

## **IAMAI Submission to TRAI Consultation Paper on Review of Television Audience Measurement and Ratings in India**

The Internet and Mobile Association of India [IAMAI], on behalf of its members, would like to make the following submission on the TRAI Consultation Paper on Review of Television Audience Measurement and Rating in India, dated 3 December, 2018.

**Q1 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.**

**C1** Based on feedback from industry, it appears that BARC has not been entirely successful in achieving its purpose with transparency.

- TRAI's 2008 recommendation suggested "BARC shall not undertake audience measurement directly and shall resort to open, transparent and competitive bidding for the various stages involved in the rating process". In practice, the whole process of collecting, processing and publishing the data is controlled by BARC at its own premise with little contribution from outside agencies. As a result, there is no transparency over the original collected data and the difference between the original and the final data released to the market.
- There should be periodic audit of modifications made to the original data via outlier detection, omission of a few records and its justification, etc. by the third party using the same rules that BARC applies to the data at the time of processing it. The actions taken on the data during the validation process should be archived in the server with the name / ID of the person who modifies the original meter data.
- Board of directors need to review the top management of BARC every year to ensure that top management functions professionally without bias towards select broadcasters.
- At present the Top management is involved in the weekly ratings validation process.
- Despite TRAI recommendation that the industry body (i.e. BARC) should be a Not for Profit Organization, there is a general perception that BARC is revenue oriented and they generate revenues from a lot of adhoc projects and products. To tackle such perceptions, certain steps need to be taken:
  - Strict procedures should be laid out on floating of RFP's, vendor selection criteria, vendor evaluation, selection of vendors, vendor renewal / removal
  - Steps to ward off allegations like BARC influences vendor's independence with contract maintenance / termination and temptation of additional business or that BARC pays more than the market rate to vendors in order to ensure they follow BARC instructions.

- Similarly, all the vendors should be liable for independent audit of the processes followed and data generated for BARC.
- There should also be independent financial audit of BARC. The audit should check the selection of vendors, benchmarking of contract value with similar contracts from the industry, whether the contractor delivered the goods / services etc.
- The vendor selection should be entrusted to an independent committee (e.g. technical committee) instead of BARC management.
- Top management of BARC should lay down the rules and ensure that the rules are followed by the vendors / teams.
- It is alleged that Meterology Data Limited (MDL), formed as a new company after BARC & TAM (Television Audience Measurement) merger and entrusted with owning peoplemeter panel, is actively involved in fieldwork and is replacing the independent, professional research companies in managing panel homes as well as contributing to the establishment surveys. If this is true, it needs to be corrected as the role of the industry body as defined by TRAI is to own and supervise the work of professional agencies and not to perform it in-house.

**Q2 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.**

**C2** At present, IBF owns 60% of BARC and 20% each is owned by AAI and ISA. As a result, IBF has a greater say in the functioning of BARC. However, globally, higher percentage of revenue is contributed by media owners.

In past TRAI consulting papers, most contributions also came from the media owners. It seems ISA and AAI members are not that involved with overall currency. Consultation with these constituents may help ensure equal contribution in functioning of BARC by all the three industry bodies, irrespective of the share of revenue contributed. Presently it is felt that with 60% share IBF controls day-to-day functioning of BARC and future course of action.

**Q3 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.**

**C3** There is no independent validation of ratings published by BARC. We believe periodically the industry should conduct studies to arrive at broad parameters such as Reach, profile of viewers of specific channel etc. and compare the same with BARC findings. A third party should also conduct co-incidental studies to ensure that the show & channel reach are in line with BARC's reporting. The outcomes of such studies should be shared with the stakeholders to ensure that they are involved in the steps taken to improve the currency constantly.



In USA, there are two providers of TV ratings; Nielsen, based on peplemeter and ComScore ratings based on Return Path Data (RPD) based on 31 million households. Such competition ensures that the providers are not complacent and work harder to meet industry requirements.

Hence, our suggestion is that we should have two currencies, one based on peplemeter and the other, based on RPD (taking care TV, Digital & IPTV measurement based on RPD). Tracking subscriber data enables us to source large amounts of audience viewing data through set top boxes or any other device with a return path. Having access to this big data is an incredibly useful and accurate measure of subscriber viewing behaviour. We can do this for different types of data, whether from the set top box in the home or mobile services that enable subscriber viewing on tablets or phones. It can be done across the range of operators in the TV, mobile and video space.

This will add Digital Viewership Measurement which is currently missing. By providing unique Reach and Frequency across devices de-duplicated by Brand, Campaign, Site, or Placement, the Single source solutions will allow analysis and comparison of different platforms and their offerings. Also taking future in view, it will cover IPTV/Hybrid IPTV content consumption and reach.

The 2<sup>nd</sup> study of RPD can be done with Internet and Mobile Association of India (IAMAI), who represents most of the Digital media and publishers, in partnership with relevant stakeholders.

