

**BY HAND/ELECTRONIC MAIL**

Date:

To,  
Advisor (B&CS)  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg,  
Old Minto Road,  
New Delhi - 110 002

Dear Sir,

**Re: Submissions to Telecom Regulatory Authority of India ("TRAI") in response to the Consultation on "Consultation Paper on Review of Television Audience Measurement and Rating in India", 2018.**

At the outset, we would like to thank the Authority for giving us an opportunity to tender our views on the **Consultation Paper on Review of Television Audience Measurement and Rating in India.**

In regard to the present consultation process, we submit that we have perused the said paper highlighting the intricacies of the draft carefully. We hereby submit our comments attached as Annexure. The said comments are submitted without prejudice to our rights and contentions, including but not limited to our right to appeal and/ or any such legal recourse or remedy available under the law.

The same are for your kind perusal and consideration.

Yours Sincerely,

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**Encl: As above**

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**Re: Submissions to Telecom Regulatory Authority of India (“TRAI”) in response to the Consultation Paper on Review of Television Audience Measurement and Rating in India”**

Kind Attention:

**Advisor (B&CS)  
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## **INTRODUCTION**

Undoubtedly Television (TV) has been the dominant medium for information, commercial communication and entertainment, which has been the primary reason for ever-increasing desire by broadcasters, advertisers and advertising agencies to have accurate, consistent and detailed information about TV audiences. However television has constantly evolved, a medium that has gone from just a few linear channels broadcasting for only part of each day in black and white, to a 24 hours, multi- channels, linear and on- demand offer that covers almost every conceivable human interest, delivered in ever higher definition to ever-larger screens, Television Audience Measurement (TAM) has naturally evolved at the same time, both in terms of the methodologies and technologies deployed.

Television audience measurement is a resource being used to answer many questions from broadcasters and advertisers in their daily work. Broadcaster need to know the audience in order to offer the best content in the most appropriate schedule so as to reach the most valuable audiences. Advertisers need to know the television audience and how to communicate with their actual and potential consumers. To answer all these questions, broadcasters and advertisers need a quantitative measurement of television audiences. Further with millions spent annually on TV programs and commercial, valid and reliable television audience measurement is vital to evaluate and maximise the effectiveness of the investment. These rating if reliable and valid becomes the common currency for the market's commercial airtime.

Television Audience measurement (TAM) system can only be reliable when the measurement system would yield similar findings if independently carried out a number of times, the system can be independent only when the rating agency operates from a position of neutrality recognized by all the stakeholders. Close links to one of the interested parties would generate suspicion about the data bias, which would hence prevent the very acceptance as a common currency. And a TAM system can be transparent only when every component of the system is comprehensible and accessible to qualified auditing by the market.

It is well established that today, viewers watch television content on many screens other than television (TV) sets and usually do so via the internet, using a variety of connected devices. Viewing behaviour have evolved faster than the audience measurement techniques that form the basis of advertising transactions, and the whole industry, audience measurement system and data analytics must be adapted to the new reality. To ensure the next generation of audiovisual audience measurement meets the needs of both Broadcasters and Advertisers, future TAM system need to be tailored to make the most

of the combined benefits of television and Video on Demand (VOD), rather than exposing the differences between the two, wherever possible it is recommended that Television Audience Measurement must aim for a holistic system that covers all video exposures in a single harmonized database for different screens

With the speedy change in technology and consumer adaptability behaviour to the technology of viewing broadcasting content on multiple screens as well as through various other digital platforms via internet coupled with the population of the country, the methodology of the viewing pattern needs to be at pace with the constant development for providing a robust, accurate and valuable rating, further with the known issue of panel tampering within the already minimal number of panel of household, the accuracy of television Audience measurement is an alarming issue that needs to be considered.

The need for the hour is to firstly increase the panel homes and that can be done by doing away with the conventional method of measuring via Bar-o-meter being placed in the selected pool of household from the panel, by replacing with the methodology of Return Path Data (RPD) via digital set-top boxes (STB) being used by consumers for receipt of signals, which in turn would reduce the risk of tampering of data and would further address coverage of all consumers viewing television, hence larger viewing data to enable the actual television ratings. Further doing away with the issues of a particular geographical areas not being counted in the audience measuring rating system. Digital set top boxes are now mandated and are the only way of receiving signal of television channels through addressable systems, which would undoubtedly reduce the expenses involved in placing bar-o-meter and its ancillary requirements thereto.

