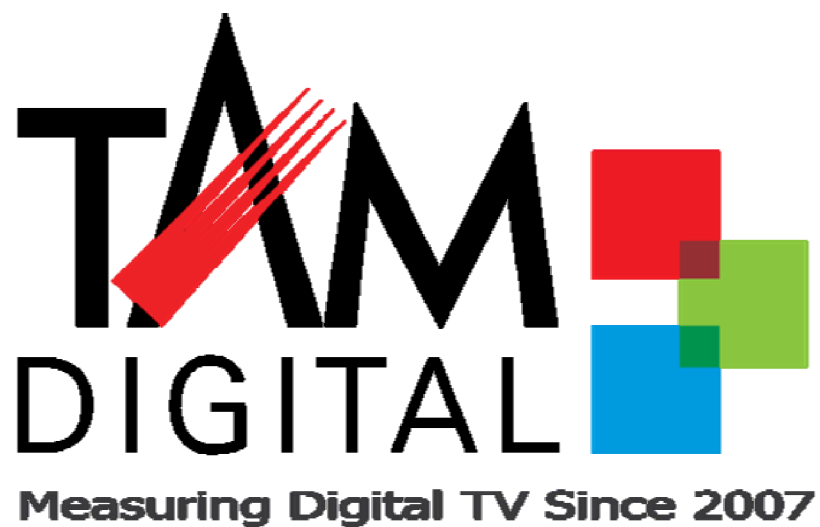


**Response to Consultation Paper on
Guidelines/Accreditation Mechanism for Television Audience
Measurement (TAM)/ Television Rating Points (TRP) Agencies in
India**



Section I. Executive Summary

TAM had in the past also responded to the TRAI's consultation as well as recommendation papers on Television Audience Measurement in 2008. Since then, TAM has interacted with the Dr. Amit Mitra committee constituted by MIB and had discussed in details with them the TAM methodology as well as the aspects on its Transparency. Most of it was used by the committee as inputs into its comprehensive recommendations. TAM methodology was also attached as an annexure to the final recommendations.

In this response to a fresh consultation paper issued by TRAI, we enclose herewith key aspects from our earlier responses as well as our latest perspective on some of the key issues highlighted in the TRAI consultation document. We begin with a short summary of TAM Media research's role in the TV industry over the last 14 years.

Summary of the role TAM has played in the TV industry and way forward from TAM perspective:

TV Audience Measurement is a specialist arena that is globally practiced by mature and evolving Broadcast & Advertising industries. The implementation of TV Audience Measurement Research is carried out by professional Audience Research organizations. Over the years, the Audience Research function has worked in tandem to help the Broadcast Media & Advertising industry to grow, through the insights about Audience behavior in watching Television.

There are very few global Research organizations that provide the service in the arena of TV Audience behavior. The Nielsen Company and Kantar Media Research are two of the globally recognized Media Measurement organizations. Nielsen along with its joint venture partner in India, Kantar Media Research, has been providing the TV Audience Measurement service to the Broadcast TV Media & Advertising industry users in over 85 countries globally. India too happens to be one of the countries where the two partners have been operating the TAM system for the last 14 years.

In India, 14 years back, TAM started with the initiation of the Broadcast TV Media and Advertising industries wanting a currency to help understand audience preferences as well as in trading (buying & selling) air-time. Hence in 1998, when the TV industry Advertising pie was just hovering around Rs. 1500 Crores, the industry bodies – AAI, ISA, IBF came together to form a Joint

Industry Body (JIB). The JIB awarded Nielsen and IMRB, two large Market Research firms in India, to kick start a Peplemeter based TV Audience Measurement service. TAM Media Research was thus born to deliver TV Audience data to the Indian Media industry. The service started with a panel of 1800 meters in 9 cities. The vision of the industry body governing TAM was obviously to scale the panel to a larger coverage over time.

The information from the TV Audience behavior data have had an implicit impact not only on the growth of Advertising Spends on TV, but also in bringing in new channel launches in different Genres of Programming, leading to an overall growth of the Broadcast TV industry. During a large part of these years, from 1998 to 2005, the Joint Industry Body was the supervising body of the measurement system and it played its role in augmenting the growth of the system.

