

Date: 10.04.08

To

Ms. Sadhna Dikshit,
Pr. Advisor,(FA & IFA), TRAI,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
(Old Minto Road)
N-Delhi-02

Dear Ms. Dikshit,

I appreciate the effort done by TRAI. I have gone through the Consultation Paper prepared by your dedicated team and found that, a lot of energy and effort have been put in to do detailed study. But before going ahead on the issue, I would like to express my concern that, the exercise being done by TRAI, with regard to the present 'TRP Rating System' should be proceed with full enthusiasm, and come out with full & foolproof effective result.

I strongly feel that, so as to study the TRP, the design and execution of TAM system has been done basically with the motive to kill the Public Broadcaster – Doordarshan , and restriction on the entry of the Private and Pure Indian Broadcasting Companies. And it is a matter of deep concern that they have succeed in their motive. It is a matter of separate high level investigation. The matter of investigation should be, the loss of revenue and credibility of Doordarshan due to the present TRP system 'TAM'. People, agencies, authorities and the official behind the 'Design', 'Execution' and 'Impalement' of TAM too should be investigated. With great emphasis, I would request the Government of India to do high level Investigation and look into matter. Having gone through the details and studying the TAM's TRP system, I would rather call it '**TAM is SCAM**' .

The TRAI's Consultation Paper, do reflect hard work and a move which should be appreciated at all ends. There are few suggestions in the referred consultation paper, but unfortunately it carries the European view point. I would like to suggest for a Module based and best suited in Indian circumstances and scenario. Like we studied different constitutions of different countries and picked up only those which suited us and after that came out with our own Constitution. The similar method should be adopted to conceive the 'MODULE' for the TRP reading system, best suited in Indian circumstances. The logic behind the expressed suggestion is that, the differences between European Countries and India. The socio-economic condition, cast-religion factor, inter country difference in literacy rate, non-friendly techno approach, and a bit low on legal obeying mindset of fellow countrymen, makes a hell lot of difference.



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I would suggest a 'MODULE' with a humble request to be please studied with deep concentration. I strongly feel that it may add value to your exercise and help to come out with a TRP MODULE as strong as our 'Constitution'.

Different TRP Module – I would like to draw your attention towards the different nature of Broadcasting in the industry. We have broadly three types of Channels...Entertainment, News, & Regional. All three are different in nature as well as have different motives. Entertainment Channels is hard core business oriented channel, where as News is a serious concern, with a nationalism motive and for the people. News Channels for any country also is a link between Government, Development, Society & people. Regional Channels are many a times mix of the two, for the people of a specific region. Now the point is that, how can a single module do the analysis of all three. Its something similar to doing analysis of the 'Newspaper' & 'Film' on the same barometer. News papers have diversified content, with a different sect of people. Films are different. Rating of News Papers are guided by National Readership Survey, whereas Films are judged at Box Office. It may sounds ridicules, but this is a fact, be it Entertainment, News or Regional Channel, all are being treated in the same manner, with the same barometer, which is basically gross injustice with the News Broadcasters. The same treatment to all channels have resulted in 'Editorial Biasness'. TAM has made News Channels to select the content on the basis of so called TRP cities, which can be termed as 'Editorial Biasness'. Above all TAM has inbuilt many functional & professional errors. Data generated on the basis of a system, full of errors, one cant expect an honest and professional analysis.

Being an Honest and serious member in this Industry, its not only my concern but duty also, to raise alarm towards the future editorial threat in the national interest. Hence I suggest three different & separate MODULE for three different nature of channels. One 'TRP MODULE 01' should be for Entertainment Channel, second 'TRP MODULE 02' should be for Regional Channels and a separate & third 'TRP MODULE 03' should be for News Channels.

'MULTI-RATING SYSTEM' - Four agencies, for each MODULE, should be incorporated. It is must so as to have a wide range of reading for fair and honest analysis.

'BALANCED REPRESENTATION SYSTEM' – All 12 agencies (4 agencies in each 3 Modules) should have a balanced, equal and proper representation of all concerns. The agencies should incorporate members from Broadcast Industry; Ad Agencies; Advertiser ; Government representation both from Judiciary and Executive.

'REPRESENTATION ON ROTATION BASIS' – The representation should be on rotation basis, with a tenure of 01 year, so as to avoid the monopoly and fixing.

'MONITORING SYSTEM' – One top level monitoring TRP Agency , with the motive to have check on all 12 Agencies and come up with Gross TRP.

'PEOPLE METER SYSTEM' – People Meter System should be of National Level and standards. Sample size should be large, with proportionate representation of Metro,



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Urban, Sub-Urban & Rural areas. The Meter System should be such, which should incorporate all TV Homes, including Terrestrial Broadcasting & DTH.

'TRP ANALYSIS FREQUENCY' – Weekly TRP analysis should be ban .It should be done at every 3 / 6 / 9 / 12 months.

DD Module of TRP analysis may also be studied. NIC can be of great help in that MODULE. NIC already is in the business of data gathering and analysis. And I feel NIC with its wide network can do the work most efficiently. Another option is a MODULE having combination of both.

Having expressed above suggestions, I feel the TRAI would act on it with great responsibility. I once again thank TRAI for its initiative in this direction.

Thanking you,

Director, Total TV.



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