

COUNTER COMMENTS TO RESPONSES TO VARIOUS STAKEHOLDERS ON CONSULTATION
PAPER “REVIEW OF TELEVISION AUDIENCE MEASUREMENT AND RATINGS IN INDIA”
ISSUED BY THE TELECOM REGULATORY AUTHORITY OF INDIA DATED DECEMBER 3, 2018

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QUERY 1:

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.

- 1) The comments from BARC India do not indicate how woefully behind the times it is in Indian television content consumption: the guiding principles with which it was set up some years back and how cheaper data pack rates have changed TV consumption. It is no longer TV consumption metrics, it should be screen consumption metrics: many channels now live-stream over internet with content being consumed over tablets, PDAs and smart-phones: by trusting only BARC TV weekly statistics: the media planners are shooting in dark, in a fraction of the dark room to be precise

“If you want people to read a book, tell them it is over-rated”

- Nassim Nicholas Taleb (*The bed of Proscutes*)

The signal bias follows a channel being marketed as the best channel in a genre using BARC ratings: the fear of missing out (FOMO) for digital media consumption has been a well-documented phenomenon. The stated goals of BARC TV ratings has failed to cover the digital consumption of channels which are consumed via apps on TV: apps like Hotstar© and SonyLiv© which would live stream TV content over internet on TV and internet connected devices is a non-addressed reality of BARC TV ratings.

Clay Shirky had written about this 20 years back, in 1999 : about convergence of legacy TV and internet TV , and how to measure it : http://www.shirky.com/writings/webtraffic_ratings.html . Unfortunately, the current ratings methodology have not kept pace. This is an opportunity to revisit the fundamentals of TV rating in India: from the view of how TV consumption has changed.

For the young audiences in urban markets of India, BARC TV ratings are a woefully inadequate metric of what the young India (single largest demographic in India) is watching. It is suggested that TRAI ask for a round of consultation on how to reconcile viewership from OTT apps of TV channels: and if the mandate is just for getting legacy TV metrics or TV contents metrics: the nuance between the two in today’s times is telling.

- 2) For viewers in the panel: it must be a dilemma: are they being constrained to watch TV only via their TV sets or can they utilize that time for watching the same content over internet connected devices. A quick check of YouTube uploads of popular General Entertainment Channel serials’ s view counts would show how much data is being lost out as the BARC TV methodology has not adapted: the methodology should be measuring impressions of TV content agnostic of what platform it is being shown. Also, the current panel may be not displaying an accurate way they want to consume content: they may desire to watch a

live stream of a sports event or news channel on their mobile: but duty bound to being in the panel, they switch on the TV and go through the motions.

QUERY 2:

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.

No response in counter comments.

QUERY 3:

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.

- 1) The comments from IBF and BARC India do not talk at all of Landing Channel related issues (*Consultation Paper on Issues related to Placing of Television Channel on Landing Page (3 April 2018* https://main.trai.gov.in/sites/default/files/CP_03042018.pdf) : while Ministry of Information Broadcasting in 2018 had directed to not use Landing Channel to be given without watermark so that the channel on the LC does not count for viewership : what it failed to check is that having a channel on LC influences decision to watch what next : example if XYZ channel is on LC , then user may be tempted to press XYZ's watermarked channel in a minute : this distorts the viewership figures dramatically . The proposed solution is to have the Landing Channel not have anything which may influence a viewer's viewing which contributes to viewership: one can have say an ad on the LC, but not a channel. LC manipulation has been a bane in viewership number manipulation. Considering this issue is currently in purview of TDSAT, BARC should exclude completely all LC induced viewership numbers till a consensus can be built on the issue.
- 2) The comments from BARC do not reflect their commitment to indicate the availability of sample sizes each week: despite this being a demand from multiple stakeholders. Be it be known that in science journals, if requested: not just the conclusions but the data set itself is made available to other researchers around the world. That is how a scientific paper is able to hold on its own: more transparency makes the ranking credible. Not making the data not available to even paid subscribers under the argument that this may lead to the panel being compromised: there are many ways meta-data can be removed in order to prevent this. Intelligent inferences may be made reviewers of data-set: enough to make intelligent media planning decisions.

QUERY 4:

IS THE CURRENT AUDIENCE MEASUREMENT TECHNIQUE USED BY BARC APPROPRIATE? SUGGEST SOME METHODS, IF ANY, TO IMPROVE THE CURRENT MEASUREMENT TECHNIQUES.

- 1) IBF , BARC have offered comments which state that audience measurement technique used by BARC are time tested : in absence of any competing measurement : this is a call to be satisfied with status -quo while this ignores how many broadcasters have lodged formal complaints over audience measurement (a sample here :a) <https://caravanmagazine.in/vantage/curious-case-republic-tvs-ratings-official-rating-agency-blind-eye>
b) how in week 19 of 2017: many news channels stripped their channels of the watermark in protest of how BARC's methodology was giving into unfair practices: this protest went on till week 22 of 2017.
- 2) It goes to BARC India's credit that in light of such grievances: it has been able to discuss the issues of audience measurement with various stakeholders: and get things rolling.
- 3) At end of January 2019: BARC India stopped publishing the TV ratings on its website with stated reason of it was waiting for settling of data of new regime: showing BARC India's inadequate preparation for the new model (which was announced by TRAI well in advance) .

