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.

Ans 1. Any form of television measurement on the back of a finite sample (which in fact is less than 1% of the represented universe) is bound to fail in serving the primary objective of a purposeful representation. Furthermore, in light of the new Tariff Order, the entire premise of the ratings system has gone faulty. Any form of TV buying on the back of the existing ratings' sampling does not hold, as the 196 million C&S homes in India are already choosing different channel packages – running into tens of thousands of combinations. The overall availability of Pay channels has already dropped by 79%, FTA channels by 49% *(Disclaimer - This is the overall average across urban and rural India. The connectivity drop / gain will differ for individual channels and will change across the weeks to come where in some channels, especially FTA have even seen a growth in their relevant markets and TGs – DD for example has gone higher in its reach across India in line with the Government mandate of being part of the Network Capacity Fee - Source: Chrome DM, week 8 compared to Chrome DM, week 4)* and none of which is captured in the existing system, as packages are not being part of the current ratings system. Also, the sampling criteria which functions on demographics does not factor the distribution landscape which again leads to monumental aberrations in representation.

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.

Ans 2. There needs to be an independent body to validate the ratings data. Also, a significant representation from the MSOs/ DPOs footprints is required to keep the checks and balances in place to promote new technologies, as the entire landscape is a function of availability across 5800+ cities & 6,00,000+ villages.

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.

Ans 3. There are over 36,000 changes every single week across the 3300+ child feeds of the 1000 unique DPOs feeds in India (by way of changes in LCNs and switch OFFs and switch ONs of individual channels). Ideally there should be ONE currency to ensure some level of consistency, however there is a serious need of a supplementary agency / independent body to validate the ratings data on daily basis as part of the system. Also, the DPOs too need to have a huge amount of representation in the system, since the entire business of linear TV depends on the distribution chain unlike the OTT platforms.

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

Ans 4. No, the data captured is based on the audio output of the TV set whereas research suggests that 36%+ viewership is completely passive, there are many instances where the TV is muted in places like offices, restaurants, shops, and even homes etc.

Current demographic profiling is incorrect as it is an unrealistic expectation to get sample to manually select the appropriate button on the remote to identify themselves and that too each time they watch TV - which in turn leads to inaccurate information. Respondents would conveniently press the all button or would not press any button at all, leading to wrong demographic extrapolation…

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?

Ans 5. Any ratings panel will always ONLY respond to entertainment / or entertaining content – A GEC channel would get exponentially higher ratings compared to a News channel at any given point in time, as a result of which many small news channels end up airing entertainment in the name of News. Similarly, DD a non-tabloid national broadcaster does not rate/ and will never rate on any sample-based ratings panel. News channels airing entertainment content, and spicing up content to garner eyeballs under the title of 'breaking news' are in fact dumbing down the audience instead.

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

Ans 6. No, there are multiple combos being rolled out by the Broadcasters, DPOs and variants of the same - earlier were an average of 5 packages, which has moved to over 5000 combinations post the NTO implementation. Expecting a panel of 30,000 to represent a market with 200 million TV homes across 22 languages and 5000 plus combinations of channel offtake – is unrealistic.

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

Ans 7. It is estimated that at any given point in time there are over 30 channels which are actively involved in tampering the people metered homes. It is absurd and preposterous to assume the secrecy of 30,000 meters in a country of 1346 active channels (TRAI registered 864 channels) of which 310 are news-based channels, many of which are non-serious players.

Corporates and ethical broadcasters will always be at a disadvantage relatively to the smaller players who tend to exploit the system. The idea of secrecy cannot survive more so when there's a physical device involving human intervention for maintenance & installation.

Suggestion:
The technology should have 100% tech integration (automation) with zero manual intervention right from data collection, post auto tuning the STB box, till the final churning of the report with second by second image capturing of Live data consumption including date/ time and geo tag stamp. The panel base should factor all unique feeds/ packages by market/ strata with an equal dispersion across all NCCS groups.

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

Ans 8. Any form of sampling, which is prone to be exposed or is in fact already exposed is not practical. The only way out is a logical conversion and trends married to national level data i.e. distribution.

The distribution landscape should definitely be part of the selection criteria with the panel home having a fair representation of each unique network feed breaking down to multiple package combinations being opted for by consumers.

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?

Ans 9. IRMAI (Image Recognition via Machine Learning/ AI) with fair representation of census having equal dispersion across the distribution landscape.

The rating data which is a decent representation of the content affinity needs to be married to a daily supplementary ground census-based data. There will be no commercial challenges as long as there is one primary agency and one supplementary agency – both operating in independence of each other to validate each other.

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.

Ans 10. Yes, DPOs should be mandated to do so along with and independent 3rd party involvement to collate & audit the data.

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.

Ans 11. The reverse data path is a long process from a scalability point. With the existing constraints, the only option is distribution representation married to the secondary variables.

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

Ans 12. Encryption at the panel home level with unique coding – as long as the sample runs into millions making it tamper proof – which is commercially not viable.

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?

Ans 13. As long as the location of the respondents does not get leaked / identified in the process, any information is good.

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

Ans 14. 100% automation with zero human intervention from data capturing till the final delivery will ensure zero infiltration – which is not practical as long as an external physical device is installed at panel homes. The only option being to use the rating data (representing content affinity) married to ground data on a daily/ weekly basis.

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?

Ans 15. Not applicable as long as the representation is not correct – 5000 combinations of packages cannot be represented by even 500,000 panel homes. The solution being using the rating data (representing content affinity) married to ground data on a daily/ weekly basis.

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?

Ans 16. Same as 15

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

Ans 17. Yes

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

Ans 18. – -