

# **POLICY GUIDELINES FOR TV AUDIENCE MEASUREMENT**

Key issues arising out of Trai's consultation  
paper dated 28<sup>th</sup> March 2008

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# MAIN POINTS THAT EMERGED FROM THE CONSULTATION PAPER

1. Supervisory / Policy frame work suggested for the ratings agencies
2. Sample size, representativeness, spread and controls
3. Technological upgradation
4. Real time reports
5. Transparency
6. Validation and Methodology
7. Maximisation of Social Welfare
8. Effects of ratings on Advertising rates, Target Audience and Content
9. Advantage to Larger channels
10. Viewers likes and dislikes unaddressed
11. Competition or Monopoly ? / Ownership issues
12. How can the Government help ?

# 1. Supervisory / Policy frame work suggested for ratings agencies

a. Should non profit, self governed bodies with membership from industry, accredit ratings agencies, as is the practice in most countries ?

- *Yes this is desirable and should be followed*
- *The mandate was given to TAM by the industry body*
- *The Industry body should own the service and the data.*
- *Research specialists in audience measurement should be commissioned to implement and run the service, in line with guidelines set by the industry body*

# 1. Supervisory / Policy frame work suggested for ratings agencies

## b. Should there be a Oversight Body ?

- *A separate oversight body would not be necessary*
- *The industry body will be responsible for such issues*
- *An independent audit could be commissioned by the industry body to periodically certify the framework and the procedure for measurement*

# 1. Supervisory / Policy frame work suggested for ratings agencies

c. Are Advertisers and Broadcasters who invest the most in advertising and programming the best judges of ratings services ?

- *Yes..to the extent of their objectives*
- *Additional inputs / participation could be invited from independent experts in development communication, public service programming, arts and culture*
- *This would provide a balance vis a vis a strictly “consumerist” perspective*

# 1. Supervisory / Policy frame work suggested for ratings agencies

d. What should be the standards / norms on governance, operations, methodology and disclosure on ownership criteria ?

- *These should be determined by the Industry body*
- *They should be in line with international benchmarks in the audience measurement domain*
- *Local realities should be given due consideration*

# 1. Supervisory / Policy frame work suggested for ratings agencies

- e. Is there any need for regulation ? If so what should be the type and criteria for regulation?
  - *There is no regulation in the audience measurement domain internationally*
  - *The industry body should be empowered with the task of managing and running the measurement system*

# 1. Supervisory / Policy frame work suggested for ratings agencies

## f. Comparison with Exit Polls, Credit ratings and Cinema reviews

- *Exit polls measure a specific decision linked to a specific event*
- *Credit ratings are based on the analysis of financial indicators of corporate entities done periodically by experts*
- *Cinema reviews are the subjective opinions of a critic / journalist*
- *Television ratings are at best comparable to market surveys, readership surveys, brand tracks based on retail panels and the more recent studies based on single source data*



## 2. Sample size, representativeness, spread and control

### a. Limitations of small sample size and disproportionate weightage given to a small sample of viewers

- *One of the largest samples in the world*
- *For the 35 million homes represented by TAM, there are 206 meters per million homes in India, vs 182 in the UK and 91 in the USA*
- *Currently represents Class 1, > 1 lakh towns as that's what the industry can currently bear*
- *Amap has approx. 6000 meters vs TAM's 7000 and has similar sample representation*
- *Weightage parameters are in line with the statistical norms that the size of the sample and the universe being measured dictates*

## 2. Sample size, representativeness, spread and control

### a. Limitations of small sample size and disproportionate weightage given to a small sample of viewers... ( contd.)

- *An increase in the proportion of the total population being measured is always desirable, but is subject to what the industry can bear*
- *A larger sample does not increase accuracy in a linear proportion... doubling the sample would improve it by 30 %, tripling it ...by 40 %, and quadrupling it ..by 50 %*
- *The current sample sizes are reliable if they are used over multiple observations over a robust period of study*
- *Perceived limitations are not linked to what the system was designed to measure*

