

Consultation Paper No.: 10/2018



Telecom Regulatory Authority of India



Consultation Paper

on

Review of Television Audience Measurement and Ratings in India

3rd December, 2018

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Written comments on the consultation paper are invited from the stakeholders by 2nd January 2019. Counter comments, if any, may be submitted by 16th January 2019. Comments and counter comments will be posted on TRAI's website www.trai.gov.in. The comments and counter comments may be sent, preferably in electronic form to, Shri Arvind Kumar, Advisor (B&CS), Telecom Regulatory Authority of India, on the e-mail: arvind@traigov.in or vk.agarwal@traigov.in.

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Chapter I

Introduction

- 1.1 Audience measurement implies measurement of what is being viewed. It indicates the popularity of a channel or a programme and assists advertisers, broadcasters and advertising agencies in selecting the right media at the right time to reach the target audience. Advertising expenditures are typically guided by audience measurement and also cost of reaching various audience segments, advertisement placements and programme schedules.

- 1.2 On the basis of audience measurement data, ratings are assigned to various programmes on television. Television ratings in turn influence programmes produced for the viewers. Better ratings would promote a programme while poor ratings will discourage a programme. Incorrect ratings will lead to production of programmes which may not be really popular while good programmes may be left out.

- 1.3 In 2008, Television rating services on a commercial basis were provided by TAM Media Research and Audience Measurement and Analytics Ltd. (aMap). Operations of both these agencies were limited to a few large cities and the panel size of households for audience measurement was also limited. Concerns were raised regarding the credibility of the rating system in India. MIB, in 2008, sought TRAI's recommendations on various issues relating to the Television Audience Measurement (TAM)/ Television Rating Points (TRP) and the policy guidelines to be adopted for Rating Agencies. TRAI gave its recommendations to MIB on 19th August 2008 covering various aspects including the need for the Government to regulate the system of television ratings. TRAI also recommended the

approach of self-regulation through setting up of an industry-led body, the Broadcast Audience Research Council (BARC).

- 1.4 Subsequently, a committee was constituted by MIB under chairmanship of Dr. Amit Mitra, the then Secretary General, Federation of Indian Chambers of Commerce and Industry (FICCI), which also made extensive recommendations towards setting up of a transparent and credible self-regulatory mechanism for television rating system by BARC.
- 1.5 Though the BARC came into existence in July 2010; no significant progress was made by BARC to set up a transparent television rating mechanism in the country. Further, in 2011, TAM Media Research became sole provider of television rating services on a commercial basis as aMAP discontinued its services. Subsequently, MIB in 2012 sought recommendations of TRAI for laying down comprehensive guidelines/accreditation mechanism for Television Rating agencies in India to ensure transparency and accountability in the rating system.
- 1.6 After an exhaustive consultation process, TRAI gave its recommendations on “Guidelines/Accreditation Mechanism for Television Rating Agencies in India” to MIB on 13th September 2013. The Authority supported self-regulation of television ratings through an industry-led body like BARC. TRAI recommended comprehensive guidelines for registration of television rating agencies.
- 1.7 MIB accepted TRAI recommendations and notified Policy Guidelines for Television Rating Agencies in India on 10th January 2014. Under these guidelines, the industry-led body BARC was accredited by MIB on 28th July 2015, to carry out the television ratings in India. TAM Media Research did not register itself with MIB and discontinued its operations.

BARC commenced its operations in 2015 and since then it is the sole provider of TV rating services on commercial basis.

- 1.8 Television audience measurement has ever since been in a developing phase with advanced technologies being used and updated to maintain transparency and improve credibility of the system. Further, over the years new issues have emerged which need to be addressed. Several concerns relating to neutrality and reliability of the existing rating system have been raised by stakeholders, which necessitated a need to review of existing Television Audience Measurement and Ratings system in India. Further, issues relating to panel expansion and panel tampering have surfaced which need special attention because they have significant impact on the TV channel ratings.
- 1.9 The basic objective of this consultation paper is to solicit the views of stakeholders on regulatory initiatives/measures to be taken to make TV rating services more accurate, widely acceptable. This consultation paper also explores possibilities of use of new technologies to enhance credibility, transparency, neutrality and fairness in the TV rating in India.
- 1.10 Chapter II presents the current scenario of television audience measurement in India. Chapter III discusses various issues related to review of existing Television Audience Measurement and Ratings system in India. Chapter IV enlightens various international practices adopted by some countries. Chapter V summarizes the issues for consultation. Accordingly, TRAI has floated this consultation paper for seeking comments of stakeholders on the various issues related television audience measurement in India and review of existing system.

Chapter II

Television Audience Measurement in India: Current Scenario

- 2.1 Television Audience Measurement (TAM)/ Television Rating Points (TRPs) have been in existence in India since 1993. Initially, the only data available and followed was Doordarshan Audience Ratings (DART), collected by Audience Research Unit of Doordarshan (DD) through its 40 Kendras and 100 All India Radio stations. The main function of the audience research was to provide research support for the programming on Doordarshan network. Starting with general viewing surveys up to 1988, panel diaries were introduced by DD in 1989 and continued till 2001. They were later revived in 2004 covering 3600 TV homes in rural and 1600 TV homes in Urban India.
- 2.2 In 1994 ORG-MARG's INTAM (Indian National Television Audience Measurement) was established. INTAM's sample size was miniscule and restricted to major cities. While INTAM was in operation, a second rating agency TAM was formed in 1998. In 2001, both INTAM and TAM were formally merged. In 2004 another rating agency, Audience Measurement and Analytics Ltd. (aMap), started operations in India. Its commercial operations however, started only in February, 2007. However, the operations of both these agencies were limited to a few large cities having population above one lakh and neither of the two agencies covered the state of J&K. Within big cities too, their panel size of households for audience measurement was limited to about 7000 (TAM) and 6000 (aMAP) metered homes.
- 2.3 The problems surrounding television rating system were first raised with the Authority by MIB in January, 2008. MIB sought TRAI's

recommendations on various issues relating to the Television Audience Measurement (TAM)/ Television Rating Points (TRP) and the policy guidelines to be adopted for Rating Agencies. After an exhaustive consultation process, TRAI gave its recommendations to MIB on 19th August 2008 covering various aspects including the need for the Government to regulate the system of television ratings. TRAI had, inter-alia, recommended the approach of self regulation through setting up of an industry-led body, the Broadcast Audience Research Council (BARC). The summary of TRAI's abovementioned recommendations is enclosed as Annexure I.

2.4 Subsequently, vide its letter dated 9th December 2009, MIB informed TRAI, inter-alia, that the self regulation through BARC, as recommended by TRAI, has not become operational and requested TRAI to suggest further course of action. TRAI vide its response dated 4th May 2010 suggested that in the event of BARC not becoming operational, Government may consider entrusting work of laying down guidelines and accreditation of suitable agencies to carry out measurement of television audience to the Indian Institute of Mass Communication, New Delhi. It was further stated that in case this is also not found feasible, Government may consider entrusting this work to TRAI appropriately under section 11 (1) (d) of the TRAI Act, 1997.

2.5 The Committee headed by Dr. Amit Mitra, the then Secretary General FICCI, had also made recommendations in November 2010, in line with the recommendations of TRAI, for setting up television rating system through BARC. The key recommendations of the Committee are enclosed at Annexure II. The Committee gave its recommendations on the issues covering sample size, transparency & reliability, viewership across diverse platforms, shareholding pattern of rating agencies, general operational &

disclosure norms of rating agencies, tampering & manipulation, frequency of television rating announcement, guidelines for BARC etc.

- 2.6 In 2011 aMAP discontinued its services and TAM Media Research became the sole provider of television rating services on a commercial basis. Its panel size of households for audience measurement was approximately 8000 homes.
- 2.7 TRAI received a reference from MIB on 31st August 2012 (AnnexureIII), wherein MIB has made the following observations:
- a) Television rating measurement system in India suffers from several deficiencies and urgent action needs to be taken to put in place a credible and transparent television rating generation system.
 - b) Self-regulation of television rating system in India has failed to take off as BARC has not been able to take any credible action on the recommendations made by TRAI and by Dr. Mitra's Committee.
 - c) The presence of cross holdings in TAM Media Research (India) raises doubts about the credibility of the data being generated by TAM Media Research.
- 2.8 MIB requested TRAI to recommend comprehensive guidelines/accreditation mechanism for television rating agencies in India to ensure fair competition, better standards and quality of services by television rating agencies.
- 2.9 After an exhaustive consultation process, TRAI gave its recommendations on "Guidelines/Accreditation Mechanism for Television Rating Agencies in India" to MIB on 13th September 2013. The Authority supported self regulation of television ratings through an industry-led body like BARC. TRAI recommended comprehensive guidelines for registration of

television rating agencies. TRAI also recommended comprehensive guidelines for registration of television rating agencies which included registration, eligibility norms, cross-holding, methodology of rating, complaint redressal, sale & use of ratings, audit, disclosure, reporting requirements and penal provisions.

- 2.10 MIB accepted TRAI recommendations and notified Policy Guidelines for Television Rating Agencies in India on 10th January 2014. Under these guidelines, the industry-led body BARC was accredited by MIB on 28th July 2015, to carry out the television ratings in India. TAM Media Research did not meet eligibility norms stipulated in MIB's guidelines and discontinued providing rating services.
- 2.11 BARC is an industry led body represented by Indian Broadcasting Foundation (IBF), Indian Society of Advertisers (ISA) and Advertising Agencies Association of India (AAAI). BARC commenced its operations in 2015 and since then it is the sole provider of TV rating services on commercial basis.
- 2.12 Currently more than 550 TV channels are being monitored for the purpose of audience measurement by BARC. All the TV channels included in the audience measurement are watermarked by BARC. Watermark is a code inserted into the audio channel of the signal of a TV channel prior to its uplinking to satellite. Each TV channel is allocated a unique code for its identification.
- 2.13 For carrying out the audience measurement, BARC through survey forms a panel of households wherein meters are installed on TV sets. Presently BARC has installed approx 33000 meters which are expected to reach 44000 by the end of 2018. Meters continuously and passively capture the audio codes embedded on TV channels which are being viewed in real

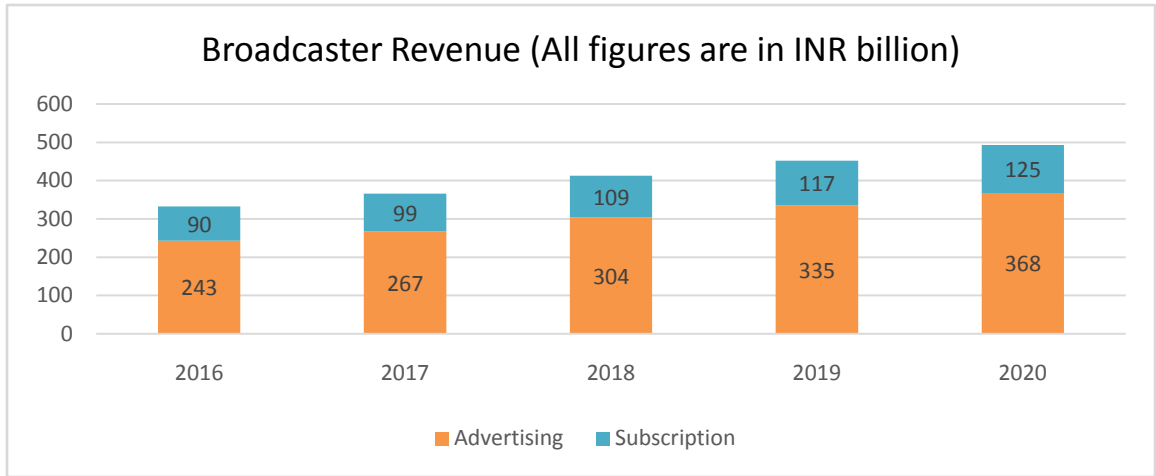
time. The raw data, captured by the meter, is then received by the BARC server where it is made available to pre-processing software that cleans the raw event data, checking for errors and inconsistencies. The pre-processed data is then subjected to further processing with software that performs data editing, validation and weighting. The final weighted and projected audience viewing output is encrypted and made available to subscribers of BARC in a form suitable for use by subscriber media companies, media agencies and advertisers. BARC provides TV ratings on weekly basis.