Today, along with the growth in TV Advertising spends to over Rs. 12,000 Crores, the TAM TV Audience panel has also grown to cover 225 cities/towns in Urban India across all population strata. The number of Peplemeters in use has already grown to 9600 meters and will be 10,100 meters by end of 2013.

The volume of information from TAM available to the industry users has grown from just Audience Viewing data to Evaluating Return on Investment (ROI). The Broadcast TV industry users can actually study the impact of Marketing/On-Air Promotions, Distribution and Content preferences in one single database, helping them to take more effective business decisions.

TAM, apart from providing information on TV Audience behavior for the industry, has also helped playing a very active role in the arena of Education. TAM started a unit called TAM Educate, to help the industry by regularly conducting Education exercises to not only industry users, but also potential industry candidates via tie-ups with various Educational institutes.

TAM, in its attempt to be as transparent as possible, have documented its workings including Methodology, Sampling process, Sample sizes, Panel Security process etc (all worked out together with the Joint Industry Body Technical Committee) and is available on its website (www.tamindia.com) for industry users reading. Every step TAM has taken to expand its panel to represent the Universe of TV viewers; it has documented the process under the name "India Peplemeter Update" and released it to the industry for reading.

In the last 14 years of our operation, TAM has interacted several times with various bodies to explain and demonstrate our Methodology. The entire approach has been consultative by TAM and the Technology and Methodology used is largely similar to the International markets. In fact, the entire Panel Methodology process had been developed in consultation with various industry stakeholders, including the technical committee of the erstwhile “Joint Industry Body”. Therefore, no stakeholder can claim a lack of transparency in the TAM methodology.

TAM, because of its parentage – Nielsen & Kantar, and singularly focused towards Media Measurement, has the requisite People, Knowledge, Experience as well as the Technology expertise to handle variety of market requirements enabling measurement of audience behavior. This obviously is the reason for TAM to operate across 85+ countries across the globe.

TAM continues to upgrade measurement technologies in tandem with the changes in TV viewing platforms evolving in the market place. In January 2007, TAM already put in place the Digital Peplemeters to enable measurement of Digital TV viewing on platforms like Direct-to-Home TV and Digital Cable (CAS). Simultaneously, TAM conducted Baseline (Universe) study to understand and check the penetration of Digital platforms to enable reporting of Digital viewing data to the industry in 2008. Since then, every year, TAM has been conducting Baseline/Establishment Studies to understand the ever expanding universe of TV Homes, Cable & Satellite Homes and Digital TV owning Homes comprising of DTH & Digital Cable Homes. Recently, with the roll-out of DAS in Phase I & Phase II markets, TAM has been conducting the baseline studies continuously across markets to keep a tab of the Digital TV homes growth.

The way we at TAM see TV Audience measurement in India taking shape in future, is only through an intense partnership exercise between the Industry users body and a Knowledgeable, Experienced research partner like TAM with global parentage of Nielsen and Kantar Media Research. Hence TAM welcomes the formation of BARC and believes that it is a step in the right direction.

Even after JIB ceased to function, TAM has been working closely with individual industry bodies – AAI, ISA and IBF – by consulting them in key decision making process. The latest example was during the DAS Phase I and II implementations when TAM requested for formation of a core industry member committee (CIC) with representation from all the three key user bodies. This

interaction with CIC members helped TAM frame a process in which data could be released to the industry during the implementation of Digitization.

Our experience of working with the Industry user bodies, like JIB or BARC, has always been fruitful, healthy and beneficial. Therefore, we believe by the recommendations stated in the Dr. Amit Mitra committee report that asks the industry body (BARC) to supervise the audience measurement system. It does not see any role for the government to intervene in any form into this industry exercise nor does it foresee any requirement of any form of governmental regulation to oversee a TV Ratings service. The industry bodies are well capable and have been performing a professional task in the past of ensuring that they govern the TV Ratings service as per the needs of its users.

In the following pages, TAM has tried to address some of the key concerns/ apprehensions raised by TRAI in a factual manner.

Section II. Responses to Questions

1. The TRAI consultation document states that TAM Media Research is the only one doing TV Audience Measurement Research in India.