## 2. Sample size, representativeness, spread and control

### b. Ratings have inhibited creativity and plurality in the country

- *The measurement system cannot be held responsible for the “media effects” resulting from content providers pandering to audiences using sensationalist, “dumbed down appeals”, to maximize profits*
- *The proliferation of regional channels represent quite a wide range in terms of plurality*
- *Doordarshan with its reach and exclusive platforms, gives ample scope for public service broadcasting*
- *The BARC is actively looking into this*

## 2. Sample size, representativeness, spread and control

### c. Panel households do not include the lower middle and top income bracket

- *MHI is not a criterion of panel design due to respondent reticence*
- *SEC is the indicator that indirectly measures the relevance of income by matching education and occupation*
- *Within SEC's both the lower middle and the top income brackets are adequately covered*

### 3. Technological upgradation

- a. **Due to upgradation of multiple delivery platforms of Terrestrial, C&S, DTH, IPTV, Mobile, CAS, HITS and Convergence, technological upgradation of measurement devices required constantly**
  - *Analogue meters upgraded to TVM5 digital meters*
  - *Baselines for DTH and CAS penetration conducted*
  - *Panels are continuously aligned to ensure representation of digital universe*
  - *Appropriate weightage measures for above being undertaken*
  - *White paper on the above to be shared with industry before release of the data*

## 4. Real time reports

### a. Transmitting data real time reduces chances of tampering

- *TAM is retrieved in encrypted form and there is no possibility of infiltration*
- *Quality Control and Validation measures rigorously followed to ensure accuracy*
- *The affordability vs utility of Quality and Validation measures on on real time data needs to be evaluated*
- *Tam has real time reporting capability, but reports weekly, with a 4 day lag with accuracy as the prime concern*
- *Amap has similar quality and validation measures and have the capability to upgrade to real time. Currently reports overnight, but often with provisos on panels where the data is not guaranteed. Confirmations often take a couple of days.*

## 5. Transparency

### a. Detailed disclosure of measurement methodologies

- *Detailed disclosure to users at all levels could compromise the IPR of the agency as well as the integrity of the sample*
- *The industry body should spell out the methodology while commissioning audience measurement contracts*
- *This would ensure transparency and keep the service secure*
- *Both agencies are transparent and proactive when queried about specific problems*
- *They don't divulge details in the public domain or to all levels within subscribers to protect the integrity of the panel and the measurement process*
- *If the measurement process is specified by the industry body it would bring in the desired transparency*

## 6. Validation and Methodology

### a. Reliability of TRPs : Confidentiality, Lack of validation, Inadequacy of measurement methods

- *The confidentiality of the panel members is rigorously maintained*
- *Systemic corrective measures are in place and are implemented whenever there are breaches*
- *The identity of the panel homes should not be revealed even to the Industry body or the Govt. It should remain with the agency and be made accessible if needed, to legally appointed auditors*
- *Both agencies have internal validation and audit procedures and are open to authorised audits*
- *Here again the involvement of the industry body in the methodology would bring in the desired transparency*



## 7. Maximise Social Welfare

### a. In Broadcast meeting viewers current demands not sufficient to maximise social welfare

- *This is in the domain of Public Service Broadcasting*
- *Many examples that can be borrowed from Development communication, Social Marketing and the Marketing of the Arts*
- *The needs of the communicator (the News editor, the Artist and the Development worker) and the viewers, have to be targeted together to contribute to social welfare*
- *The ratings system cannot be held responsible for this.... when it actually helps measure and quantify the disparity being referred to*
- *Content analysis methods to measure media effects and social welfare are a totally separate subject from ratings measurement*