2.14 Economic growth and evolution of technology has created a new generation of consumers consuming large amount of programmes via different mediums. Today, non-linear platforms comprising of time shifted programmes along with linear platforms are driving the programme to the consumers and forming a new trend for programme consumption. India attract a diverse audiences from all regions watching local linguistic as well as other premium programmes. Therefore, the terms and methodology used to derive and analyze audience measurement data becomes utmost important.

2.15 As we all know broadcasting sectors major share depends on advertising revenue compared to subscription revenue from the subscribers. In 2017, broadcasting sector grew from INR 59,400 crore to INR 66,000 crore with 60 percent revenue generated through distribution and 40 percent from advertisement. EY estimates that advertising revenue is 41% of industry revenues while for the broadcaster the numbers increase to 72% to total revenues.¹ In the world where data security is becoming a major concern, audience measurement techniques need to be upgraded for better understanding of the user behaviors without any data breach.

¹FICCI- EY Report – Re-imagining India’s M&E Sector - March 2018

Figure 1: Broadcasters' Revenue



Source: FICCI- EY Report – Re-imagining India's M&E Sector- March 2018

2.16 As we can observe from above bar graph, advertising revenue plays an important role for broadcaster. Major share of broadcaster's revenue comes from advertisements. Therefore, television audience measurement needs to be more credible, transparent and representative.

Chapter III

Issues related to review of Television Audience Measurement and Rating

- 3.1 The importance and need for a credible, transparent and representative television audience measurement system is recognized the world over. Continuance with an inadequate television rating system will hamper the growth of TV industry as financial decisions; production of programme and its scheduling are largely influenced by television ratings.
- 3.2 The Authority while framing its recommendations on “Guidelines/Accreditation Mechanism for Television Rating Agencies in India” dated 13th September 2013, observed that the prevailing television ratings carried out by M/s TAM Media Research had certain deficiencies as pointed out by several stakeholders. The major concerns were related to credibility and neutrality of TV ratings arising due to cross-holding between the rating agencies and broadcasters, advertisers and advertising agencies; disclosures by the rating agencies; non-transparent methodology; inadequate sample size etc. The Authority was of the view that these issues can be effectively addressed by putting in place a proper regulatory framework and stipulating appropriate guidelines for television rating agencies.
- 3.3 The Authority noted that in countries like Australia, Canada, France, Ireland, South Africa, UK and USA, the television rating systems were managed through a self-regulatory model. In the self-regulation model, the onus for credibility and accuracy of ratings vested in the concerned stakeholders - the broadcasters, advertisers and advertising agencies- whose business is mainly affected by the television ratings. A proper self-regulatory model having adequate representation from all

concerned stakeholders, could help in ensuring that no individual section of the industry has majority control (and hence influence) on decisions as these would be collective. This could be a way of mitigating the conflict of inherent issues that arise when the rating agency is dominated by one particular group.

3.4 The Authority also noted that the Mitra Committee in its report had also recognized the self-regulation by the industry as the best way to go forward. The Committee felt that there should be self-regulation of a credible nature which should provide continuous improvement in quality and methodology of the rating system, to provide accurate, up-to-date and relevant findings. The Committee had made extensive recommendations towards setting up of a transparent and credible self-regulatory mechanism for television ratings by BARC. Accordingly, the Authority in its recommendations dated 13th September 2013 supported the self-regulation of television rating system through an industry-led body like BARC.

3.5 Further, the Authority was of the view that the shortcomings in the rating system had to be rectified irrespective of whether the rating is undertaken by either BARC or by an independent rating agency. In the absence of a framework, a rating agency could continue to operate without addressing the shortcomings. Thus, the Authority was of the view that a framework, in the form of guidelines to be notified by MIB, for functioning and monitoring of television rating agencies was required to ensure generation of credible and transparent ratings. Accordingly, the Authority recommended comprehensive guidelines for registration of rating agencies which covered eligibility norms, cross-holdings, methodology, complaint redressal, sale & use of ratings, audit, disclosure, reporting requirements and penal provisions for rating agencies.

- 3.6 Based on the recommendations of TRAI, MIB notified the Policy Guidelines for Television Rating Agencies in India on 10th January 2014 and registered the industry-led body BARC on 28th July 2015 under these guidelines, to carry out the television ratings in India. BARC, an industry body, was set up to design, commission, supervise and own an accurate, reliable and timely television audience measurement system for India. BARC, a joint industry body comprising of three industry associations Indian Broadcasting Foundation (IBF), the Indian Society of Advertisers (ISA) and the Advertising Agencies Association of India (AAAI) having 60%, 20%, and 20% shares respectively, commenced its operations in 2015 and since then is providing rating services to the stakeholders on regular basis. Despite being an industry-led body, some concerns have been raised by some stakeholders regarding neutrality and credibility of the ratings services provided by BARC. In such scenarios, the issue arises whether the BARC is able to accomplish the purpose, for which it has been established.
- 3.7 In this regard it is also important to mention that though MIB registered BARC in 2015 for television audience measurement but later it was informed to TRAI that a joint venture was formed between BARC and TAM to hold equity share in the joint venture company in the ratio of 51:49 for the purpose of providing services to BARC. Under the agreement, TAM had also committed to decommission, uninstall and transfer to the company an aggregate minimum number of 10,000 TAM TV meters.

Issues for Consultation:

- Q1. Whether BARC has been able to accomplish the purpose with transparency and without any bias for which it has been established? Please elaborate your response with justifications. Also,**

suggest measures to enhance the effectiveness of BARC to give TV ratings with transparency and without bias.

Q2. Do you feel that present shareholding/ownership pattern of BARC ensures adequate representation of all stakeholders to maintain its neutrality and transparent TV ratings? How its credibility and neutrality can be enhanced further? Please elaborate your response with justification.

Is there need to create Competition in rating services

3.8 Currently only one agency is providing the rating services in India. Inadequate competition may raise concerns related to monopolistic behaviour due to presence of only a single rating agency, whereas increased competition may lead to better quality of service and reduced costs. It is also pertinent to note that representative, credible and transparent rating services require substantial capital investments. Therefore certainty of a business for a period of time is also required to ensure reasonable return on investments. One may opine that multiple rating agencies in the same region may lead to duplication of efforts, disputes on credibility/reliability and wastage of resources, therefore, initially more focus could be given on increasing coverage.

3.9 One way of limiting monopoly markets could be by having different rating agencies for different regions/states. The country could be divided into different zones for the purpose. However, such an approach would not result in greater competition in a particular area. Another alternative could be to have separate rating agencies for different stages involved in the rating process i.e. establishment survey, preparing panel of households for measurement and analysis of the data to arrive at the ratings. For example, in the UK different agencies are appointed for each

of these stages. A third option could be to have different agencies for different delivery platforms.

- 3.10 Although there is no restriction on the number of firms entering into rating services in India, as on date television audience measurement is being done by only one agency i.e. BARC. One may opine that sufficient market for multiple television rating agencies in financial sector does not exist in India. However, it is pertinent to note that in case of credit rating services there are seven rating agencies (such as CRISIL, ICRA, CARE, ONICRA, and SMERA) at present which have been registered by SEBI². India is a large country with over 1.3 billion population and more than 19.5 crore TV households, therefore, it may be argued that a market exists.
- 3.11 The main issue for consideration is as to whether there is a need to have competition in the television rating services. In case competition is required, what initiatives are required to encourage effective competition in television rating services, so that rating services also may reap the benefits of competition.

Issue for Consultation:

- Q3. Is there a need to promote competition in television rating services to ensure transparency, neutrality and fairness to give TAM rating? What regulatory initiatives/measures can be taken to make TV rating services more accurate and widely acceptable? Please elaborate your response with justifications.**

²<https://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yes&intmId=7>

BARC Methodology³

- 3.12 In India, BARC is the sole organization which gathers and publishes audience measurement data with the help of measurement techniques adopted globally with an objective to have fair rating of all TV channels. BARC uses a people-meter, namely, BAR-o-Meter for collection of viewership data. Audio Watermarking technology embeds audio watermarks in videoprogramme prior to upload and broadcast. These watermarks are not audible to the human ear, but can easily be detected and decoded using dedicated hardware or software. The watermark is broadcasted along with the program. As viewing details are recorded by the BAR-O-meters, so are the watermarks. The raw data is cleaned, merged with the channel, program, language and broadcast schedule details. Universe Estimates are applied to get viewership data. This gives programme owners unprecedented visibility into when and where their programme is broadcast, who has viewed it, etc. As the watermark is part of the program, any attempt to destroy or remove it will also ruin the quality of the material in which it is embedded.
- 3.13 Watermark technology- BAR-O-Meter captures TV usage, TV station identification and individual viewing through the use of two digital devices, one installed by the broadcaster (Embedder) at station head end/transmission site(s) and the other device, referred to as the “BAR-O-Meter” that is installed on each TV set in the panel household.
- 3.14 Embedder equipment is placed at the Broadcaster’s headend where the Channel signal transmission begins. The device embeds a unique watermarked code in the audio component of the program workflow. This code consists of the Channel ID & the time stamp. Each channel has its own unique code (or codes, in case the channel has taken a back-up).

³<https://www.barcindia.co.in>

Once the unique watermark IDs are generated and assigned to each broadcast station cooperating with BARC India, the embedder is installed at the broadcaster's headend transmission site and a special station specific electronic card is inserted. The results in the embedder continuously placing a time stamped channel name and watermark ID in the station's program workflow. The watermark is an inaudible audio code made available to TV broadcasters that subscribe to and support the BARC India measurement of TV audiences. A master list of TV Station Watermarked IDs is stored on the BARC India server and downloaded to BAR-O-Meters for the identification and measurement of TV Station viewing.

3.15 Each meter system consists of a main unit, a display unit and probes that for BAR-O-Meters capture the audio output of the TV set. Each main unit is equipped with a microprocessor and a modem. The main unit is placed near the TV set being measured in the panel household. Each main unit has a probe attached to it that is either placed near the TV set or connected to the line or audio out of the TV. The probe capture the identity of each tuned TV signal and feeds this information to the main unit where it is time stamped and stored for transmission as viewing events to BARC India central site collection servers assigned to BAR-O-Meter.

