTV Conditional Access Modules (CAM) are currently used by millions of Pay Television subscribers worldwide.

As a founder member of CIPlus LLP and active member of DVB CIPlus WG, we are convinced that the adoption of the DVB CI-Plus standard is key for the development of the Pay TV ecosystem from which TV industry players and the subscribers will benefit.

As a result, regulators should mandate the support of CI-Plus technology for the commercialization of the Integrated Digital TVs (iDTV) in the same way it was put in place in Europe.

In response to your "Pre-consultation Paper on Set Top Box Interoperability" dated 4<sup>th</sup> April 2016, we would like to give you the following comments:

- Chapter 3, Paragraph 3.8:
  - **Cost of hardware:** today due to economy of scale (450 million of CIPlus devices have been deployed), it is very much more competitive than a classic Set Top Box
  - **One active CA/DRM only for broadcast content:** hardware can indeed embed multi CAS/DRM and are not limited to the support of broadcast content: last release of the Standard (issued last year as Version 1.4) goes beyond the linear channels by adding support of IPTV and Over-The-Top (OTT) contents; in conjunction with HbbTV, the Standard addresses Multiscreen and smart devices scenarios as well
- Chapter 4, Paragraphs 4.3.2/3: **concern about different modulation standards and compression:** Conditional Access Modules (CAM) are future proof against change in the modulation or codecs since the TVs are in charge of the demodulation and decoding while the CAM are in charge of CAS/DRM descrambling.
- Chapter 4, Paragraph 4.4: **concern about DVB-CSA:** current CAM supports either DVB-CSA or AES
- Chapter 4, Paragraph 4.6: **CI Slot in DTH STB mandate:** as highlighted the effort has not been fruitful and the main reason being the lack of added value of STB+CAM compared to a proprietary STB; this will not apply to an iDTV+CAM bundle where the CAM becomes a simple and cost effective device enabling PayTV content on the generic and universal TV set that is acquired by the subscriber.

In conclusion, we strongly believe Government regulatory Authority mandating CIPlus technology in all IDTVs to be sold in their country, is the best approach to enable a market quickly without additional cost for PayTV operators, thus for population. This will as well avoid the waste of devices lying idle or unused as mentioned in your document for a capital expenditure of \$750 million!

In addition, the technology is clearly accelerating the overall Energy Efficiency: CAM is consuming 10 times less than STB resulting into a drastic power saving (up to 15W \* 85Mio = 1.275 Gigawatts reduction!)

The success in Europe and Russia shows the benefit of such technology.

We believe that PayTV Operators will support government Regulatory Authority through a specification or a logo program to quickly reach market adoption for TV vendors and their retailers distributing their services.

And finally, TV vendors are willing to differentiate from their competition. Promotional activities easily get organized with PayTV operators and retailers for sharing cost of marketing information to end users, and attractive joint offers can be made at Retail places for selling PayTV services at the same time population purchase a new TV set.

Yours faithfully,

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**PS: Attached presentation "Mandating CIPlus Technology in India"**