

**16 September 2019**

*By Email and Hand*

Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg  
New Delhi - 110002

**Subject: TRAI's Draft Telecommunication (B&CS) Interconnection (Addressable Systems) (Amendment) Regulations, 2019 (\_\_\_ of 2019) dated August 27, 2019**  
**Kind Attn: Shri Anil Kumar Bhardwaj, Advisor (B&CS)**

Dear Sir,

We thank you for the opportunity to express our views on the above captioned draft amendment regulation. Tata Sky's response to the same is enclosed for your ready reference.

Thanking you.

Yours sincerely,



**Manish Gupta**

Vice President - Regulatory Affairs

Enclosed: As above

**TATA SKY COMMENTS ON THE TELECOMMUNICATION (BROADCASTING AND CABLE) SERVICES INTERCONNECTION (ADDRESSABLE SYSTEMS) (AMENDMENT) REGULATIONS, 2019 (\_\_\_\_\_ of 2019)**

The Authority has proposed this draft Amendment of the Interconnection Regulations to modify certain aspects of the technical and system requirements of DPOs (as per the Schedule III of the Interconnection Regulations) basis certain concerns that have been gathered during the various meetings with the stakeholders with TRAI.

Apart from the specific issues, that the Authority is redressing vide this draft proposal, we wish to utilize this opportunity to highlight a few other issues, which are likely to become a concern going forward, and hence a suitable regulatory clarification may be issued. Our concerns are mentioned below:

*(C) Conditional Access System (CAS) and Subscriber Management System (SMS):*  
17. *The SMS shall be capable of generating bills for each subscriber with itemized details such as the number of channels subscribed, the network capacity fee for the channels subscribed, the rental amount for the customer premises equipment, charges for pay channel and bouquet of pay channels along with the list and retail price of corresponding pay channels and bouquet of pay channels, taxes etc.*

Tata Sky comments:

**Bill generation is a Postpaid concept. DTH operators including Tata Sky do not have a Postpaid platform and are completely Prepaid. Therefore, it is suggested that a suitable clarification be inserted in the Regulations as well as the Audit Manual to avoid any understanding gap between the DTH Operators and the Auditors.**

*(C) Conditional Access System (CAS) and Subscriber Management System (SMS):*  
12. *The SMS should be capable of:*  
*(b) Locating each and every STB and VC installed.*

*(F) Digital Rights Management and Subscriber Management System (SMS)*  
10. *The SMS should be capable of:*  
*(b) Locating each and every STB installed.*

Tata Sky comments:

**The STBs and VCs are issued against a CAF to a subscriber and the subscriber's address are captured in our systems. Consequently, the Auditor can check our systems on a random sample basis, however, we will not hand-over our entire database along with addresses to the Auditor in compliance to this requirement. We would therefore suggest that a suitable clarification be inserted in the Regulations as well as the Audit Manual to avoid any understanding gap between the DPO and the Auditors.**