It is important to point out here that TV Audience Research can be done in multiple ways, thus bringing in many other organizations too involved with TV Audience Measurement Research. Presently, there are three different methodologies followed by different organizations in India. There are listed below:

- **Recall Method**: Whereby the respondent is asked a question about the Channel he watches and the Program he watched 'Yesterday'. No. of people viewing a Channel/Program is used to calculate the viewership of the Channel/Program. This method has largely been used in short term studies done by various organizations wanting to understand TV viewing behavior of the audience. A similar approach is also used by the organization conducting Indian Readership Study (IRS) for an industry body MRUC. Similar methodologies have been executed in research studies by various Broadcast organizations in India belonging to genres like "News", "Kids", "Life-style" etc. by using various market research firms to understand their genres audience taste to Content.
- **Diary Method**: Whereby the respondent is given a prescribed Diary and is asked to fill on a daily basis the Channels and Programs watched by him across different time-slots for each day of the week/month. This Diary is then collected on a weekly or monthly basis and is used to estimate the viewing tastes of TV audiences. A similar methodology is adopted by Doordarshan in their DART study covering Urban & Rural India.
- **Peplemeter Method**: Whereby an electronic equipment called Peplemeter is attached to the TV set in a panel home or to the Set-Top Box in a Digital TV home. This meter records the viewing behavior of every member of the TV home automatically on a minute to minute basis. This data is collected via GPRS or Mobile/Land telephone daily. Similar data from a set of viewers in the panel home is used to estimate the viewership of channels and programs. This methodology is followed by our organization, TAM in India. Our two global parent companies, Nielsen and Kantar Media Research, use the same methodology across 80+ countries across the globe. Similar methodology to understand TV

audience taste was followed by a few other Media Research organizations too in the Indian market.

But with evolving market place and growing new needs of the industry data users, new technologies to measure TV Audience taste will get developed in time. Some of them like the PPM (Portable People Meter) and Set-Top Box are already being discussed from an Indian market context with the industry users group.

We believe that, it should be left to the market forces that ensure constant evolution of new technologies to deliver measurement of audiences across various emerging new media platforms, depending entirely on the requirement of market forces. It will be impossible for any regulation to ensure uniform governance across audience measurements on all platforms. Any regulation skewed to only one platform measurement will be deemed to be prejudiced and will be considered as extremely irrational. Finally, even if any rulings does get prescribed by TRAI (on TAM and its present Peplemeter methodology), the same prescription should also be applied on all formats of methodology, across all forms of Media Audience Measurement and on all organizations measuring audience behavior in Media.

2. It has been stated that the TAM methodology is not in public domain and thereby casting aspersions on its transparency.

This is far from the truth. TAM, in its attempt to be as transparent as possible, have documented its workings including Methodology, Sampling process, Sample sizes, Panel Security process etc (all worked out together with the Joint Industry Body Technical Committee since 1998) and is available on its website (www.tamindia.com) for industry users reading. Every step TAM has taken to expand its panel to represent the Universe of TV viewers; it has documented the process under the name "India Peplemeter Update" and has released it to the industry for reading. The DAS Phase I and DAS Phase II changes in the panel are the latest addition that has been notified to all industry users of data. This is also available for public consumption in the TAM website.

In the last 14 years of our operation, TAM has interacted several times with various bodies to explain and demonstrate our Methodology. The

entire approach has been consultative by TAM. The Technology and Methodology used is largely similar to the International markets. In fact, the entire Panel Methodology process had been developed in consultation with various industry stakeholders, including the technical committee of the erstwhile “Joint Industry Body”. Therefore, no stakeholder can claim a lack of transparency in the TAM methodology.

The bodies TAM has interacted include the Industry data user bodies like the IBF (Broadcast Body), AAI (Advertising Body) and ISA (Marketer’s Body) as well as Govt. Ministry formed Committees like the Standing Committee of Parliament on Information Technology, Ministry of Information & Broadcasting directly, and with Dr. Amit Mitra committee on TRPs that was set up by the Ministry of Information & Broadcasting. In each of our meetings, we have made presentations clearly outlining TAM panel methodologies processes and the framework of our panel coverage on a pan-India basis. TAM has been, in all material ways, extended whatever help asked for to the bodies & committees in clarifying any doubts about the system and has also constantly been engaging with industry representatives for feedback to enhance the present system. Infact, Dr. Amit Mitra committee on TRPs released in 2011 annexed the entire TAM methodology to its recommendations. Same has been shared with TRAI too and has been attached for the reader’s guidance. We will be very happy to provide any further clarification/information that may be required by TRAI in this regard.