With the present time taking methodology of selection of panel homes created through establishment survey on distribution of target viewership for a particular segment like age group, socio-economic class, gender, working status can also be done away with introduction of RPD embedded STBs thus reducing the burden of privacy breach of information being collected by the said households. The broadcasting contents already in existence are made keeping in mind catering to a particular audience, the data collected via the RPD embedded STBs would inevitably act as a resource to determine the viewing pattern of consumers in a more detailed format without the need to collect information through surveys or through obtaining personal data of the consumers.

With the introduction of Digital India and improved online infrastructure to have increased internet connectivity, resulting to further online viewing, Wi-Fi routers can also be considered to be used as a medium to capture audience measurement for viewing of broadcasting content.

Further with the question raised of creating competition in the rating services, it is best that the television audience measurement/ rating remains with a single self-governed body with representation of various stakeholders from the industry as already existing in the present scenario. The change of methodology as suggested above would certainly

remove the issues and concerns being raised. More than one rating agency body would only create duplication of data and chaos in the system than increasing accuracy and quality in the rating system.

## **RESPONSE TO ISSUES FOR CONSULTATION:**

**Q.1. Whether BARC has been able to accomplish the purpose with transparency and without any bias for which it has been established? Please elaborate your response with justifications. Also, suggest measures to enhance the effectiveness of BARC to give TV ratings with transparency and without bias.**

**A.** BARC was established to setup and control TV audience measurement in India. The idea behind conception was to report “What India Watches”.

The main reason for setting up of BARC was to make it an unbiased and transparent system such that it helps the broadcasters to make their content better for the viewers and not result in a fight for ratings. The major bias of the sample towards Urban due to advertising implications has led improper reporting of viewership by BARC. Low sample to universe ratio in many markets have led to erratic viewership behaviour leading to misinterpretation of viewing behaviour. Even after investing heavily on technology which is primarily funded by Broadcasters, BARC data is still delayed by a week and not daily.

BARC should be able to have a proper representation of India as a whole and should be able to report “What India Watches”. It should increase the sample size and should have representative Urban-Rural Ratio as the Universe. Also it had started with the premise of automating most process and reducing human contact, therefore it should be able to reduce the lag in data release. There should be better checks and balances for outlier deletion of data.

**Q.2. Do you feel that present shareholding/ownership pattern of BARC ensures adequate representation of all stakeholders to maintain its neutrality and transparent TV ratings? How its credibility and neutrality can be enhanced further? Please elaborate your response with justification.**

**A.** The present shareholding/ ownership pattern of BARC does ensure adequate representation of all types of stakeholders.

**Q.3. Is there a need to promote competition in television rating services to ensure transparency, neutrality and fairness to give TAM rating? What regulatory initiatives/measures can be taken to make TV rating services more accurate and widely acceptable? Please elaborate your response with justifications.**

A. History has it that in mid-2004, Ahmedabad based aMap started an alternative rating system wherein buyers and advertisers could actually see the ratings online and decide. However, the market could not support 2 rating systems and the organization aMap got wiped out (DD however has its own Doordarshan Audience Research rating system).

It is not advisable to promote competition as blooming of one or more agency would create chaos and duplication of data which in turn would give scope for tampering of data. A single self-governed body would rather be more accountable and responsible.

**Q.4. Is the current audience measurement technique used by BARC apposite? Suggest some methods, if any, to improve the current measurement techniques.**

A. BARC's Audience measurement uses the New Consumer Classification System (NCCS) which is inadequate to define various strata of population. The variables defining NCCS has become so obsolete that it reports a shrinkage in NCCS DE population which is not in line with the Census of India. Also its methodology fails to report how the viewer is accessing TV channel. It doesn't take care of the Last Mile operator and distinguish the viewership pattern of a DTH subscriber or a Cable subscriber or a IPTV subscriber. Rectifying NCCS and adding operator information increases the actionability of the data

Further with the various tampering issues within the panel further reduces the credibility of the rating especially when millions are being invested based on this data for advertising.