**Q4 Is the current audience measurement technique used by BARC apposite? Suggest some methods, if any, to improve the current measurement techniques.**

**C4** The current measurement system of using peplemeter is the global standard. However, with BARC Watermarking system which involves heavy initial investments in hardware, this is not affordable by long tail channels and their viewership cannot be measured. There is an urgent need to either supplement such a system with RPD (Return Path Data) or have an independent RPD based currency which can cater to the long tail. This will ensure that the system will be able to provide robust estimates for smaller channels as well as reduce the influence of tampered households on overall ratings. The RPD-based data will also help the platform owners (DTH/MSO) to know and understand the consumption of data and trends region-specific. RPD mechanism will also help in resolving the issue of panel home tampering.

The current BARC measurement system is only partly passive. It requires the panel member to press buttons to let the system know that he / she is watching the program. Most errors are introduced in the system due to lapses in compliance from panel members. A system of infrared detection of household member based on their body shapes (or similar technology) will make the system completely passive and improve the compliance, resulting in more accurate viewership data. Such systems have been developed in the past but were not operationalize due to privacy concerns, particularly in USA. The merits and demerits of such systems should be debated and a decision taken.

The current practice of measuring the viewership from 2+ years should be modified to 4+ years, as is the global norm.

The current system also does not measure the OTT consumption. Pilots need to be conducted to measure it, authenticate the accuracy of measurement, the problems faced etc. Once fully tested, the system needs to be operationalized and expanded to more households.

**Q5 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?**

**C5** Few television news/ entertainment channels show popular programmes that are out of their category or in different language for some time during the telecast. This broadcast of popular programmes attracts more eyeballs and potentially affects the TV ratings/TAM ratings. All these anomalies can be restricted by taking them out of the ratings. This should be taken up by the Technical Committee of Research agency. Once they are not part of the ratings, broadcasters will have lower incentive to add such programs in their programming.

**Q6 Can TV rating truly based on limited panel homes be termed as representative?**

**C6** Samples provide surprisingly accurate results at an overall level. One can easily calculate the margin of error for an estimate based on the sample size, which proves the robustness of smaller samples in providing accurate population estimates at national level. For example, opinion polls predict the outcome of general polls reasonably with sample sizes as low as 1000 or 2000. With good sampling one can reliably poll a population as large as India's with a sample size of 16,000 with 99% accuracy.

BARC panel is already one of the largest in the world. The challenges are faced when one analyses data by geography, language, target group and time slots and expects robust estimates. In our view, the comparison based on Reach and daily GRP provides robust estimates at channel level for major channels.

To improve the sample, we need to supplement BARC panel with RPD since RPD is significantly cheaper and hence can scale easily. This will enhance the accuracy of estimates as well as allow deep dive into the data. An independent, RPD based currency can also help assess the accuracy of BARC estimate and provide robust estimates for smaller channels.

**Q7 What should be done to reduce impact of manipulation of panel home data on overall TV ratings? Give your comments with justification.**

**C7** Following actions need to be taken to detect manipulation and to reduce its impact on overall TV ratings

- To control manipulation of data, the data from Barometers (peplemeters) collected should not reach BARC, instead it should be received by a third party vendor experienced in audience measurement practice. The responsibility of data validation, outlier detection and extrapolation as well as channel/show ratings for every week should be owned by the third party.
- BARC will ONLY get to know the Ratings post the release of data along with other stakeholders.
- Rest all methodology of Sampling, Technology and Reporting Software remains the same.

- Continuously evolve the system of outlier detection (influence is one of them) using multiple techniques. When system identifies outliers, they should be investigated for their deviation from a) their past behavior, and b) the viewership pattern of the general population. Investigation feeds into fine-tuning the rules and algorithms for outlier detection.
- Increase the overall sample size so that the impact of a single household on overall viewership trend is lesser.
- Include other methods / technologies to supplement the peplemeter panel. Return Path Data (RPD) is a low hanging fruit and needs to be integrated with BARC panel as soon as possible. Measurement of OTT is also important as growth in OTT is significant and the current system is leaving these viewers out.

**Q8 What should be the panel size both in urban and rural India to give true representation of audience?**

**C8** We need to take the cognizance of the fact that India is a diverse country with many regional languages, cultures and channels and device a sampling set that also considers the expenses involved in such an exercise.

A sample size of 75,000 - 100,000 peplemeter homes should be reasonable. However, this sample needs to be supplemented with RPD. The RPD sample size in US is about 69 million TV's in 31 million homes (<https://www.comscore.com/Insights/Press-Releases/2018/2/comScore-Grows-TV-Measurement-Footprint-to-More-Than-69-Million-TVs-in-Over-31-Million-US-Homes>). For India, we should aim for at least 1 million homes with the caveat, the more the better. To achieve this number, DPOs must be mandated to facilitate collection of second level data from sample homes.

**Q9 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?**

**C9** Use of multiple technologies such as peplemeter, RPD, channel video players, softwares measuring the consumption of OTT and data modelling should help increase the overall sample size without commensurate increase in the costs. Advertisers can pay 0.25% of their media spend for measurement every year to make the currency more robust which in-turn helps them to make judicious investments.

