

Without Prejudice

Times Network's Response to the Consultation Paper dated December 03, 2018 on Review of Television Audience Measurement and Ratings in India

Preamble: We all know that when we introduce any new system, there will be always teething issues at the beginning and from time to time, there will be a scope for improvement as per the change in technology, viewers' choice, target markets/ audience, reach and affordability with accessibility of the content. The same is applicable in case of BARC also which is a body incorporated with the knowledge and involvement of industry stakeholders. We appreciate the efforts taken by TRAI to improvise BARC's rating system through the present consultation paper (CP). Our answers to the questions raised in the present CP are as follows:

Q1. 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.

Comment: BARC has largely been carrying out the responsibility of monitoring ratings in India fairly and in a transparent manner. This is evident through spike in ratings of the relevant channels during key events like elections; TV premieres of movies or important sporting events.

However, there are still few challenges which BARC is facing today. As per the Policy Guidelines framed in this regard, BARC was to achieve the sample household target of 50,000 by the end of 2018; however, till date, around 33,000 household samples have been installed. Such shortfall in the sample size compromises the representativeness of the data. Thus, a need is felt that BARC should devise concrete plans/ policy to achieve the targeted figures of household samples at the earliest.

Other big challenges that need immediate attention are the extreme fluctuations in the ratings for niche channels and the present policy used by BARC in this regard. The present policy needs an overhaul from the perspective of niche channels. Due to their specific demand, Niche Channels unlike other channels of general entertainment, sports, infotainment do not command a very large subscriber/ viewer base. Thus, it is to be specifically seen that these channels are adequately represented and that they are compared with only those channels which fall under the category of Niche Channels, for analysing their viewership/ audience measurement.

Finally, apart from the quantity of sample, the quality of sample under BARC must be focussed on to enhance quality of viewership measurement.

Q2. 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.

Comment: BARC has an adequate representation of the member organizations to maintain its neutrality and transparent TV ratings.

Q3. 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.

Comment: Though opening the ground for multiple agencies to enter the TV ratings space may aid in growth of competition but at the same time it may also invite concerns related to the comparative accuracy of the final data/ ratings supplied.

Multiple rating agencies will not be financially viable. Further, since the data of all agencies will be based on a sample of different sample households, the output from different agencies can differ which is not good for the industry as a whole. The following downsides are foreseen with the concept of having multiple agencies to tap and report television audience measurement and ratings:

1. Increased cost of operations due to multiple agencies.
2. Such increased cost would be passed on to the Broadcasters and ultimately to the end users/ consumers
3. Possibility of conflicting data.

The need of the hour is to strengthen BARC and provide it with more teeth to take on persons or entities which undertake activities to artificially boost ratings of certain channels.

Thus, we are of the opinion that the Ratings given by a centralized agency like BARC should be just like a common currency and should be accepted by everyone wholeheartedly.

Due to the above reasons we do not suggest establishment of multiple agencies for television audience measurement and ratings in the country.

Q4. Is the current audience measurement technique used by BARC apposite? Suggest some methods, if any, to improve the current measurement techniques.

Comment: In our opinion, the methodology used by BARC is largely appropriate. However, there is a scope to increase panel size, regulation of mechanism for selection of sample homes, improve quality of panel, include out of home viewing and incorporate Return Path

Data to make it more robust and representative. However the data analysis of RPD should be done separately and not combined with conventional Household data results.

Further, a need is also felt to ensure an equal representation of all channels in the sample homes for carrying out a more accurate analysis. For eg. If the sample homes included in the overall analysis subscribe to only (say) Channel A, then the ratings of (say) Channel B automatically come down. Hence due to unequal distribution of sample homes subscribing to Channel A viz-a-viz Channel B, there is an inevitable error in the ratings.

Thus, we suggest that a mechanism should be prescribed by TRAI so as to ensure that the samples have an adequate representation of all channels. Therefore, as far as possible, all sample homes should have subscription of similar/ all channels available on the platforms of respective DPOs.

We further suggest that the mechanism for selection of Sample Homes by BARC be regulated. There should be a mandate to release data separately for each of the following category of platforms:

- a. DTH,
- b. HITS
- c. IPTV
- d. Digital cable
- e. DD Free dish (should be a separate category under Free DTH)

The number of sample homes under each of the above category of the platforms and further for each DPO should be determined on the basis of actual subscriber base of the DPO. Each DPO should be allocated sample homes on the basis of a certain uniform percentage of its subscribers, prescribed by TRAI/ MIB. With the new 2017 regulations in place the DPOs actual subscriber base will be available with TRAI and in public domain.

