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Date: 29th April, 2016

To,
Mr. S. K. Singhal
Advisor (B&CS)
The Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi - 110002

Sub: **Comments on Pre – Consultation Paper on Set Top Box Interoperability**

Dear Sir,

We compliment the Telecom Regulatory Authority of India (TRAI) on issuing Pre-Consultation Paper on Set Top Box (STB) Interoperability whereby TRAI has rightly identified various issues related to interoperability of STBs, the challenges being faced and ancillary concerns in Broadcasting & Cable TV industry in India.

In this regard and as desired, we would like to place on record our views with regard to questions raised by the TRAI which is mentioned below:

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?**

According to us, the following are the concern which needs to be taken care of at the time of development of framework of interoperable of STBs:

- Maintain security of the platform – Security is a requirement of the system. A large scale security breach would damage the entire ecosystem.
- Recoverability – Any system may eventually be hacked. Whatever system should have a method of recovery for when that happens.
- Maintaining diversity of security solutions – this splits hacker attention and motivates the various vendors to compete on security leading to a higher security bar.
- Avoid a single standardized solution that will be hacked. Standards bodies are too slow to respond to the needs of a commercial dynamic market.
- Pay attention to the ecosystem - Who is responsible for maintaining security? What is the commercial motivation for fixing a security breach? What legal or commercial channels are there for an operator to get hacks addressed.

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

   - Any standard solution for non-interoperability of STBs would intensify the additional costs to the Company.
   - Subsidized STBs being taken over by alternate companies without compensation. It therefore breaks business models.

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

   - A standard base with a proprietary replaceable tier on top either hardware (like CAM, cablecard or USB dongle ability) OR something like a USB SC for serious hack addressing.
   - This may significantly increase the cost per box and with any evolving new technology followed by one operator will bring back the challenge of interoperability as the boxes cannot be forward compatible.

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

   - TRAI should form a committee consisting of technical and commercial people who would set out the guidelines and technical framework for the STB interoperability. They should be from MSO/DTH/STB Vendors/BIS/CAS Vendors.
   - TRAI should also ensure that the STBs which has already been deployed or are currently lying in stocks should be allowed to be seeded in future as well when the interoperability comes into play.

We sincerely hope that your kind office would take into consideration the comments submitted by us.

Thanking you,
For Hathway Cable and Datacom Limited

Ajay Singh
Head Legal, Company Secretary and Chief Compliance Officer

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