3.16 The TV set metering systems continuously and passively captures TV viewing events in real time, recording the time and duration of channel tuning events and capturing the viewership events of individual members ages 2+ that have pressed their viewer ID button to confirm their presence in the audience. The main unit stores the individual time stamped events in memory for transmission to the BARC India server at predetermined intervals throughout the viewing day. The BAR-O-Meter TV viewing event data is then received by BARC India collection server

where collected TV event data are simultaneously backed up and made available to pre-processing software.

- 3.17 Data collected from the meters is in seconds. However, in keeping with international standards, all validation rules are on viewing sessions (blocks of time of TV Set on in the HH – Tuning; and of each individual viewing TV - Viewing) and reported data is in clock minutes. Hence, all data needs to be converted to clock minutes (i.e. HH:MM format, e.g. 12:00:00 to 12:01:00, 12:01:00 to 12:02:00 and so on).
- 3.18 Individual viewing sessions within a clock minute: For BAR-O-Meter measured TV sets there are rules applied to the events that attribute viewing to one and only one TV channel for an entire clock minute. Only one channel is eligible to receive viewing credit for each clock minute throughout the viewing day. If an individual is viewing a TV channel for 30 seconds or more in a clock minute, the rules are straightforward and viewing is attributed to that channel for the entire clock minute. The rules become more complex when viewing during a clock minute involves multiple channels for a total of 30 or more seconds. The pre-processed minute level data is then subjected to further processing with software that performs data validation and weighing.
- 3.19 Validation of viewership data is a daily process performed at two levels – A set of Validation rules that validate the data for identification of statistical outliers and set of more stringent rules are applied to channels that have been confirmed as having attempted tampering of panel households following a rigorous process of Vigilance investigations and raw data analyses by Data Scientists. As part of Quality Control procedure these validation rules are automated and inbuilt in the system with minimal human intervention. Those households and individuals that fail a defined number of rules in this set are identified as outliers and

removed from the reporting data of the day. These validation rules are updated at regular intervals basis new learnings.

- 3.20 Though BARC publishes ratings as point estimates, in reality they are interval and range estimates. The range depends on the relative error associated with each estimate. The factors that affect relative error are sample size and the reach. Therefore, new methods need to be developed which would minimize the relative errors.
- 3.21 Further, it has been observed and also stated by some stakeholders that a few television news channels show popular programmes that are out of their category or in different language for some time during the telecast. This broadcast of popular programmes attracts more eyeballs and potentially affects the TV ratings/TAM ratings. The major issue is that such channels by showing popular programmes other than its category, gain unfair advantage over the other similarly situated channels.

Issues for Consultation:

- Q4. Is the current audience measurement technique used by BARC appropriate? Suggest some methods, if any, to improve the current measurement techniques.**
- Q5. Does broadcasting programmes that are out of their category or in different language for some time during the telecast affect the TAM rating? If so, what measures should be adopted to curb it?**

Panel Expansion

- 3.22 Panel size is the number of homes, drawn from samples collected during establishment survey, where the audience measurement device is placed. It is an important parameter that determines the accuracy of statistical

exercise. The panel size should be representative of age, socio-economic class, gender, working status, delivery platforms and geographical coverage (both urban & rural markets).

3.23 The policy guidelines for television rating agencies has the following provisions regarding panel size:

“5.3.5 A minimum panel size of 20,000 to be implemented within 6 months of the guidelines coming into force. Thereafter, the panel size shall be increased by 10,000 every year until it reaches the figure of 50,000. The panel of homes has to remain representative of all television households in the country.”

3.24 As per information available, by the end of 2015, BARC had attained a panel size of 22000 but as per the provisions of policy guidelines, panel size should have reaching 50000 by the end of 2018. However, as per information available BARC is expected to achieve a panel size of 44000 by the end of 2018. With such small panel size, it becomes really difficult to predict/ establish true measurement data, especially, for a country of about 1.3 billion people along with diversity.

3.25 Smaller panel size results in limited data for analysis and therefore is not truly representative, which compromises the accuracy of the findings. Contrary, a larger panel size would certainly improve robustness and give more weightage/value to measurement rating. But larger panel size comes with a higher cost and logistics. The cost would have to be borne by the stakeholders who may not be in a position to infuse such costs. This poses a significant challenge.

3.26 Today, the world is advancing towards Internet of Things (IOT), a technology in which any device is connected to the internet and to other connected devices, collecting and sharing data. Similarly, TAM

systems require collecting data from the panel homes as discussed in the methodology used by BARC. Today, BARC through establishment surveys conducts a study and gather details of households and individuals which is used together with census data for preparing a universe estimate for TV audience characteristics such as geography, demography, age, social-economy status etc. This set-up involves huge amount of installation and maintenance cost to the industry. Thus, panel expansion becomes a huge barrier to the industry in terms of cost.

3.27 Achieving a higher panel size more rapidly requires newer technologies to be adopted. One method for increasing panel size could be to collect viewership data from a large set of panel homes, transferring viewership data electronically to the servers from these homes, making it a more viable and cheaper option for the industry. This requires manufacturing of hybrid STB's, capable of transferring viewership data through establishing a path/connection from STB to the remote servers of the television audience measurement agency (could be a SIM inserted in the STB or via an external device consisting of a SIM which could be installed into existing STB's). The implementation of such technology could require replacement of the existing STB's or upgrading the existing STB's (that support the technology). This may involve some cost but may bring more objectivity and transparency in the system. Another method for rapid panel expansion could be to mandate the distribution platform operators (DPOs) i.e. cable operators and DTH operators to electronically send viewership data to the television measurement agency for statistical analysis of data.

3.28 Obtaining higher panel size through return path data technology may be one of the way to collect viewership data. But, installation of devices in such panel homes involves keeping the individuals information highly anonymous so that the individual's privacy is not

compromised. Further, transfer of viewership data electronically from panel to the servers must only happen with the consent of the individuals. If the individual denies sharing of the viewing data, then his opinion should be respected and no data should be obtained from that individual's home.

- 3.29 Another issue is regarding information/level of data that could be pulled out/retrieved from the panel homes regarding the individuals. The amount of granularity of individual information and viewership data, retrieved from panel homes, should not disclose the identity of the individuals keeping it anonymous. One method could be to provide a virtual id to each individual containing all different individual characteristics and retrieve all viewership data with respect to their virtual id.

Issues for Consultation:

- Q6. Can TV rating truly based on limited panel homes be termed as representative?**
- Q7. What should be done to reduce impact of manipulation of panel home data on overall TV ratings? Give your comments with justification.**
- Q8. What should be the panel size both in urban and rural India to give true representation of audience?**
- Q9. What method/technology would help to rapidly increase the panel size for television audience measurement in India? What will be the commercial challenge in implementing such solutions?**

- Q10. Should DPOs be mandated to facilitate collection of viewership data electronically subject to consent of subscribers to increase data collection points for better TRP ratings? Give suggestion with justification.**
- Q11. What percentage of STB supportstransferring viewership data through establishing a reverse path/connection from STB? What will be the additional cost if existing STBs without return path are upgraded? Give your suggestions with justifications.**
- Q12. What method should be adopted for privacy of individual informationand to keep the individual information anonymous?**
- Q13. What should be the level/granularity of information retrieved by the television audience measurement agency from the panel homes so that it does not violate principles of privacy?**

Panel Tampering/Infiltration

- 3.30 Panel Tampering/ Infiltration remains a legacy issue for television audience measurement in India. In panel tampering, incentives are providedto people in the panel homes for watching a particular channel that would affect ratings. Panel infiltration has a significant impact when the panel size is smaller. With the increase in panel size, infiltration of panel homes becomes challenging.
- 3.31 Additionally, one of the biggest challenges has been the absence of any specific law through which the agents/ suspects involved in panel tampering/infiltration could be penalized. BARC has filed FIRs in various police stations against the agents/ suspects involved in panel tampering/infiltration. However, BARC efforts to mitigate panel

tampering/ infiltration have been hampered due to absence of any legal framework. Also, present MIB guidelines governing the media sector and audience measurement do not address “Panel Tampering/Infiltration”. One method could be to provide special provision in the existing guidelines to address panel tampering issue. Another method could be that the broadcasters give authorization to BARC for filing complaints on their behalf.

Issue for Consultation:

Q14. What measures need to be taken to address the issue of panel tampering/infiltration? Please elaborate your response with justifications.

Raw Level Data (RLD)

3.32 Television viewership data generated from the meters installed at panel homes is called the raw level data (RLD). This raw data is transmitted to the centralized server of BARC, where it is processed and analyzed minute-by-minute to offer actionable/valuable insights for better targeting of advertisements, social messaging. Weekly data released by BARC comprises of weighted estimates of individual panel level data providing high level of granularity. RLD data of such granularity makes it possible to extract timely, actionable insights which can help in more effective programming, scheduling, promo planning, distribution and media planning etc. BARC has given access of RLD to media agencies, helping advertisers in planning investments efficiently.

3.33 Some broadcasters represented to TRAI that BARC is contemplating to provide RLD to broadcasters in the near future. They raised the concerns that sharing the raw data by BARC would expose the headend level information, which can be used by data experts to make informed

judgement on the headends wherein the people meter gadgets are most likely placed by BARC, for compiling the viewership data, and would defeat the sanctity of the data as broadcasters will be able to know the markets that maximize ratings and the MSO/LCO will have a major unfair advantage as they would start charging disproportionately high fee based on raw data ratings from the broadcasters. TRAI sought clarification from BARC regarding reason for release of raw data, how secrecy of households where the people meter are placed is maintained, and if there was any breach of the policy guidelines for television rating agencies prescribed by MIB in case raw data is released. BARC in its reply said that raw data can be a powerful tool for planning by broadcasters and optimization of advertising spends by Media Agencies. For Advertisers, analysis of raw data improves efficiency of resource allocation as far as advertising expenditure on TV channels is concerned. For Broadcasters, access to raw data gives sharper insights into viewership behavior. This can help improve targeting of viewers with appropriate programmes. Regarding maintainance of secrecy of panel homes, BARC added that sanctity of panel households can be maintained if raw data has a secured, limited release, and particularly to entities that have no stake/gain in seeking to influence viewership. BARC further added that release of raw data on a large scale, without adequate safeguards, may make it difficult to ensure secrecy of panel households because of panel tampering/ infiltration, exposure of sample expansion & panel churn etc. Regarding breach of the policy guidelines for television rating agencies prescribed by MIB in case raw data is released, BARC replied that release of raw data does not contravene MIB policy. BARC added that release of raw data to a wider section of the broadcasters may aid infiltration and potentially weaken the system. Subsequently, TRAI was of the view that release of raw data may potentially compromise on secrecy of households and sanctity of the data. Thus, TRAI directed

BARC India to hold back the release of RLD to broadcasters till a final decision is taken by TRAI on this issue.

Issues for Consultation:

Q15. Should BARC be permitted to provide raw level data to broadcasters? If yes, how secrecy of households, where the people meters are placed, can be maintained?

Q16. Will provisioning of raw level data to broadcasters, in any manner, either directly or indirectly contravene the policy guidelines for television rating agencies prescribed by MIB?