## 8. Effect of Ratings on Ad rates, Target Audience and Content

### a. Popular Genres duplicated and less popular genres unserved

- *Advertiser revenue streams will always prioritise reach over involvement*
- *Hence popular genres will always be less risky for broadcasters who depend primarily on Advertising revenues*
- *Advertiser don't buy only on ratings. Prior experience, dealer feedback and independent research also point to a certain kind of risk averse programming*
- *Media marketing that matches niche genres with congruent advertiser needs can partially address this*
- *On the other hand addressability and direct to consumer platforms will ensure more diversity in programming*
- *Here again ratings can't be held responsible for what it only measures quite accurately*

## 8. Effect of ratings on Ad rates, Target Audience and Content

### b. Wrong TRPs will result in the wrong shows getting higher ad rates... media planners will miss their TG

- *Advertisers are abreast with what the measurement system is geared to provide*
- *In this context they are primarily interested in shows that allow them to maximise reach above all else*
- *The shows that get high ad rates are the ones that get high TRPs, within the scope of what the panel is designed to represent*
- *A media planners TG is accurate to the extent the sample is representative... and they are fully aware of it*
- *The need to measure a larger portion of the population should not be confused with the accuracy of the portion that is being measured*
- *The measurement system cannot be blamed for what it was not designed to measure*

## 9. Advantage to larger channels

### a. Ratings provide larger channels an advantage over niche channels

- *This should be stated as : Higher ratings have a lower degree of statistical error ... a fact that is inherent in statistics as a subject*
- *The smaller the unit of viewership, the higher the degree of error*
- *Analysis of smaller units of viewership in terms of niche channels or even components of big channels by crossing multiple variables need to be performed on data taken over a robust period*
- *This reduces error levels*
- *BARC is evaluating this too*

# 10. Viewer likes and dislikes not addressed

## a. Ratings are responsible for viewer likes and dislikes not being addressed

- *Advertiser led programming will always prefer reach over involvement*
- *Content strategy is not solely dependent on ratings... experience, independent research also point towards certain risk averse genres that make it on air*
- *Given the above reality, the ratings systems have several ways of analysing viewers preferences within the fare on offer*
- *Audience migration, duplication, loyalty, reach profile, frequency and time spent viewing are some of elements measured*
- *Creative media marketing often uses these indicators to market niche genres to marketers with congruent target audiences*
- *The increase in addressability and direct to consumer platforms will help bridge the gap*

# 11. Competition or Monopoly / Ownership issues

- *The industry body should own and operate the measurement system*
- *A common measurement system where separate components are commissioned to multiple agencies as done by BARB in the UK is good way of ensuring sustainability and gaining from the benefits of competition*
- *To elaborate BARB in the UK commissions four agencies to provide measurement services on its behalf*
- *RSMB does the sample design, panel controls and quality control checks on BARB's behalf.*
- *Ipsos Mori does the establishment survey*
- *AGB Nielsen and TNS do the panel recruitment and meter installation*

# 11. Competition or Monopoly / Ownership issues

- *The software tools could be designed and owned by the Industry body, but developed through the engagement of a specialist research vendor*
- *Further value addition to include Psychographics, Behaviouristics , Brand usage that rides on the back of the industry owned panel could be commissioned to specialist agencies*
- *Elements to include issues of audience needs, plurality, social welfare and public service needs could similarly be farmed out to specialist agencies on the back of the industry owned panel*
- *Proprietary analytics based on the raw data could be considered from international experts at the cutting edge of marketing science*
- *Each and every media organisation that uses or relies on media is allowed membership and should be entitled to a seat in the board (as in the case of the Media Rating Council in the US).*

## 12. How can the Government help ?

- *Catalyse the implementation of measurement technology through incentives, rationalisation of duty structures*
- *Consider the merits of monitoring channels by making digital water marks mandatory*
- *Provide easy access to Census Maps and Electoral rolls at district and town level*
- *Protect the confidentiality of the Panel by introducing and enforcing stricter laws*
- *Make CAS mandatory and support direct to consumer platforms to ensure real consumer needs in the context of media are met*



THANK YOU !