3. Requirement of adequate sample size, representing complete demographic profile and geography across the entire country (Urban & Rural) and in all delivery platforms. TAM falls short of this coverage.

The TAM sample size is adequate to give a reasonably precise picture of the overall level of TV viewing within its geographic and demographic frame of operation. This has been clearly defined by TAM to all data subscribers. TAM data is used as an industry currency. Different industry constituents have different needs. For example, a certain broadcaster may be a regional language channel. Within some geographic description, different programs have different demographic targets: some may target women, others kids. Advertisers within a geographic market may target, say, older upper socio-economic women in UP living in homes with a cable and satellite connection. Even at this level, the sample size provided

by TAM is reasonable. But if this target group definition was to also include a finer geographic stratum or say, presence of a digital connection, then the user may run into a sufficiency-of-sample size issue since TAM does not report any data with a sample size of less than 50 individuals in order to safeguard against misleading analysis.

The sample size has been arrived at after extensive discussions with the Joint Industry Body (JIB) and has been documented in the India Peplemeter updates available on our website. A range of factors such as expected precision, depth of analysis required, heterogeneity in the population and level of investments that the industry could make were taken into account. The approach taken by TAM was to give the industry the best possible sample size at the level of investments that the industry could make.

The current geographic coverage of TAM is:

- 1) TAM panel coverage is across All states in India except for J&K, North-East (except Assam where TAM has a presence), Andaman and Nicobar and Lakshadweep islands. These states and territories possibly represent not more than 1% of the total TV owning households in India.
- 2) Within the states we are present in, we represent viewership for the entire Urban in North and West States (Maharashtra, Gujarat, MP, UP, Rajasthan, Punjab & Haryana) while for the states in East and South, the TAM panel presently represent the Class I stratum, which is all towns with a population of more than 100,000 individuals.
- 3) We are not present in Rural India currently though there are steps to be in that stratum soon based on discussions with the industry users.

Importantly, TAM does not and has never claimed to represent the viewership of the entire country including Rural. We have been categorical that we only represent viewership for the geography we are present in.

On the other hand, we've always spoken about the need to be in Rural India. The aim to represent Rural India is important. But for this to fructify, the industry needs to also support the plan with requisite funding.

The primary reason for TAM for excluding the markets like J&K or North-East presently is the poor demand from the industry users for data from those areas as well as the higher level of security arrangements that would be required for our operations in those regions. You will appreciate that TAM's Television Audience Measurement Service is continuous year round and, therefore, a relatively safer environment to operate the expensive technology is required, and also for TAM's operations staff. Additionally, in some areas of the region, various permits would be required from the Government and Defence Authorities for TAM to carry out its operations. But if the government/TRAI is willing to support the operation in these markets, funding as well as operations, TAM will be keen to extend the coverage.

To ensure the present system accurately captures viewing habits of the people and across all sections of society adequately, a great amount of care has been taken in ensuring that the panel is representative of all households in our geographic markets who own a TV set – across all sections of society. In fact, one of the key variables used in controlling the sample spread is the Socio-Economic Status of the home thus ensuring full coverage. More details are given in the TAM Methodology document attached to this note.

TAM follows a multi-stage sampling plan, the highlights of which to ensure representativeness are:

- A) From the list of towns, a representative set of towns is first sampled
- A large town sampling ratio (~40% of all towns in Class I India are sampled)
 - Towns are selected in such a way that there is geographic spread. Census-based Socio-Cultural Regions (SCRs) is used as a town selection factor so all regions within a state are covered. Availability of Terrestrial Channels and C&S penetration in the market is also used as a town selection factor so as to take care that Prasar Bharati is not disadvantaged in any way
- B) Homes are selected within the population of the sampled towns
- Key home selection factors are used that cover geography, socio-economic status, demography and viewing habits.

One of the key indicators of the accuracy of the system is its sensitivity to stimulus changes. These stimuli could be that of the general viewing environment like distribution or power cuts or that of programming changes. Irrespective, the system has always responded accurately to these changes. In fact, it is this sensitivity that has made the industry accept and accord the data “currency status”.

TAM also ensures that the viewership of all distribution platforms including Terrestrial, Cable Analog, Cable Digital, DTH, IPTV, is being accounted for.

