

General Comments

Prasar Bharati is the largest public service broadcaster in the world through two of its wings, viz., Doordarshan and All India Radio. Presently, Doordarshan operates six national channels and eleven regional language channels besides limited telecast from its terrestrial system with 16 channels in multiple languages. The role of Prasar Bharati has been significant in the history of broadcasting in India as till the last decade of the 20th century, it was the monopolistic service broadcaster in the field of television and radio. While the monopolistic system has been radically altered, Doordarshan still retains an important place in the broadcasting system of the country.

Over the last ten years, while private television channels have proliferated, Doordarshan, as India's public service broadcaster, too has extended its reach through DTH and has also increasingly made its contents available through social media vehicles. However the fact remains that massive growth of private channels in the country has inevitably impacted the primary position that Doordarshan once occupied in the mind-space of the viewer.

The precise quantification of that impact is the moot point.

Questions that hang over the only operational method to measure effective reach and popularity of TV channels impact reliability of the system to measure popularity of various channels in the country. There is no disagreement across the industry that the current measurement system suffers some key deficiencies. For a public service broadcaster with a mandate to reach out to every citizen of the nation, the inability of the current system to measure substantial segments of semi urban and rural population is indeed a significant weakness. The fact that less than 10,000 people-meters are used to draw inferences about 15.5 crore television homes highlights another limitation of its model. Additionally, several sensitive, borders states like the North Eastern states and Jammu and Kashmir are not covered. Allegations of leakage of household database have also not helped the current system establish an across-the-board reliability quotient.

These factors have, without doubt, negatively impacted perceptions of Doordarshan's popularity - at least more than they have hurt private general entertainment channels.

The attempts of Ministry of Information and Broadcasting to revamp the TV measurement system have not yielded any substantial results as yet. The Committee headed by Dr Amit Mitra recommended several measures which are yet to be implemented. Despite a recommendation to put in position a High Power Committee, which will include outside established agencies (to create confidence in the system), not much has happened on the ground. An attempt to make the present measurement system more robust by allowing established agencies to vet the process has not been accepted by BARC.

No external audit of the process is carried out by any independent agency, and thereby TAM's data remains vulnerable to questions over its veracity and robustness. That vulnerability gets more pronounced when attention is drawn to cross holding connection between the rating agency and advertising agencies.

The prevalence of a single system of TV rating totally rules out the option of a "second opinion", a remedy that should be available to any "aggrieved party".

Specific comments required under Chapter 5

Q.1. Which of the model described in Para 4.4 should be followed for regulating television rating services in India?

Reply:

Doordarshan recommends the option of accreditation of rating agency by industry regulator to ensure compliance of prescribed standards of reporting systems. This recommendation is based on the understanding that regulation by the industry has not worked as shown by non-functionality of BARC. Doordarshan feels the market regulator will be able to maintain an equal distance from industry as well as from Government and it will have requisite experience and authority only to issues related to rating agencies. While the Government may prescribe

standards and rating requirements in consultation with TRAI, the enforcement should be done by the regulator as it has adequate powers under the existing Act to ensure compliance.

Q.2 Please give your comments on the eligibility conditions for rating agencies discussed in Para 4.7

Reply:

Doordarshan agrees with the proposals detailed in Para 4.7 regarding essential eligibility conditions for rating agencies. These conditions are of general nature and should not exclude any major player from the market.

Q.3 Please give your comments on the guidelines for methodology for audience measurement, as discussed in Para 4.19, for television rating systems.

Reply:

(a) Doordarshan strongly recommends a combination of measurement techniques, i.e., surveys, diary system and people meter in order to cancel out any weakness in the system. Doordarshan strongly feels the present people-meter system needs to be balanced by cross checking results (at least in the long run) by an alternate method of measurement.

(b) Doordarshan agrees with the proposal to have a procedure based on systematic methods defensible by empirical analysis.

(c) Doordarshan agrees with the fact that the rating systems are required to be technologically neutral and capture data across multiple viewing platforms, namely, cable TV, DTH, terrestrial, etc.

(f) Doordarshan recommends that any shortcomings, deviations, limitations in the rating systems need to be disclosed in rating reports and brought to notice of the users of the rating system in a transparent manner.

(g) Doordarshan strongly recommends adoption of a transparent system for selection of panel households and regular rotation of these households.

(h) Doordarshan agrees with the recommendation that widest possible geographical representation should be given to the panel households.

(i) Doordarshan strongly recommends substantial enhancement of the current panel size to a size of at least 30,000 at the earliest possible.

(m) & (n) Doordarshan agrees with the recommendation that the secrecy and privacy of the panel households should be maintained.

Q.4. What should be the minimum panel size (in terms of numbers of households) that may be mandated in order to ensure statistical accuracy and adequate coverage representing various genre, regions, demographics etc., for robust television rating system? Should the desired panel size be achieved immediately or in a phased manner? In case of implementing the desired panel size in phased manner, what should be the quantum of increase and periodicity of such increase in size?