In future, BARC can also look at data fusion to measure not only TV viewership but also radio and digital to measure incremental reach across different mediums.

Q5. 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?

Comment: The decision to introduce programmes to cater to any specific audience/ in specific language is made by the Broadcasters after extensive research of the market factors. Channels with specific demand i.e. the Niche Channels are introduced taking into consideration factors like the percentage of audience having specific television viewing needs, the reach and demand of niche channels, cost of operation of such channels etc. This involves huge investments made at the Broadcaster's end.

TRAI should acknowledge the fact that India is a multi-lingual country. The Broadcasters should be given freedom to telecast the programme in the category and in the language

they want depending on the content mix as planned by the broadcaster. The consumers will always be the final judge of content and if they don't like the change undertaken by the channel then they would change/ switch the channel/ programme they are watching and its ratings would automatically drop.

Q6. Can TV rating truly based on limited panel homes be termed as representative?

Comment: It is understood that any sample based study will always have a margin of error as it is not a census. However, in research, it will not be financially feasible to do a census, hence a sample based approach even with limited panel home can be quite representative if the panel size is robust and the sampling methodology adopted is scientific and transparent.

Panel size selection is a statistical exercise and should be based on cost consideration and a comparative/ relative error of the sample. It is worth noting that, after a certain point even if we increase the sample the proportionate improvement in relative error will be marginal. Hence a balance needs to be maintained in terms of sample size, relative error and sampling cost management.

Further, we also suggest that shops, offices, commercial establishments and hotels may also be included in the sample homes/ panels so that the data is more representative as the viewing pattern/preferences at these places are likely to be different from home viewing.

Q7. What should be done to reduce impact of manipulation of panel home data on overall TV ratings? Give your comments with justification.

Comment: Manipulation of panel home data is a big concern for transparent and fair viewership measurement in the country. Panel manipulation should be recognised as a serious offence and any individual or a company undertaking it should be punishable by law.

In our opinion, BARC should be given more powers to take on persons/ entities which indulge in these malpractices. Simultaneously, BARC needs to ensure effective validation check so that outlier data gets weeded out on daily basis.

Q8. What should be the panel size both in urban and rural India to give true representation of audience?

Comment: There cannot be a defined number/ panel size that can be held to be adequately representing the entire TV viewing audience. However, attempts may be made to make additions to the current panel size every year. Firstly, BARC has to achieve the targeted 50000 sample size. Thereafter, a yearly incremental number may be prescribed in discussion with BARC for increasing the sample size in relation to the growth of TV viewership in the country.

A need is felt to have adequate measures in place to ensure that Urban Indian homes are well represented in sample homes. The fact that the current mechanism does not ensure true representation of urban TV screens is reflected in the ratings of English channels.

As per the available data, nearly 52% of the people's meters/ panels are installed in rural areas. We would suggest installation of majority meters in the urban areas as this would comparatively be more relevant for the advertisers. The same would be helpful to the advertisers to make a better analysis in light of the following factors with respect to the consumer's preferences:

1. Consumption pattern
2. Spending capacity
3. Income brackets
4. Disposable income
5. Programme preferences

Thus, we suggest that the sample homes should give more representation to the urban population.

Q9. 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?

Comment: Return Path data (RPD) can be used to increase the panel of households for viewership measurement in the country. However, fusion of RPD with current BARC panel, using viewer attribution model will be a challenge and needs to be handled carefully.

Q10. 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.

Comment: The collection of viewership data electronically by the DPOs would be subject to a number of factors namely the accuracy and reliability of data, understanding of data collection process, implementation by DPOs including the cost and infrastructural aspects to be taken into consideration. Further the data should be secure by using appropriate technology. An approach like this requires much more deliberation and detailing to take a concrete stand on this.

Q11. 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.

We do not have information on the same. However if any additional costs are required to be incurred, it needs to be clearly understood that who will incur such costs particularly in case of upgradation to be done, if any.

Q12. What method should be adopted for privacy of individual information and to keep the individual information anonymous?

