Comments on AMVS Study for the European Commission, DG Information Society and Media

Measurement of the volume of European Television production in the future

Having both attended the recent seminar in Brussels and subsequently reviewed the materials provided, Madigan Cluff has the following thoughts on future measurement of programme content in and across Europe

- Current processes for all measurement of programmes would be significantly more accurate if there was a single common database utilised to be clear on the country of origin of programmes. There clearly already exist sources such as Essential Television Services which hold multi-national data, and would seem that it is important that this type of data is more readily available and utilised to ensure accurate statistics. In addition there should be clear metrics to define how a programme is classified to a country of origin

- These processes will only become more important as non-linear services (catch-up/ video-on-demand) become an increasing proportion of total television viewing – where the number of programmes available will increase without necessarily easy access to the information on their origin

- The proposals set out on the 18th November for non- linear feel to us to mislead the opportunity to measure digital download. Although we understand the desire for this to be a light touch regime with compliance not requiring the transfer of large volumes of commercially sensitive information from broadcasters - we have significant reservations on the priorities placed. Specifically:-
    - As presented a straight count of the material held in a download library will give very little reliable information on the real volume of viewing of titles. From current data it is clear that a small proportion of titles will have the majority of viewings
    - The reliance within the report on reviewing the websites of providers to obtain a view of the prominence they give to titles is we believe potentially deeply misleading. The nature of good website design for interactive users should be to vary front pages (and subsequent pages) so that the individual consumer sees material which they are more likely to buy or use. Where a company has access to consumer data (in this case the programs the user is actually viewing) they can use this data to individualise the users front and navigation pages to his/her actual behaviour. This makes inaccurate any one off external viewing of the site. Additionally the web front page is only one aspect of the promotion of programmes to the consumer, with most companies using e-mailing, on air promotion and other forms of direct marketing to their consumers. We think it is very difficult to imagine that any accurate information can be gleaned on the prominence of promotion
    - The study appeared to not accept the use of spider technology to understand what is happening on sites. This technology is in widespread use across the web monitoring business and although there may be untested copyright issues, most companies in the web metrics business use it extensively
    - The underplaying of potential audience data was very surprising. There are clearly challenges within web measurement as to the most accurate source and standard of information. However there do exist very clear potential points of measurement. At an overall global level suppliers like Nielsen Netratings and ComShare provide

overall data with panel sizes massively bigger than comparable TV peoplemeter systems. It is acknowledged that there are limitations in the ability of this data to differentiate web applications which are run by very low proportions of the population, but they will give an accurate view of the total non-linear market and the constituent companies within it. Equally all providers will hold server based data which very accurately shows what was provided out to consumers. This data does not absolutely say that the consumer was exposed as it may have been hidden by another window as it played. Howeevr this issue is really only the issue the media measurement business has always had that with peoplemeters that you don't know if the person was in the room when the TV was switched

There will exist numerous ways in which this data can be explored without creating either complexity or commercial confidentially issues for stations/ VOD services. Given that a small proportion of the programmes will be the bulk of the audience if the broadcaster declares the names of the top programs which constitute 50% of viewing, the central authority can code these programs for country of origin and then request the broadcaster to provide share of viewing by country of origin to these s programs in total

Over the next two/ three years there are other interests within the television industry which are likely to promote the need for audience standards. It will be in the interests of all broadcasters who carry advertising on downloads to have an audience performance standard in order to maximise advertising revenue, and equally the sale and licensing of programs between production houses and broadcasters will need consistent reference points. It strikes us that AVMS should be aiding the development of these processes which are in the interests of a vibrant European production industry – not suggesting that these are difficult to do

Overall we believe that there is an opportunity to help lead the need for accurate information and data, which is as yet unfulfilled in the proposals