TRA

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FCC Mail Room

September 16, 2009

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
c/o 9300 East Hampton Drive
Capitol Heights, Maryland 20743

In re: MB Docket No. 08-187

Dear Sir or Madame:

Please accept this letter as a statement of our company's position with respect to the Federal Communications Commission's subject proceeding. We support Arbitron's Portable People Meter ("PPM") service, for the reasons set forth in this letter.

TRA, Inc. is a privately-held marketing media research company which began full-scale operation in August 2007. Although we are a young company with about 25 employees, our clients are among the largest advertisers, agencies, and television networks in the world. Our investors include the world's largest advertising agency group WPP as well as Arbitron among others. The reason for our early success is that TRA meets a need that has long existed which is to be able to measure the actual sales results of television advertising. We do this by licensing media viewing data collected by others and providing a business intelligence software solution to our clients such as CBS.

The insights gained from our system will only be useful if we maintain the highest standards of accuracy in the data that we license into TRA's software system. It is for this reason that we are writing to you today to express our concern for the kinds of radio information that the industry will have available in the coming years.

In contrast to the diary method for recording and reporting radio station audience listening behavior, the PPM data provides much more detailed and current insight into that behavior; for example, the ability to track a panelist's tune-in/tune-out conduct on a minute-by-minute basis, which allows for the evaluation of whether a purchase was made after exposure to a radio commercial or not. This is preferable to self-generated reports from diary-keepers, who do not always faithfully record their actual listening experiences, whether from misremembering, or writing down what they usually listen to but what they in fact didn't listen to on that particular occasion, or for other reasons.

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Inspection of actual diaries is the best way to truly understand the enormity of the difference in quality between the diary and the PPM. If you look into actual diaries you will see that whole pages are often filled with a single entry of listening for a very long time period – when it is likely that the listener was in and out of the room for large blocks of time which could have been the exact moments that the specific commercial run by e.g. P&G aired.

It is also obvious from the ink and penmanship one sees in diaries that diaries are often all filled out at the end of the week – where page after page has similar entries for large blocks of time all in the same ink or pencil color with the same penmanship exactly. The number of different radio stations which get credit in the diary is a far smaller number than the number of radio stations that get picked up during the same length of time in a PPM. The difference in methodology is literally between a 19th century methodology and a 21st century methodology.

It would be very unfortunate for the radio business if while Internet and television and even outdoor and other media are being measured increasingly by extremely modern methods, that radio fell behind in this regard. Radio station executives might be taking a very short term view in resisting change to PPM today without realizing what the long-term damage could be. Reasons for resisting change in general are well known, it involves retraining, extra effort, extra cost, perceived risk. As in any new methodology there will be temporary difficulties that are well within the range of available techniques e.g. assuring that minority groups are represented, etc. As fellow practitioners of media research we believe that the steps that Arbitron is already taking to correct for its deficiencies in this and every other regard are appropriate and will be effective. We do not see Arbitron as a company or its PPM product specifically to be in any way a standout from industry norms in terms of care and accuracy in fact quite the opposite, both the company and the effort which has gone into perfecting the bold new technology have been above industry norms.

If the FCC were to take steps that have the effect of discouraging PPM measurement as a technology, it would be a disservice to our industry.

Sincerely,

Mark Lieberman
Chairman/CEO