Dear Sir.

Please refer to your draft consultation paper on Radio Audience Measurement (RAM). I wish make following submissions on the subject:

- (a) RAM is undertaken by the service providers primarily to gauge the popularity of their programs, this in turn facilitates them in better bargaining/negotiations from the potential advertisers/content creators. TRAI being the regulator may not be expected to undertake such exercise as it may hamper its unbiased position. At max TRAI may be interested in enforcing advanced green/renewable technology by the Radio channels for reduction in carbon foot print and at the same time encouraging the service providers to enhance their reach in the rural sector which may be devoid of information revolution in the present times. So there is actually no necessity of institutionalizing RAM and rating services.
- (b) Several models have been proposed in para 4.3, it is submitted that no one method can be considered apt due to their inherent advantages and disadvantages. Media/Art being a creative field may not be regulated predominantly by any one agency as it hampers the quality and the content. Notwithstanding the above it is submitted that the model proposed in para 4.3.3.3 seems to be more apt due to its limited limitations as compared to the other models.
- (c) The per-qualification criteria listed at para 4.5.3.2(c) and (d) seems to be restrictive in nature and are also subjective, the same needs to be reconsidered to get a better competition, as such criterion of such nature are against the provisions of CVC guidelines.
- (d) Random sampling has been proposed for selection of the samples, this incidentally may not be a good proposition. It is submitted that we may undertake Stratified or Cluster sampling instead for better evaluation. The random sampling though recommended for a large population has its own limitations in terms of biases, errors in sampling, generalization of trends which may be otherwise very misleading.
- (e) The panel size may not be predefined and needs to be kept flexible, it may ideally be dependent on the geographical size, demography, diversity etc. The panel size of 480 for each category may not provide accurate results.
- (f) The panel size may be arrived at after periodic surveys in a phased manner. Mathematical/Statistical formulae/models may be employed to arrive at the incremental value. Involvement of Academia may be resorted to in arriving at the initial panel size and the subsequent incremental values. The values may be revised after every 3-4 years based on the demography and size of the population in each zone.

Best Wishes.

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