Q1. Whether BARC has been able to accomplish the purposewith 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.

Below are the points required to be more transparency to gain stake holder confidence.

1. Sample sizes are not reviewed in BMW software.
2. Weekly panel health reports/validation reports/market wise reported/reject/ nil viewer samples are not disclosed. (Designed sample VS Intab sample (reported sample with in reported markets))
3. As per the TRAI guideline rating agency suppose to publish the balance sheet in the website. It has not been practiced. Like in the case of MRUC they publish balance sheet in the website for the subscribers. TRAI should appoint the auditor. Maker and checker should be deferent.

Suggest measures-

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.

Current shareholding/ownership pattern is totally towards broadcasters and they dominate the control over other stake holders. It should have 1/3 equal share holding between all the three stake holders. Also some independent TRAI nominate subject matter experts on Board will make much sense.

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/measurescan be taken to make TV rating services more accurate and widely acceptable? Please elaborate your response with justifications.

Good to have competition, so that subscriber can validate the data sets. Competition will not be able to succeed since BARC stake holders are the only subscribers to the services.

BARC management should not involve in the data processing, data validation, data weighting activities. It should be out sourced to research agency. (BARB all the activities should be outsourced to research agency). All manual validation
Process should be stopped and should be automated with the help of AI, ML using Viewer behavior analytics and other outlier's detection techniques.
Newly recruited home's viewership should be monitored for 10 to 12 weeks before considering them for final reporting. If they feel something is wrong then such homes should be dropped from reporting.

BARC management should validate its own rating by way of coincidental check or setting up parallel panel in few sample markets by the 3rd party or by using RPD data at h'hld levels

BARC management should focus on core ratings business only. They should macro managements not micro management.

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

BARC currently consider certain percentage of the Nil viewing homes in the sample actual it should consider all nil viewing h'hld. This will have impact on the TV rating estimate.

BARC Panel incentive is based on homes connectivity and homes watch TV. This rules will have impact on the viewers to watch more TV. This would mean home normal viewing behavior is compromised.

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?

No, different language for some time during the telecast will not affect the TAM rating. Once the water marking is done for the channel, it will carry that channel ID only.

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

Yes. If proper sampling / survey methodology are followed.
Panel homes recruitments are done according to the sample design and panel selection criteria.

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

Only option is to develop strong AI, ML based automated validation/outlier detection system based on Viewer behavior pattern.
Sample size should be doubled and panel should split in to set1 & set2 randomly by panel profile and randomly any one of the set data should be released weekly. (Panel size should double)

Button pushing is the major issue in the panel homes. To capture who is watching correctly, new technology should be used.
Motion sensors should be used to check is some one really in the room and watching TV. Compromised homes will just press all the button on and rally no one watches TV. These cases can be handled if motion sensors are used.

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

Panel size should be proposinate to the population in both urban & rural.

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?

Barometer (BARC meter) is the only option to increase the panel size. Rest of the option like RPD data is not going to be an easy task. To do the complete profile of the RPD data they need subscriber information from the DTH operators. Sharing subscriber data with 3rd party is also issue for DTH operators. More over RPD data sample also should be proposinate to the universe of RDP H'hld. DD free dish are not capable to enable written path.

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.

Q11. What percentage of STB supportstransferring 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.

It is not worth considering STB RPD data integrations for

ratings. There so many challenges.

STB RPD data integrations has lot of challenges and dependency for data release on time. More over DD or FREE STB box do not have RPD capability.

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

CISO need to be recruited for all IT security implementation. Current panel home database is cloud hosting and access by developers and platform teams. These needs to be reviewed by IT security expert.
All the database/files should be encrypted while on motion & at rest and proper cyber security practices to be followed and IT security audits should be conducted frequently. User behavior Analysis needs to be implements to identify anomalies of database access. Currently database also includes panel homes bank account information, phone number, address etc. This information is accessed by call center team, installation teams. All the home details access logs should be analyzed by CISO.

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?

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

justifications.

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?

Yes, it is good income for the agency.
With raw level data secrecy/location of the households will not be identified.

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?

Providing raw level data to the broadcasters will not contravene the guidelines for television rating agencies. (raw level data will not have information like home address, name, phone numbers etc, so more the raw level data, no one is able to identify the home location.)

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

Any Other Issues

Q18. Stakeholders may also provide their comments on any other

issue relevant to the present consultation.