

To,
Sh. Anil Kumar Bhardwaj,
Advisor (B&CS)
Telecom Regulatory Authority of India.

Reference: Consultation Paper No.12/2022.

Subject: Our recommendations and detailed response on issues related to Draft Regulations 2022 raised in this CP. We have provided valid reasons and Justifications and have included annexures to support the recommendations.

Dear Sir,

We are Pioneer Digital TV Pvt Ltd with MSO Registration No: 9/16/2020-DAS Dated 18-08-2020. We have submitted all the mandatory self-declarations to TRAI, DOT & MIB to allow us to provide IPTV services in India during the validity of our MSO registration i.e. currently upto 17-08-2030.

We are going to offer TV services along with internet, to pass the benefit of cost reduction of delivering multiple services on the same infrastructure. Consumers can today get bundled services at lower price. We are using latest technologies to deliver quality services and choice to consumers.

We are submitting our response to the consultation paper issued on 9th September 2022 as per the prescribed format. Detailed explanations and justification for our responses for some of the Clauses were submitted in Annexures.

for Pioneer Digital TV Pvt Ltd.,



(Authorized Signatory)

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	Page 11	No	Must be 0.5% as similar in cable TV	Must be 0.5% as similar in cable TV
2	Page 19, Point 33	No	IPTV is an operator driven and controlled platform in which the consumer directly interacts with equipments installed by operator in closed user group. IPTV system delivers digital television service using Internet Protocol (IP) over various access technologies i.e. broadband connection based on copper loop, optical fiber, wireless technologies etc.	As Definition states, the IPTV delivers the Liner TV services using Internet Protocol. Since most of the operators who wish to start IPTV, do not have a managed network. Hence, using multicast might pose deployment challenges. Hence, Unicast should be allowed to carry the channels.
3	Page 19, Point 35	No	It should be allowed on Android TV to avoid unnecessary burden on subscribers.	The DAS Schedule III / Schedule IX norms can be satisfied with the help of DRM.
4	Page 20, Point 37	No	We should allow recording at headend level to support catchup-tv & time shift, as it is good features to promote IPTV.	Proper measures can be taken to securely deliver the data over network using DRM and Content protection techniques
5	Page 21, Point 48	No	It should be allowed if there is no objection by channel provider and the operator takes formal approvals for the same. Advertisement banners or Asto bands shall be allowed at some place holders in such a manner that will not interrupt or block the content.	In most of the existing Digita TV networks the MSO / TSO are posting their promotional banners / asto bands. This is not appropriat to restrict in IPTV
6	Page 23, Point 16	No	STB Should be allowed to download / side load app or apk to install 3rd party apps. Untill unless it is not counterfieting the Copyrights law.	The customer are willing to go with the IPTV only becaues they can use the same STB to convert their TVs to Smart. If we block the STB from installing third party APP there will not be any difference between Digital TV STB and IPTV STB
7	Page 23, Point 18	No	STB can have Playstore / app store to download 3rd party app.	The IPTV STBs are mostly Android / Linux. The reason the customer is opting for IPTV is to make their TVs smart or to enjoy VAS.
8	Page 23, Point 21	No	DRM may allow delivering liner TV Channels in any mode enabling content protection to avoid Piracy.	Since most of the operators are not having the Managed network, HLS / DASH / Smooth streaming is best way to stream the Liner TV Channels without having to change their network architecture.