Reporting Requirements & Disclosure

3.34 Presently, Policy Guidelines For Television Rating Agencies In India have mandated the rating agencies to provide the following disclosures and reporting requirements:

a) Disclosure

The following information shall be disclosed by the rating agency on its website:

- a) Detailed rating methodology in clear terms including possible sources of errors.
- b) Details about the coverage in terms of geographical and other socioeconomic representation.
- c) Possible sources of conflict of interest, which could impair its ability to make fair, objective and unbiased ratings.
- d) Quality control procedures with respect to all external and internal operations which may reasonably be assumed to exert significant effects on the final results.
- e) Rate card for the various reports and discounts offered thereon.

- f) Ownership pattern of the rating agency, including foreign investment/joint venture/associates in the agency.
- g) Quarterly/Annual audit reports.
- h) Complaint redressal statistics.
- i) Comments/viewpoints of the users of the rating data.

b) Reporting Requirement

- a. The rating agency shall annually report to the Ministry of Information and Broadcasting on following aspects:
 - i. Equity structure, share-holding pattern including foreign investment/joint venture/associates in the rating agency. Any changes during the reporting period, if any, shall be reported immediately.
 - ii. Details of key executives and Board of Directors.
 - iii. Interests of the rating agency in other rating agencies/ broadcasters / advertisers / advertising agencies.
 - iv. Details of coverage of rating services.
 - v. Subscription and revenue details.
 - vi. Any other information and reports as may be asked for by MIB or TRAI, from time to time.
- b. The company shall be bound to give such information with respect to its ratings or its operations as may be required by the Central Government or Telecom Regulatory Authority of India (TRAI) or any agency authorized by the Central Government or TRAI, as the case may be, within such period and in such format, as may be specified by the Central Government or TRAI or their agency.
- c. The authorised signatory of the company providing the information sought for under Para 9.2 shall also be required to affirm as to the correctness and truthfulness of the information so provided.

3.35 Television audience measurement guidelines were issued by MIB in 2014. Over the years, additional new challenges have been faced by the industry. These challenges need to be addressed and improved for the healthy growth of the broadcasting sector.

Issue for Consultation:

Q17. Is the current disclosure and reporting requirements in the present guidelines sufficient? If no, what additional disclosure and reporting requirements should be added?

Any Other Issues

Q18. Stakeholders may also provide their comments on any other issue relevant to the present consultation.

Chapter IV

International Experience in Television Rating Service

The provisions in the major international markets can be placed in following broad categories:

- a) Setup & Framework
- b) Methodology and Technology Updates
- c) Panel size

a) Setup & Framework

France⁴

- In France, television audience measurement is managed and carried out by an independent research company, Médiamétrie consisting of representatives from all across media. The organization acts as both operator and JIC for TV, radio and internet audience measurement. The TAM service is specifically known as Mediamat and Mediamat'thematik.

Canada⁵

- Television audiences measurement in Canada is carried out by a non-profit organization, Numeris(formerly BBM), a broadcast research organization. Numeris is Canada's most trusted and authoritative source for broadcast measurement and consumer behavior data, as well as the industry-leading intelligence provider to broadcasters, advertisers and agencies. Numeris is member-owned tripartite

⁴ <http://www.mediametrie.fr>

⁵ <http://www.bbm.ca/en/>

- industry organization, governed externally by a Board of Directors and internally by our Executive Team.
- It was jointly established in 1944 as a tripartite cooperative by the Canadian Association of Broadcasters and the Association of Canadian Advertisers.
 - Their membership includes television and radio stations and networks, major advertising agencies, and national advertisers.

Australia⁶

- Television ratings in Australia are provided by two agencies OzTAM and Regional TAM in different geographical areas.
- OzTAM is an independent company owned by Australia's major commercial television broadcasters (Seven Network, Nine Network and Network Ten) and is the official source of television audience measurement in the five metropolitan cities (Sydney, Melbourne, Brisbane, Adelaide and Perth) and nationally for subscription television.
- Regional TAM Pty Limited is a joint venture comprising the five free to air (FTA) regional commercial networks - NBN Limited, Prime Television Pty Ltd, Seven Queensland, Southern Cross Austereo and WIN Corporation Pty Ltd. Regional TAM data is the official source of free to air and subscription television measurement in the five east coast aggregated regional markets including its 19 component sub-markets and the regional Western Australian market.
- Both OzTAM and Regional TAM have agreement with Nielsen TAM for collecting and producing ratings data on their behalf. OzTAM and Regional TAM had awarded Nielsen TAM a contract agreement until the end of 2020.

⁶ www.oztam.com.au, www.regionaltam.com.au, <http://www.agbnielsen.com>

Ireland⁷

- TAM Ireland (Television Audience Measurement Ireland Ltd), a not-for-profit company limited by guarantee, was set up in 2007 with a mission to provide precise viewership data and promote the power of television with commitments to excellence, adaptability and vision. TAM Ireland provides the industry-standard television audience measurement service for the broadcasters and the advertising industry. TAM Ireland is owned by RTÉ, TG4, TV3, Channel 4, UTV, Sky, Viacom and Setanta. All of the major media buying agencies in Ireland are also members of TAM Ireland.
- TAM Ireland has contract with Nielsen Television Audience Measurement to provide research services on its behalf, including the production of audience viewing figures.

Italy⁸

- Television ratings in Italy are provided by Auditel, which is a Joint Industry Committee (JIC) consisting of investors of advertising, Agencies & media centers and target companies.

South Africa⁹

- South African Advertising Research Foundation's (SAARF) has the responsibility to measure the audiences of all traditional media such as newspapers, magazines, radio, television and cinema. SAARF's Board of Directors represents the marketing, media and advertising industries through their respective industry bodies. SAARF is financed through a fixed amount contributed by print media owners and through an industry levy on other media owners (television, radio, etc.).

⁷ <http://www.tamireland.ie/>

⁸ <http://www.auditel.it/>

⁹ <http://saarf.co.za/>

- Major research surveys conducted by SAARF are All Media and Products Survey (AMPS), Radio Audience Measurement Survey (RAMS) and Television Audience Measurement Survey (TAMS).

UK¹⁰

- In UK official ratings for television audiences are provided by the Broadcasters' Audience Research Board (BARB). BARB is a not-for-profit limited company, funded by the major players in the industry it supports. It is owned by BBC, ITV, Channel 4, Channel 5, BSkyB and the IPA (Institute of Practitioners in Advertising). We commission research companies Ipsos MORI, Kantar Media and RSMB to collect data that represent the viewing behavior of the UK's 27 million TV households.

USA¹¹

- Media Rating Council (MRC), established in 1960's, is an Industry funded organization to review and accredit audience rating services in US. Currently MRC has Board members representing from TV and Radio Broadcasting, Cable, Print, Internet and Advertising Agency organizations as well as Advertisers and Trade Associations. Organizations such as Nielsen or Arbitron that provide media ratings are not allowed to be members.
- The activities of the MRC include:
 - The establishment and administration of Minimum Standards for rating operations;
 - The accreditation of rating services on the basis of information submitted by such services; and
 - Auditing, through independent Certified Public Accounting (CPA) firms, of the activities of the rating services.

¹⁰ www.barb.co.uk

¹¹ mediaratingcouncil.org

Singapore¹²

- The Singapore Television Audience Measurement (SG-TAM) is the official source of television audience measurement in Singapore. Commissioned by IMDA, GfK operates and manages the integrated television audience measurement system. It provides the viewership of television channels, such as Free-To-Air TV and Pay TV channels, shown across traditional and digital platforms. Supported by GfK's advanced technologies, SG-TAM enables targeted television content and effective advertising campaigns.
- SG-TAM aims to help media industry players keep pace with the trend of media convergence, growth of the digital broadcast sphere and evolving television consumption habits in Singapore.

Germany

- Television audience measurement in Germany is the responsibility of the JIC ArbeitsgemeinschaftFernsehforschung (AGF), with GfK as the contractor.

b) Methodology and Technology Updates

Australia¹³

- People meters are installed on every TV set in the home included in the panel, which is formed based on a large-scale establishment surveys. Each meter monitors and stores individual panel member viewing on each TV set - every second, 24 hours a day, and 365 days a year. The data stored in the memory of the online People meter is retrieved, known as polling, daily between 0200 hrs and 0600 hrs via the home's fixed telephone line or a GSM modem installed in the meter's transmission unit.

¹² <https://www.imda.gov.sg/>

¹³ www.oztam.com.au, www.regionaltam.com.au

- The data captured from the panel homes is matched with a reference library of all available TV broadcast channels within each market, to measure viewing to individual channels, whether the viewing is Live (i.e., as the programme actually went to air), As Live (paused or recorded programming played back before 2am on the same day of the original broadcast) or Time Shift (recorded broadcast program played back after the same Research Day and within seven days of the original broadcast). The production system collates, processes, analyses, validates, weighs the data and produces a final report of each household's viewing. Once the production processes have been completed, the television programme schedules provided by the TV networks and ratings are integrated. All data undergoes rigorous quality control both electronically and manually.
- In February 2016 OzTAM introduced its Video Player Measurement service, providing Australia's first official figures for viewing of internet-delivered TV program. OzTAM's VPM Report captures all online video program streamed live or played on-demand ('catch up') from participating broadcasters' video players.
- Demographic estimates will be introduced to the VPM Reports posted on OzTAM's website by the end of calendar 2018. This will be an important component in OzTAM's new integrated Total TV database, Virtual Australia (or, 'VOZ'). Progressively rolling out from Q1 2019, VOZ will bring viewing on TV sets and connected devices together, and support advanced audience targeting.
- VOZ will provide a Total TV picture of the TV program Australians are watching, who is watching, and how they are watching, reflecting the fact that Australians have, on average 1.8 TV sets in the home, but more than 6 screens. People are using those screens to watch television throughout the day, inside and outside the home. VOZ will deliver all-screen, de-duplicated estimates of this Total TV viewing.

Canada¹⁴

- Canadian television audiences are measured using the Personal People Meter (PPM), supplemented by a twice-yearly diary for each medium to cover smaller market areas. This work is carried out by the research organization, Numeris. Numeris uses several different methods of collecting the ratings data.

a) Survey Diary

Numeris uses the diary measurement technique for the Audience measurement for the seven major markets (Halifax, Quebec, Montreal Anglo, Ottawa/Gatineau, Kitchener/London, Winnipeg and Edmonton) and 29 minor markets. This is done twice in the year (in fall and in spring). Viewed TV programmes are recorded by each member of the household in the diary and mailed to BBM Canada immediately after the survey week is over.

b) Portable People Meter (PPM)

Numeris also uses PPM (Portable people meter), installed in a carefully selected panel of homes. The PPM automatically identifies the TV stations by picking up a special 'encoded' signal sent on the air by each station.

