



BARC India response to TRAI Consultation Paper on Issues related to Placing of  
Television Channel on Landing Page

BARC India was established as per TRAI recommendations and Guidelines issued by Ministry of I&B. Our mandate is to report what was viewed - irrespective of why and how it was viewed. In other words, our job is to measure viewership 'after the fact' - irrespective of what transpired prior to occurrence of the fact. It is neither our expertise nor mandate to dissect 'prior to the fact'.

The MIB guidelines say that "*Ratings ought to be technology neutral and shall capture data across multiple viewing platforms viz. cable TV, Direct-to- Home (DTH), Terrestrial TV etc.*"<sup>1</sup>

To implement the above and provide a future-ready measurement system, BARC India adopted "Audio Watermarking" (WM) technology to detect and identify TV channels. WM technology was adopted with industry consensus, and government representatives on BARC India Board and Technical Committee were part of the decision-making process. Ministry & TRAI were also kept informed of the same.

WM technology detects TV channels by their unique watermark code, and not by their name or channel number. This ensures that measurement is agnostic to distribution platforms and mode-of-signal reception.

Hence, BARC India's measurement can neither identify "landing page" on a platform, nor does it capture data on which channel is shown on "landing page".

Placement of TV channels on "landing page" is carried out at distribution level, i.e., at the level of multiple head-ends in the country. The only parties involved in this activity, and aware of it, are Broadcasters and Distribution Platforms (Cable/DTH operators), who are licensed and regulated by MIB/TRAI.

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<sup>1</sup> Clause 5.2.1 of POLICY GUIDELINES FOR TELEVISION RATING AGENCIES IN INDIA



As a measurement agency, BARC India has absolutely no role / locus standi / oversight in this. Monitoring and Regulating this aspect of distribution lies entirely in the domain of TRAI and Ministry of I&B.

Issues for consultation:

Q1. Do you feel that emerging concept of placing TV channel on landing page can influence TRP ratings? Suggest the action which may address the issue with justification.

BARC India response:

Placement of a channel on “Landing Page” improves “opportunity to view” i.e., probability of it being sampled by larger audience. However, viewership is a factor of number of people who viewed it AND time spent viewing it.

As required by MIB Guidelines, BARC India has set up a measurement system that is platform and mode-of-signal agnostic. The technology adopted (“Audio Watermarking”) detects TV channels based on their unique watermark code, and not by their name or channel number. Hence it cannot distinguish between a watermarked channel placed on a “landing page” or anywhere else in distribution platform’s EPG.

Placing channels on “Landing page” is a purely distribution level activity involving broadcasters and distribution platform operators. Any action to control/regulate this activity must therefore be taken at the level of distribution. Controls at the level of viewership measurement is not advisable since they would be neither feasible nor practically implementable.

Regulating and ensuring compliance in the area of distribution lie entirely in the domain of TRAI and MIB. It has no relevance or touchpoint for the process or methodology of viewership measurement.

Q2. Should concept of landing page be defined? If so, please suggest the definition of the landing page with justification.

BARC India response:

The practice of placing channels on “landing page” is an activity undertaken at the headend level by distributors, possibly on direction of broadcaster. As a measurement agency, BARC India neither has locus standi in it, nor jurisdiction over it.

This is validated by TRAI order on the matter (dated 8th Nov 2017) - which makes it clear that it is a “*Direction to Broadcasters and Distributors of Television channels...*”

Meanwhile, BARC India has received a letter from Ministry of Information & Broadcasting (dated 5th April 2018) asking it to stop reporting viewership accrued from “landing pages”.

It appears that BARC India is expected to contribute to efforts of TRAI and Ministry to enforce regulations relating to placement of channels on “Landing Page”, which is a distribution level activity.

In such a situation, it is important to first define a “Landing Page”, before enforcing regulations/controls over it. Defining what is a “Landing Page” would help develop technical solutions to identify them.

This is also important because STB configurations are not standardized in India, and may behave differently depending on type or make. Some observed variants are as follows:

- In some STBs, the last viewed TV channel appears when it is switched back on. This can be a default configuration, or programmable by platform operator for specific geographies.
- Some STBs, when switched on, open with their default channel - which is a fixed LCN. However, the TV channel that is available on this LCN can be programmed by the operator. This can be done specific to geographies.
- The “landing channel” on some STBs (i.e., channel that appears when switched on) could be a promotional/non-watermarked channel. But they



can be programmed by the operator to automatically redirect to a watermarked channel after a few seconds.

