

**TO BE PUBLISHED IN THE GAZETTE OF INDIA, EXTRAORDINARY,
PART III, SECTION 4
TELECOM REGULATORY AUTHORITY OF INDIA
NOTIFICATION**

**THE TELECOMMUNICATION (BROADCASTING AND CABLE) SERVICES
INTERCONNECTION (ADDRESSABLE SYSTEMS) (AMENDMENT) REGULATIONS,
2019
(7 of 2019)**

New Delhi, 30/10/2019

F. No. 21-6/2019-B&CS.— In exercise of the powers conferred by section 36, read with sub-clauses (ii), (iii) and (iv) of clause (b) of sub-section (1) of section 11 of the Telecom Regulatory Authority of India Act, 1997 (24 of 1997), read with notification of the Central Government, in the Ministry of Communication and Information Technology (Department of Telecommunications), No. 39, —

(a) issued, in exercise of the powers conferred upon the Central Government under clause (d) of sub-section (1) of section 11 and proviso to clause (k) of sub-section (1) of section 2 of the said Act, and

(b) published under notification No. S.O.44 (E) and 45 (E) dated the 9th January, 2004 in the Gazette of India, Extraordinary, Part II, Section 3,—

the Telecom Regulatory Authority of India hereby makes the following regulations to amend the Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017 (1 of 2017), namely: -

1. (1) These regulations may be called the Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Amendment) Regulations, 2019 (7 of 2019).

(2) They shall come into force from the date of their publication in the Official Gazette.

2. In regulation 15 of the Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017 (hereinafter referred to as the principal regulations) – (a) for first proviso to sub-regulation (1), the following proviso shall be substituted, namely:-

“Provided that the Authority may empanel auditors for the purpose of such audit and it shall be mandatory for every distributor of television channels to cause audit, under this sub-regulation, from M/s Broadcast Engineering Consultants India limited, or any of such empanelled auditors:”;

(b) after sub-regulation (1), the following sub-regulation shall be inserted, namely:-

“(1 A) If any distributor fails to cause audit once in a calendar year of its subscriber management system, conditional access system and other related systems, as specified under sub-regulation (1), it shall, without prejudice to the terms and conditions of its

license or permission or registration, or the Act or rules or regulations or order made or direction issued thereunder, be liable to pay, by way of financial disincentive, an amount of rupees one thousand per day for default up to thirty days beyond the due date and an additional amount of rupees two thousand per day in case the default continues beyond thirty days from the due date, as the Authority may, by order, direct:

Provided that the financial disincentive levied by the Authority under this sub-regulation shall in no case exceed rupees two lakhs:

Provided further that no order for payment of any amount by way of financial disincentive shall be made by the Authority unless the distributor, has been given a reasonable opportunity of representation against the contravention of the regulations observed by the Authority.”;

- (c) for first proviso to sub-regulation (2), the following proviso shall be substituted, namely:-

“Provided that the Authority may empanel auditors for the purpose of such audit and it shall be mandatory for every broadcaster to cause audit, under this sub-regulation, from M/s Broadcast Engineering Consultants India limited, or any of such empanelled auditors:”

3. For Schedule III of the principal regulations, the following schedule shall be substituted, namely:-

“Schedule III

(Refer sub-regulation (6) of the regulation 10 and regulation 15)

Scope and Scheduling of Audit

- (A) Scope: The annual Audit caused by Distributor shall include the Audit to validate compliance with this Schedule and the Subscription Audit, as provided for in these regulations.
- (B) Scheduling: The annual Audit as caused by Distributor under regulation 15 (1) shall be scheduled in such a manner that there is a gap of at-least six months between the audits of two consecutive calendar years. Further, there should not be a gap of more than 18 months between audits of two consecutive calendar years.

