

Date: 28th Feb, 2019

**The Advisor,
TRAI,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
New Delhi - 110002**

Sub: Counter comments on Consultation Paper on 'Review of Television Audience Measurement and Ratings in India'

Dear Sir,

Thanks for initiating consultation process on 'Review of Television Audience Measurement and ratings in India'.

Please find attached our views on TRAI's Consultation paper.

Regards

(Sanjay Kulshreshtha)
Editor in Chief
NewsNation

Views of News Nation Network Pvt. Ltd. on TRAI's Consultation paper on 'Review of Television Audience Measurements and ratings in India' and various responses received against it

We welcome TRAI's initiative to make Television Audience Rating process transparent. The very fact that the regulator has come out with a Consultation paper on this issue shows that there is something wrong with the existing rating system.

If one reads various articles published in national and trade media in last few years, it becomes clear that there is an urgent need to make rating system transparent.

TRAI first intervened in TV viewership ratings in 2013, when there were complaints against incumbent TAM Media Research. TAM was unable to capture "What India watches". This resulted in exit of TAM and paved the way for BARC, which became the sole TV viewership rating provider. Now, the question is whether BARC is able to capture "What India watches"?

TRAI's initiative becomes all the more important as Television viewing habits are changing, thanks to fast technological developments. Now, a lot of people, especially millennial generation, view TV program on non-conventional screens such as mobile handsets and Tablets. Of course, conventional TV remains to be an important screen. Similarly, medium of transmission is also changing. Online and IPTV are spreading very fast. OTT Apps are becoming important. Research reports suggest that in next couple of years, they will overtake DTH and Cable.

The biggest advantage of Digital technology is that it brings transparency in the system. All the tools used in TV viewership measurement should be completely Digital and transparent so that there are no cases such as "tempering of meters" and subsequent intervention of BARC to "rectify" ratings.

Hence, there is a need to take holistic view of the sector.

Following are our views:

Q: 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.

A: There is an urgent need to improve transparency in the Television rating system. If one reads media reports, it becomes clear that many organisations are losing faith on BARC's rating system. The biggest problem with the current methodology is that one can enhance viewership figures by bribing members of BARC panel homes. Even BARC accepts it. It is root cause of all the problems. Once BARC identifies

tempering, it manually intervenes to rectify the problem. Any manual intervention will always give rise to suspicion of non-transparency.

Moreover, if a broadcaster wants to implicate its competitor, it can send imposters to BARC panel homes to manipulate meters in such a manner that the Competitor's rating is fixed and BARC punishes the Competitor.

Even if we assume that BARC is unbiased, the whole system itself is non-transparent. Any system of measuring audience ratings that can be 'fixed' is unscientific.

In a Digital world, there is no excuse for non-transparency.

Q. 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.

A: A TV rating agency should be under an independent authority and should not be influenced by any lobby.

The biggest flaw with the existing ownership pattern of BARC is that those who are being rated are also shareholders. This raises eyebrows. How can an agency rate its clients who are also its promoters? If BARC continues to do the rating, its ownership should be dynamic. This would increase transparency. It should not become monopoly of incumbent or powerful players.

Our only concern is regarding transparency in the TV audience measurement ratings. We favour any organisation that is able to bring transparency.

Q: 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.

One can always argue that if there can be seven rating agencies (such as CRISIL, ICRA, CARE, ONICRA, and SMERA) in financial markets that are registered by SEBI, there is definitely a case for more than one rating agency in Television program ratings.

In USA, Nielsen was the sole provider of supplying ratings data for more than 60 years and was the "currency" for media buying from all sides. However, last year ComScore also started providing rating data. It uses return path data (RPD) collected from satellite and cable set top boxes as well as people meters.

Again we will like to reiterate that competition or no competition, it is TRAI's duty to ensure transparency in the Television audience measurement.

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

India is a large country with many regional languages and cultures. For true representation of Television program ratings, sampling of data plays an important role.

BARC should disclose how data selection is done – both in terms of quality and quantity. Currently, it is an opaque process.

There are many reported cases of tampering of people meters. This raises questions on authenticity of data. The existing rating also neglects Online, OTT and IPTV.

Q: Can TV rating truly be based on limited panel homes be termed as representative?

No. In a country like India with different cultures and languages limited homes can't be termed as representative.

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

First of all, if the management of any TV audience measuring agency is transparent and unbiased, the chances of manipulation are reduced. Use of digital technology, coupled with larger sample size, and regular audit by an independent agency will reduce this problem.

Q: 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?

Sample size would increase, if RPD embedded Set top boxes are used. It should be made mandatory in the existing set top boxes also. It may be implemented in phases.