

## GTPL HATHWAY LIMITED'S COMMENTS ON CONSULTATION PAPER ON ISSUES RELATED TO PLACING OF TELEVISION CHANNEL ON LANDING PAGE

1. 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.

**Comment:** In our view, placing TV channel on the landing page has no effect on consumer choice and therefore does not influence television ratings of that channel.

The broadcaster should be given the opportunity to market its content before the consumer, by placing it on the landing page of a distribution platform. If a broadcaster has a unique or new content/channel to offer to the consumers, the landing page would be one of the best ways of informing the consumers about the availability of such content/channel. The broadcaster gets an opportunity to present its content before the viewer who may not be aware of the channel or the option to view such content. It is therefore in the interest of the consumers that the broadcasters are given an opportunity to place its content/channel before the consumer, and the consumer can make an informed choice. If the consumer finds interest in the content being shown on the landing page the consumer will continue to view the said channel, thereby making a conscious choice. If the consumer does not find any interest in the content placed on the landing page then the consumer will change browse the menu options on the EPG and switch to the channel of his/her choice.

Additionally, the basic reason why landing page does not distort consumer choice is that a consumer is not required to stay on the landing page and the electronic programme guide allows the consumer to seamlessly navigate to the channel of its choice.

As far as the argument about rural and remote places is concerned, where electric supply is erratic and TV may get switched on when no one is there and landing page continues as if it is being watched (thus distorting channel rating), this may be true for any channel not being a landing page. If consumer behaviour is taken into consideration, there might be several instances where the consumer leaves the TV on while doing some other work and the channel is measured as viewed, even though the consumer may not be watching that channel at all. Even in such instances, the TV rating may not be resulting in correct rating of the Channel. Therefore, such scenarios cannot be avoided in terms of trying to develop an accurate measurement of viewership of a channel.

To conclude, we are of the view if a channel being placed on a landing page and consumer stays on that particular channel then it is not a distortion of consumer choice, but an expression of consumer choice. Moreover, the advantageous placement of a channel on the landing page is in the interest of the consumer who gets a chance to view new and different content, if the consumer so chooses. The subscriber is not bothered about which channel is coming first or last and it sees only that channel which subscriber wishes to watch. Therefore, placing TV Channels on landing page cannot distort TV ratings/restricts consumer choice.

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

**Comment:** Landing page is the Logical Channel Number (LCN) which is displayed first when the set top box is switched on.

- 3. 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.**

**Comment:** In our view, defining Framework for placing TV channels on landing page will indeed affect the present business model of distributors, like us. Distribution platforms like us earn placement revenues on the placement of a channel as a landing page. If the landing page is restricted, for instance, to only channels not metered by BARC for TV ratings, then even in such a situation it would impact our revenues on the placement of a channel as a landing page, simply because the broadcaster may demand reduction in the placement fees due to decrease in competition for the landing page. More broadcasters in competition for a placing their channel on the landing page would ensure that the placement is accordingly monetized by the distribution platforms.

- 4. 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.**

**Comment:** Whether the landing page is the natural choice of the consumer or not is irrelevant for the consumer. The consumer has the choice to stay on that LCN or navigate to any other LCN. However, it is in fact in the benefit of the consumer if channels, whose TV ratings are released by BARC, are placed on landing page. By placement of a channel, whose TV ratings are released by BARC, the consumer becomes aware of content in which he/she might be interested to watch, but did not know that it exists. It is an effecting marketing tool adopted by the broadcasters to promote their channel, which works for the consumer

as well if they find the content being marketed interesting. In the end, the choice is of the consumer to watch it or not. However, if content/channel is restricted to be placed on the landing page, the consumer would rather lose an opportunity to view content he/she might be interested in, apart from getting reduced options on the channels appearing on the landing page.

- 5. 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.**

**Comment:** In our view, placing of a TV channel merely increases the possibility of increasing the television rating of the channel placed on the landing page, as it offers an option to the consumer to view the channel appearing on the landing LCN. However, the offer to view the channel can be taken by the consumer by staying on the channel or rejected by switching to another channel within few seconds, not affecting the rating of the channel.

Broadcasters are eager to place their channels on landing page for this very opportunity to showcase their content to the viewers in the hope of catching their attention, which might otherwise come to the notice of a consumer, despite their potential liking of the content. For instance, if a new channel is launched by a broadcaster with varied content, the option of placing it on the landing page provides them opportunity to display their content to the viewers which might help them garner quicker response from the viewers.

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

**Comment:** In our view, there should be no such criterion for placing a channel on landing page, as it will unnecessarily curb the liberty of the distribution platforms to choose the content it desires to place at the landing page.

- 7. 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?**

**Comment:** In our view, the methodology for measuring television ratings can be re-considered only by conducting an extensive research/study.

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

**Comment:** Modifying the configuration in middleware such that last visited channel of the subscriber may be kept as a landing channel, would not be feasible for the distribution platforms to implement at such a large scale. Moreover, the exposure of the ratings getting distorted for the 'last visited channel' placed as landing channel remains the same.

**9. 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.**

**Comment:** As already stated in preceding paras, restricting the landing page to only TV channels not being monitored by BARC and/or only to platform specific information would be less beneficial to the consumer as well, apart from the broadcasters and the distribution platforms. If it is limited to only TV channels not being monitored by BARC, it results in lesser options of channels to be placed for viewing on the landing page. If it is restricted to platform specific information, consumer may lose the opportunity to discover new content in which he/she might be interested. Moreover, it restricts the liberty of the distribution platforms to choose the content of its landing page.