Addressable Systems Requirements

(C) Conditional Access System (CAS) and Subscriber Management System (SMS):

1. The distributor of television channels shall ensure that the current version of the CAS, in use, do not have any history of hacking.
Explanation: A written declaration available with the distributor from the CAS vendor, in this regard, shall be construed as compliance of this requirement.
2. The SMS shall be independently capable of generating, recording, and maintaining logs, for the period of at least immediate preceding two consecutive years, corresponding to

- each command executed in the SMS including but not limited to activation and deactivation commands.
3. It shall not be possible to alter the data and logs recorded in the CAS and the SMS.
 4. The distributor of television channels shall validate that the CAS, in use, do not have facility to activate and deactivate a Set Top Box (STB) directly from the CAS terminal. All activation and deactivation of STBs shall be done with the commands of the SMS.
 5. The SMS and the CAS should be integrated in such a manner that activation and deactivation of STB happen simultaneously in both the systems.
Explanation: Necessary and sufficient methods shall be put in place so that each activation and deactivation of STBs is reflected in the reports generated from the SMS and the CAS terminals.
 6. The distributor of television channels shall validate that the CAS has the capability of upgrading STBs over-the-air (OTA), so that the connected STBs can be upgraded.
 7. The fingerprinting should not get invalidated by use of any device or software.
 8. The CAS and the SMS should be able to activate or deactivate services or STBs of at least Five percent (5%) of the subscriber base of the distributor within 24 hours.
 9. The STB and Viewing Card (VC) shall be paired from the SMS to ensure security of the channel.
 10. The CAS and SMS should be capable of individually addressing subscribers, for the purpose of generating the reports, on channel by channel and STB by STB basis.
 11. The SMS should be computerized and capable of recording the vital information and data concerning the subscribers such as:
 - (a) Unique customer identification (ID)
 - (b) Subscription contract number
 - (c) Name of the subscriber
 - (d) Billing address
 - (e) Installation address
 - (f) Landline telephone number
 - (g) Mobile telephone number
 - (h) E-mail address
 - (i) Channels, bouquets and services subscribed
 - (j) Unique STB number
 - (k) Unique VC number.
 12. The SMS should be capable of:
 - (a) Viewing and printing of historical data in terms of the activations and the deactivations of STBs.
 - (b) Locating each and every STB and VC installed.
 - (c) Generating historical data of changes in the subscriptions for each subscriber and the corresponding source of requests made by the subscriber.
 13. The SMS should be capable of generating reports, at any desired time about:
 - (a) The total number of registered subscribers.
 - (b) The total number of active subscribers.
 - (c) The total number of temporary suspended subscribers.
 - (d) The total number of deactivated subscribers.
 - (e) List of blacklisted STBs in the system.
 - (f) Channel and bouquet wise monthly subscription report in the prescribed format.

- (g) The names of the channels forming part of each bouquet.
 - (h) The total number of active subscribers subscribing to a particular channel or bouquet at a given time.
 - (i) The name of a-la carte channel and bouquet subscribed by a subscriber.
 - (j) The ageing report for subscription of a particular channel or bouquet.
14. The CAS shall be independently capable of generating, recording, and maintaining logs, for the period of at least immediate preceding two consecutive years, corresponding to each command executed in the CAS including but not limited to activation and deactivation commands issued by the SMS.
 15. The CAS shall be able to tag and blacklist VC numbers and STB numbers that have been involved in piracy in the past to ensure that such VC or the STB cannot be re-deployed.
 16. It shall be possible to generate the following reports from the logs of the CAS:
 - (a) STB-VC Pairing / De-Pairing
 - (b) STB Activation / De-activation
 - (c) Channels Assignment to STB
 - (d) Report of the activations or the deactivations of a particular channel for a given period.
 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.
 18. The distributor shall ensure that the CAS and SMS vendors have the technical capability in India to maintain the systems on 24x7 basis throughout the year.
 19. The distributor of television channels shall declare the details of the CAS and the SMS deployed for distribution of channels. In case of deployment of any additional CAS/ SMS, the same should be notified to the broadcasters by the distributor.
 20. Upon deactivation of any subscriber from the SMS, all programme/ services shall be denied to that subscriber.
 21. The distributor of television channels shall preserve unedited data of the CAS and the SMS for at least two years.

(D) Fingerprinting: -

1. The distributor of television channels shall ensure that it has systems, processes and controls in place to run finger printing at regular intervals.
2. The STB should support both visible and covert types of finger printing. Provided that only the STB deployed after coming into effect of these Amendment regulations shall support the covert finger printing.
3. The fingerprinting should not get invalidated by use of any device or software.
4. The finger printing should not be removable by pressing any key on the remote of STB.
5. The finger printing should be on the top most layer of the video.
6. The finger printing should be such that it can identify the unique STB number or the unique VC number.
7. The finger printing should appear on the screens in all scenarios, such as menu, Electronic Programme Guide (EPG), Settings, blank screen, and games etc.