- Numeris is already working with broadcasters to encode their video-on-demand (VOD), through separate set of codes for linear and on-demand, which will allow it to be identified within the PPM panel, and the next phase of the project for a full hybrid measurement model involves the integration of census-level return path data (RPD) from participating broadcasters' servers and from cable TV set-top box operators. Numeris is currently developing a proof of concept model for this data integration.
- Numeris has started releasing non-linear viewing data to the market in October 2015, reporting on September 2015 data. The organisation

¹⁴ ETGA insight : Advances In Hybrid Television Audience Measurement

- provides episode-level average minute audience (AMA) data from the encoded programs viewed by the PPM panel to the industry on a monthly basis. Research reports that include aggregated genre-level reporting of comedy, reality and drama programs and VOD viewer profile information have also been distributed to the industry.
- Following pressure from the industry and a decision by Canada's broadcasting and telecommunications regulator, CRTC, cable television operators were asked to form a working group to explore how to release the viewing data from their set-top boxes to enrich audience measurement. This would be particularly valuable for smaller, niche channels, which are not well served by panel-based measurement systems. The working group selected Numeris to conduct a successful Technical test that combined RPD data from multiple set-top box providers. Subsequent testing should establish a method to obtain the viewing files from the STB boxes and link the STB and currency PPM data. Numeris presented a design for a national STB system to the Working Group. They are in the process of securing BDU (Broadcast Distribution Undertaking) datasets to conduct a POC that will help inform a business plan for further development. The development of a Set-Top Box measurement solution is an integral part of Numeris' cross platform audience measurement strategy. Numeris will continue to develop the hybrid TAM methodology and define the associated new models with the industry through the course of 2018.
 - Cross Platform Audience Measurement: VAM (Video Audience Measurement) is a solution currently being designed by Numeris to help deliver an audited standard unit of measure originating from one neutral, credible and transparent organisation, for all video distributed across all platforms and devices. Its purpose is to characterise the value of digital video in the media space, and to provide a deeper understanding of who is watching. Through the VAM

solution, Numeris will be working to extend the measurement of Canadian viewing to include as much of the digital video landscape as possible. Numeris is working to provide measures of pureplay (services such as YouTube and Google), OTT and other related viewing behaviours as part of their intended service. A steering committee comprised of Numeris members conducted a request for proposal process to select a digital partner to conduct the VAM Proof Of Concept (POC). Kantar Media supported by comScore was chosen to conduct the POC and work is now underway.

France¹⁵

- Médiamat is a tailor-made TV audience solution, to quantify television channel audiences and analyse viewer behaviour. With Médiamat you can have an accurate and detailed measurement of audience behaviour for TV in general and its main categories, for each programme broadcast by the national channels. It has been constructed to represent both the socio-demographic characteristics of households in metropolitan cities and also the characteristics of the television offer available.
- In each home which is part of the Médiamat panel, Médiamétrie installs one or more - depending on how many pieces of equipment they have - audimeters fitted with a remote control with individual keys, which constantly records all uses of the television set(s) in the household:
 - When the television set is switched on and off
 - How the different channels are watched
 - The other ways in which the television set is used.
- Traditional TV audience measurement in France currently covers all TV sets in the home, including time-shifted and replay TV, that are measured separately through watermarking. Considering the large

¹⁵<http://www.mediametrie.com>

share of IPTV/Fiber/Cable (55% in 2017) and the growing importance of catch-up services, the market asked Médiamétrie to be able to differentiate time-shift viewing from replay TV. This feature is enabled by a new type of watermarking technology: file-based watermarking. Médiamétrie reports detailed information about the replay TV audience at a program level.

- Médiamétrie's online measurement expertise provided an opportunity to start measuring video across screens and devices. Since 2013, Médiamétrie has been working to unify these panels into a single measurement, and the results of the first 3-screen Internet measurement were released in January 2015. The next step in this project was to extend this measurement to video content and to fuse it with Médiamétrie's TV panel. As part of this process, the company is also using a 4-screen single source panel, which consists of 3,500 households, which has been developed in partnership with Google. Since early 2016, Médiamétrie provides 4-screen total ratings – that do not include demographics – on a daily basis, at the programme level. Data on demographics are available on a monthly basis, at TV channel level (less granular approach). This 4-screen measurement was designed to ultimately provide 4-screen GRPs to be used for media planning and buying.
- In 2014, Médiamétrie developed a new hybrid television measurement initiative to improve the granularity of the measurement for thematic channels, with the support of Pay TV Operator Canal+. In this case, the term hybrid refers to the combination of people meter TAM data and return path data (RPD) from a sample of set-top box television decoders. Therefore, census data does not form part of this model. The objective was to be able to measure thematic channels with greater granularity and to increase the frequency of reporting. Médiamétrie's solution is built on RPD delivered initially by a sample of about 10,000 Canalsat decoders, with demographic information

appended using an individualization model. The household data is acquired using CATI/CAWI surveys. The RPD data is then used to enrich the viewing data from the Médiamat TV measurement service. Comparison of the results of this hybrid measurement with the Médiamat TAM data shows good consistency. The granularity of the measurement is improved, and use of a much larger sample than just the people meter panel provides lower volatility and fewer zero ratings.

Italy¹⁶

- The Super Panel is a project that Auditel has been working on since 2014, and became a currency as of July 31st 2017. The project was created as an answer to the fragmentation observed in various TV markets across the world, and particularly in Italy where, out of more than 200 TV channels, only 32 TV channels were measured on a daily basis back in 2006. This number was up to 219 in 2016. Fragmentation was also observed in devices' capacity to measure TV and video content. To tackle this, Auditel increased its basis from 32 million traditional TV sets to 130 million total viewing devices including OTTs, smartphones and tablets where people are able to stream video and TV content.
- Auditel replaced the traditional people meter with a 'set meter panel' to create the Super Panel Currency. In terms of implementation, the two devices are exactly the same, they measure TV on and off, they are capable of measuring the device providing content on TV, they are equally able to measure the content tuned on TV. The difference stands in how people are measured. With the people meter, there is a remote control and a traditional display where it is possible to detect who is actually in front of the TV. While on the set meter panel, to have an optimal collaboration with the households, the people meter

¹⁶ ETGA insight : Advances In Hybrid Television Audience Measurement

is not installed. This means that the measurement is very accurate for both panels. The two panels are also equally balanced and equally representative of the Italian population. The benefits of the Super Panel are the much smoother data and the reduction of the 0 rating spots on the day of broadcast.

- Auditel is working on the second stage of the Super Panel was to be launched in 2018 – which involves introducing census measurement using ComScore’s tags and launching the panel pilot phase when Kantar’s Focal Meter will be installed on a small sub-sample to validate some of the assumptions which are currently being used to plan for the third stage of the Super Panel. This last stage is set to be completed in 2019 and will result in the installation of Kantar’s Focal Meter on the entire panel, the completion of Auditel’s content library, working on the census data calibration and the merger of digital content and traditional TV data.

UK¹⁷

- In order to estimate viewing patterns across all TV households, a carefully selected panel of TV homes is chosen. The methodology for establishment survey, to arrive at household sample is designed by RSMB¹⁸. Designing ensures that panel homes remain representative of all television households across the UK. Another firm Ipsos MORI on behalf of BARB, interviews over 1000 households each week for the BARB establishment survey. It also provides us with the information needed to accurately weight our viewing data so they are always representative of the whole country.
- In every panel household, all television viewing is monitored automatically by metering equipment installed by Kantar Media. Also

¹⁷ ETGA insight : Advances In Hybrid Television Audience Measurement

¹⁸RSMB is contracted by BARB for methodology, statistical design and quality control for the overall service for BARB.

including timeshift viewing. The meter records all viewing by every person in the household aged 4+, adding individual demographic information to the overall viewing data. This information is uploaded automatically to BARB every morning between 2 AM and 6 AM where it is processed to apply various statistical adjustments. Each day at 9.30 AM the data is released to the TV industry as overnight viewing figures. Eight days later, consolidated audience figures are released, incorporating any timeshift viewing from the previous seven days.

- BARB initiated a project named “Project Dovetail”. The project's aim was to create a hybrid measurement system which takes the goodness that is in the census data and puts it together with the panel data. It seeks to deliver cross-platform insights into the viewing of programmes. It uses a single source panel for measuring all viewing behaviours. Census-level data is delivered by metadata tags inserted by broadcasters, completing the hybrid methodology. Delivered in a series of steps, the complete hybrid measurement solution was operationalized and reporting programme data to the market as of from 27 August onwards (multiple-screen programme viewing figures will not be available prior to this date).
- In order to measure online video viewing, software meters are installed on the desktop and laptop computers present in each panel household, and a measurement app is installed on tablets. Panelists are required to log in each time they use the device for watching content through TV player apps, ensuring that the number and identity of people accessing a piece of video content on a given screen whether alone or collectively, is recorded just as it is for broadcast television viewing.

GERMANY¹⁹

- In Germany, measurement for linear TV viewing is carried out mainly by using GfK's audio matching hardware meters, with a panel of 5,000 households that represent approximately 11,000 individuals. AGF established two online panels – operated by Nielsen – to measure non-linear viewing using software meters, for PCs and laptops on the one hand (Panel A: 15,000 people) and tablets and smartphones on the other hand (Panel B: 5,000 people). It is worth noting that the fused online-TV data are not yet regarded as a currency. The German television industry has chosen to establish separate panels for non-linear viewing, to operate alongside the existing linear TV panel. These new panels provide data on audience demographics, age, gender and household composition. AGF developed a calibration model for the panel and census-level data providing demographic reach metrics based on the relationship between views from the census and users from the panel.
- YouTube videos will be measured with a census approach that provides the number of online views, viewing duration and content identifiers for each format, while panel data offers demographic profiles. A calibration model will unite those data to provide reach and demographics. At the same time AGF and YouTube will unite their respective online panels, i.e. the panelists from AGF's Nielsen online panel and YouTube's GfK online panel will be joined into a virtual mega panel. The work is still in progress.

USA²⁰

- The television ratings service in the US is delivered by Nielsen, with electronic measurement across the national service, as well as the top 56 local markets. The most commonly used metric for national

¹⁹ ETGA insight : Advances In Hybrid Television Audience Measurement

²⁰ ETGA insight : Advances In Hybrid Television Audience Measurement

television advertising is the Average Commercial Minute Rating, introduced and agreed upon by the industry in 2007. This standardised measure for commercials averages all minutes of the program that contain national commercials from the live telecast either via playback or on-demand. The most common metric currently was referred to as “C3” which included up to 3 days of viewing, but the past 18 months have introduced a significant amount of change, with the extension of the window of crediting for the Average Commercial Minute data from 3 to 7, and out to 35 days which enables clients to evaluate opportunities beyond traditional viewing intervals.

- The other major enhancement to the television currency was the inclusion of Out of Home (OOH) ratings which is particularly important for networks that distribute sports and news content. Nielsen also produces program content ratings and accounts for all time users spend watching television from any source. Nielsen is working towards a Total Audience solution to extend audience measurement beyond the distribution channels and viewing patterns that are currently included in its traditional ratings, including a wider range of mobile and digital devices as well as dynamically inserted advertising. The company is developing a hybrid methodology that is built on data from its people meter panel alongside big data from partners, such as Roku, Facebook and Experian. In terms of cross platform solutions already in currency, Nielsen on February 2017 was granted accreditation by the Media Rating Council (MRC) for inclusion of digital measurement in the TV ratings. The additional capability, known as Digital in TV Ratings (DTVR), accounts for linear TV viewing occurring on desktop and mobile devices for participating programming sources.
- Television companies, both broadcasters and cable companies, are facing significant challenges in the US. Measured viewing of live +3

days (represented as the C3 rating, which is commonly used for trading) is undoubtedly declining. As the industry has analysed these data, it becomes evident that the largest impact comes from other viewing options on the set, including subscription-VOD. The changing nature of television and video consumption, and the increased availability of Return Path Data from set-top boxes and connected devices, has led to a number of other companies becoming involved in the supply of television audience insights.

c) Panel size

Australia²¹

- There are approximately 20 million TV household²² in Australia.
- The OzTAM panel consists of 5250 metro panel homes and 2120 homes in the national subscription TV (STV) service sampling actual viewing behaviour of more than 12,000 people throughout the year.
- The Regional TAM panel comprises a total of 3198 homes representing a potential audience of individuals.

