

## Infosys view and approach to guidelines and accreditation mechanism for television rating agencies in India

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**Q1. Which of the model described in para 4.4 should be followed for regulating television rating services in India? Please elaborate your response with justifications.**

**Infosys comments:**

Out of 4 models given in sec 4.4, the option Accreditation by regulator where the regulator accredits the rating agency and ensures the compliance of prescribed standards and reporting requirements.

- Self-regulation would be an ideal solution in mature markets and may not be suitable for a country like India where television audience measurement is still in nascent stages
- Regulation by government may not be best option as government operates channels like Doordarshan and has vested interest in rating process.
- At current juncture it would be best to have an independent regulator who would provide guidelines and policies for accreditation of rating agencies

**Q2. Please give your comments on the eligibility conditions for rating agencies discussed in para 4.7 above. You are welcome to suggest modifications. Please elaborate your response with justifications.**

**Infosys comments:**

Some of the additional eligibility criteria for rating agencies are given below:

- Rating agency should disclose on details on methodology , technology, selection criteria to be used for audience measurement
- Rating agency should have a minimum of 5 years of experience in field of audience measurement and should have maintained highest standards of integrity, transparency and accuracy
- Rating agency should have the capacity to handle demographics like rural, urban, gender, language
- Agency should be able to cover multiple platforms like TV, mobile, internet and rating process should be technology agnostic

**Q3. Please give your comments on the guidelines for methodology for audience measurement, as discussed in para 4.19 above, for television rating systems. You are welcome to suggest modifications. Please elaborate your response with justifications.**

**Infosys comments:**

- Latest trend in television viewing includes time shifted viewing, cross platform viewing like mobile devices. Proposed rating system should be able to handle these mentioned scenarios
- Based on recent guidelines by Information and broadcasting ministry, STB would be the primary mode of viewing channels in India in few years. While this process of moving to STB could take some time, rural areas may still not have access to STB. Since mobile penetration is quite high in rural area, One solution could be mobile based portable

people meter along with STB data (wherever available) could be used for audience measurement process

- Rating system should not only include the proportion of population watching a specific channel or program but also frequency of the program being watched, how many times that specific channel or program was watched within a specific duration.
- Rating system should cover various sources of error with respect to people meter, sampling error

**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?**

**Infosys comments:**

- For country as diverse as India, samples must be spread across rural, urban, gender, region and language with right proportions. Desired panel size could be 20000 to 25000 households.
- Overall trend in audience measurement is to follow census based approach rather than sampling approach. Using mobile based portable people meter could be cost effective considering that mobile penetration is quite high in India and this could avoid the issues related to sampling like inadequate representation

**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?**

**Infosys comments:**

Desired panel size could be implemented in phases considering the cost and effort involved in this exercise. One could start with 10000 households and then increase 5000 every year and reach around 20000 in 2 years

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

**Infosys comments:**

- Household panel identity could be made secure by use of strong technology and process framework
- Panellist's need to ensure that they do not reveal their participation to strangers
- In long term by following census based approach, security issues related to sampling based approach would become irrelevant

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

No additional comments

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

- There should be some timelines say 15 days within which the rating agency should respond to complaints after which this could be escalated to accrediting agency
- Its not only essential to have a complaint redressal mechanism, there should be a whistleblower policy which would allow anyone without revealing their identify would be able to point any shortcomings or any other wrongdoings as a part of this process
- There should be a feedback mechanism which would help in overall improvement of the existing process

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

Yes this would be good as it would increase the transparency and help all stakeholders in their business decisions

**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?****Infosys comments:**

- Ratings data could be made available to anyone seeking the information provided there is a valid reason given by the company or person who is seeking that information. In addition any household who has participated in this process should be able to get this information
- There need not be any restriction sharing this rating data as long as there is a valid reason given by the person seeking that data
- Ratings data should be kept confidential and should not be shared with others
- Ratings data should not be sold to others

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

Ratings should not be shared with third parties or publically accessed media

**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.****Infosys comments:**

- Quality control should include periodic independent internal verification of field work and periodic accuracy checks of meter performance and data collected
- Sample design for audience survey must reflect statistical population targeted for measurement

**Q12. Please give your comments with regard to the parameters/procedures, as suggested in para 4.37, pertaining to reporting requirement for ensuring effective**

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**monitoring and compliance of the prescribed accreditation guidelines by rating agencies.****Infosys comments:**

- Concise description of survey methodology should be mentioned in each report. The details could include the details of survey methodology, areas to which the survey was undertaken, period of survey, any weighting or adjustment factors that were used
- Rating report should mention the deviations from standard operating procedures that were followed and impact that it may have caused to ratings
- Geographical areas surveyed must be clearly mentioned. Criteria/source of selection must be clearly mentioned
- Audience data obtained is subject to sampling and non-sampling errors. This should be clearly mentioned in report

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

- Rating agencies should maintain all the supervisor/ interviewer records at least for the past 6 months
- Documentation related to biases, omissions and errors should be explicitly mentioned in report
- Ratings should be technology neutral. Irrespective of platform on which measurement is done, rating process should remain the same

**Q14. Who should be eligible to audit the rating process/system?****Infosys comments:**

- Any certified auditing firm should be eligible to audit the rating process.
- Audit team should comprise of technical expert, statistician, chartered accountant, media expert and legal professional

**Q15. What regulatory initiatives are required to promote competition in rating services?****Infosys comments:**

- There are not many companies as of today who would provide competitive rating services
- Regulator could provide list of rankings of rating agencies based on various parameters like accuracy of rating services, number of companies/individuals who have subscribed to rating services

**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?****Infosys comments:**

One could look at a period of about 6 months for compliance to new rules for rating agencies

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

People meter provide the data on the individuals who are actually watching the channel/program. Due to proliferation of channels/programs, there has been fragmentation in audience and set top box data would be able to provide details on channel changes till last seconds. Integration of both these information would provide a single source of information on who is viewing along with data on viewing behavior at a very detailed level.

Set top box penetration may take longer time to reach rural households as compared to urban regions. Mobile based portable people meter could be used as mobile penetration is high in India

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

**Infosys comments:**

We see the future of Television Audience Measurement as increasingly moving towards a Cross Platform approach as opposed to a single Platform approach. We also see the future of Television Audience Measurement moving away from Panel and Diary based approaches towards Population (census) wide approaches. Technologies like mobile based portable people meter would be cost effective and provide more accurate ratings as this is practical solution for reaching wider population in a complex demographic country like India.