QUERY 5:

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?

- a) There are legitimate use cases where a channel sends multiple audio streams for the same channel: so that the user can choose which audio track to listen to while using same visual feed. That seems to be the only the legitimate use-case. Riding on multiple language groupings (say a channel uses both Hindi and English programming , and claims to be in both genres as given to a DTH operator in channel guide : that points to artificial methods to boost rankings.
- b) The comments from various stakeholders like BARC, and IBF indicate that broadcaster should be given flexibility to change genres. This indicates a pivoting-till-you-succeed approach : a news channel which classifies itself as a General Entertainment channel in a different Logical Channel Number is aiming to manipulate : to pass off this practice as giving broadcasters flexibility defeats the purpose of genre : the genre exists to help the viewership bucketing , any other ostensible reasons is merely leaving too much runway for manipulation of BARC India ratings. Allowing broadcasters leeway to classify channels under

multi-language when bulk of their programming is in one language like a classic product line extension does not help in determine who are true leaders in a genre.

QUERY 6:

CAN TV RATING TRULY BASED ON LIMITED PANEL HOMES BE TERMED AS REPRESENTATIVE?

- a) With new rules on how a channel package can be made: BARC's current method of limited panel homes cannot be said to representative as it fails to account for: -
- i) if users make a true choice at time of selecting the channel package or at the time of viewership on daily basis. With number of channels each viewer has access to falling down after channels are selected: the panel of homes has to now account whether the channel is Free to Air and whether that increases its chances of being seen while channel surfing happens.
 - ii) Since discretionary spending determines how much one is willing to pay for cable TV for a month (and for competing demand from other venues of TV content providers from OTT apps) : the panel of homes has to take into account that as well . In price sensitive demographics, it may be observed that Free to Air channels now have enhanced ratings than any other channel. Case in point, the first week after the new mechanism for channel selection came in: DD India came in from lower end of the ranking to occupy the top slot.

WEEKLY DATA

Week 5: Saturday, 26th January 2019 to Friday, 1st February 2019

Eng News ▾

Top 5 Channels ▾

Rank	Channel Name	Weekly Impressions (000s) sum
		Week 5
1	DD India	1503
2	Republic TV	725
3	Times Now	611
4	India Today Television	356
5	CNN News18	309

- b) Unfortunately, unless we have a census form of methodology: sampling is still the best bet. Even Alexa Website rankings use a sampling from a large global panel.

QUERY 7:

WHAT SHOULD BE DONE TO REDUCE IMPACT OF MANIPULATION OF PANEL HOME DATA ON OVERALL TV RATINGS? GIVE YOUR COMMENTS WITH JUSTIFICATION.

No response in counter comments.

QUERY 8:

WHAT SHOULD BE THE PANEL SIZE BOTH IN URBAN AND RURAL INDIA TO GIVE TRUE REPRESENTATION OF AUDIENCE?

No response in counter comments.

QUERY 9:

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?

No response in counter comments.

QUERY 10:

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.

No response in counter comments.

QUERY 11:

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.

No response in counter comments.

QUERY 12:

WHAT METHOD SHOULD BE ADOPTED FOR PRIVACY OF INDIVIDUAL INFORMATION AND TO KEEP THE INDIVIDUAL INFORMATION ANONYMOUS?

No response in counter comments.

QUERY 13:

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?

No response in counter comments.

QUERY 14:

WHAT MEASURES NEED TO BE TAKEN TO ADDRESS THE ISSUE OF PANEL TAMPERING/INFILTRATION? PLEASE ELABORATE YOUR RESPONSE WITH JUSTIFICATIONS.

No response in counter comments.

QUERY 15:

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?

Meta data and geo data which can point to subscriber's locations should be protected and removed before giving the raw data to broadcasters. The fields which can breach panel privacy can be 'salted' i.e. mixed with a random number sequence so as to prevent tracking back of the panel homes.

BARC's comments indicate that the data would be robust enough to be disseminated to broadcasters when it hits a panel size of 40,000 while it makes a case elsewhere that its panel size is sufficiently robust currently. This is a delaying tactic at best, as the dissemination of data to broadcasters has been a long-standing demand.

QUERY 16:

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?

No response in counter comments.

QUERY 17:

IS THE CURRENT DISCLOSURE AND REPORTING REQUIREMENTS IN THE PRESENT GUIDELINES SUFFICIENT? IF NO, WHAT ADDITIONAL DISCLOSURE AND REPORTING REQUIREMENTS SHOULD BE ADDED?

- i) Outlier removal data has not been covered by BARC's comments: monthly reports on how outlier's data was removed from the panel data should be published as well.

QUERY 18:

STAKEHOLDERS MAY ALSO PROVIDE THEIR COMMENTS ON ANY OTHER ISSUE RELEVANT TO THE PRESENT CONSULTATION.

I concur with BARC 's comments on how convergence is going to impact the TV ratings methodology: only that BARC is making a case for it now, when India's OTT app for TV content usage has already made a significant dent in legacy TV viewing time. The time to seize the change is now. With news of 5G spectrum auction now in news: a sea-change is expected in how Indians will consume TV content in a near future.