8. The location, font colour and background colour of fingerprint should be changeable from head end and should be random on the viewing device.
9. The finger printing should be able to give the numbers of characters as to identify the unique STB and/or the VC.
10. The finger printing should be possible on global as well as on the individual STB basis.
11. The overt finger printing should be displayed by the distributor of television channels without any alteration with regard to the time, location, duration and frequency.
12. Scroll messaging should be only available in the lower part of the screen.
13. The STB should have a provision that finger printing is never disabled.
14. The watermarking network logo for all pay channels shall be inserted at encoder end only.

Provided that only the encoders deployed after coming into effect of these Amendment regulations shall support watermarking network logo for all pay channels at the encoder end.

(E) Set Top Box (STB): -

1. All STBs should have a Conditional Access System.
2. The STB should be capable of decrypting the Conditional Access messages inserted by the Head-end
3. The STB should be capable of doing finger printing. The STB should support both Entitlement Control Message (ECM) and Entitlement Management Message (EMM) based fingerprinting.
4. The STB should be individually addressable from the Head-end.
5. The STB should be able to receive messages from the Head-end.
6. The messaging character length should be minimal 120 characters.
7. There should be provision for global messaging, group messaging and the individual STB messaging.
8. The STB should have forced messaging capability including forced finger printing display.
9. The STB must be compliant to the applicable Bureau of Indian Standards.
10. The STBs should be addressable over the air to facilitate OTA software upgrade.
11. The STBs with facilities for recording the programs shall have a copy protection system.

(Sunil Kumar Gupta)
Secretary, TRAI

Note.1----- The principal regulations were published in the Gazette of India, extraordinary, Part III, Section 4 vide notification No. 21-4/2016-B&CS dated the 3rd March, 2017.

Note.2----- The Explanatory Memorandum explains the objects and reasons of the Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Amendment) Regulations, 2019.

Explanatory Memorandum

A consultation paper on “Interconnection framework for Broadcasting TV Services distributed through Addressable Systems” was issued by TRAI on 4 May, 2016. This consultation process resulted in notification of the Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017 (1 of 2017) dated the 3rd March, 2017 [hereinafter referred to as Interconnection Regulations 2017].

2. During the consultation undertaken to prepare the Audit Manual certain comments and observations reflect some issues in the Schedule III of the Interconnection Regulations 2017.

3. Accordingly, Draft Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Amendment) Regulations, 2019 [hereinafter referred to as the Draft Regulations] was issued on 27 August, 2019. These Draft Regulations amended Schedule III of the Interconnection Regulations 2017, on the following issues: -

- i. Digital Rights Management Systems
- ii. Transactional capacity of CAS and SMS system
- iii. Fingerprinting – Support for Visible and Covert fingerprinting in STBs
- iv. Watermarking network logo for all pay channels

4. The comments of the stakeholders were invited by 9 September, 2019. On request of stakeholders, the deadline to submit the comments was extended till 16 September, 2019. Twelve comments were received from stakeholders. Subsequently, an Open House Discussion (OHD) was held on 26 September, 2019 in Delhi, which was attended by a large number of stakeholders.

5. After taking into consideration the comments received from the stakeholders and in-house analysis, the Authority finalized the Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Amendment) Regulations, 2019 [hereinafter referred to as the Amendment Regulations]. The subsequent paragraphs explain the objects and reasons of the Amendment Regulations.

Scope of Audit

6. Draft Regulations specified that the annual Audit caused by Distributor shall include the Audit in compliance with this Schedule and the Subscription Audit.

7. During the consultation process, a few stakeholders suggested some modifications in this clause. According to the suggestion, the annual Audit caused by Distributor shall include the Audit to validate compliance with this Schedule and the Subscription Audit. In addition, some stakeholders also proposed explanation to this clause that detailed audit methodology / steps provided in Audit Manual read with provisions of interconnection agreement are required to be followed, the empanelled auditor shall have the right to seek / obtain directly any data / information / declaration from CAS / DRM and SMS vendors regarding audit requirements, empanelled auditor shall have access to complete and unaltered data & logs of the DPO's

systems in the audits caused either by DPO or by Broadcaster, there should not be any filtering of data by DPO from CAS and SMS server for any reason whatsoever till the Audit report is prepared and released by the Auditor.