In fact, “type of access” Terrestrial, Analog Cable and Digital Cable, DTH is a variable explicitly used during the recruitment process to ensure that all platforms are covered.

TAM has been digital-ready right from the start. The genesis of digital transmission in India can be traced to the introduction of Conditional Access distribution systems (CAS). When CAS was introduced in 2003, TAM in association with the industry undertook a series of steps to educate the industry about digital transmission and also our steps to measure the same. This is covered in the India Peplemeter Update – III document available in our website.

Currently, TAM captures digital though state-of-the-art, Swiss-made TVM5 meters.

TAM also ensures that there is adequate transparency in selection of sample homes for placing people’s meters.

As noted earlier, the current TAM panel is a product of extensive interaction between the industry and TAM. Numerous meetings were held before the methodological processes were arrived at. This includes the methodology of selecting households for placing Peplemeters which is described in the India Peplemeter Update. Of course, given the nature of the operations, extreme care is taken to ensure confidentiality of the actual sample home list.

TAM has always been conscious of its responsibility to the industry. Accordingly:

- i) As we have always stated (including in our statement to TRAI), TAM does not take unilateral decisions. There is open and transparent dialog between industry constituents on planning and implementation.

The TAM system is itself a product of intense industry-measurement agency interaction. The Joint Industry Body (JIB) made of advertisers, broadcasters and agencies was the nodal point of contact for TAM. Decisions that TAM took on the panel were vetted with the JIB Technical Committee before implementation.

- ii) During the recent DAS Phase I implementation in Oct 2012, TAM requested for a Core Industry Committee (CIC) to be formed made of members from all three industry bodies – IBF, AAI, ISA. Post having intense discussions with them, the final policy of the post digitization panel structure was drawn out and communicated to the industry users before the release of Post DAS Phase I data. The rules agreed with the CIC were carried over to DAS Phase II data release too.
- iii) The methodology is documented in the India Peplemeter Update (available on our website) to ensure transparency in operations. We also encourage questions from the industry and from time to time hold industry-wide conventions to inform the industry. For example, our BLINK series of conventions focused on digital TV, how TAM measures it and insights from digital audience data.
- iv) TAM, to ensure that the industry users have a standard practice of data usage, compiled an advisory/guideline and issued it to all users to follow. This guideline stipulates not only the best practices in TAM data usage, representation as well as interpretation but also suggest aggregation of data periods (weeks) for small sample profiles as best practices to users.
- v) The methodology is internationally gold standard. Due to our parentage (Nielsen and Kantar) we use best international practices learning from various countries across the globe.
- vi) TAM is audited by external audit agencies:
 - a) The methodology has been audited by a respected academic from the University of Michigan, Ann Arbor, considered the modern home of survey sampling.

- b) Our data processing is audited by an Indian audit firm (that also undertakes auditing for TRAI)
- c) We have an agreement with a reputed top-four consulting firm to audit our general panel operations.

All in all, the above should provide TRAI with the perspective that the intention of TAM has and will always be to give an accurate and transparent TV audience measurement system to the industry.

4) Maintaining the secrecy of the TAM panel homes

In 2001, the Joint Industry Body (JIB) & TAM together laid down a series of security norms on the ground level as well as at the central processing level which are being followed by TAM. These are also documented in the 1st India Peplemeter update (available on our website). These Security norms have helped us to get continuous MIS from the ground on any kind of intrusion which TAM used to report to the industry body (JIB) chairperson for further action.

Post the JIB ceased functioning; TAM has been taking various steps like increasing the panel turnover (rotation of panel homes) to a minimum of 25% per annum and conducting internal panel audits.

Recently, TAM took the step of being probably the first market research agency in India to appoint a fulltime vigilance officer to safeguard the panel homes. He is an ex-Assistant Commissioner of Maharashtra Police and a President's Medal award winner with a rich experience of 22 years in the police crime detection unit. TAM is also open to additional independent professional external auditors too to help us further tighten our norms.

TAM panel today covers a vast geographical area of 225 urban towns (metros and very small semi urban towns) across the country. Given the complexity of the exercise TAM is undertaking, it is an extremely difficult task for TAM alone to police the ground continuously. Hence the prime responsibility of safeguarding the panel lies with the media industry constituents too, by ensuring none of their personnel is engaged, directly

or indirectly, in trying to compromise panel security, as much as on TAM. TAM seeks help from industry bodies to frame a self regulation for its members with penalties for any breaches as well as from institutions like TRAI to frame a stringent law on any industry member for breaching the TAM panel home guidelines.