France²³

- There are approximately 26.3 TV million households²⁴ in France.
- The Médiamat panel is made up of nearly 5000 households covering around 12000 individuals approximately aged 4 and over. This amounts to 0.019% of total TV households in France. Based on audimetric information acquisition, Médiamat'Thématik permanently measures the viewing behaviour of individuals aged 4 and over whose

²¹<https://oztam.com.au/AboutOzTAM.aspx> ; <https://www.regionaltam.com.au/>

²²As per ACMA report on Television sets in Australian households 2011, there were approximately 18.7 million television sets in 8.4 million Australian households, with an average of 2.2 in each home. There was no working television set in about 100,000 households.http://www.acma.gov.au/webwr/_assets/main/lib310665/Television_sets_in_Australian_households.pdf

²³<http://www.mediametrie.com>

²⁴http://www.ivf-video.org/new/public/media/France_2012.pdf

households receive television by either analogical or digital cable, Satellite or TV by ADSL.

UK

- There are approximately 27 million TV households in UK.
- The BARB reporting panel consists of 5300 homes, which are located across the UK and represent the viewing of all the individuals aged 4 and above within the households (plus their guests). This amounts to 0.019% of total TV households.
- In general, panel members are recruited to be on the panel for as long as they wish. There is no maximum length of membership. Panel members are not paid for participating on the BARB panel. Instead they are thanked for taking part with a choice of gift vouchers from a variety of outlets that appeals to all ages. They also receive a regular panel newsletter that includes competitions and opportunities to enter free prize draws.

Italy²⁵

- The survey system relies on the collaboration of about 16,200 families with over 30,540 meter detectors, active on as many televisions, photograph the choices of approximately 40,000 individuals at any time of the day.

²⁵<http://www.auditel.it/come-lavora>

Other Countries²⁶

Country	TV Population	TV Households	Sample size (individual)	Sample size (households)	TV Panel Operator
Argentina	14,556,300	5,216,686	3,740	1,296	Kantar Ibope Media
Austria	8,188,000	3,795,000	3,567	1,643	GfK
Belgium	10,505,006	4,632,824	3,780	1,555	GfK Belgium
Brazil	68,821,100	24,570,186	17,626	6,319	Kantar Ibope Media
Canada	35,680,191	-	9,048	-	Numeris / Nielsen
Chile	7,193,800	2,189,860	1,965	645	Kantar Ibope Media
China	1,283,852,000	436,029,000	29,361	10,400	CSM
Denmark	5,554,000	2,772,000	2,550	1,223	Kantar Gallup
France	58,112,000	26,731,000	12,000	5,000	Médiamétrie / Médiamat
Germany	75,681,000	38,802,000	10,000	5,000	GfK
Greece	10,385,572	4,134,540	3,536	1,400	Nielsen
Hong Kong	6,499,000	2,463,000	2,167	790	Nielsen
Indonesia	54,133,000	15,922,000	8,870	2,273	Nielsen
Ireland	4,188,000	1,585,000	2,867	1,069	Nielsen
Italy	58,638,611	24,367,883	40,110	16,055	Nielsen
Japan	65,527,000	29,406,000	4,890	2,100	Video Research Limited
Malaysia	21,456,000	6,258,000	4,602	1,100	Nielsen
Mexico	55,241,300	16,418,501	7,754	2,190	Kantar Ibope Media
Netherlands	15,664,000	7,794,000	2,750	1,250	GfK
Norway	4,733,008	2,161,000	2,500	1,000	Kantar Media
Russia	69,337,299	28,942,100	13,500	5,401	Mediascope
Singapore	5,271,000	1,430,000	3,750	1,090	SG-TAM
South Africa	45,062,118	14,006,143	12,000	2,918	Nielsen
South Korea	47,940,204	19,111,029	11,870	4,170	Nielsen
Spain	44,601,216	18,396,383	11,197	4,625	Kantar Media
Sweden	9,367,000	4,545,000	2,600	1,350	Nielsen
Thailand	66,297,000	25,139,000	8,300	2,400	Nielsen
Ukraine	37,092,338	14,680,089	7,000	2,840	Nielsen
United Kingdom	59,533,000	26,821,000	12,229	5,315	Kantar Media
United States	301,670,000	118,400,000	111,108	42,888	Nielsen

²⁶Data is provided by Television Industry Committee as of 2017 year; Information source: One Television Year in the World 2018

Chapter V

Summary of issues for consultation

- Q1. Whether BARC has been able to accomplish the purpose with transparency and without any bias for which it has been established? Please elaborate your response with justifications. Also, suggest measures to enhance the effectiveness of BARC to give TV ratings with transparency and without bias.**
- Q2. Do you feel that present shareholding/ownership pattern of BARC ensures adequate representation of all stakeholders to maintain its neutrality and transparent TV ratings? How its credibility and neutrality can be enhanced further? Please elaborate your response with justification.**
- Q3. Is there a need to promote competition in television rating services to ensure transparency, neutrality and fairness to give TAM rating? What regulatory initiatives/measures can be taken to make TV rating services more accurate and widely acceptable? Please elaborate your response with justifications.**
- Q4. Is the current audience measurement technique used by BARC apposite? Suggest some methods, if any, to improve the current measurement techniques.**
- Q5. Does broadcasting programmes that are out of their category or in different language for some time during the telecast affect the TAM rating? If so, what measures should be adopted to curb it?**
- Q6. Can TV rating truly based on limited panel homes be termed as representative?**

- Q7. What should be done to reduce impact of manipulation of panel home data on overall TV ratings? Give your comments with justification.**
- Q8. What should be the panel size both in urban and rural India to give true representation of audience?**
- Q9. What method/technology would help to rapidly increase the panel size for television audience measurement in India? What will be the commercial challenge in implementing such solutions?**
- Q10. Should DPOs be mandated to facilitate collection of viewership data electronically subject to consent of subscribers to increase data collection points for better TRP ratings? Give suggestion with justification.**
- Q11. What percentage of STB supports transferring viewership data through establishing a reverse path/connection from STB? What will be the additional cost if existing STBs without return path are upgraded? Give your suggestions with justifications.**
- Q12. What method should be adopted for privacy of individual information and to keep the individual information anonymous?**
- Q13. What should be the level/granularity of information retrieved by the television audience measurement agency from the panel homes so that it does not violate principles of privacy?**
- Q14. What measures need to be taken to address the issue of panel tampering/infiltration? Please elaborate your response with justifications.**

- Q15. Should BARC be permitted to provide raw level data to broadcasters? If yes, how secrecy of households, where the people meters are placed, can be maintained?**
- Q16. Will provisioning of raw level data to broadcasters, in any manner, either directly or indirectly contravene the policy guidelines for television rating agencies prescribed by MIB?**
- Q17. Is the current disclosure and reporting requirements in the present guidelines sufficient? If no, what additional disclosure and reporting requirements should be added?**
- Q18. Stakeholders may also provide their comments on any other issue relevant to the present consultation**

Glossary

Abbreviation	Description
AAAI	Advertising Agencies Association of India
BARB	Broadcasters' Audience Research Board
BARC	Broadcast Audience Research Council
CAGR	Compounded Annual Growth Rate
CPA	Certified Public Accounting
DART	Doordarshan Audience Ratings
DTH	Direct to Home
DVR	Digital Video Recorder
E&M	Entertainment & Media
FICCI	Federation of Indian Chambers of Commerce and Industry
HITS	Headend-in-the sky
IBF	Indian Broadcast Foundation
ISA	Indian Society of Advertisers
MIB	Ministry of Information and Broadcasting
MRC	Media Rating Council
OOH	Out of Home Advertising
PPM	Portable People Meter
QoS	Quality of Service
RFI	Request For Information
SAARF	South African Advertising Research Foundation's
SEBI	Securities and Exchange Board of India
STB	Set Top Box
TAM	Television Audience Measurement
TRAI	Telecom Regulatory Authority of India
TRP	Television Rating Points

Summary of TRAI's recommendations in 2008

5.1 Need for the Government to regulate the system of Television Rating Points (TRP)

- The manner, extent and nature of Regulation.

Recommendation

The Authority recommends Self-regulation through the Industry led body, with Government exercising oversight through its nominees in the industry led body and guidelines covering organisation, functions and methodology to be adopted for ratings by the Industry led body. The continuance of Government nominees on BARC's board may be reviewed after five years. Such industry led body should be a not-for-profit body registered under the Companies Act, 1956.

Self-regulation should aim to achieve the following objectives;

- Continuous improvement in quality and method of the rating system, to provide accurate, up to date and relevant findings;
- To maintain the highest possible standards of integrity and to ensure that its findings are not misused / manipulated by any one to convey a wrong impression;
- To promote, maintain and uphold fair, ethical and healthy practices relating to ratings and its use;
- Discourage unfair or deceptive practices employed in connection with the sale or use of ratings; and
- Observe and enforce the conditions / standards / norms prescribed by the Government for the ratings process.

The Government guidelines to BARC should cover the following:

(I) Organizational Structure

- a) BARC shall have equal representation with equal voting rights from the three Associations namely; AAI, ISA and IBF. It is expected that these Associations will be truly representative of their segments and that membership rules will be applied in a completely transparent manner by the respective Associations.
- b) In addition to 12 Board members proposed in the Articles of Association of BARC, there shall be two nominees of the Ministry of Information and Broadcasting on the Board of Directors of BARC. The Government nominees will not have

voting rights on any resolution. Any dissent of the Government nominees shall be recorded in the minutes of the Board Meetings, if so desired by the nominee. The sitting fees for the Government nominees shall be regulated in terms of GoI instructions issued from time to time (Presently Government nominees are not entitled for any sitting fees).

- c) There shall be a Technical Committee within BARC which shall guide and supervise the various processes. The Technical Committee shall inter-alia include one nominee each from the Ministry of Statistics and Programme Implementation, National Council of Applied Economic Research (NCAER) and Indian Statistical Institute (ISI), Kolkata. The nominated members of the Technical Committee shall be entitled to remuneration in line with the remuneration of other members of the Committee, if permitted by the rules & regulations of their parent organisation.
- d) For specific assignments contracted by BARC to any of the organisations represented through the nominees in the Technical Committee; the terms & conditions and fee shall be governed through mutual negotiation.

(II) Functions

BARC shall not undertake audience measurement directly and shall resort to an open, transparent and competitive bidding process for the various stages involved in the rating process; including (a) establishment survey (b) panel design and quality control (c) recruiting and metering, data collection and processing and (d) Audit.

