RESPONSE TO CP ON

STB INTEROPERABILITY

Submitted by : Ravindra B. Deshmukh

Credentials : A Cable TV Subscriber and OSS-BSS Technology Provider (UPASS) excluding CAS

Preamble : Pardon me for not submitting Point by Point response but note since the response has less to do with Technology challenges than with practicalities

This response is self-limited to Cable TV Services which has much larger number of Players than DTH and hence greater the probability of need for interoperability features

Genesis :

1) Relevance

The feature is required more at LCO /MSO Level than at Subscriber level since-

A Subscriber moving from one location to another may be moving to non-Cable service area

Churn at individual levels is rare since same building/locality rarely serviced by two LCOs

MSO and LCO will continue to exit from/enter into ICA where instant shift would be desired to avoid service interruptions

MSOs exercise either Hard (cash) or Soft (ware) controls; the former is not addressable through Regulations, while latter is to some extent

The MSO needs to further his interests through scaling up RGUs by inward Portability.

MSO may also feel the need to exit from exorbitant AMC/Card replacement fees charged by some CAS Providers

The LCO may have need to protect his own and the connected Customer interests by outward churn in case the ICA is adverse, Consumer pricing and SLA by MSO are unsatisfactory

Both the above cases require Bulk migration

It is therefore humbly suggested that the Interoperability be also viewed from B2B perspective where LCO is treated as Bulk Customer to the MSO

2) Ownership &Rights

Currently these remain undefined so far as the Subscriber is concerned

With vagueness on ownership aspect, the derivative Rights are non-existent

STB ownership is incomplete without the Smart Card license being transferable at Owner's discretion.

Even when bought on Monthly instalments, the underlying Rights vest in Subscriber and these should be automatically transferred to the Subscriber on full consideration being paid by him

Regulations may kindly be amended to bring in clarity on ownership Rights

3) Shrinking Problem & Life

The need for STB interoperability is at peak currently with-

- × MSO-LCO relations not showing turn around for the better
- × Universal discontent at Subscriber level against BST composition, delegation of Powers to exercise Rights and bundling of "Content

At the same time, developments under way point to the shortening of life span for the Solution to be relevant with-

- ➢ Android STBs and IPTV will pose different problem, if at all and hence 'one size fits all ' solution hard to arrive at
- ➢ Time is not far when TV sets (screens actually)would turn digital and have in-built CAS decipherer

It is therefore suggested that a quick fix be found for todays' problems and reviewed periodically

4) Practicable Solution

The Soft control needs to be disabled by mandating-

Transfer of CAS Keys from one MSO to another in case of churn at LCO Level

Such transfer to be subject to following terms-

Accounts being drawn up and cleared with due regards to arrears, accruals and advance Subscription paid and balance EMI wherever applicable

The Receiving MSO installing the same CAS in bilaterally acceptable terms

Viewing Cards being replaced to avoid overlapping of VC Numbers in Audit Reports

Such migration-taking place on the day of commencement of Reporting Week

Anticipated Benefits:

Protecting MSO interests

Discouraging the grey market for STB Swaps

Empowering LCO to translate Subscriber Wishlist for overall changes

Fast- track Solution

Insignificant costs compared to Software level revamping