5) Mechanism to handle complaints from the users of TAM data

TAM, in order to help the industry data users address their concerns & complaints about TAM data, has constituted an independent 'TAM Transparency Panel' (TTP), which has started acting as an ombudsman to TAM's clients for any grievances. Any client who is dissatisfied with TAM's explanation on a query posted to TAM can approach this panel to probe deeper into their queries. This six member fully functional panel is headed by person of eminence, Mr. M. Damodaran, earlier Chairman of Securities and Exchange Board of India (SEBI) and UTI. The panel also consist of members of repute from not only Indian media and research world, but also from the international markets – Mr, Chintamani Rao, Independent Strategic Marketing and Media Advisor with years of experience in Broadcasting and Advertising, Mr. Giovanni Fabris, an International expert on Media Research and Audience Measurement with global experience, Mr. Ivor Millman, with experience in the development of audience measurement industry bodies like JICTAR and BARB in UK, also was part of the BARB Board, Mr. Praveen Tripathi, from IIT Kanpur and IIM Ahmedabad, involved with media research, consumer research and market modelling, Ms. Sheila Byfield, a Media research consultant from UK, Chair of the European Association of Communications Agencies Media Research and was a Global Director - Research and Insights, WPP. This is one of the very first such initiative driven by a Market Research firm anywhere in the world. While the TTP panel has been familiarized with the TAM operations, it will operate at an arm's length to TAM. It will act as a true ombudsman to the TAM clients whose issues have not been resolved by TAM directly. A guideline for industry data users; not satisfied with the response from TAM and wants to consult the TTP members, have been attached to this document too.

6) Disclosure of well laid out practices related to use of ratings data

Here too TAM has published a full guideline on Data Usage, Representation and Interpretation. It is an advisory guideline requesting all users to follow it. TAM has also written to the industry bodies – IBF, AAAI, ISA, requesting them to ask their members to adhere to the guidelines. Beyond this, since TAM being a Research organization, is incapable of policing the users who violate the guidelines, we have requested the members to bring any violations to the notice of ASCI, Advertising Standards Council of India. It also suggests aggregation of data periods (weeks) for small sample profiles as best practices to users.

On the issue of full disclosures by any TV Audience Measurement firm to industry data users or in public, TAM believes that this disclosure should be restricted to a panel of independent trustworthy not-active professionals belonging erstwhile to the field of Research/Broadcast /Advertising/Regulation/Audit where such disclosures will be for evaluations as well as improvisations. The confidentiality of the disclosures will be maintained. Confidentiality will be paramount as there are patented processes and procedures which would be proprietary to a specific TV Audience Measurement organization built over time with learning and investment. Proprietary methods are critical to research and form a basic part of its Intellectual Property Rights. Based on a subjective opinion, making proprietary information/reports public effectively destroys the agencies' competitiveness and is a deterrent to transparency. TAM has already taken the initiative by creating a "TAM Transparency Panel" (TTP) constituted by members from Ex-industry professionals, based out of India & International markets. Their names and profiles are attached to this document as annexure. TAM has already made them aware of the entire backend processes and will be implementing any of their suggestions for improvisation in future.

7) Ownership pattern of ratings agencies - Crossholding in TAM

In 1998, when the Joint Industry Body (JIB) decided to award the TV Audience Measurement exercise to a Nielsen-IMRB jointly owned independent company called TAM Media Research, the industry members clearly knew that one of the parent company of TAM Media Research, IMRB (was India's largest Market Research firm), belonged to

the WPP group owning Advertising and Media Agencies. This ownership was never viewed as a hindrance by the JIB members in asking the Joint Venture organization to conduct TV Audience Measurement in India. It has also never been perceived as a threat by any users of TAM. This is because, WPP's global Media Research firm, Kantar Media Research, does TV Audience Measurement in over 35+ countries and never has any country raised any objections to Kantar's ownership of TAM services across the globe.

In India, TAM Media Research has provided the TV Audience Measurement service for 14 years and no specific client has questioned its ownership interfering into the service or data received from TAM Media Research.