(III) Methodology

The Ministry of Information & Broadcasting shall provide the key eligibility norms for the selection of rating agencies and also provide performance obligation norms including scope of work in the Request for Proposal (RFP) issued by BARC for appointment of rating agencies. These will be duly considered by the Technical Committee while finalizing the relevant BARC documents.

(IV) Reporting Requirements

- a) BARC shall provide such information and reports as may

be asked for by the Ministry of Information and Broadcasting from time to time. The Ministry shall maintain confidentiality of the information thus provided, if so desired by BARC. However, the addresses and location of homes where people meter are installed shall not be reported to the Ministry.

- b) The reports shall be made available in a transparent and equitable manner. BARC shall display the rate card for the various reports and discounts offered thereon on its website.

(V) Complaint Redressal mechanism

- a) BARC shall have in place a complaints Redressal mechanism, which shall be responsible for handling complaints, shortcomings and deficiencies in the rating system brought to notice by Board of Directors, consumer organisations, users of ratings and the general public. BARC may consider the model followed by Advertising Standards Council of India (ASCI).
- b) Till BARC is fully functional in terms of selection of Rating Agencies, BARC shall engage constructively with the existing rating agencies for resolution of any complaints received in respect of the rating services.

BARC shall formalize MoU with the Ministry of Information and Broadcasting to reflect the above features and the eligibility conditions for selection of rating agencies.

Timeframe for Implementation - The Authority expects that the Government will be able to complete processing the Recommendations in four weeks and the MoU can be signed between BARC and the Ministry within two weeks thereafter. BARC should become fully functional within eight weeks of signing the MOU. Setting up of functional norms by BARC may take another four weeks and initiation of activity by BARC should get started by January 2009.

The Authority further recommends that if BARC fails to meet with the objectives or is found deficient in its functioning, the Government shall then consider regulation of rating system through TRAI by way of legislative enactment or any other institutional framework.

In view of the significant influence exercised by content on the society, the Authority strongly recommends that regulation of content should also be transferred to TRAI.

5.2 Eligibility criteria for registration of rating agencies.

Recommendation

With the setting up of BARC, the Authority considers that there is no need for registration of rating agencies with the Government. The RFP inviting bids for getting the rating work done shall, however, be finalized by BARC after duly considering the eligibility conditions and performance obligations as provided by the Ministry of Information and Broadcasting from time to time. The indicative guidelines / standards are attached as *Annexure III*. The key features of the eligibility conditions, general, operational & ethical and disclosure standards are given below:

Essential eligibility conditions for rating agencies

1. The Rating Agency is set up and registered as a company under the Companies Act, 1956.
2. The Rating Agency has, in its Memorandum of Association, specified rating activity as one of its main objects.
3. The rating agency has, in its employment, persons having adequate professional and other relevant experience.
4. No single company/ legal person, either directly or through its associates, shall have substantial equity holding in more than one Rating agency. 'Substantial equity' herein will mean equity of 10% or more'.
5. A promoter company/ Legal person/ Directors of rating agency cannot have stakes in Broadcaster, Advertiser and Advertising agency either directly or through its associates. Similarly, a Broadcaster, Advertiser or Advertising agency shall also not have any stake in rating agencies.

General Standards

6. A rating agency shall, wherever necessary, disclose to the clients, possible sources of conflict of duties and interests, which could impair its ability to make fair, objective and unbiased ratings.
7. A rating agency or any of its employees shall not render directly or indirectly any advertisement / advertisement related advice about any channel/channel related programme in the publicly accessible media.

Operational and Ethical Standards

8. Appropriate quality control procedures shall be maintained with respect to all external and internal operations which may reasonably be

assumed to exert significant effects on the final results.

9. Rating has to be technology neutral. Viewership shall be assessed and rating given irrespective of the source of the viewing platform viz. cable TV, DTH, IP TV etc.. The Measurement devices must be able to operate on every platform.
10. The anonymity of all personnel in any way concerned with sample respondents or households shall be preserved.
11. All weighting or data adjustment procedures utilized by a rating agency in the process of converting basic raw data to rating reports shall be based on systematic, logical procedures, consistently applied by the rating agency and defensible by empirical analysis.

Disclosure Standards

12. Each report shall include statements calling attention to all omissions, errors and biases known to the rating service which may exert a significant effect on the findings shown in the report.
13. Each rating report shall point out changes in or deviations from, the standard operating procedures of the rating service which may exert a significant effect on the reported results. This notification shall indicate the estimated magnitude of the effect.
14. Each rating report shall contain standard error data relevant to the audience estimates contained therein. Such data shall be presented whether or not effective sample sizes are shown. The method used to develop standard error estimates as well as the formulas used to compute the standard errors shall be fully disclosed.
15. The rating agency besides publishing the methodology/process in detail shall also publish the comments/viewpoints of the users of the rating data on their website.

5.3 The minimum sample size, and minimum coverage required a) over different platforms, b) rural and urban, c) All states including North-East and J&K, d) Prasar Bharti channels;

The Authority recommends that the sample should be determined in such a manner so as to cover different platforms, including terrestrial / PrasarBharati channels, cable and satellite platforms, rural and urban areas, and all the states. The sample should be regularly updated so as to reflect the developments taking place in the delivery platforms, growth in viewership etc.

The Authority further recommends that the sample size shall be decided by the Technical Committee of BARC.

The Technical Committee should have as members, one nominee each from the Ministry of Statistics and Programme Implementation, NCAER and Indian Statistical Institute, Kolkata in addition to the members nominated in the Technical Committee by the Industry Associations.

To bring in transparency, the Authority recommends that BARC should disclose on their website the methodology of sample selection, the sample size, the frequency of the audience panel rotation and margin of statistically acceptable error.

The Authority further recommends that while keeping the above-mentioned recommendation for determination of panel size, the following may also be taken into account by BARC:

- Removal of demographic disproportionality. The design of the panel should be in proportion to the urban rural spread of TV Households.
- Improved geographic representation in proportion to the TV viewing population.
- The recruited panel should inter alia be representative of age, social class, sex, working status, life stage, and number of people in the household.
- A detailed weighting scheme to introduce a greater level of representativeness of the reporting sample.
- The establishment survey must provide robust estimates, particularly by platform.

5.4 *Type of equipment to be used to address the different delivery platforms and Whether technology adopted should be real time system for generation of reports;*

Recommendation

The Authority recommends use of technology capable of capturing data over different platforms and constant up-gradations of the technology would be required in the measurement devices. Where electronic meters are used, the system should be capable of providing overnight ratings through unobtrusive means. Diaries, interviews, people meters may have to co-exist in order to address the special needs of specific areas and to augment the sample size. Periodicity of reporting should however be left to BARC to decide.

5.5 Restrictions on crossholding / interests between the Rating Agencies and their clients.

Recommendation

The Authority recommends that there should be no cross holding between the rating agencies and the Broadcasters, Advertisers and the Advertising agencies. This cross-holding restriction is also applicable in respect of individual promoters besides its applicability to legal entities. The Ownership pattern of the ratings agency, including foreign investment / Joint Venture / Associates in the Agency should be reported to the Government on an annual basis and changes, if any should be reported immediately.

5.6 Safeguards to ensure secrecy of sampled families

Recommendation

The Authority recommends that BARC and the rating agencies should have proper systems in place to safeguard the secrecy of the sampled panel homes. The systems should be subjected to independent audits and the auditors should state in their report that proper mechanisms and procedures exist to ensure the secrecy of the sample homes. The aspect of secrecy should be specifically mentioned in the RFP floated by BARC. The Authority further recommends that at least one fifth of the sample homes should be rotated every year.

5.7 Standards / norms to be followed by the rating agency

Recommendation

The Authority recommends that while following the best practices, minimum standards / norms relating to operations, governance, crossholdings and ethics be followed by the rating agencies as issued by BARC from time to time. Indicative standards / norms are at *Annexure III*.

5.8 Mandatory audits of rating agencies, qualification of auditor, scope of such audit and reporting.

Recommendation

The Authority recommends that:

- There should be comprehensive mandatory audit of the rating system carried out by independent qualified auditing firms having experience of TV ratings audit.
- The Audit team should comprise of technical experts, statistician, media expert, chartered accountant and legal professional.

- The audit should be conducted at least once in three years. A copy of the Audit report should be submitted to the Government.

5.9 Competition in rating services

Recommendation

The Authority recommends that BARC will follow an open, transparent and competitive bidding process for each stage of the activity in the rating process [(refer para 4.2.3.3 (II)].

5.10 Other suggestions for making ratings more representative, transparent and reliable including –

- *FDI related issues*
- *Net-worth of the Rating Agency*
- *Responsibility of Agencies to educate listeners and viewers of the methodology adopted*

Recommendation

The Authority makes the following recommendations:

- Government shall make efforts to ensure that the concerned agencies are adequately sensitized to make available data relating to Census at reasonable cost.
- No limits on FDI / Net-worth requirement are suggested for rating agencies as registration for rating agencies is not recommended.
- BARC and the rating agencies should invest in programs to educate the general public about the work of audience measurement at regular intervals in various parts of the country and through detailed information available on their websites.
- With the emergence of digital platforms, every programme of a channel and advertisement delivered to a set-top box gets logged. Therefore, capturing of data by using addressability features of CAS, DTH, IPTV etc. would enhance the results of the rating system.
- The industry should invest in research for upgrading the set top boxes so as to make them compatible for audience measurement.
- Government should examine making digital watermarks mandatory for channels.

Summary of Dr. Amit Mitra committee's recommendations

CHAPTER V

EXECUTIVE SUMMARY & CONCLUSION

The Committee has taken serious view of the small sample size used by the two rating agencies in India. Further people meters are installed in select urban households leaving out rural households. The committee also found other lacunae in the current TRP measurement systems. The committee is also convinced that the changes in the content, viewership and delivery platforms need to be more effectively measured. This can be remedied by increasing the sample size and having a more scientific approach towards research.

1. Sample size

The Committee strongly recommends an increase in sample size in terms of number of sample households, coverage of rural areas (which is practically missing today!) and addressing the need to cover multiple delivery platforms. The sample size should be increased by almost 4 times from the current 8000 approx. (TAM) to 30,000 households over a period of 5 years for television households of INR 129 million in India, as of 2009. An added cost of approximately INR 660 crore is required to install the 22,000 additional people meters. To support the funds required for such high numbers of additional peplemeters, the committee suggests that BARC should involve the industry to pay an agreed upon annual fee depending on their size and the number of channels they beam. It is suggested that this expansion in the TRP measurement system should be carried out over a period of 5 years.

It is expected that wider coverage would mean installation of more meters resulting in economies of scale, reducing the cost per meter. This could be aided further by exploring innovation and local manufacturing with indigenization, to reduce the manufacturing cost of people-meters and also help to avoid import duties. The import duties are a deterrent in increasing the sample size and it should be explored if these duties can be brought down, if not waived off completely.

2. Transparency & Reliability

The rating agencies should make the process more transparent. The research methodology should be disclosed and be subjected to financial and process audits. BARC should disclose on its website relevant information pertaining to the research process. The Committee believes that transparency of methodology and data can be achieved by putting it in the public domain and making it available to statisticians & researchers for review. The methodology should be clearly elaborated on the website of BARC and the ratings should be made available after an appropriate time lag of report generation and seek their suggestions for better research processes and evaluation.

