

Counter-comments of Prasar Bharati on the consultation issues raised in the TRAI Consultation Paper on “Issues related to Radio Audience Measurement and Ratings in India” dated 15 March 2016

• Issue of need for regulating the audience measurement in India:

Production of content and its scheduling are largely influenced by radio ratings. Unless the audience measurement is transparent and truly representative, the effect of rating errors may get perpetuated in the ecosystem, affecting multiple stakeholders. Therefore, it is indeed required that audience measurement and ratings are brought under regulatory framework.

Radio broadcasting sector in India comprise of radio services offered through Frequency Modulated (FM), Medium Wave (MW) and Short Wave (SW) radio transmitters. It is expected to grow at a steady pace. At present, FM radio services are available from 413 AIR FM radio transmitters located in 383 cities and 243 private FM radio transmitters in 86 cities. In addition, AIR covers almost all of India by its 145 MW and 48 SW radio transmitters. AIR has also introduced digital radio services in India. Further, in Phase-III expansion of FM radio, 966 FM radio channel frequencies will be made available for auction in 253 new cities, 11 border areas and 69 existing FM cities. This indicates that a significant market does exist which will progressively grow with the rollout of Phase III.

From the Consultation Paper as well as the comments of the stakeholders, it appears as if the realm of radio is confined to FM radio only. However, it should be recognised that Radio rating system is for listenership and should not be restricted to any one mode of transmission i.e. FM radio. It must be avoided at all costs. In a given market, the audience measurement and rating system should gather viewership data for radio services received through all the available modes- FM, MW, SW and Digital Radio.

And, as far as rollout is concerned, the rating system, *ab initio*, must cater to a complete mix of listeners- urban, semi-urban and rural.

• Issue of appropriate model for regulating radio rating services in India:

A Regulated model should be adopted for the radio measurement and rating services in India. A Regulated model, which follows the laid down standards/guidelines by Government/Regulator, can provide audience measurement and ratings which are transparent, truly representative and free from external influences.

In case a joint industry body (JIB), under the guidelines prescribed by Govt/Regulator, is entrusted with the rating business, being the largest broadcaster having presence across the country and broadcasting in all modes of radio broadcasting, it is essential that AIR is compulsorily made a part of the technical and advisory council deciding the design and implementation of the measurement and rating system.

Prasar Bharati is not in favour of self-regulation or a system where industry/JIB itself frames the guidelines or accreditation mechanism and monitors as well the audience measurement and rating of radio services.

- **Issue of sample home and sample size for a robust radio rating system:**

The samples should be across all geographies, irrespective of the type of radio transmission mode (FM, MW, SW or digital radio) used in a given area. Moreover, listenership samples collected should cover all the modes of reception- home radio sets, mobiles and car radio sets. This would ensure that the audience measurement is truly representative.

The minimum sample size for even the lowest category of city may not be less than 1000 (one thousand). Currently, in AIR, the sample size taken is 1000.

Though it is desirable to have a minimum sample size in place at the time of commencement of audience measurement, however, if there are practical difficulties, the rollout time for populating the measuring devices should not be more than 2 years.

- **Issue of complaint redressal mechanism:**

Disclosure of the detailed methodology adopted by the rating agency on its and independent audit of various processes involved in the measurement and generation of ratings generally helps reducing the incidences of complaints.

The rating agency, however, should have a transparent and strong complaint redressal mechanism for time bound redressal of complaints. Status of a complaint's redressal as well as the complaint redressal statistics should also be disclosed on the website of the rating agency.

- **Issue of sale and use of ratings data:**

The rate card should be published by rating agency so that the rating information is available to all stakeholders without any further qualification or change of rate.

- **Issue of regulatory initiatives required to promote competition in radio rating services:**

Though Prasar Bharati agrees with the comments of other stakeholders that in a given market there should be a single rating currency, however unlike TV, as radio has a local/regional market, there could be different rating agencies in different regional markets. However, a rating agency, within a given market, must collect representative data from all the category of listeners- urban, semi-urban and rural.

Accordingly, there should not be a regulatory restriction on the rating agency to have a pan-India rating system.

- **Issue of time to be given to existing entities in the radio rating services for complying with the prescribed rules:**

Within one year.