SingTel

SINGNET PTE LTD

RESPONSE TO MDA CONSULTATION PAPER –
CONTENT PROTECTION SECURITY REQUIREMENTS IN SUPPORT OF THE CROSS-CARRIAGE MEASURE IN THE PAY TV MARKET

1. BACKGROUND

1.1. SingNet Pte Ltd (**SingNet**) refers to the Media Development Authority of Singapore (**MDA**) consultation paper dated 29 April 2011 on the Content Protection Security Requirements in Support of the Cross-Carriage Measure in the Pay TV Market (**Consultation Paper**).

1.2. SingNet is a leading Internet service provider (**ISP**) in Singapore and has been at the forefront of Internet innovation since 1994, being the first ISP to launch broadband services in Singapore. It is licensed to offer IPTV services under a nationwide subscription television licence.

1.3. This submission sets out SingNet's response to the MDA Consultation Paper.

2. COMMENTS

2.1. As a licensed IPTV service provider, SingNet already has a set of rigorous and tight content protection procedures in place for its current provision of IPTV services. This includes security requirements at its headend, delivery of the content and at the set-top box.

2.2. We have reviewed the requirements described in the MDA Consultation Paper. We are generally in compliance with the requirements and provide our specific comments to the MDA Consultation Paper below.

2.3. The MDA has also sought comments in relation to the certification process for compliance with the content protection security requirements. Currently, SingNet is already carrying out self-certification on its processes. In addition, SingNet is also required to conform to compliance certification as requested by our content providers,

as well as internal and external audits by third parties. Hence, SingNet proposes that the Requesting Qualified Licensee (**RQL**) be allowed to self-certify its compliance.

3. SPECIFIC COMMENTS

3.1. We provide our specific comments to the specific paragraphs within the MDA Consultation Paper as follows.

Paragraph 3.4.2 (Facility security)

3.2. In the MDA's email on 19 May 2011, the MDA clarified that the condition on facility security is adapted from the document issued by the Motion Picture Association of America (**MPAA**) titled "Content Security Best Practices for Digital Services".

3.3. Based on the definition of 'emergency protocol' as defined in the MPAA document, SingNet does not envisage the need for a power backup system to support closed-circuit TV (**CCTV**) system(s) for at least thirty (30) minutes. However, we believe that at minimum, the card access and the fence intrusion systems should be supported with a backup system.

Paragraph 3.4.3 (Facility monitoring)

3.4. The MDA requires CCTV recordings and key-card access logs to be retained for at least ninety (90) days. Based on SingNet's current processes, CCTV recordings are retained for seven (7) days while key-card access logs are retained for 90 days.

3.5. Since the key-card access logs are retained for 90 days, we do not foresee a need to retain CCTV recordings for a similar period. Hence, we propose that CCTV recordings to be retained only for 7 days.

Paragraph 3.5.2 (System security)

3.6. The MDA requires anti-virus software to be implemented on any system on the internal content network that is vulnerable to being infected with viruses and/or malicious codes coming from outside the facility.

3.7. SingNet cautions that anti-virus software may affect the performance of associated systems and servers. Nevertheless, we recognise that there is a benefit for anti-virus software to be implemented in systems that interact directly with customers; this should provide sufficient protection against virus and/or malicious codes.

Paragraph 3.5.8 (Content security and watermarking)

3.8. The MDA requires the RQL to apply transactional forensic watermarking for such qualified content (**QC**) accessed by each of its subscribers.

3.9. SingNet envisages that it is sufficient for an RQL to support a pass-through of the SQL's watermark; we believe that it is not necessary for the RQL to apply transactional forensic watermarking.