Comment: In order to ensure privacy of individual information and to keep the individual information anonymous, we strongly suggest the frequent rotation of homes/ households.

It is suggested to have a system of automatic programming whereby a fixed random number of homes is selected from the total number of homes/ households to assess the required data. The selection of homes to arrive at the ratings can be made rotational over the given period of time say, weekly, bi-weekly, monthly, bi-monthly etc. This is possible when sufficient BAR-O meters are installed.

Further, outsourcing the installation of BAR-O-Meters by BARC, to an external reputed and neutral agency, which will maintain privacy of information, may also be considered.

Even in the newer methods being contemplated, privacy of individual information should be given utmost importance.

Q13. 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?

Comment: We are of the opinion that discretion should be exercised w.r.t. the dissemination of information regarding the households. All the information which requires effective selection of a panel home be it demographics, mother tongue, language of viewing TV, product ownership etc. must be collected from panel homes.

In our opinion, information related to demographics i.e. age, average income bracket of households in the area, average disposable income etc can be shared as part of research and analysis. However, minute information like who is watching television, the time at which the particular household is watching etc. should not be shared at all.

Information collection from a respondent is a standard procedure under all research studies; care needs to be taken in not divulging the information to the outsiders and to ensure that the information is used solely for efficient panel management and data analysis.

Active and express consent of the viewer should be a pre-condition for collecting any such information.

Q14. What measures need to be taken to address the issue of panel tampering/infiltration? Please elaborate your response with justifications.

Comment: As suggested in our reply to question no.7, Panel tampering/ infiltration should also be recognised as a serious offence and any individual or a company undertaking it should be punishable by law.

It is reported that sometimes due to fear of information leakage about the sample households; such sample households/ households in a particular area are contacted by some agents/ agencies on behalf of certain broadcaster/s who carry out promotional activities thereby influencing viewers to watch particular channels.

BARC should be given more powers to take on broadcasters/ agencies which indulge in these malpractices in terms of blacking out data for the culprit for certain period of time etc. apart from the penal action as stated above.

Q15. 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?

Comment: One view is that the Raw Level Data (RLD) may not be of much use to the Broadcasters at that level because the same is later subject to various permutations & combinations and is further processed and refined for a minute to minute analysis for a better understanding and an efficient targeting of advertisements and social messaging.

On the other hand, the other view is that since the RLD is accessible to media agencies, helping advertisers to plan investments efficiently, the Broadcasters may also be allowed to access the same to plan their investments accordingly.

Thus raw level data, to a certain extent can be provided to broadcasters for better planning. However, information like details of households like address etc. must not be disclosed and it must also be ensured that no person should be able to tamper with the data and manipulate the final ratings.

For example, it would help the broadcasters to understand viewership by DTH, digital cable, FTA Channels but not by actual head-ends.

Q16. 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?

Comment: We suggest here that the provisioning of RLD to broadcasters should, at every step, be consonant with the privacy laws prevailing in the country and should, at no cost contravene and compromise the privacy of the sample households.

Q17. Is the current disclosure and reporting requirements in the present guidelines sufficient? If no, what additional disclosure and reporting requirements should be added?

Comment: The present disclosure and reporting requirements are appropriate. However, the following suggested points may also be made part of the said disclosures/ reporting requirements:

- a. The MIB guidelines should include disclosure of the sample size on the BARC website and software.
- b. The guidelines should also include a fair and permissible data usage in promotions (mailers, ads, etc.), since the BARC guidelines currently used by the industry are vague in nature and prone to misinterpretation.
- c. Disclosure regarding the steps taken during the year towards upgradation of technology, any research & development made and the details of expenses undertaken for the said purpose.
- d. Disclosures regarding any corporate actions undertaken by the Ratings Agency or any of its member associations/ agencies to ensure a smooth and transparent functioning.

Q18. Stakeholders may also provide their comments on any other issue relevant to the present consultation

Comments: The market surveys conducted by the TV Ratings agencies include questions related to the present average income brackets of the users, the consumer durables owned by the users, the present spending capacity of the users etc.

We are of the opinion that the above questions may also be taken into consideration with respect to the future prospects of the consumers/ users. Accordingly, the questions may also revolve around the expected increase in the income brackets of users in the near future; related increase in the disposable income of the users; intention of the end users to buy consumer durables in the near future, the type of consumer durables that the end users intend to buy, financial assets they wish to own etc.
