



**STARHUB CABLE VISION LTD'S RESPONSE TO
MDA AND IDA PUBLIC CONSULTATION PAPER
ON**

**“THE TECHNICAL SPECIFICATION FOR THE
INTEGRATED RECEIVER DECODER FOR USE WITH
THE SECOND GENERATION DIGITAL TERRESTRIAL
TELEVISION BROADCASTING SYSTEM”**

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StarHub Cable Vision Ltd (“StarHub”) welcomes the opportunity to comment on the Authorities’ Public Consultation Paper, on the proposed Technical Specification for the Integrated Receiver Decoder for use with the second generation Digital Terrestrial Television Broadcasting System (“the Proposed Code”).

StarHub supports the presence of a well-defined and workable Code to be adopted and effectively implemented in Singapore. It is important that such technical specifications should be clear and practical to all users and manufacturers; in order for the relevant Authority to effectively implement the Proposed Code. However, StarHub would submit that the specifications in the Code should not be over-reaching or unnecessarily burdensome. If the regulatory requirements are ambiguous or too onerous, this will result in uncertainty and confusion, will discourage investment, will delay innovation, and will impose costs on operators (which must inevitably be passed on to customers).

StarHub has carefully reviewed the Proposed Code. Our comments on the mandatory requirement to support both Dolby Digital Plus and HE-AAC as a multi-channel audio requirement are appended below for your considerations.

Whilst the proposed mandatory requirement to support both Dolby Digital Plus and HE-AAC as a multi-channel audio requirement would result in better audio quality and bandwidth efficiency, the cost of incorporating this specification into the decoders would be substantial.

<p>This statement is marked as “Confidential”</p>

Given that Dolby Digital Plus is a relatively new specification with a very limited deployment in the region, we submit that this requirement should be implemented in phases. The requirement should initially be implemented on an optional basis, and should then be reviewed triennially. The Authority should monitor the region’s market conditions, technology advancement and deployment rate before proceeding to mandate this specification in the Code.

We would emphasise that, as StarHub does not benefit from the carriage of FTA services (or from carrying the Dolby Digital Plus signal) we would not be in a position to absorb the cost of implementing this specification. If we were required to carry the Dolby Digital Plus signal for FTA channels on our cable platform then, based on a principle of cost-causality, MediaCorp (as the FTA operator) should be responsible for funding the cost of implementing the specification.
