

**RESPONSE TO THE PUBLIC CONSULTATION ISSUED BY THE
MEDIA DEVELOPMENT AUTHORITY OF SINGAPORE**

PROPOSED CODE OF PRACTICE FOR TELEVISION BROADCAST STANDARDS



January 2014

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1. Introduction

M1 is a leading full-service provider of mobile and fixed communications services with a customer-focused approach. Since commercial launch in 1997, M1 has made significant inroads into the info-communications market and achieved an outstanding track record in innovation, service and technical excellence. As an integrated service provider, M1 has been actively monitoring the developments in the media market, exploring opportunities that may bring about new, innovative services for our customers.

M1 welcomes this opportunity to make a submission in response to the Media Development Authority of Singapore (“MDA”) consultation paper dated 9 December 2013 on the Proposed Code of Practice for Television Broadcast Standards (“Proposed Code”).

2. General Comments

M1 commends MDA’s efforts to provide more transparency and guidance to the industry and consumers on the TV broadcast standards imposed on the different TV services. However, we are of the view that the Proposed Code could be further fine-tuned to provide more operational certainty to industry players. It is also necessary to ensure that the collection of information does not impose unnecessary operational burden and costs in regulatory compliance on service providers.

Clarification Required on Roles and Responsibilities of Intermediaries

In the era of media convergence and proliferation of smart/connected devices, OTT services in the form of on-line media players and applications have been gaining widespread popularity over the past few years and are readily accessible by individuals. In line with technological developments, TV service providers may allow access to 3rd party OTT services on their respective platforms e.g. set-top-boxes. However, the fact remains that under the OTT model, the TV service provider would have limited/no control of the content and its delivery, and are akin to conduits.

We seek the MDA’s clarification on the roles and responsibilities of intermediaries (e.g. network providers, bill-on-behalf agents, etc.) for such “unmanaged content”.

Reporting Requirements on Viewer Complaints

End-user complaints and feedback are often multifaceted. As such, it may be operationally challenging to report viewer complaints to the extent proposed by MDA. Balancing consumer interests against compliance costs, we propose to remove the requirement to provide a detailed breakdown of the complaints by categories.



3. Specific Comments

Reference to Section	Description	M1 Comments
2.2.1 & 3.2.1	“The provisions set out in this sub-section shall apply to all Licensees providing free-to-air nationwide Terrestrial broadcast TV services, unless otherwise stated.”	Please clarify whether sub-section 2.2 and 3.2 apply to “must carry channels” i.e. free-to-air nationwide terrestrial TV channels provided on subscription nationwide TV services.
2.2.2 (b)	“A Licensee providing free-to-air nationwide DTV service shall ensure that the indoor reception of such service is enabled for at least 98% of all residential properties in Singapore. In order to meet this standard, the Licensee shall ensure that the outdoor TV signal strength for its free-to-air nationwide DTV service does not fall below the minimum signal strength specified in Clause 3.2.2(b).”	We would like to highlight that the signal strength is dependent on the source. At the receiver, depending on the quality of the received signal, the set-top-box may display High Definition (HD) quality stream or Standard Definition (SD) quality stream.
4.2.2 (a)	“A Licensee shall ensure that the programmes on the Terrestrial broadcast TV services, Cable TV services or IPTV services that it may provide shall achieve a picture and audio grade of 5 on the ITU-R 5-Point Quality Grading Scale as described in ITU–R BT.500.”	<p>As the MDA will appreciate, standards and specifications are taken into consideration during the design stage to guarantee system/network delivery. In this regard, M1’s IPTV service was designed to meet the current broadcast standard of at least 4 on the ITU-R 5-Point Quality Grading Scale as described in ITU–R BT.500 for <u>recorded programmes</u>.</p> <p>Hence, we request that the revised broadcast standards not be applied retrospectively for systems/services already deployed. Licensees are to comply with the revised standards during future system/network upgrades, at the earliest time possible.</p>



Reference to Section	Description	M1 Comments
4.2.3 (e)	<p>“In the event of a pattern or trend of viewer complaints related to picture and audio quality, MDA may, in its discretion, launch an investigation into the service(s) provided by the Licensee. Where an investigation is undertaken in this regard, the Licensee shall provide at MDA’s request and without charge, recordings of the programme(s) or channel(s) in question. Such recordings are to be made of the MPEG transport stream after all encoding and multiplexing have taken place.”</p>	<p>We would like to seek further guidance from MDA on its assessment of viewer complaints, in particular, under what circumstances will an investigation be launched e.g. pattern/trend, threshold, duration of observations etc.</p> <p>We would highlight that due to system limitation, it may not be feasible for Licensees to retain recordings of all programmes broadcasted for an extended period of time.</p>
5.2.3 (a)	<p>“A Licensee providing nationwide TV services shall monitor and submit to MDA monthly ORI reports on the Channel ORI and Service ORI results.”</p>	<p>With reference to Section 5.2.3 (a), Licensees providing niche TV services are not required to submit any ORI reports to MDA. As such, we understand that it follows that Section 5.2.3 (d) on the reporting of outage incidents does not apply to Licensees providing niche TV services.</p>
5.2.3 (d)	<p>“A Licensee shall also record and report all outage incidents in the monthly ORI reports...”</p>	
5.3	<p>Reliability Requirements for OTT TV services</p>	<p>Please clarify whether this sub-section applies to TV service providers who allow viewers to access 3rd party OTT content via its platforms.</p>
5.3.3 (f)	<p>“A Licensee shall submit to MDA quarterly reports, in the format set out in the First Schedule, on viewer complaints relating to outages and poor reception quality that were received over the past three (3) calendar months, 14 days after the end of the quarter...”</p>	<p>Please clarify if this obligation only applies to nationwide OTT Licensees.</p>