Docket. 95-42

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September 22, 1989

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By: Hand Delivery

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Request of A.C. Nielsen for Permissive Authority to Use Line 22;
FCC Public Notice DA 89-1060.

Dear Ms. Searcy:

Enclosed for filing on behalf of A.C. Nielsen Company ("Nielsen") in the above-referenced proceeding is a letter to Mr. John Dimling, Executive Vice-President for Nielsen, from E.R. Plowden, Assistant Director of Media for the Procter & Gamble Company ("P&G"). We believe the Commission should consider Mr. Plowden's comments in light of prior correspondence P&G has provided to the Commission regarding this matter.

Any questions regarding this matter may be referred to the undersigned.

Sincerely,

Grier C. Raclin

cc: John C. Johnson, Jr., Esq.
Bruce H. Turnbull, Esq.

THE PROCTER & GAMBLE COMPANY
ADVERTISING DEPARTMENT
1 PROCTER & GAMBLE PLAZA, CINCINNATI, OHIO 45202-3315

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September 20, 1989

Mr. John Dimling
Executive V. P.
Nielsen Media Research
1290 Avenue of the Americas
New York, NY 10104

Dear John:

This is a follow-up to our recent conversation and also to Ward Woodhead's September 20 letter regarding the controversy between A. C. Nielsen's and Airtrax' uses of the VBI line 22.

Procter & Gamble does not elect to intervene further in this subject with the FCC. P&G, however, has a major interest in seeing that all parties, including others than Nielsen and Airtrax, which can provide good electronic reporting of line-ups and commercial monitoring have a fair and equal opportunity to use the public airways for such purposes. This is P&G's fundamental position on the subject. I will elaborate on the reasons for this position.

Procter & Gamble has always encouraged top quality and constantly improving television audience measurement. We expect to continue to do so, because our business importantly depends on the use of broadcast for advertising. If we do not have adequate audience measurement, P&G does not have a qualified basis for targeting commercials to a wide spectrum of consumers of our products. Moreover, we do not know what value we're getting for the advertising cost investment we make. Sound audience measurement is extremely important to our best marketing efforts.

Over the past several years P&G has actively urged Nielsen to improve the timeliness and accuracy of its national syndicated programs ratings. We and the vendors have found it difficult to conduct business because there have often been enormous delays between syndication's exposure of various episodes and valid ratings being delivered. This holds up the process of paying our bills and of knowing that our advertising reached the appropriate consumers. One of the fundamental problems in achieving sound syndication ratings on a timely basis has been the absence and/or delay of correct station-by-station line-up airing times for the various syndicated programs. Nielsen has made substantial improvement in the past couple of years in this area through the use of AMOL for electronic monitoring of the programs airing. There are still a number of deficiencies in this system.

We think Nielsen's decision to move from line 20 to 22 for AMOL could significantly improve the timely and correct syndication line-up information and bring it up to the standards of the interconnected networks. Therefore, more accurate ratings for syndication would result. This would be a healthy thing for syndication, and the whole advertising industry.

We are aware that Nielsen is the only company in the U.S. with staff and technical expertise currently in place to provide national syndicated program ratings. Airtrax is offering a substantially different service which is that of monitoring a correct airing of individual brand commercials. Both functions can meet industry's diverse needs. We understand that line 22 can be technically used by one service without foreclosing it to another service.

We wish Nielsen success in providing better line-up data - and therefore - better ratings for syndication!

Best regards,

E. R. Plowden
Assistant Director of Media

ERP:fs(613)

cc Mr. J. W. Van Cleave
Mr. W. M. Woodhead - A. C. Nielsen

THE PROCTER & GAMBLE COMPANY

ADVERTISING DEPARTMENT

1 PROCTER & GAMBLE PLAZA, CINCINNATI, OHIO 45202-3315

September 20, 1989

Mr. John Dimling
Executive V.P.
Nielsen Media Research
1290 Avenue of the Americas
New York, NY 10104

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JAD

Dear John:

You may feel free to disclose the attached September 20 letter from me directly to the FCC if you think it would be useful to the FCC regarding their deliberations on your petition to use line 22 of the VBI for AMOL line-up information. We prefer not to contact the FCC further on this matter.

Best regards

E. R. Plowden
Assistant Director of Media

ERP:fs(613)

cc Mr. J. W. Van Cleave
Mr. W. M. Woodhead - A. C. Nielsen