

Television Monitoring and Research

Dear Sir,

This is with reference to the consultation paper on Policy Guidelines for Television Audience Measurement (TAM) / Television Rating Points (TRP) dated 28th March 2008, by Telecom Regulatory Authority of India (TRAI). Please find below our views.

- 5.1 We must be able to evolve a new system of TAM/TRP measurements capable of addressing the concerns of the Govt as raised in the letter of Secretary, Information and Broadcasting (I.B) to the chairman, TRAI. The Government must legislate to prescribe the system of regulating T.R.Ps. While doing so, it must be able to lay down the definition of various terms / terminologies to be used in any survey as also the methodologies. Standardization of terms / terminologies and methodologies in a legal manner will ensure that the TAMs / TRPs of any survey, carried out by Govt., semi-Govt. or any other private body have same base and will facilitate cross checking the fidelity of each survey and will also provide comparative picture as brought out by various agencies. Having said all, we feel that as many agencies as wish to undertake TAM / TRP survey should have the freedom to do so

- 5.2 Constitution of Oversight Body consisting of stake holders and headed by professional with proven capability and integrity for TAM /TRP survey should also be legally prescribed through legislation. All the rating agencies should be under compulsory obligation to use in their surveys only legally prescribed terms / terminologies and methodologies. They should also be under obligation to report the results of survey within a specified period. Format of reporting should also be prescribed by the Oversight Body. Any agency wishing to undertake survey should be accredited to do so only after its capability has been assessed. Capability assessment procedure should also be part of the legislation / regulation.
 - 5.2.1 Eligibility criterion for survey agencies is a must, which should naturally be based on its Capability Assessment to be prescribed in the legislation / regulation. It will ensure that only genuine and capable agencies come into the arena of survey. It should have a mechanism of filtering out bogus surveys. Any non – credited agency undertaking survey and publishing results should be prevented from doing so. Violation of this principle should incur a criminal liability.
 - 5.2.2 Unless the size of universe and its character is assessed by a scientific survey, dwelling upon the sample size (in relation to universe) is meaningless sample size is also determined by the characters to be captured in a particular survey. It is a well developed science and is not in the realm of conjecture / speculation.
 - 5.2.3 Equipment in use currently are not automatic, tamper proof and free from manipulation. Moreover, they are not universally useable for different delivery platforms. Public / private participation should be invited to invent suitable equipment for different delivery platforms. Given the required support we can develop the desired equipment and technology (within 3-6 months).
 - 5.2.4 Unless the technology is real time system for generation of reports, fidelity of reports will be questionable. In our view, this issue should not have been posed at all.

- 5.2.5 Use of the word and phrase “ Minimum Coverage” is not correct. As indicated against 5.2.2 (above) sample size should be scientifically determined as it is a well developed science. Instead of talking “Minimum Coverage” we should talk of “**Optimum Coverage**”.
- 5.2.6 Rating agencies should normally have no interests in the clients as it will influence their survey results and will not be credible. However, if agencies having interests in clients wish to do survey, they should not be prevented from doing so. However the published results should boldly carry the extent of their interest holding in different clients
- 5.2.7 Survey principles / guidelines should be the same or similar as the National Sample Survey Organization’s (NSSOs) survey. No dilution of the principle should be allowed under any condition whatsoever.
- 5.2.8 Our views are contained in para 5.1. Standards / norms must be legally prescribed. They cannot be dwelt upon in an exercise of this type. It should be formulated by an Expert Committee and should be in line with international definitions / practices to facilitate comparisons.
- 5.2.9 Independent auditors for validation of ratings provided by rating agencies should be a wing of the union Govt. Scope of the audit, the qualifications of auditors etc should be prescribed by the aforesaid legislation to be recommended by an Expert Committee.
- 5.3 We do not favor an industry initiative only. It will not be as credible as an independent body to be statutorily created having all the stake holders under its umbrella. We feel that if the charter of TRAI permits, it should be under TRAI as it has already established its credentials over the years.
- 5.4 Do not shut off any rating service / agency from undertaking the work provided it has right credentials / accreditations for which capability assessment in a transparent manner is a must as provided by a legislation / regulation.
- 5.5 We are still working out and finalizing our views and would like to take the opportunity of sharing it at the time of formal consultation in a workshop to be convened by TRAI. Matter being of great public importance, the consultation is a must to judge how well founded / ill founded suggestions are of the agencies which have joined discussions and offered their comments on the issues raised in TRAI paper. To us TAM/TRP measurement is a statistical exercise which should be done under the watchful eyes of an Expert Body to be known by whatever name.

With Best Regards

Manager