8. The Authority is of the view that the issues proposed as explanation and other comments have already been discussed at length in the consultation process related to audit manual. Keeping in view all the comments and suggestions received from the stakeholders on this clause, the authority is of the view that the annual Audit caused by Distributor shall include the Audit to validate compliance with this Schedule and the Subscription Audit.

Scheduling of Audit

9. During the comments and discussion on the Draft Audit Manual many stakeholders have suggested that the authority should specify the schedule of audit for DPOs to ensure that the audit is held effectively and in a timely manner. Clause (1) of regulation 15 of Interconnection Regulations 2017 provides that a DPO will get audit completed once every year. Stakeholders that are desirous that the Authority may specify the audit schedule refer to the limited availability of auditors and also that if all DPOs chose to get their systems audited during the last quarter of a year, there will be a severe capacity constraint.

10. On the contrary, most of the DPOs have averred that being responsible stakeholders, they will get their systems audited properly and in a time-bound manner in compliance with the regulations. As per the framework, it is incumbent upon distributors to maintain a current and valid audit compliance. Any slippage by DPO will entail follow up and audits by multiple broadcasters. The framework, therefore, has sufficient checks and balances in the interest of DPOs as well as broadcasters.

11. There is another argument as regards the gap between the two audits caused by the DPOs. One of the comments received by TRAI was that it is possible for a DPO to schedule audits of two different calendar years in consecutive months. That is first one in December of current year and next one in January of next calendar year. In such hypothetical cases, the systems of the distributor will remain out of the ambit of audit for a long period of 23 months. Given that audit is an important foundation in establishing the trust-based regime under the new regulatory framework, therefore the Draft Regulations mentioned that the annual Audit caused by Distributor shall be scheduled in such a manner that there is a gap of at-least six months between the audits of two consecutive calendar years.

12. During the consultation process, most of the stakeholders favoured the inclusion of this clause. However, some stakeholders suggested an addition to this clause. According to them, wording in proposed amendment takes care of erroneous situation where DPO causes audits in two consecutive months (December of first calendar year and January of second calendar year). However, this does not take care of the other undesirous situation where DPO causes audit in January of first calendar year and then causes next audit in December of second calendar year i.e. there is a gap of 23 months between two consecutive audits. These stakeholders opined that this long gap if allowed is detrimental to the interest of broadcasters for revenue assurance and

proposed that there should not be a gap of more than 12 months between audits of two consecutive calendar years.

13. Keeping in view all the suggestions given by the stakeholders the Authority is of the opinion that there should be a minimum and a maximum gap of 6 and 18 months respectively, between two annual audits caused by a DPO. The Authority is of the view that there should not be a gap of more than 18 months between audits of two consecutive calendar years.

14. Further, quite a few stakeholders have raised the issue that the Authority should incorporate appropriate provisions for dealing with such DPOs who do not comply with regulatory provisions, especially when it comes to adherence to timelines. After due consideration, the Authority has prescribed levying of financial disincentives on the distributor of television channels for not causing an audit in a calendar year. The financial disincentive is proposed on a graded scale. That is if the audit is not caused by the due date, then the distributor of television channels will be liable to pay an amount of rupees one thousand per day for the delay of first thirty days. In case of delay beyond thirty days, the financial disincentive will increase and will be @Rs. 2000/- per additional day beyond first thirty days. In addition, the Authority considers that the maximum financial disincentive may be restricted to an upper limit. Therefore, the Authority has prescribed a maximum limit of Rs Two Lakhs (Rs. Two Hundred Thousand) only per instance of violation/delay.

Transactional capacity of CAS and SMS systems

15. Para 8 of Section A of the Schedule III of the Interconnection Regulations 2017 specifies that, 'The CAS and the SMS should be able to activate or deactivate services or STBs of at least 10% of the subscriber base of the distributor within 24 hours.'

16. While the requirement seems as reasonable, this puts an unwarranted investment on part of certain large DPOs. The issue becomes really alarming for most of the DTH service providers and top four to five MSOs. Each one of these operators have a subscriber base of more than five million customers. Hence, they had requested the Authority to review this threshold limit.