TAM Media Research as always is proud to display its parentage as being the two global Media Research firms – Nielsen and Kantar Media Research (owned by WPP, involved largely with Advertising & Media agency business). We have also publicly stated the ownership of TAM Media Research as a 50:50 JV between the 2 parent organizations. This fact has never been hidden.

The important thing to note is, TAM Media Research is not owned by any Broadcaster and neither of the two parent organizations have any ownership of TV Broadcast organizations in India.

TAM believes that the stated cross-holding has no significant role to play in TV Audience Measurement exercise. If so, when TAM faced competition from other similar service providers for all the years from 2004 to 2011, the subscribers of TAM could have easily switched to the competitive service provider! Finally, the quality of the service provided and comprehensiveness of the panel coverage is the decider for selecting the service provider by a user of the data.

At the same time, creating such a cross-holding restriction will tend to restrict global organizations from offering its services in India and also reduce the level of competition in the ratings business. This conflicts with the avowed objective of the Authority to promote competition.

We would recommend that the authority should focus on full and complete disclosure of the ownership patterns of ratings businesses so

that subscribers of the ratings services are aware of the implications of subscribing to one or the other service provider (the principle of *caveat emptor*). Full-disclosure will help uncover any 'phantom owners' behind the rating businesses.

Section III. Final Perspective

Recommended Model to be followed in India

TAM strongly recommends that the industry body like JIB or BARC be the only body to supervise Audience Measurement needs of the Media Industry. There is no role for the government to in bring new regulations in this sector.

The laying down of guidelines by the TRAI or government is again not a requirement. This is because, TAM, like any other TV Audience Measurement agency round the globe follows a clear set of guidelines stipulated by GGTAM - GLOBAL GUIDELINES for TELEVISION AUDIENCE MEASUREMENT. These set of guidelines are produced by Audience Research Methods (ARM) Group and is sponsored/published by European Broadcasting Union in collaboration with the following international organizations:

Advertising Research Foundation (USA)
Canadian Advertising Research Foundation
European Association of Advertising Agencies
European Group of Television Advertising
European Media Research Organizations
European Society for Opinion & Marketing Research
Group of European Audience Researchers
Pan-European Television Research Group
World Federation of Advertisers

GGTAM is universally regarded as the best set of guidelines for any country or body or organization involved in TV Audience Measurement system. TAM and our parent companies Nielsen and Kantar Media Research operating in over 85+ countries round the globe follow these guidelines set by GGTAM.

GGTAM sets down 10 key guidelines for the TV Audience Measurement agency to comply. We have listed down these 10 guidelines along with the TAM's compliance to the same.

TAM's endeavour is to provide the industry constituents with valid and reliable data on Television audiences. By valid we mean that the measurement system employed to measure Television audiences actually measures what it purports to measure. By reliable, we mean that the measurement system would yield very similar findings if independently carried out a number of times. To deliver to this endeavour, TAM's has worked continuously to progress on the Methodologies employed, Technology used and Up-gradations in User SWs that has primarily helped in not only reflecting the changing dynamic market place but also the growing needs of user across the Broadcast and Advertising constituents.

TAM operation draws inspiration from the commonly followed GGTAM recommendations. We follow the key operational guidelines that are based on ten over-riding Principles:

- Meeting total marketplace needs

TAM's vision as charted on day one of its operation, is to measure TV Audiences engagement with the medium on a All India basis – Urban as well as Rural India. Today, we have come a long way of covering the Urban India market place. With the backing of the industry bodies, TAM will be able to realize its vision that it set out to do in 1998, in a full manner.

- Effective industry consultation

Till 2005, when the Joint Industry Body (JIB) used to exist, TAM used to regularly dialog with the JIB Technical Committee. Post that, TAM has been interacting with individual industry bodies and with industry consultative committees formed as and when required (like in the DAS implementation phase in 2012). Now with the BARC formation, TAM could like to extend all support to its Technical committee and restart the exercise of a consultative approach as part of a future roadmap.

- Full disclosure

Full detail of methodological procedures is not only available to all our TAM subscribers via our annual India Peplemeter update reports uploaded on our website www.tamindia.com but also the full TAM Methodology report has been annexed in the Amit Mitra committee report available on the Ministry of Information and Broadcasting website.

- Optimal resource allocation

All available Research resources for TAM over these years were deployed effectively to take into account the Industry constituent's need for enhanced coverage of the market place in terms of additional Markets.