**Q10 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.**

**C10** Collection of viewership data electronically after masking user information may be mandated. This can protect individual privacy while at the same time build robustness of RPD and reduce sample error of the current survey.

**Q11 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.**

**C11** RPD involves capturing TV viewing data of homes with addressable set-top boxes (DTH and digital cable) by enabling “return path” flow of data. Since the viewer is not conscious about the collection of data there is a lower chance of data manipulation. The accuracy of data also increases exponentially with the sample size . Most of the Set-top boxes are ready to use for RPD. As suggested earlier, the cost can be borne by the pool created from the Advertiser money to create a robust currency.

**Q12 What method should be adopted for privacy of individual information and to keep the individual information anonymous?**

**C12** The personally identifiable information of the household & individuals should be stored on a single secure server with access granted to only those who genuinely need it, with appropriate privileges. A log of such access should be maintained on the server with only ‘READ ONLY’ access to it for everyone who wishes to access it.

The daily data collected from the peplemeter should only have the household ID and individual ID’s. This way, the agencies which are processing the data do not know the actual household, its address or the names of individual members.

The primary source of leak of such sensitive data is from the field team as they need to personally visit panel households. To the maximum extent possible, communication with the household should be shifted to telephone or other impersonal means.

**Q13 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?**

**C13** Globally, viewership information is collected at the level of second. However, at the time of reporting, the data resolution is converted to a minute, with the help of business rules stored on the server. It may be difficult to migrate these rules to the peplemeter. The other side effect of transferring these business rules to peplemeter would be that making changes to them later may be difficult.

In our view, privacy is more of a concern for the type of content viewed and the overall time spent on watching such content. This may be tackled by anonymising the viewers with only ID numbers, without exact details being shared while analysing the data.

**Q14 What measures need to be taken to address the issue of panel tampering/infiltration? Please elaborate your response with justifications.**

**C14** Tough actions need to be taken against broadcasters who attempt to influence the rating system. In some cases, an intermediary is used and relationship between the intermediary and the channel is often difficult to prove conclusively. This poses the challenge of identifying the true broadcaster who is trying to influence the ratings. Detailed fact finding to establish the connections between intermediary and the broadcaster is essential. Once such a link is

established, tough action needs to be taken against both the channel as well as the intermediary, to serve as a strong deterrent for channels and intermediaries who indulge in such activities.

**Q15 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?**

**C15** There are multiple ways in which the industry comes to know of the metered household. The simplest is to follow the field executives managing the peplemeter panel. The second is to bribe the field personnel to obtain the addresses. Third method is to physically examine cable households for presence of meters in their households. Fourth one is to stop distribution of specific channel to an area for some period (e.g. a day) and check its impact on ratings. Influencing the ratings using data is very tough. It requires an ability to understand the complex media data, analyse it, isolate the impact of ground activities and then find the specific households.

Once the data is anonymized and provided at the reporting unit level, there is no way anyone could identify the panel home from it.

The organization on which the BARC is modelled, BARB UK, provides raw data to its customers through 13 data bureaus. These bureaus provide data, enhance it with additional variables and attributes, help customers analyse the data through a variety of tools and reports and provide consultancy. In contrast, BARC provides data through only a single software called BMW. This limits the use of the data to the capabilities of the software and deprives the subscribers of competitive services in analyzing the data to its fullest capacity.

Earlier services (e.g. INTAM, TAM) used to provide raw data to agencies as well as clients at additional costs. In our view, the sale of raw data stopped due to apprehensions of subscribers asking too many questions based on comparison of granular findings from the raw data outputs from competing services (e.g. TAM and aMAP) rather than actual incidences of using the raw data to influence the ratings. The second probable reason is that these services wanted to hide the actual sample sizes in the face of growing criticism on inadequacy of coverage.

The user of the data has the right to know the sample size of specific incidence (e.g. viewership) to take appropriate decision (either ignore the estimate due to smaller sample size or use it with confidence). The practice of hiding sample size is leading to problems in business decision making process.

Hence, BARC should provide the raw data to the clients and allow them to use it the way they want. BARC should also educate the user of appropriate use of the data.

**Q16 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?**

**C16** As stated earlier, once the personal identifiable information is removed from the data (i.e. anonymized), there is no threat of compromising the privacy of the panel home. Hence, in our view, there is no violation of policy guideline.

**Q17 Is the current disclosure and reporting requirements in the present guidelines sufficient? If no, what additional disclosure and reporting requirements should be added?**

**C17** We have answered this question in C1 (i.e. answer to question 1)

**Q18 Stakeholders may also provide their comments on any other issue relevant to the present consultation**

**C18** The current system should help the subscribers utilize the data effectively. In this regard, the following aspects of the existing system needs modification

- BARC does not provide the raw data to subscribers. It provides the data loaded on the software. This hinders the subscriber's ability to analyse the data using its own tools and as per its needs.
- BARC has limited the number of agencies which could provide consultation to the subscribers to just two. We have mentioned earlier that BARB UK has 13 data bureau servicing the subscribers. We believe increased competition will ensure optimal use of BARC data. It will also ensure that increased analytics will help validate the data and bring out anomalies, if any.