**Q.5. Does broadcasting programmes that are out of their category or in different language for some time during the telecast affect the TAM rating? If so, what measures should be adopted to curb it?**

A. No it does not affect the TAM rating.

**Q.6. Can TV rating truly based on limited panel homes be termed as representative?**

A. No, limited panel homes cannot be termed as representative especially when the number of panel homes are minimal in number against the large Indian population

watching television. The ratings can be representative only when sample size is large and sample to universe ratio is representative.

**Q.7.What should be done to reduce impact of manipulation of panel home data on overall TV ratings? Give your comments with justification.**

- A. To reduce the impact of manipulation of data they should have:
- a. Tighter control over sample homes and their behaviour should be present
  - b. Increased Checks & balances in the system to eliminate outliers and erratic behaviour homes
  - c. Algorithm for outlier deletion in the data cleaning process
  - d. Increased buffer homes to 15-20% to replace outlier homes and proper represented viewership data.
  - e. Independent and external agency to look into the grievances and do timely audits.

**Q.8.What should be the panel size both in urban and rural India to give true representation of audience?**

- A. The sample size of both Urban & Rural should be such that the error levels should not be greater than 5% on any type of bifurcation of data. If the error levels increase the system should not report the numbers.

**Q.9.What method/technology would help to rapidly increase the panel size for television audience measurement in India? What will be the commercial challenge in implementing such solutions?**

- A. As been stated above, the introduction of RPD embedded STBs would rapidly increase the panel size of television audience measurement, however, it would be a time taking process initially to convert the already existing STBs with RPD embedded STBs. However the same can be done in phases.

**Q.10. Should DPOs be mandated to facilitate collection of viewership data electronically subject to consent of subscribers to increase data collection points for better TRP ratings? Give suggestion with justification.**

- A. No, the DPOs should not be mandated to facilitate collection of viewership data, as it may lead to data tampering. The DPOs can influence the subscribers leading to misrepresentation of data. The DPO is stakeholder who's business depends on the how much viewership representation it commands.

**Q.11. What percentage of STB supports transferring viewership data through establishing a reverse path/connection from STB? What will be the additional cost if existing STBs without return path are upgraded? Give your suggestions with justifications.**

- A. The percentage of STB supporting RPD is unknown and can be obtained from distribution operators. They would also be able to inform about the cost implications of the same.

**Q.12. What method should be adopted for privacy of individual information and to keep the individual information anonymous?**

- A. The present existing framework for privacy of individual information suffices the same.

**Q.13. What should be the level/granularity of information retrieved by the television audience measurement agency from the panel homes so that it does not violate principles of privacy?**

- A. The subscriber data as already available with the DPOs suffice and no change is required.

**Q.14. What measures need to be taken to address the issue of panel tampering/infiltration? Please elaborate your response with justifications.**

- A. As already mentioned earlier, to reduce panel tampering BARC should have:
- a. Tighter control over sample homes and their behaviour should be present
  - b. Increased Checks & balances in the system to eliminate outliers and erratic behaviour homes
  - c. Algorithm for outlier deletion in the data cleaning process
  - d. Increased buffer homes to 15-20% to replace outlier homes and proper represented viewership data.

- e. Independent and external agency to look into the grievances and do timely audits.

**Q.15. Should BARC be permitted to provide raw level data to broadcasters? If yes, how secrecy of households, where the people meters are placed, can be maintained?**

- A. To increase transparency of the system, BARC should provide Raw level data to broadcasters in same format as it is providing to its agencies i.e. Kantar & Neilson.

**Q.16. Will provisioning of raw level data to broadcasters, in any manner, either directly or indirectly contravene the policy guidelines for television rating agencies prescribed by MIB?**

- A. No.

**Q.17. Is the current disclosure and reporting requirements in the present guidelines sufficient? If no, what additional disclosure and reporting requirements should be added?**

- A. Yes the current guidelines are sufficient with only one addition of a cut at aggregated DPO level reporting.

**Q.18. Stakeholders may also provide their comments on any other issue relevant to the present consultation.**

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