

To,  
The Chairman,  
Telecom Regulatory Authority of India  
Mahanagar Doordarshan Bhawan  
Jawahar Lal Nehru Marg,  
New Delhi 110002

**Subject: Consultation paper on Guidelines/accreditation Mechanism for Television Rating System Agencies in India dated April 17, 2013**

Dear Sir,

At the outset, we appreciate the initiative taken by the Government to address the issues related to television rating system in India. We recognize that the Broadcast Audience Research Council (BARC) is the best model for mechanism of television rating systems in India. BARC has been recognized by the Amit Mitra Committee in its report. As a first time industry initiative it is gaining pace and with the cooperation of the stakeholders can develop as the comprehensive mechanism. We understand that BARC has already appointed the BARC Advisory High Table in line with the recommendations of the Amit Mitra Committee.

The issues and scope for consideration under the Consultation Paper are within the ambit and scope of BARC.

Keeping in mind the above view, we provide our comments on the Consultation Paper as follows:

**Q1. Which of the model described in para 4.4 should be followed for regulating television rating services in India?**

Of the four models suggested in para 4.4, the first model, of Self Regulation whereunder Industry-led body undertakes the work of rating services itself should be followed for regulating television rating systems in India. The television ratings are mainly used to facilitate advertisers and broadcasters to measure the reach of their advertising and programming, and these primarily facilitate the pricing of and trading of television



advertising inventory. It is a form of market research. Therefore, there is no need for any Government intervention in the area of TV rating point measurement.

In 2008, TRAI had, inter-alia, recommended the approach of self regulation through setting up of an industry-led body, the Broadcast Audience Research Council (BARC). Subsequently, a committee was constituted by MIB under chairmanship of Dr. Amit Mitra, the then Secretary General, Federation of Indian Chambers of Commerce and Industry (FICCI), which also made extensive recommendations towards setting up of a transparent and credible self regulatory mechanism for television rating system by BARC. Under the BARC, advertisers, their agencies and broadcasters coexist in the television audience measurement space, there is no public space for any intervention either by the Regulator or by the Government.

**Q2. Please give your comments on the eligibility conditions for rating agencies discussed in para 4.7.**

BARC fulfills all the criteria formulated for rating agencies. BARC, comprising Indian Broadcasting Foundation (IBF), Indian Society of Advertisers (ISA) and Advertising Agencies Association of India (AAAI) is a progressive way forward.

**Q3. Please give your comments on the guidelines for methodology for audience measurement, as discussed in para 4.19, for television rating systems.**

- The 25% refresh of panel should be done in a staggered manner across each of the 12 months and not at one go, for stability of the data
- Minimum panel size – there should be a minimum panel size that covers upper SECs/elite audience viewership to ensure a sizeable base of sample HHs/individuals
- Point h & j mention different recommendation on universe update. A yearly update is recommended, with the exception being a major environmental change like the DAS implementation in 2012-13, which demands an immediate/mid-year universe update.

We should also add the following:

- Ensuring adequate deployment of sample to measure viewing of niche/English language channels in a robust manner
- Ensuring equal and fair proportion of sampling (sample : universe ratio) for each market/state for correct representation

**Q4. 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?

The prevalent sample size is inadequate, both in terms of numbers as well as in respect of platforms; are urban centric and that there is a need for a manifold increase in the current sample size with proportionate representation for different platforms.

As opposed to the meager sample size of 8000 people meter homes being relied upon by TAM, the sample size should be fixed at minimum 30,000 urban & rural households, covering urban areas, rural areas and small towns, J&K, North east thereby providing a complete geographical coverage of the country. This size should further be increased to upto 50,000 People Meters by 2015. Rotation of such People Meter homes should also be improved.

**Q5. Please give your suggestions/ views on as to how secrecy of panel homes can be ensured?**

At all times it should be ensured that the panel list is available with very few people and the same should be strictly on need to know basis. Those who are privy to the panel list should give adequate indemnities and representation to ensure responsibility. There should also be a periodic refreshing of the panel and in staggered manner.

**Q6. Please give your comments on the cross holding restrictions for rating agencies as discussed in para 4.23.**

There should be no cross holdings between the Rating Agencies and their clients, as these can lead to biased ratings. There should be a complete prohibition on broadcasting companies having any interest whatsoever, in rating agencies to ensure independent, unbiased and credible ratings.

**Q7. Please give your comments on the complaint redressal mechanism discussed in para 4.25.**

There should be fixed timelines prescribed at each stage of redressal. We believe that If the rating agency is not able to address the concerns within 5-7 days then the issue should be referred to the accrediting agency which should also ensure redressal within a prescribed time frame.

**Q8. Whether the rate card for sale and use of ratings should be published in the public domain by the rating agencies?**



Yes, it should be published in order to be transparent

**Q9. 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?**

Only the people with a certain direct interest in the rating should be given access to the rating data but the same should be at a premium price. The amounts thus collated can be used in improving the efficiency of the rating system

**Q10. Whether the user should be allowed to share the data provided by the rating agency with third parties or publically accessed media.**

We believe Users should be allowed share data

**Q11. 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.**

The parameters/procedure seems exhaustive.

**Q12. 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.**

There should be a periodic neutral third party audit of the raw viewership data to check for stability, compliance at panel household level, absence of anomalies etc.

**Q13. Please give your comments on the audit requirements for rating agencies as discussed in para 4.42.**

It should be mandatory for rating agencies to get independent audits done through a third party and the auditors of rating agency should state in their report that proper mechanisms and procedures, as disclosed publicly by the rating agency, exist for various processes involved in the audience measurement and ratings.

**Q14. Who should be eligible to audit the rating process/system?**



Audit should be carried out by professionally managed firms chosen from amongst the first top five in India. The audit firm should have qualified chartered accountant, software engineers and expert from the media industry.

**Q15. What regulatory initiatives are required to promote competition in rating services?**

BARC proposes to follow a multi-stage procedure covering the activities involved in Television ratings. BARC has stated that it would encourage competition from the initiation of research itself. It will invite global bids for the two stages viz baseline establishment survey and ratings panel. The research suppliers remit will be restricted to providing data, and that value added analysis is opened up for competitive participation.

**Q16. 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?**

30 days is a reasonable time to adhere to the guidelines

**Q17. Do you think integrating people meter with set top boxes is a good solution? If yes, how to encourage such systems?**

Yes, by ensuring a smooth and complete digitization.  
The rating in case of analogue should not be reported

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

1. It is essential that aberrations are probed with due justifications
2. The households considered on panel should be relevant to the Genre for which ratings are taken.

Thanks and regards

For Reliance Big Broadcasting Private Limited



Authorized Signatory