Tampering & Manipulation

It is absolutely essential to ensure that there is no tampering or manipulation at the time of data generation and collection and the Committee is convinced that an increase in sample size could act as a deterrent to any fraudulent manipulation. This concern partly arises from reports that certain 'agencies' have been gifting separate TV sets for viewing to residents of people-meter homes and manipulating the people meter based TV sets in favour of specific channels who have appointed the

agency' by raising the number of people meter homes to 30,000, such practices would become more difficult.

3. Viewership across diverse platforms

There is a pressing need for making the rating systems compatible with the emerging technologies and capable of capturing data over different platforms including cable, terrestrial, DTH, IPTV and others. A regular updation in samples shall be required to reflect the developments taking place in viewership on a variety of delivery platforms.

TRAI has also opined that new technologies such as portable people meters and Return Path Data should be used to used by rating agencies to ensure that the emerging technologies/delivery platforms being made available for television viewing are also measured. The rating systems should keep pace with the emerging new technologies to cover viewers through different platforms.

4. Frequency of TRP Announcement

The Committee recommends that all rating agencies follow the practice of releasing the ratings on a weekly basis, particularly for the NEWS channels. It is upto the discretion of BARC to reduce the periodicity further to a fortnight.

5. Shareholding pattern of rating agencies

To avoid conflict of interest there should not be any crossholding between rating agencies, broadcasters, advertisers and advertising agencies.

6. Guidelines for BARC

The Committee has made recommendations on the guidelines for BARC's functioning.

- (a) **Board composition:** BARC should have representation from Broadcasters, advertisers, and advertising agencies and have a 12 member Board constituting 7 members from broadcasters (6 private broadcasters, 1 public sector broadcaster), 3 members from advertisers and 2 members from advertising agencies (1 private sector agency and 1 from Directorate of Advertising & Visual Publicity, DAVP).
- (b) **High Powered Committee:** BARC will be guided by a High Powered Committee of a broad based nature constituting of twelve members including a Statistician of national repute from among the top institutions of the country such as Indian Statistical Institute (ISI), National Council of Applied Economic Research (NCAER), Measurement technology expert, a renowned individual from civil society or judiciary, a demographer, a sociologist, an economist, a business management expert from one of the IIMs, nominee of an eminent institution/individual engaged in media research, a leading woman of national stature and 3 special invitees from BARC to guide and supervise the various processes. The primary intent is to broaden the participation of different types of experts including eminent members from civil society, who would guide BARC to ensure greater accuracy, total transparency and appropriate representation of viewer stratification and diversity.

- (c) High Powered Committee will also provide the key eligibility norms for selecting the agencies.
- (d) The agencies should be engaged through an open, transparent and competitive bidding process.
- (e) BARC should have a complaint redressal mechanism in place to handle complaints, shortcomings and deficiencies in a time bound manner.
- (f) To break the Duopoly of TAM and aMAP in the TRP metering market, BARC must invite more players to come into the field and call for competitive tendering for best pricing without compromising on quality.

CONCLUSION

The Committee has arrived at the conclusion that self-regulation by the industry is the best way to move this important initiative forward. The committee clearly feels that there should be self regulation of a credible nature which should provide continuous improvement in quality and methodology of the rating system, to provide accurate, up to date and relevant findings.

It is our emphatic preference that all the stakeholders collectively create institutions and corrective mechanisms to improve the accuracy of television audience measurement. The media as a key pillar of democracy must remain independent and free. However, after studying the judicial concerns, concerns raised by the TRA report, the report of the standing committee of the Parliament, perspectives of the industry and civil society, the Committee also fears that in case significant progress is not made within defined timelines, the Government may be left with no option but to step in, primarily because of the nature of public concerns that have been raised and debated across many platforms.

MIB's letter dated 31st August 2012

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MINISTRY OF INFORMATION & BROADCASTING
NEW DELHI-110015

D.O. No.3105/3/2006-BC-III(Pt.II)

31st August, 2012

Dear Dr. Khullar,

As you are aware the TV Viewership Measurement System in India has been under the constant review of the Government. The Standing Committee of the Parliament on Information Technology in its 67th Report (2008-2009), "Television Audience Measurement in India" had made extensive recommendations for improving the TRP Measurement System in India. TRAI in its Report on 'Policy Guidelines and operational issues for Television Audience Measurement/ Television Rating Points 2008' had recommended self-regulation of TRPs through an industry body i.e. the Broadcast Audience Research Council (BARC). Subsequently, on the initiative of the Minister of Information and Broadcasting a committee was constituted under the Chairmanship of the then Secretary General, FICCI, Dr. Amit Mitra, which also made extensive recommendations towards setting up of a transparent and credible self-regulatory mechanism for TRPs by BARC

2. Ministry has been constantly reviewing the progress made towards setting up of BARC. After constant persuasion and follow up by the Ministry, BARC was finally registered in July 2010. Several meetings were held subsequently with BARC representatives to ensure that the recommendations made by TRAI and Dr. Mitra Committee were implemented. However, it is disappointing to note that till today no significant progress has been made by BARC to set up a transparent TRP mechanism in the country.

3. Moreover, TRAI in its report on TRPs had also made the following recommendation with regard to Cross holdings:

"There should be no cross holding between the rating agencies and the broadcasters, advertisers and the advertising agencies. This cross holding restriction is also applicable in respect of individual promoters besides its applicability to legal entities. The ownership pattern of the rating agency, including foreign investment/joint venture/associates in the agency should be reported to the Government on an annual basis and changes, if any should be reported immediately".

4. The Amit Mitra Committee constituted to review the existing Television Rating System in India also mentioned that ' This committee is in consonance with the TRAI report 2008 that there should be no cross holding between the rating agency and the broadcasters, advertisers and the advertising agencies, to avoid conflict of interest '.

5. However, in spite of these recommendations the cross holdings have continued to exist in TAM Media research (India) as the self regulating mechanism recommended by TRAI and Dr Amit Mitra Committee has not taken shape. The presence of cross holdings in TAM Media Research (India) raises doubts about the credibility of the data being generated by TAM. TRAI is, therefore, requested to recommend specific guidelines for regulating cross holdings in those companies which are involved in the generation of Television viewership measurement data in India.

6. We are concerned about the spate of articles that have appeared recently in Media subsequent to the filing of a law suit by NDTV against the parent company of TAM Media Research (India) i.e., Nielsen. Most of these articles have highlighted the deficiencies and inadequacy of the present TV Viewership Measurement System. As pointed out earlier, the self-regulation of TRP system in India has failed to take off as BARC has not been able to take any credible action on the recommendations made by TRAI and by Dr Mitra's committee. Meanwhile the TRP measurement system in India continues to suffer from several deficiencies. It is therefore felt that urgent action needs to be taken to put in place a credible and transparent TRP generation system.

7. It is pointed out that TRAI in its report on TRPs had recommended that if BARC fails to meet with the objectives or is found deficient in its functioning, the Government shall then consider regulation of rating system through TRAI by way of legislative enactment or any other institutional framework. Further in response to a letter dated 9th December 2009, from the Ministry, TRAI had also mentioned that in the event of BARC not becoming operational, Government may consider entrusting the work of laying down guidelines and accredit suitable agencies to carry out measurements of television audience to IIMC. TRAI had further mentioned that in case this is also not found feasible Government may consider entrusting this work to TRAI. ✓

8. In view of above, TRAI is requested to recommend comprehensive guidelines/accreditation mechanism with TRAI as accrediting agency for TRP rating agencies in India to ensure fair competition, better standards and quality of services by TRP rating agencies. A comprehensive accreditation system inter-alia should have the following;

1. Well represented and statistically valid sample size of TV homes giving adequate representation to both urban and rural areas.
 2. Coverage of all states in the country
 3. Third party audit of the data
 4. Transparency in the selection of people metre homes.
 5. Secrecy of people metre homes on the panel
 6. Public grievance redressal mechanism
9. The accreditation process will ensure that the data so generated by the accredited agencies is representative, credible and transparent.
10. TRAI is therefore requested to make recommendations on the issues raised above under section 11(1) (a) (iv) and 11(1) (d) of the TRAI Act, 1997.

Regards,

Yours sincerely,

Uday Kumar Varma
(Uday Kumar Varma)

Shri Rahul Khuliar
Chairman
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
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NEW DELHI 110 002.

TRAI's letter dated 9th October 2012

Dr. Rahul Khulliar



अध्यक्ष
भागीदार वृत्तसंचार
विनियामक प्राधिकरण
CHAIRMAN
TELECOM REGULATORY
AUTHORITY OF INDIA

D.O.No. 23-04/2009-B&CS
October 9, 2012

Respected Sir,

Please refer to your letter DO No. 3105/3/2008-BC-III(Pt. II) dated 31st Aug 2012.

2. AS you are aware, TRAI has been entrusted with the functions of making recommendations to the Government under section 11(1) (a) of the TRAI Act, 1997. However, under section 11(1)(d) of the Act, TRAI performs other functions including such administrative and financial functions as may be entrusted to it by the Central Government or as may be necessary to carry out the provisions of the TRAI Act.

3. It is not clear from your letter whether the Ministry of Information and Broadcasting intends to seek the recommendations of TRAI under Sec 11(1)(a) on comprehensive guidelines/accreditation mechanism for accreditation of TRP rating agencies in India or intends to entrust the function of accrediting TRP rating agencies in India to TRAI under Sec. 11(1)(d) of the TRAI Act, 1997. In the later case, it needs to be done through a formal Government notification in which case TRAI would do the same as per the provisions of the TRAI Act, 1997 and decide upon the comprehensive modus-operandi for the same.

4. I would be grateful if you could expressly convey the intent of the Ministry in this regard.

Regards,

Yours sincerely

Rahul Khulliar
(Rahul Khulliar)

Shri Uday Kumar Varma
Secretary,
Ministry of Information and Broadcasting,
Government of India,
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MIB's letter dated 16th November 2012

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D.O. No.3105/3/2008-BC-III(Pt.II)

16th November, 2012

Dear Dr. Khullar,

This is with reference to your D.O. letter No. 23-04/2009-B&CS dated 9th October, 2012.

2. Ministry intends to seek the recommendations of TRAI under Section 11(1)(a) of TRAI Act, 1997 for laying down comprehensive guidelines/accreditation mechanism for accreditation of TRP rating agencies in India. It is felt that this mechanism will bring transparency and accountability in the system as it will ensure that only those agencies enter into the business of TRP measurement which have the capacity to comply with the TRAI recommended accreditation mechanism. Laying down comprehensive guidelines/accreditation mechanism for TRP rating agencies in India will also provide a level playing field for all agencies which will help in curbing monopolistic practices. The mechanism would also help to ensure a balanced and true representation of urban and rural areas in TRP rating mechanism. I, therefore, request you to kindly provide your recommendations under Section 11(1)(a) of TRAI Act, 1997.

3. It is felt that in case the accreditation mechanism fails to address the maladies of the current system then there would be a need for entrusting the accreditation mechanism to TRAI under Section 11(1)(d). TRAI may, therefore, consider this aspect also.

Regards,

Yours sincerely,

Uday Kumar Varma
(Uday Kumar Varma)

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