

31 August, 2025

Ministry of Information and Broadcasting
Shastri Bhawan
New Delhi

By email: sobpl-moib@nic.in

RE: Proposed amendments to the Policy Guidelines for Television Rating Agencies in India

The Asia Video Industry Association (AVIA) is the trade association for the video industry and ecosystem in Asia Pacific. It serves to make the video industry stronger and healthier through promoting the common interests of its members. AVIA is the interlocutor for the industry with governments across the region, leading the fight against video piracy, as well as publishing reports and hosting industry conferences. It aims to support a vibrant video industry for the benefit of all stakeholders. Our membership consists of a combination of local, regional and multi-national companies, many of which are substantial cross-border investors; creating and purchasing video content to meet rapidly-expanding consumer demands and investing in India's communications and creative industries.

AVIA notes the Ministry of Information and Broadcasting's proposed amendments to the Policy Guidelines for Television Rating Agencies in India announced on 2 July, 2025. We welcome the Ministry's stated objective of these amendments is to enable fair competition, generate more accurate and representative data, and ensure that the Television Rating Point (TRP) accurately reflects the diverse and evolving media consumption habits of viewers. This, in turn, should encourage investment in new technologies.

However, we strongly recommend that the Ministry takes this opportunity to ensure that robust safeguards are established in order to maintain credibility and integrity of audience measurement in India. In this regard, we would highlight the following points for consideration for inclusion in such safeguards:

- To ensure measurement objectivity and prevent data manipulation, clear protocols should be established for managing conflicts of interest when rating agencies have significant investments from measured entities. At a minimum, these protocols should include the requirement for full public disclosure of ownership structures, crossholdings, and affiliations. Additionally, stringent technology and security checks should be deployed in order to safeguard data integrity.

- AVIA notes that the 2014 guidelines already mandate regular internal and third-party audits of measurement methodologies and systems. We recommend that this requirement be reinforced by mandating timely publication of audit findings in the public domain, along with clear action plans to address any gaps. This will ensure greater transparency and trust in the measurement process.
- Mandatory comprehensive transparency and disclosure standards should be considered, requiring rating agencies to publish detailed panel composition, sampling methodology, and data collection processes. The Ministry should set minimum sample thresholds and geographic distribution requirements for accredited agencies, and include provisions for periodic panel changes, robust audit mechanisms, and transparent outlier-handling algorithms.
- We recommend the adoption of a tiered accreditation system with unified measurement standards that new entrants must meet before being recognised as authorised rating agencies. This framework may include regular compliance audits, performance standards, and penalties for non-compliance.
- Financial disincentives, including penalties for not meeting sample size targets, (including cancellation of registration) should be implemented to ensure compliance
- Finally, AVIA recommends that the MIB consider the creation of an independent ombudsman or statutory grievance cell specifically for television audience measurement disputes, with the authority to investigate complaints, mediate disputes between rating agencies and industry participants, and impose corrective measures when necessary in adherence to response timelines.

Including these proposed safeguard measures will help to ensure that the Guidelines for Television Rating Agencies remains fit for purpose, enables consumer confidence in the product and delivers a product which supports business needs.

Yours sincerely,



Clare Bloomfield
Chief Policy Officer