

Response to Consultation Paper on Issues related to Placing of Television Channel on Landing Page.

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Introduction:

At the Outset we would like to thank the Authority for publishing the Consultation Paper on Issues related to Placing of Television Channel on Landing Page and giving us an opportunity to furnish our comments.

We do feel that the Consultation Paper on Issues related to Placing of Television Channel on Landing Page would not only go a long way in addressing issues related to landing page and complaints received from various stakeholders regarding placing of television channels on multiple LCNs for influencing television ratings but also initiate a comprehensive consultation on all issues relating to landing page.

Comments on Issues for Consultation:

Q1. Do you feel that emerging concept of placing TV channel on landing page can influence TRP ratings? Suggest the action which may address the issue with justification.

Ans:

It is possible that placing TV channel on landing page can influence TRP rating. It depends on the measurement methodology used for Rating of channels. From the consultation paper it appears that with the current methodology used for Rating, placing TV channel on landing page can influence its ratings. But the methodology can be changed to avoid that.

Placing TV channel on the landing page gives better exposure to a channel. It is like placing a product in the first shelf (which everybody sees) in a department store. The department store would be charging for the same. This is a well-accepted form of advertisement, especially for new products. In the same manner this is a legitimate method of advertisement and source of revenue for the Distributors. We request the Authority to ensure that this revenue source is not affected. Any restriction on the distributor in the landing page settings barring the channel from flipping for a specified period, is acceptable.

Q2. Should concept of landing page be defined? If so, please suggest the definition of the landing page with justification.

Ans:

We do not think that there is a necessity to define the concept of landing page, the current understanding in industry that landing page or channel refers to the Logical channel number which is displayed first when the Set Top Box (STB) is switched on should suffice.

Q3. Will defining Framework for placing TV channels on landing page affect the present business model of distributors? If so, will it be considered impacting the freedom to do business by distributors of TV channels? Give your suggestions with justification.

Ans:

As discussed earlier, any framework for placing TV channels on landing page which curtails the right of distributors to place a TV channel on a landing page thereby reducing its revenue will have a detrimental effect on the business model of the distributors. The regulation may be prescribed only to the extent of restriction in the landing page settings barring the channel from flipping for a specified duration thereby ensuring that distributors do not give any undue advantage to any TV channel/broadcaster. Subject to the distributors having rights to determine the other contents to be placed in landing page based on market forces and local needs.

Q4. Is landing page a natural choice of consumer while viewing TV channels? If not, why should channels, whose TV ratings are released by TV rating agency, be placed on landing page? Give your comments with justifications.

Ans:

We are of the opinion that though the landing page does hold the attention of a consumer for a few secs in the end it is the choice of the consumer in choosing the TV channel he wants to watch that should determine the TV rating of the channel.

Q5. Whether placing of a TV channel on landing page increases television ratings? If yes, why TV Channels, whose TV ratings are released by TV rating agency, should not be barred from being placed on landing page? If no, why broadcasters are eager to place their channels on landing page? Give your suggestions with justification.

Ans:

We feel that the placing of a TV channel on landing page should not increase television rating, as it is ultimately always a consumer's choice which determines the channel he wishes to watch. This should only influence the rating. However the authority can always ensure that the distributors do not have any restriction in the landing page settings barring the channel from flipping for a specified duration thereby ensuring that distributors do not give any undue advantage to any TV channel/broadcaster.

Q6. What should be the criteria/consideration to put a TV channels on landing page? Give your suggestion with justification.

Ans:

We do not think there is a necessity to prescribe any criteria/consideration to put a TV channel on the landing page. We are of the opinion that it is best if it is left to market forces.

Q7. Do you think the influence, if any, in television ratings by placing of TV channels on landing page can be mitigated through changes in measurement methodology of television ratings? Give your suggestions with justifications?

Ans:

As discussed earlier, the measurement methodology should ensure that rating is not affected by the landing page. Also, the measurement methodology used for television ratings must be in sync with the action the authority proposes to implement on distributors.

Q8. Please comment on the feasibility to implement user's 'last visited page' as landing page in distributors' network?

Ans:

We do not think that this is a feasible solution. This assumes that the subscriber is switching off the TV with his favourite channel. This may not be true.

Q9. Should the landing page be used to place TV channels not having TRP rating or only to provide platform specific information? Give suggestions with justification.

Ans:

We do not think that this is a possible answer to the current issue. We should not be throwing out the baby with the bath water

Q10. Any other suggestions/comments related to the issue under consideration?

Ans:

We are of a firm opinion that the landing page is a legitimate source of revenue for the distributor which brings down the cost to the subscriber and the authority must ensure that this source of revenue is protected when it proposes an action to address this issue.
