



Comments on TRAI Consultation Paper

on

“Review of Television Audience Measurement and Ratings in India”

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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.

Yes, BARC has enhanced transparency over its predecessor TAM.

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.

Current Shareholding pattern of BARC is adequate.

However, Cross holding of research companies implementing MIBs objective needs to be shared publicly and discussed periodically.

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.

- **Single Currency measure for television ratings is apt. No Need to change.**
- **Increasing accuracy and acceptability:**
 - **Sample should be representative of universe for each language being broadcast, not only at national level**
 - **Sample should represent all linear broadcast viewership across devices, and not merely on television.**
- **For greater credibility: Raw data (masked for consumers) should be made available to subscribers. Utility of a report is reflected in the ability of affected party to take adequate marketing or distribution or content action.**

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

No. Current audience measurement technique are obsolete and inadequate. There are three ways of getting research methodology upto speed with 2020 (assuming it takes 12 months for BARC to implement)

- 1. Removing Obsolescence: All linear Television viewership measurement has to be reported. Currently, only television sets are being measured disregarding internet enabled devices including but not restricted to smart televisions, laptops, mobile phones, pads and others.**
- 2. Enhance Establishment Survey: TRAI has the wherewithal to get stakeholders to report channel-wise subscription across digital TV households and internet enabled devices. This should replace current establishment survey. Or rather television ratings measurement has to be designed in a manner based on TRAI universe data. Else there is duplication, which was the very reason for this elaborate exercise to start in the first place.**
- 3. Fill-in the Missing Link: Extrapolation of Bar-o-meter data captured on TV watching household 'assumes' all members are all watching TV. This changed in last few years with screen viewership fragmenting even in single TV household with few members consuming other screens simultaneous to TV. In a way, this is a second (possibly missing) step of extrapolation sample, which is missing.**

Using audio watermarking to have BAR-o-meters identify channels is ok.

Q5. Do 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?

No. From a BARC perspective, viewership in viewership. If a channel is broadcasting multiple languages, which does not infringe its broadcasting license, then it has to be a part of its viewership.

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

Yes. All quantitative research techniques use sample-based measurement, where sample size is statistically determined based on size and diversity of universe.

If the same is being followed, then it does not need to change. TRAI should regulate this. This author is of the opinion that devices beyond television consuming linear broadcast television is missing.

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

There is no substitute of integrity. As a process, use best practices:

- **Rotate people in responsible positions, have short-term deputations.**
- **Rotate Research Agencies every 2-3 years. Meters can be the same**
- **Rotate panel across cities/ representing cells (make it time series)**
- **Put a TRAI auditor to audit BARC, just like there is an external auditor to an internal auditor**

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

Incomplete question! It is not urban vs rural. It is “language-wise” urban and rural, across genders and age bracket. Hence the problem. Every language where license is being given should be represented

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?

This is a dynamic answer and hence this question should be asked every year.

For 2019

- **Television viewership = All linear TV viewing, irrespective of device**
- **Sample: Across devices**
- **Extrapolation: across devices**

- ***Till such time investment is made in panel across devices, collaborate with IAMA I to get single currency (from comScore, alexa, app annie etc) for linear TV viewership on devices***

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.

- **DPOs already have both KYC and subscription data. Hence no fresh mandate required. Yes, use DPOs as they are an indispensable stakeholder. Their role as a partner in establishment will simultaneously enhance credence and reduce cost**
- **The effort and money used for establishment survey should be re-directed to DPOs for getting subscribers to become volunteer paid partners on reporting monthly subscription packages. No extra resources needed.**

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.

Refer Q10. No extra money needed

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

Refer Q10. Since there will be volunteer paid partners, then anonymity is not needed

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?

[NCCS x AGE x Gender x Language understood] i.e. all profile base information should be collected

No information on contact coordinates should be taken.

Make it volunteer basis to reduce or possibly eliminate cost

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

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?

Yes, please share raw data with all members, not just broadcasters

Collect data at a profile level and not on actual people names and addresses

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?

MIB is best placed to reply this. In my opinion, there is no contravention

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

No Comments

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

TRAI has done a wonderful job in organizing this industry. While TRAI and consumers are both converged, it is time for broadcast and BARC rating to also converge across devices for all linear viewing. Given TRAI's success, it is important that it plays a more significant role in moderating viewership currency too through taking over extrapolation requirement.

There should be a separate consultation paper on monitoring, measuring and reporting non-linear viewership of the same broadcast content.

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