

Subject: **Fwd: Response from MM TV - TRAI issued Consultation Paper on Issues related to Placing of Television Channel on Landing Page**
To: Rakesh Kumar <rakesh@tra.gov.in>

Date: 05/04/18 01:05 PM
From: AKPathakSRO <akpathak@tra.gov.in>

----- Original Message -----

From: **S M K Chandra** <smk.chandra@tra.gov.in>

Date: May 4, 2018 12:29:47 PM

Subject: Fwd: Response from MM TV - TRAI issued Consultation Paper on Issues related to Placing of Television Channel on Landing Page

To: ak pathak <akpathak@tra.gov.in>

----- Original Message -----

From: **Manoj V Cherian** <manojvcherian@mmtv.in>

Date: May 4, 2018 12:00:24 PM

Subject: Response from MM TV - TRAI issued Consultation Paper on Issues related to Placing of Television Channel on Landing Page

To: advbcs-2@tra.gov.in

Cc: smk.chandra@tra.gov.in

To,
Sh. Anil Kumar Bhardwaj,
Advisor (B&CS),
Telecom Regulatory Authority of India

Dear Sir,

Please find below our comments against each of the ten points in TRAI's consultation paper on Issues related to Placing of Television Channel on Landing Page.

For purpose of clarity our responses are in blue and italics under each of the said points.

Regards

Manoj V Cherian
Senior General Manager - Distribution
MM TV Ltd, Aroor, Alappuzha -688534
Kerala
Mob No. 9895701750

Q1. Do you feel that emerging concept of placing TV channel on landing page can influence TRP ratings? Suggest the action which may address the issue with justification.

Yes. It can influence TRP ratings.

Under the current Audience measuring methodology and the rules used by them and also the use of random allotment algorithms applied in some cases by them the probability of a TV channel getting rating points from landing page, unrelated to actual viewing by viewer is very high. For eg. every time a STB is switched off and then switched on voluntarily or involuntarily (during power offs and subsequent power on when STB is rebooted at every instance) rating points can get added to the channel on the landing page. This can happen even when the viewer is not even sitting in front of his Television. This happens because under the Audience measurement methodology using an audio watermark, the BARO-Meters pick up the audio signal of the channel from the Television irrespective of whether the channel is placed on the landing page or on it's actual LCN as per the genre of the channel.

Under the above circumstance the system erroneously captures as viewing the signal from the landing page unrelated to the viewer actually viewing it and converts it to rating points which is against the very principle of measuring viewer data. Hence this should not be allowed.

This situation also becomes discriminatory to various stake holders:

(a) Discriminatory to competing broadcasters / channels who are already paying a placement fee for good placement within the genre - because when the distributors place another channel on landing page and the distributor system directs the viewer to the landing page / channel on the landing page by default and against the wish of the viewer that channel eventually earns rating points because of the methodology and rules currently used by the Audience Measurement system and just because the channel is on the landing page. While other channels who have already paid / paying a placement fee gets a raw deal and loses value because of this anomaly. This also takes away the level playing ground envisaged and built into the act and ecosystem. It becomes all the more critical when the difference in rating points between competing channels in some markets / genre are miniscule and the additional rating point from landing page unrelated to actual viewing can shift the leading position in favor of the channel on the landing page which actually

may not be the real situation.

(b) It also becomes discriminatory to the viewer and viewer interest : because it pushes unsolicited content to viewers by system default, though in reality the viewer would have preferred to choose another channel of their liking and interest immediately after STB was booted. This also leads to a situation when the default direction to the channel on the landing page against the viewer interest gets measured as his / her viewing preference / interest and the resulting misleading conclusion that such content / channels are more popular than the ones preferred by viewers.

(c) Can the landing page decision be fully left to the distributor with out any regulation? Can channels unsuitable for family viewing or which demands discretionary viewing be carried on landing page? Such aspects also need to be looked into.

Suggestion: Landing Page should be used only as an info channel of the Distribution platform and should not be used for retransmitting satellite channels that would be measured for viewer ship.

Q2. Should concept of landing page be defined? If so, please suggest the definition of the landing page with justification.
Yes. Landing Page should be defined as an info channel owned and operated by the Distribution platform that will not be measured for viewer ship and that will provide all requisite information to viewers / subscribers by the distributor / service provider regarding their services, packages, pricing, changes in packaging / pricing, schemes, offers, options available to subscribers / viewers on service related issues - upcoming planned maintenance, after sales service options etc and upcoming events etc (and certainly not for placing satellite channel / channels that would be measured for viewer ship).

