

February 15, 2019

By Email and hand

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawaharlal Nehru Marg
New Delhi – 110 002

Subject: Response to the TRAI's Consultation Paper on 'Review of Television Audience Measurement and Ratings in India' dated 3rd December, 2019

Kind Attn.: **Sh. Arvind Kumar, Advisor (B&CS)**

Dear Sir,

We thank TRAI for the opportunity to express our views on the above captioned consultation paper. Tata Sky's response to the same is enclosed for your ready reference.

Thanking you.

Yours faithfully,



Himavat Chaudhuri
Chief Legal & Regulatory Affairs Officer

Encl.: As above

TATA SKY'S RESPONSE TO THE TRAI'S CONSULTATION PAPER ON 'REVIEW OF TELEVISION AUDIENCE MEASUREMENT AND RATINGS IN INDIA' DATED 3RD DECEMBER, 2018

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.

BARC is not transparent regarding sharing the methodology and the representation of the panel home amongst the various platform types.

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.

Ideally, the BARC shareholding body, presently comprising of Broadcasters, Advertisers & Agencies should also include members representing the DPO/DTH platform body too.

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.

- Yes, multiple rating agencies need to be promoted.
- The underlying policy framework should allow for multiple rating agencies.
- Competition would bring in new technologies, new research methodologies, new methods in analysis, new and better ways to ensure better data quality
- For example, for the financial sector we have multiple rating agencies CRISIL, ICRA, CARE.

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

- There is an under representation of DTH customers amongst the existing panel homes and BARC has taken no steps to publish a list for transparency.
- The representation of HD homes also needs correction.
- The TAM Ratings should be based on a sample which should be representative of the industry based on Town and Town Class i.e. DAS 1, DAS 2, DAS 3, DAS 4 and SEC A, B & C and technologies (DTH, Cable, IPTV etc.). All segments of consumption whether demographic or technology should be captured.

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?

Yes, BARC should share the raw level data, after suitably anonymizing it to securely mask the identity of the individual household. It should be available to any subscriber (including DPO's) who wishes to subscribe to it at a nominal cost.

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?

- The MIB guidelines mandate secrecy and privacy of the panel homes.
- The raw level data can be anonymized, to comply with the MIB mandate.
- Sharing such anonymized raw level data will not contravene the policy guidelines.

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 reporting is limiting in nature. The current reporting level is as follows:

- All India
- Top metros
- Zonal level
- Urban
- Rural
- Population strata: - Below 75L | 10-75L | Below 10L

We need following additional levels of reporting:

1. DAS wise – Phase I, II, III, IV
2. Definition wise –SD/HD
3. Platform wise – Cable, DD Free Dish, DTH (Operator wise)
4. More sample at each population strata so that we can get data at city (top cities) level too
5. NCCS detailed cuts (12 cuts)
6. LC1 (50K-1L)
7. LC1 (<50K)

Also, BARC should publish the samples at every reporting level in its data, which will help users to qualify the accuracy of the reported data while using it for decision making.