- It has also been observed that some operators can configure their STBs in such a manner that when switched on, goes directly to a particular LCN carrying a watermarked TV channel.
- The “landing channel” on a platform could also genuinely be the first/default channel in operator’s channel line-up depending on his channel setup configuration.

It has also been observed that when people end a viewing session, they often switch off their TV, but not their STB. When they return, as the STB is still running, the first channel viewed is what they last watched. This outcome is not the result of any “landing page” activity, but entirely due to viewer’s actions.

It is therefore important to first define a “landing page” in a manner that considers above-mentioned factors.

Q3. Will defining Framework for placing TV channels on landing page affect the present business model of distributors? If so, will it be considered impacting the freedom to do business by distributors of TV channels? Give your suggestions with justification.

BARC India response:

We have no comments on this.

Q4. Is landing page a natural choice of consumer while viewing TV channels? If not, why should channels, whose TV ratings are released by TV rating agency, be placed on landing page? Give your comments with justifications.

BARC India response:

As submitted above, it is important to first define what is a “Landing Page”.



This is important because, as elaborated in our response to Q2, STBs in India have different configurations and behave differently with regard to what channel appears when they are switched on.

As also mentioned above, viewer's actions with regard to operating TV set/STB can also impact what channel is viewed first.

Assessing "natural choice of consumers" would be feasible if "landing page" is first clearly defined, identified and regulated at distribution level.

Q5. Whether placing of a TV channel on landing page increases television ratings? If yes, why TV Channels, whose TV ratings are released by TV rating agency, should not be barred from being placed on landing page? If no, why broadcasters are eager to place their channels on landing page? Give your suggestions with justification.

BARC India response:

In our response to Q1 above, we have given our views on possible impact of channel placement on "landing page" on its viewership.

On the other part of this question, we have no comments to make.

From the question placed above for discussion, it is evident TRAI recognizes that placing channels on "landing pages" involves broadcasters, and hence controls on this activity must be addressed at broadcasters (and distributors), and not applied at the level of viewership measurement.

However, if Ministry of I&B or TRAI provides a list of channels that are found through a legal process to be in violation of TRAI regulations through use of the "landing page", we would be in a position to deal with any directions that are given to us in accordance with law.

Q6. What should be the criteria/consideration to put a TV channels on landing page? Give your suggestion with justification.



BARC India response:

We have no comments on this.

Q7. Do you think the influence, if any, in television ratings by placing of TV channels on landing page can be mitigated through changes in measurement methodology of television ratings? Give your suggestions with justifications?

BARC India response:

Placing channels on “Landing Page” is undertaken at distribution level. This point also comes out strongly from TRAI’s direction on the matter (dated 8 Nov 2017).

Therefore, monitoring/controls to ensure regulatory compliance would need to be applied at “source” rather than at viewing/viewership measurement level.

The transparent, accurate, representative and credible Viewership measurement methodology adopted in India has been arrived at basis global best practices, and in consultation with industry stakeholders, as well as regulator / government representatives.

To the best of our knowledge, there is no measurement system worldwide that detects “landing page” and removes it from reported data. Solutions for detecting “landing page” is separate from measurement, and must not be clubbed with technology/methodology of viewership measurement.

Any suggestion to “change” the measurement methodology, with the aim of “mitigating” influence of landing page may result in a measurement that is neither accurate nor representative. The impact on the larger eco-system would be overall adverse.

Q8. Please comment on the feasibility to implement user’s ‘last visited page’ as landing page in distributors’ network?

BARC India response:



As submitted above in our response to Q2, STBs deployed in India have different configurations and behave differently with regard to what channel appears when they are switched on.

As also mentioned above, how viewers operate their TV set/STB can also impact what channel is viewed first.

Given the various viewership behaviour outcomes that can result from this, it is not advisable to apply any “landing page” filters or controls at the level of viewership or measurement

Q9. Should the landing page be used to place TV channels not having TRP rating or only to provide platform specific information? Give suggestions with justification.

BARC India response:

We have no comments on this.

Q10. Any other suggestions/comments related to the issue under consideration?

BARC India response:

None at present. But we may choose to provide “counter comments” to views expressed by others in response to this consultation paper.

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