BROADCAST AUDIENCE RESEARCH COUNCIL (BARC)'S RESPONSE ON TRAI'S CONSULTATION PAPER ON POLICY GUIDELINES FOR TELEVISION AUDIENCE MEASUREMENT / TELEVISION RATING POINTS (TRP)

5.1 Is there need for the Government to regulate the system of Television Rating Points

There is no need for any government intervention in the area of TV rating point measurement. The purpose of TRPs is the provision of a robust commercial currency to facilitate the pricing of and thus trading in television advertising inventory. Across the world, including countries like China the government does not intervene in the TV audience measurement process. Where it has been mooted it has been found to be irrelevant, not accountable, and a factor that slows down innovation and data reliability rather than enhancing it. Global best practice suggests that an industry body is best suited to represent stakeholder interests and drive accuracy, representativeness and value from TV audience measurement. In India BARC (Broadcast Audience Research Council). is already formed to carry out this task.

5.2 If so what should be the manner and extent of such regulation in matters 5.2.1 to 5.2.9

We do not believe that government has any role to play in the areas 5.2.1 to 5.2.9 This role will be played by BARC in addition to ensuring that the service asked for is paid for by relevant stakeholders.

5.3 If this is left to be decided by industry initiative, what should be the framework for such arrangement and the role of the Government with reference to the issues narrated from 5.2.1 to 5.2.9.

BARC is a non-profit organization currently being incorporated under section 25 of the Companies Act, 1956 with nominated representation from all relevant industry associations viz. IBF (Indian Broadcasting Foundation-Doordarshan is a full member of the Indian Broadcasting Foundation), AAAI (Advertising Agencies Association of India) and ISA (Indian Society of Advertisers). The IBF has as members virtually every single broadcaster that operates in the country and represents their interest. The AAAI has about 80 advertising agencies, large , medium and small, along with their Media agencies who play a key role in the buying of advertising time on behalf of their advertisers and represents almost 80% of all televison time bought in this country. The Indian Society of Advertisers is a body of Advertisers and represents almost 70% of all Television time bought in this country.

It is significant to note that the founders of BARC have appreciated that there may be both common and conflicting interests of its 3 members who are the 3 constituents that get affected by Ratings and therefore have provided in the Articles that each has an equal voice in the design and monitoring of the rating system and in the administration of BARC, irrespective of the funding pattern.

The purpose of BARC is to commission research in audience measurement. This will comprise of two stages. Stage I involves designing and commissioning an establishment survey which is a cross-sectional study of Television Penetration (rural and urban), Viewership Habits (of both terrestrial and satellite delivered channels over analogue as well as digital delivery modes) and demographic taxonomy of viewers. This study becomes the basis of designing the rating panel. Stage II begins when the Establishment Study analysis is complete and the contours of the Ratings

Panel can be defined. Both stages will be separately commissioned and both will involve global competitive bidding to ensure that the process is competitive. All aspects of representation (coverage) and data quality will be ensured keeping all stakeholder interests in mind.

BARC's founding team is comprised of eminent professionals from Broadcasting, Advertising and the broader business community that includes chairmen/ CEOs of organizations like Hindustan Unilever Ltd, Procter & Gamble, Zee Telefilms, Sony Entertainment, Star TV, Times Group, WPP, IPG and Madison. Prasar Bharati is an active member of the IBF (Indian Broadcasting Foundation) which has nominated its representatives on BARC.

BARC's infrastructure includes a CEO with a secretariat and it enjoys access to an industry Technical Committee to guide it in the area of research design and analysis.

We believe that since BARC formally represents all stakeholders including the government broadcaster, it is technically the best equipped to set audience research guidelines and it enjoys legitimate mandate from the key stakeholders, it is uniquely placed to commission and extract high quality research that is completely paid for. It does not need any government intervention in this task.

5.4 What are your suggestions to encourage competition in rating services?

BARC encourages competition from the initiation of research itself. It will invite global bids for the two stages viz. baseline establishment survey and ratings panel. The bids are expected to attract the best research vendors from across the world to pitch for this prestigious assignment.

BARC believes that best value from any research will emerge if resources are not scattered across multiple researches at any time. Also being the representative of all stakeholders, it will encourage a single set of data as rating currency to prevent ambiguity from prevailing in the determination of advertising pricing.

It will however periodically review research vendor performance. It will also ensure that the research suppliers remit is restricted to providing data, and that value added analysis is opened up for competitive participation.

5.5 Any other suggestions for making ratings more representative, transparent and reliable?

BARC believes that the key to a reliable, representative and transparent rating system lies in smart rather than indiscriminate sampling. We believe that it is key to determine the variables that cause variation in TV viewing and to ensure that a stratified sampling design is followed that works at capturing this variation. This allows the same sample number to work harder. BARC also believes in according priority to data quality (validity and reliability) over indiscriminate coverage. By ensuring that the panel is built to capture data variation we are committed to delivering optimum market and socio-economic coverage.

To that end the establishment survey is already designed to be exhaustive in the true sense. It will cover urban-rural, all socio-economic classes, all town classes and all delivery types (terrestrial, cable and CAS/DTH homes). BARC will also ensure that the panel is open to audit following industry research norms.