Reply:

Doordarshan recommends that there should be a minimum panel size recommended by TRAI based on international experience and viability. Doordarshan is of the opinion that the regulator is well within its rights to recommend certain basic norms for agencies in the TV rating business in order to ensure accuracy and adequate coverage representing various genres, regions and demographics. Inability to meet such this basic requirement should make an agency ineligible to carry out its operations. Doordarshan recommends a substantial scaling up in the number of people-meters besides adopting other methods of survey to corroborate the findings of the technology based option. In order to achieve a robust rating system, the minimum panel size of 30,000 meters, as recommended by Dr Mitra Committee report, should be enforced immediately, and not in a phased manner.

Q.5 Please give your suggestions/views on as to how secrecy of panel homes can be ensured?

Reply:

The secrecy of panel homes can be only ensured by the regulator which should be in direct possession of such data and the selection of such

homes should also be decided by the regulator rather than the rating agency. Doordarshan recommends that the regulator should decide the panel homes by following standard procedures and industry practices and maintain secrecy of panel homes.

Q.6 Please give your comments on the cross holding restrictions for rating agencies as discussed in Para 4.23.

Reply:

Cross-holding between rating agency and leading advertisers opens up possibility of distortions in the system. The authority had in fact recommended earlier in 2008 that there should be no cross holding between rating agencies and broadcasters, advertisers and advertising agencies. Doordarshan agrees with recommendations contained in Para 4.23 while stating that it is important to enforce that cross holdings do not exist as it is one of the fundamental issues concerning the rating sector.

Q.7 Please give your comments on the complaint redressed mechanism discussed in Para 4.25.

Reply:

Doordarshan recommends that the complaint redressed mechanism be handled by the regulator, as is the international practice.

Q.8 whether the rate card for sale and use of ratings should be published in the public domain by the rating agencies?

Q.9 whether other users apart from broadcasters, advertisers and advertisement agencies be allowed to obtain the rating data from the rating agencies? If yes, who all should be allowed to obtain and use the data from the rating agencies? What restrictions should be imposed on use of the rating data by users?

Q.10. Whether the user should be allowed to share the data provided by the rating agency with third parties or publicly accessed media.

Reply to Q. No.8, 9 and 10:

Doordarshan recommends that rate card for sale and user rating should be put in the public domain by rating agency in order to make people aware of price paid by each broadcaster to avail services of TV rating system.

There should be no restriction placed on anyone to obtain the rating system from rating agencies. The present Government policy to encourage dissemination of information especially through the RTI Act is an important milestone to be emulated. Wide scale dissemination of information regarding TV ratings should be encouraged in order to reduce distortion in the system. Therefore, users should be allowed to share the data provided by the rating agency with third parties or publicly accessed media.

Q.11. Please give your comments with regard to the parameters/procedures, as suggested in Para 4.34, pertaining to mandatory disclosures for ensuring transparency and compliance of the prescribed accreditation guidelines by rating agencies.

Reply:

Doordarshan recommends mandatory disclosures in order to ensure transparency and compliance of prescribed accreditation guidelines by rating agencies. Further, regulator should mandate that non-compliance of any of these conditions would lead to cancellation of permission to conduct the rating business.

Q.12 Please give your comments with regard to the parameters/procedures, as suggested in Para 4.37, pertaining to reporting requirement for ensuring effective monitoring and compliance of the prescribed accreditation guidelines by rating agencies.

Reply:

Doordarshan agrees with the recommendations contained in Para 4.37 to monitor and enforce compliance of the accreditation guidelines.

Q.13. Please give your comments on the audit requirements for rating agencies as discussed in Para 4.42.

Q.14. Who should be eligible to audit the rating process/system?**Reply to Q.No. 13 and 14:**

Doordarshan recommends audit of TV rating systems to ensure a credible and transparent rating process. However, Doordarshan recommends that the regulator should appoint an independent auditor in this regard and not leave the appointment of the Auditor to the rating agency. Complete absence of any external auditor presently does not give Doordarshan any confidence in the present system of rating and this is required to be corrected immediately by appointing an external auditing agency by the regulator to raise the level of confidence in the rating system, as is the practice internationally.

Q.15. What regulatory initiatives are required to promote competition in rating services?**Reply:**

As the present process is market driven, it may not be possible to mandate more than one service provider to provide television rating services. The primary distortion in the rating system stems from the cross holding issue where major advertising agencies have a stake in the rating agency.

Once the regulator eliminates such cross-holding matters, it will simply be a matter of time before it is able to create an alternate solution to the monopoly situation. Laying down certain broad quality and quantity parameters for any agency to enter the rating business in country would also encourage genuine players to enter the sector which is not the case presently.

Q.16. In case guidelines/rules for rating agency are laid down in the country, how much time should be given for complying with the prescribed rules to existing entities in the rating services sector, which are not in compliance with the guidelines?**Reply:**

The regulator must lay down guidelines and rules for the rating agency and ensure its compliance within a period of twelve months. The

television advertising market is far too large to be left to be given a substantial transit time. Any further delay will only help perpetuate whatever distortions currently plague the system.

Q.17. Do you think integrating people meter with set top boxes is a good solution? If yes, how to encourage such systems?

Reply:

Integration of people-meter with set-top boxes is a desirable solution if the costs are kept low. Doordarshan is aware of such alternate technologies which are required to be examined by TRAI. Doordarshan is prepared to make a presentation to TRAI regarding the possible alternate solutions.

Q.18. Stakeholders may also provide their comments on any other issue relevant to the present consultation.
