

**CONSUMER PROTECTION ASSOCIATION
HIMMATNAGAR
DIST. : SABARKANTHA
GUJARAT**



COMMENTS

ON

**THE TELECOMMUNICATION (BROADCASTING AND CABLE)
SERVICES
INTERCONNECTION (ADDRESSABLE SYSTEMS) (FOURTH
AMENDMENT) REGULATIONS, 2022
(___ of 2022)**

Introduction :

Over the past pandemic years, online media streaming has shown explicit growth in every perspective. It's capacity of grabbing audience attention to expanded genres, content categories, flexible subscription plans, online streaming has reached its highest possible peak of success. But along with that, it has also caused several major media distribution issues like unauthorized access to content libraries, unauthorized modification and digital content distribution. Monitoring and preventing such illegal activities have been way too complex for content creators, authors, movie producers/publishers or persons who are part of media content distribution over the internet.

To protect the media content from illegal modification/update/usage, Digital Rights Management (DMR) is a proactive approach towards restricting digital content access by creating a barrier between publishers and content users. It will :

- (i) Maintains the authority of content creators over content
- (ii) Protect the revenue streams
- (iii) Secure sensitive files and data
- (iv) Restrict content prints, downloads and device access

Issues for consultation :

Q1: Stakeholders may offer their feedback/ comments on the Draft Regulations 2022 as per following format (Table 1).

Table 1: Format for stakeholders’ response on issues related to Draft Regulations 2022 raised in this CP

S no	Clause number of Draft Regulations 2022	Do you agree with the Draft Regulations proposed in this CP (Yes/No)	If you do not agree with the amendment proposed in this CP, then provide amended Clause proposed by you	Reasons with full justification for your response
1.	15 - Audit	Yes	-	1. The IPTV based DPOs are switching to DRM technology. It is necessary that the Audit regime covers the DRM based networks and provides for

				<p>enabling provisions for operators.</p> <p>2. It will prevent unauthorized redistribution of digital media and restrict the ways consumers can copy content they have purchased.</p> <p>3. It will prevent rapid increase online privacy of commercially marketed material which proliferated through the wide spread use of peer to peer file exchange programs.</p> <p>4. It will prevent copying specifies a time period in which the content can be accessed or limits the number of devices the media can be installed.</p> <p>5. It will provide the requirements/specifications of DRM system.</p>

Q2: Please provide comments/ any other suggested amendment(addition), if any, with reasons thereof, in the Draft Regulations 2022, that the stakeholder considers necessary (other than those proposed in this CP). The stakeholders must provide their comments in the format specified in Table 2 explicitly indicating the new clause number, suggested amendment(addition) and the reason/ full justification for proposed amendment.

Table 2: Format for stakeholders’ response on issues related to ‘System Requirement for Digital Right Management (DRM)’ on issues other than those proposed in this CP

S no	New Clause number proposed in the Draft Regulations 2022	Suggested Amendment (additional clause)	Reasons/ full justification for the proposed amendment
1	Nil	Nil	Nil
2			

Thanks.

Yours faithfully,
(Dr. Kashyapnath)
President