17. In general, these large operators do not need to activate/ deactivate/ re-configure more than 1 % of their active subscribers on everyday basis. Therefore, the operators have represented that prescribing to deploy equipment to cater to 10% of activation/ deactivation is uncalled for.

18. However, some stakeholders have suggested that most of the subscribers are on monthly pre-paid packages these days and by the law of averages every customer is required to pay/ recharge once every month and may require to be configured at the SMS level once every month. Therefore, such stakeholders have argued that a minimum of 3.3 % capacity of CAS/ SMS is necessary. The Draft Regulations mentioned that the CAS and the SMS should be able to activate or deactivate services or STBs of at least Five percent (5%) of the subscriber base of the distributor within 24 hours.

19. During the consultation process, some stakeholders supported the amendment. One stakeholder opined that MSOs/DPOs should increase the capacity of their systems to activate

STBs seamlessly without any glitch. Low transactional capacity of MSOs/DPOs result in loss to the subscribers and broadcaster. Another stakeholder suggested that the subscriber base may not be the appropriate criteria to assess the capacity of CAS and SMS, more so, in the current framework when a single customer can generate more than one transaction in terms of activation/deactivation of channel, recharge, etc. Therefore, they suggested that the criteria of 5% should be measured in context to total volume of transactions.

20. Taking into considerations all the comments received during the consultation process and internal analysis, the authority is of the view that the CAS and the SMS should be able to activate or deactivate services or STBs of at least Five percent (5%) of the subscriber base of the distributor within 24 hours.

Fingerprinting – Support for Visible and Covert fingerprinting in STBs

21. There are issues related to the availability of both visible and covert fingerprinting on all the STBs. Based on industry information, it has been ascertained that not all the deployed STBs provide both types of fingerprinting. Before the Interconnection Regulations 2017, the STBs with overt fingerprinting would suffice to comply with the regulations. Therefore, some of the distributors have represented that the set-top boxes deployed prior to the year 2017 does not support covert fingerprinting as they were not mandated by The Telecommunication (Broadcasting and Cable Services) Interconnection (Digital Addressable Cable Television Systems) Regulations, 2012. The BIS standards also did not mandate both overt and covert fingerprinting.

22. Quite-a-few number of distributors have requested the authority to review the Schedule III of Interconnection Regulations 2017 in view of the above-mentioned inconsistency. These stakeholders are of the opinion that the system requirement of covert fingerprinting specified in Interconnection Regulations 2017 should be applicable only on the set-top boxes which are deployed after the coming into effect of the Interconnection Regulations, 2017 and not on the boxes deployed before that. Some stakeholders have opined that given that average life of an STB is around 3 years, all such old STBs will get retired within next two years.

23. Noting the inconsistency, the Draft Regulations mentioned that the STB deployed after coming into effect of Interconnection Regulations 2017 should only be mandated to support the covert finger printing.

24. During the consultation process, some stakeholders suggested that there should be a sunset date. Some stakeholders suggested that all the STBs deployed shall support covert fingerprinting for all pay channels by sunset date of 1 July, 2020. According to one stakeholder, covert fingerprint is a vital tool to detect piracy on the ground and it should be made applicable all across India. TRAI should come up with a deadline for DPOs to replace their existing technologies/ STBs with covert fingerprinting technology.

25. Keeping in view all the comments and suggestions the Authority is of the view that the STB deployed after coming into effect of these Amendment regulations shall support the covert finger printing. Given the life-span of STB, it is but natural that in due course all STBs in

network will become compliant to both covert and overt fingerprinting. Therefore, to include any specific regulation for the same is redundant.

Watermarking of Network Logo by the DPO

26. The ‘watermarking’ logo can be inserted at the encoder end before combining of all the signals by a DPO. Alternatively, a DPO can introduce the ‘Watermarking’ through their middleware provided in the STB.

27. Para 13 of part B of Schedule III of Interconnection Regulations 2017, states that, ‘The watermarking network logo for all pay channels shall be inserted at encoder end only’.

28. Many DPOs have requested TRAI that the ‘Watermarking’ network logo can be inserted by the encoder itself, only when the encoders have this feature. However, many of encoders deployed currently by such MSOs are part of their legacy system and do not have the provision for water marking logo insertion.