- Scientific method

TAM's objective has always been to deploy the best of Technologies irrespective of the source of the Technology at a reasonable price. In that, its two parent companies have always helped in fulfilling the Indian market needs by making available the latest in Peoplemeter Technology to TAM at global comparative price levels. TAM has ensured the localizations needs of these global technologies and deployed them in tough ever changing ground environments to ensure continuous delivery of data to industry users. TAM wishes to point out that in its 14 years of operations, in each of the week, TAM has managed to always deliver data to the industry.

- Best Research practices

Being a part of two global Research firms, TAM's Research practices are in sync with our global parent company practices. In some of the areas, additional local practices have been incorporated to aid Data Collection, Validations and Reporting. Crucial areas like Weighting and Outlier management have been further validated/audited by international experts. Further to this, recently TAM has even created a Transparency Panel consisting of International Research experts as well as Indian industry members to aid in closer working with the Industry bodies.

- Quality control

Systematic quality control procedures get carried out in each of the areas before data is reported to the industry users. TAM system follows relevant international Codes of Conduct established by ESOMAR.

- Maximizing response

Since the objective of the panel has been to elicit good response to the TV measurement, TAM has rarely accepted rider questions on the panel inspite of strong requests from industry members. The burden placed on TAM respondents is strictly minimized in the interest of high response rates, minimum exposure to bias and towards the gathering of valid and reliable information. Equally, TAM has tried it's best in keeping the respondent's right to privacy and confidentiality respected at all times.

- Equal access to data

TAM has ensured across all these years that the access to the trading data remains common to all user groups. This has ensured even trading conditions between buyers and sellers of TV airtime. All these have happened at relatively low cost to the user.

- Methodological experimentation

Over these years, TAM has successfully experimented in quite a few arenas to deliver more reliability as well as value to users of TAM. One of the biggest exercises was to create a sub-panel of Elite TV homes in 2 Metros of Mumbai and Delhi. Besides this, TAM has implemented quite a few path-breaking work in using new methodologies in Baseline Sampling, Respondent compliances, Weighting, Outlier Detection etc.

Using the above GGTAM guidelines, an industry body could well set the norms for any media research organization to operate in the audience measurement research exercise.

For all other recommendations on Methodology, Sample Size, Establishment/Baseline studies, Panel Rotation etc. TAM has already discussed it with the Dr. Amit Mitra Committee. Much of the same has been recommended by the committee in its report and should be followed along with the funding of the panel expansion via a governed industry user body like BARC.

Internationally, industry bodies are an effective way of ensuring that a reliable system is in place. However, an industry body's recommendation of a rating agency does not prevent other organizations from conducting research in the area of Television Audience Measurement. The freedom of market researchers is safeguarded in article 19 of the UN Covenant of Civil and Political Rights safeguards the freedom for market researchers to seek, receive and impart information, two of the main ideas being:

a) Everyone shall have the right to hold opinions without interference.

b) Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.

Any restrictions, therefore, on the conduct of market research which is not to protect public order, public health or morals, could be considered as an infringement of basic rights protected under the UN charter.

Additionally, the market research industry has its own codes viz. the MRSI Code of Conduct and the ICC/ESOMAR International Code on Market and Social Research that is followed by TAM. With all this, it is difficult to see why government oversight/regulation is necessary.

Hence, only an industry-based oversight system will have an inherent system of checks and balances to ensure reliability.

Besides the above perspective on governance of the Audience Measurement System, we strongly advocate the following points too:

- a) Full-disclosure of the ownership patterns of ratings agencies so the industry is fully aware of the implications of buying into such a service. However, shrinking the industry by restricting a serious and reputed agency from operating just because it has cross-holding will be counter-productive
- b) Myths and misconceptions about the ratings system prevail. One reason for this is that it is a highly specialized field, having its own technology, methodology etc. The task of decoding for the users must be left to professionals within subscriber companies
- c) Right now, it appears that the Television medium is the only one brought under scrutiny. It is unclear why this must be so. If any regulations are being proposed on audience measurement companies, it should be across for all Media audience measurement companies. TV alone shouldn't be singled out.

We do hope that the Authority does consider our arguments put forth in this document and include it in their draft recommendations. If any further clarifications are required on any of the above, we welcome an opportunity to discuss this.