



Madhyamam Broadcasting Limited

Response to TRAI Consultation On Review of Television Audience Measurement and Ratings in India

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.

We feel, BARC has done a better job than TAM, INTAM and aMAP, erstwhile rating agencies operated in India. BARC, being an Industry owned service, and having no cross holding and conflict of interests that was widely attributed to previous rating services like TAM, has been able to furnish better data sets.

The strength of BARC is in its technology of unique coding in each audio file. Methods used for processing the data and making final report are also awesome. But the lacking is in the core area, ie sampling, even a small flaw of the same will make the whole processes done afterwards a misleading one. Still panel tampering, inadequate sample size, data being not representative of socio/cultural/regional/linguistic/religious diversity within a state are some issues lingering. BARC can do a lot better in terms of publishing barometer distribution to a depth of district and SCR(Socio Cultural Region) in a state.

Even though BARC claims of higher number of barometers, any breakup of the same (District/socio/cultural/regional/linguistic/religious wise) is not available to the stake holders. BARC officials say that they are not supposed to reveal the same to protect the secret nature of the sampling. Most of the time, the common understanding from the ground is that there are no adequate barometers. In many incidents, households refuse to install meters in fear of security and privacy. As a result, at least in many cases, meters are installed in households having some kind of connections to DPOs/Broadcasters etc and kill the whole concept of transparent sampling and processing of TV viewing. Just because the same reason, churning of meters between households does not happen within an year.

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.

Yes. Current ownership structure is fair enough. Credibility of the service can be further enhanced by revealing state wise/reporting unit wise/SCR/District wise barometer distribution. Meter tampering is still rampant. Criminal proceedings initiated against those found infiltrating panel homes have not resulted in effective prosecution. Currently rating is available at Metros,10-75 Lac Towns, Below 10 Lac, Urban and Rural break ups. District wise or SCR (Socio Cultural Region) reporting is also needed to understand channel preference across SCRs within a state.



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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.

Competition in rating service is to be seen different from competition in other commercial sectors. While competition in a market is generally viewed as welcome, television rating sector is something different. Our past experience suggests that whenever there was more than one agency on the job, it created confusion and added to chaos rather than bringing in more clarity. Since these different agencies followed different methods, there was no mechanism for inter conversion or comparison. This multi agency operation was later contracted to a single agency scenario. Likewise, print readership research earlier had NRS (National Readership Survey) and IRS (India Readership Survey). Currently this sector has only a single currency, i.e. IRS. Competition is to be encouraged at different stages of research process like establishment survey, panel management; data analytics and data capture technologies.

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

Measurement technique used by BARC is better and enhanced one than what was employed in earlier time. In India, television rating is a composite index of how many people watch a TV event and time spent. But in the West, number people watching an event (reach/coverage) is the primary barter. Time spent factor can be influenced by partisan groups in terms of religious/caste/political affiliation lines. For example, recently in Kerala, a channel which had the lowest reach in News channel category was shot to No.2 position in GRP in the wake of a particular political and religious development in the state. This was resulted by concerted campaign by religious group(s) which promoted that particular channel as their own when the channel sided with the interest of the religious group. Consequently, this particular channel had disproportionate growth in time spent while being last in reach figures in the news category. Hence the rating methodology should start giving more weightage to reach/coverage factor which indicate wider appealability of a channel.

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?

Television rating captures what viewers watch. It's up to channels to decide what kind of program to be scheduled at a particular time band.

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

Sampling studies are used world over whenever census data is not available. These study findings are to be used with caveats and conditions applicable to statistical studies. TV rating studies are not an exception to the rules of statistical sampling studies. Better sample depth, robust data capture and statistical methodologies, new age technologies like AI and Machine learning and fusing panel and RPD datasets will go a long way in having better accuracy in study outcomes.



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Still, methods to get wider samples are to be explored. In the new age where social media is spreading faster than TV, any innovative technology for sampling each and every viewer will be really wonderful. Many a time, the rating of BARC and rating of live TV viewing in social media do not match and raises doubts and confusions over BARC rating. (Even though the habits of TV and social media viewing will be different, there should be a similarity in patterns of viewing.)

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

When number of panel homes is low and given the size of TV viewing population of our country, population to sample ratio will be very high. This high weight ascribed to a single panel home act as a catalyst to tampering. Increasing sample size is natural step towards preventing panel home tampering. Secrecy of panel homes is to be maintained at any cost. Involving non interacting and independent service providers at different levels of the research operation is of utmost importance in ensuring data integrity. Maintaining at least 25% churn ratio/year is another non negotiable element for data integrity. Panel home monitoring for anomalous TV viewing pattern is to be strengthened.

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

Sample size depends on number factors like universe size, demographics, reporting unit requirement and permissible relative error. It would take an expert committee to arrive at a ball park figure of sample considering aforesaid factors.

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?

Return Path Data is a promising area that will give huge fillip to accurate viewership measurement initiatives. Since India has almost 100% digital STB/DTH penetration, peplemeter built in STB/DTH and RPD, algorithms for fusing RPD with demographic details can surely help in increasing panel size. This will reduce the fear factor of households while installing separate meters. This also will make every STB into a barometer.

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.

Yes. This will give huge boost to data robustness.

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.

No Comment



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

The identity of individual respondents should be kept anonymous. Assigning virtual ids to respondents is one way of ensuring privacy of respondents.

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?

Market Research anywhere in the world conducts its business by getting opt in by sampled consumers. As long as target consumers are willing to participate in the market research study and the measurement agency adhere by MRSI code of conduct, micro granular data deemed necessary by the rating agency shall be collected. The research agency is bound to keep the individual data confidential.

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

Strict action should be taken against those who indulge in the act of panel home infiltration. If it is proved a channel has done the tampering, its data should be suspended for at least 6 month. Apart from this, criminal proceeding should be taken up against them. Currently there is lack of effective provisions in the criminal procedure code to deal with this new age data violations. TRAI may recommend to GOI for bringing more clarity on applicable legal framework.

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?

Raw level data should not be made available to broadcasters.

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?

There is a possibility of potential misuse of raw data, if it's made available to industry players. Hence there is a chance of contravention of policy guidelines prescribed by MIB.

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

The current disclosure and reporting requirement is enough.

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

No Comments

With Thanks and regards,

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