Q3. Will defining Framework for placing TV channels on landing page affect the present business model of distributors? If so, will it be considered impacting the freedom to do business by distributors of TV channels? Give your suggestions with justification. Page 19 of 24

No. Only the revenue from placing a Satellite Television Channel (which wants to be measured on the landing page) will get affected. All the other revenue streams to them remain intact. However this does not fully close other options for distributors to earn revenue from landing page. Distributors can have a revenue earning model from landing page by placing surrounding advertisements on this info page. They can also carry AV promos / TVCs as in their other channels / distributor owned cable channels etc and earn a revenue. They can also carry AV promos / TVCs of Broadcasters / Satellite channels - AVs which will not have an audio embedded for audience measurement and earn revenue from the same. This can open up additional revenue opportunities to distributors through their landing pages with out disrupting the ecosystem.

Ideally landing page should be used as an info channel for the viewers, subscribers, providing information on the channel mix, any new additions, removals, subscription package details with prices, network maintenance, new schemes and offers, service details etc as elaborated earlier.

Q4. Is landing page a natural choice of consumer while viewing TV channels? If not, why should channels, whose TV ratings are released by TV rating agency, be placed on landing page? Give your comments with justifications.

No. Landing page is not a natural choice of consumer while viewing TV channels. It is a form of forced viewing because it is a boot up screen every time a STB is switched on - be it when switched on by the viewer for viewing or when it gets switched on after every power cuts / power offs even with out viewer involvement. How can a booting action where viewer has no control be measured as viewing? The reasons and justifications are already given in our response to Q1.

Q5. Whether placing of a TV channel on landing page increases television ratings? If yes, why TV Channels, whose TV ratings are released by TV rating agency, should not be barred from being placed on landing page? If no, why broadcasters are eager to place their channels on landing page? Give your suggestions with justification.

Yes, placing a TV channel on landing page increases television ratings as per the current measurement mechanism. As per the current audience measurement methodology, their rules and also their algorithms used in some situations, the channel placed on a landing page gets increased television rating from the measurement system and not from actual viewing by the viewers. This defeats the very purpose of audience measurement - to measure viewer preference of content / channels etc.

TV channels that are measured should not be allowed to be placed on the landing page of distributors. The justifications why it should not be allowed is given in our response against Q1, Q2, Q4. As regarding the revenue for distributors and the freedom to do business, suggestions regarding revenue / business models are given in our response against Q3.

Q6. What should be the criteria/consideration to put a TV channels on landing page? Give your suggestion with justification.

Landing page should ideally be an info channel with possible revenue models for Distributor explained above, but certainly not to be used for placing a Television Channel that is measured be it for revenue for distributor or otherwise.

Q7. Do you think the influence, if any, in television ratings by placing of TV channels on landing page can be mitigated through changes in measurement methodology of television ratings? Give your suggestions with justifications? **Page 21 of 24**

We do not think so given the current situation. BARC measures the embedded audio on the channel which are picked up and measured from the Television set of the viewer by the BARO-meter, irrespective of the channel frequency on which the channel is placed by the distributor (irrespective of whether the channel is placed on the landing page or on the LCN of the channel with in it's respective genre). They currently do not seem to have any mechanism to identify whether the

signal comes from a landing page or some other frequency. Hence it do not seem possible for them to identify whether they are measuring landing page signal or from the LCN allocated to the said channel by the distributor unless they make fundamental changes on their measuring mechanism - technology, process etc.

Alternatively, BARC should develop a mechanism / process to identify landing pages of distributors by giving it a unique audio code or some other mechanism to check if the signal is coming from landing page and if so not measure it.

Having said the above, our view continue to remain that landing page should be used as an info channel of Distribution Platform Operator as stated earlier.

Q8. Please comment on the feasibility to implement user's 'last visited page' as landing page in distributors' network? *This may need major changes on the distributor's technology and process. Screen / STB switching on to the 'last visited page' makes sense only in the case of a shut down of STB for a short duration while watching (mostly due to temporary power disruptions), so that viewer can resume viewing when the power is back with in a short time frame and while the viewer is still in front of the TV. However if it is a long shut down (normally shut down by viewer after viewing) it would be better that STB boots on to the landing page. The main issue here is not about STBs booting to landing page. If landing page is an info channel operated by distribution platform operator then we think it appropriate for the STB to boot on to landing page because it would give the viewer the necessary / mandatory information. The issue here is about landing page being used for placing a television channel and then it getting measured every time a STB is booted.*

Q9. Should the landing page be used to place TV channels not having TRP rating or only to provide platform specific information? Give suggestions with justification.

Ideally landing page should be used only as an info channel for providing platform specific information for all the reasons cited above.

Q10. Any other suggestions/comments related to the issue under consideration?

No.

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S.M.K.CHANDRA
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