29. Considering the issue and the cost implications on legacy systems, the Draft Regulations mentioned that the encoders deployed after coming into effect of Interconnection Regulations 2017 should only be mandated to support watermarking network logo for all pay channels at the encoder end.

30. During the consultation process, some stakeholders suggested that there should be a sunset date. Some stakeholders suggested that all the encoders deployed shall support watermarking network logo for all pay channels at the encoder end by sunset date of 1 July, 2020. According to one stakeholder, there has been a rise of online piracy in the industry. In the case of absence of the watermarking logo, there is possibility of manifold increase in instances of piracy. There should be a provision to retain watermarking clause and encoders currently present in the market should be directed to be replaced by encoders, which have the feature to support watermarking logo for pay channels, to get a curb on piracy.

31. Taking into considerations all the comments, the Authority is of the view that the encoders deployed after coming into effect of these Amendment regulations shall support watermarking network logo for all pay channels at the encoder end.

Digital Rights Management (DRM)

32. DRM is a systematic approach to copyright protection for digital media. The purpose of DRM is to prevent unauthorized redistribution of digital media and restrict the ways consumers can copy content they've purchased. DRM products were developed in response to the rapid increase in online piracy of commercially marketed material, which proliferated through the widespread use of peer-to-peer file exchange programs. Typically, DRM is implemented by embedding code that prevents copying, specifies a time period in which the content can be accessed or limits the number of devices the media can be installed on. DRM technology focuses on making it impossible to steal content in the first place, a more efficient approach to the problem than the hit-and-miss strategies aimed at apprehending online poachers after the fact.

33. The Schedule III of the Interconnection Regulations 2017 does not provide for the requirements / specifications of DRM based systems. The Authority, during its consultations on Audit manual, received the feedback that owing to its benefits the IPTV based DPOs are switching to DRM technology. It is necessary that the Audit regime covers the DRM based networks and provides for enabling provisions for such operators. Accordingly, Draft Regulations included DRM specifications in Schedule III.

34. During the consultation process, the Authority received numerous comments and suggestions from various stakeholders on this issue. Numerous modification/additions were proposed by several stakeholders. Hence, the Authority is of the opinion that system requirements for DRM shall be dealt with in a separate consultation paper.

Other issues

35. In addition to the amendments proposed in the Schedule III of the Interconnection Regulations, 2017 on issues related to scope and scheduling of audits, transactional capacity of CAS and SMS system, covert fingerprinting, watermarking logo and DRM, the Authority received a large number of comments from several stakeholders on other clauses of Schedule III. Several stakeholders suggested modifications on other clauses of Schedule III. Suggestions were also received on additional clauses/ sections to be included in Schedule III.

36. The Authority is of the opinion that most of these suggestions were related with Audit process and has been discussed at length during the consultation process of the Audit Manual. Further, issues related to DRM need to be discussed during separate consultation process. Other issues have been discussed pointwise in this Explanatory Memorandum.

37. In addition, a representation dated 20.09.2019 was received from M/s. Broadcast Engineering Consultants India Limited (BECIL), wherein they informed TRAI that the name of BECIL has not been mentioned in carrying out the audit under Section 15 of the Interconnection Regulations 2017 whereas regulation 10 of Interconnection Regulations 2017 mandates BECIL or any other empaneled agencies of TRAI to conduct the audit. BECIL mentioned that in view of this many MSOs who wish to take the services of BECIL in carrying out the audit under regulation 15 are not able to do so. BECIL has been conducting technical as well as commercial audits under earlier interconnection regulations of TRAI of 2004, 2009 and 2012 regularly as well as Hon'ble TDSAT directed audits which include both commercial as well as technical audits. BECIL further mentioned that it appears that in regulation 15, mention of BECIL's name has been left inadvertently. Therefore, BECIL requested that they should also be nominated for conducting the commercial audit under regulation 15, in addition to the empaneled auditors of TRAI, keeping in view BECIL's vast experience and expertise in conducting these audits since last 10 years. BECIL also raised this issue in the OHD conducted on the Draft Regulations. During the OHD, the Authority consulted all the stakeholders on this issue, and it was felt that BECIL's name may be included in regulation 15.

38. Accordingly, the Interconnection Regulations 2017 dated the 3rd March, 2017, have been amended.