

May 23, 2013

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**Sub: Comments on Consultation Paper on “Guidelines / Accreditation Mechanism
for Television Rating Agencies in India”**

Dear Sh. Upadhyayji,

This has reference to the Consultation paper issued by TRAI on “Guidelines / Accreditation Mechanism for Television Rating Agencies in India” asking the stakeholders to give their comments in electronic form by 23rd May 2013. In this regard, please find appended below our response for your attention and reference.

If there is any other clarification required, please do get in touch.

Thanking you,

Yours truly,



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Q1. Which of the model described in para 4.4 should be followed for regulating television rating services in India?

Either Self Regulation – wherein the Industry sets up a body with representatives from Broadcasters, Agencies & Advertisers or Accreditation system by the agency wherein a body (like BARC) monitors the compliance of its standards by rating agency for continuation.

Q2. Please give your comments on the eligibility conditions for rating agencies discussed in para 4.7.

- a national agency setup for the purpose of ratings
- a national agency setup by an expert research agency, and endorsed by Rating Committee
- an agency which has no direct/ indirect business or investment stake by broadcaster/ agency/ advertiser

Q3. Please give your comments on the guidelines for methodology for audience measurement, as discussed in para 4.19, for television rating systems.

Survey methods are based on recall and can lead to errors creeping in based on likeability of a channel/program/time band

People meters are currently the best suited measurement tools.

The ratings should be captured from all transmitting modes – STBs, DTH, Cable, terrestrial TV & going forward hand held streaming devices

Q4. What should be the minimum panel size (in terms of numbers of households) that may be mandated in order to ensure statistical accuracy and adequate coverage representing various genre, regions, demographics etc. for robust television rating system? Should the desired panel size be achieved immediately or in a phased manner? In case of implementing the desired panel size in phased manner, what should be the quantum of increase and periodicity of such increase in size?

We should definitely aim at 0.016% in times to come – however with the costs implications – we should definitely target the suggested number of 30000 meters in the coming 5 years – wherein in the Y1 the base should increase to atleast 12000 (approx 50% higher than current number) & every 6 months target adding 2500 more meters to reach the desired 30000 in 5 year period.

Q5. Please give your suggestions/ views on as to how secrecy of panel homes can be ensured?

The panel details must be available only with a small control group in the monitoring agency. The - DAS areas: direct access by TRAI accredited agencies to the headend wherein sampling of live viewing can be done through 2 way devices

- non-DAS areas: same sampling exercise as the current people meters of TAM
- Mobile/ Internet devices: collaboration with existing technologies of players where the entire data of reach as well as time of viewership is captured on a real time basis and aggregated with the people meter measurement of viewing on TV.

Q6. Please give your comments on the cross holding restrictions for rating agencies as discussed in para 4.23.

- Ideally the Rating agency should be a Not-for-profit organization
 - The rating agency has to be an independent body
- this itself will free it from any obligations/bias to any Agency/Broadcaster or Advertiser
Question here is – can this be possible in India with WPP having cross holdings across multiple agencies

Q7. Please give your comments on the complaint redressal mechanism discussed in para 4.25.

The rating committee should meet monthly and should be final authority which takes decision and comes out with an annual report on its functioning

Q8. Whether the rate card for sale and use of ratings should be published in the public domain by the rating agencies?

The basis for arriving at the rates must be definitely published in a public domain.

Q9. Whether other users apart from broadcasters, advertisers and advertisement agencies be allowed to obtain the rating data from the rating agencies? If yes, who all should be allowed to obtain and use the data from the rating agencies? What restrictions should be imposed on use of the rating data by users?

Should be core members of the rating research club comprising broadcasters, agencies and advertisers who will underwrite the subsidised (by the government) cost of the research. These should be industry bodies and not individual organisations and should have full access to all data, including raw data

Apart from the above, certain standard reports in pre-decided format should be made available to citizens/ organisations based or operating in India who are willing to pay for it as per the rate card.

Q10. Whether the user should be allowed to share the data provided by the rating agency with third parties or publically accessed media.

The data being used in publically accessed media must be transparent – with no intent of hiding facts.

Q11. Please give your comments with regard to the parameters/procedures, as suggested in para 4.34, pertaining to mandatory disclosures for ensuring transparency and compliance of the prescribed accreditation guidelines by rating agencies.

All 7 points indicated are relevant

Q12. Please give your comments with regard to the parameters/procedures, as suggested in para 4.37, pertaining to reporting requirement for ensuring effective monitoring and compliance of the prescribed accreditation guidelines by rating agencies.

All 6 points indicated are relevant

Q13. Please give your comments on the audit requirements for rating agencies as discussed in para 4.42.

There should be a cost audit done as well – if the rating agency is a not-for-profit agency the cost audit will substantiate it

Also, in any case the cost audit will indicate the revenue streams from any other source for the rating agency

Q14. Who should be eligible to audit the rating process/system?

Similar to MRC in USA – there should be an industry funded organization to audit the rating agency

Q15. What regulatory initiatives are required to promote competition in rating services?

Ideally there should be a single rating agency/currency in the market – that way there will be homogeneity in the market.

Dual or more rating agencies will lead to

1. Confusion due to the multiple ratings
2. Convenient usage of favorable data from any source
3. Cost implications for Agencies & Broadcasters – as they will have to subscribe to more than 1 ratings source & advertisers will be selective in what rating data to follow

This is exactly what happened in 1998-99 when TAM & INTAM were the 2 currencies available. Also when aMaP was functional – convenient/selective usage of the data was witnessed.

Q16. In case guidelines/ rules for rating agency are laid down in the country, how much time should be given for complying with the prescribed rules to existing entities in the rating services sector, which are not in compliance with the guidelines?

there should be maximum overlap of one year possible between two reports. Ideally all historical data, already paid for by the various stakeholders should be made available to the new rating agency and only one agency should be permitted as giving the ratings.

Q17. Do you think integrating people meter with set top boxes is a good solution? If yes, how to encourage such systems?

Yes. Ideally the Regulator body must imbed the peplemeters in the STBs – these can then be installed in the sample homes by the rating agency.

Imp: the people meters should represent the MSO wise universe for that city I.e the rating weight age of an MSO should broadly be in line with it's share of the city/ state.

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

In the long term, ensuring neutrality of the agency and it's output is key to it's success and hence the active participation of regulator is key to ensure that agenda of individual but large players donor usurp ratings.