

CBC/SRC Position on CMF Digital Media Measurement Framework

CBC/SRC continues to support the CMF's efforts to develop a performance measurement system for Digital projects. We recognize how difficult it has been up to this point and we appreciate the lengths to which the CMF has gone to consult with the industry on this question. In that spirit, CBC/SRC would like to take this opportunity to elaborate on its position on the process as it stands now.

Given the importance of allocating digital funding on an equitable basis and the requirement that the various stakeholders recognise the validity of the process, CBC/SRC believes that the Digital Media Measurement Framework must be Verifiable, Relevant and Reliable.

Verifiable

In order for all stakeholders in this process to have sufficient confidence in what the data is saying and so that, ultimately, funds are allocated properly, the Digital Media Measurement Framework needs to be verifiable.

CBC/SRC is in favour of a single common measurement system for all projects. The most important step to reducing complexity and developing confidence in the process is to settle on one common measurement system. Despite the fact that most analytics system function in a similar way, there are frequently subtle differences in the way they report data. Reconciling data between two analytics systems will add yet another layer of complexity to an already complicated framework. Of the two proposed, we would recommend the Comscore system rather than Google Analytics. We have concerns about sharing data with a free system with which there is no contractual relationship and we believe that it is preferable that the company providing the measurement solution have a stake in the process. These considerations make Google a less desirable choice than Comscore.

Furthermore, access to the data collected in the tool needs to be given to publishers on an ongoing basis so that they can confirm that data being collected is consistent with their internal measurement system. That way, publishers should be able to identify potential measurement issues early on in the project – in time for corrections to be made. Moreover, any errors or corrections should be disclosed to other broadcast participants in the system (in the same way as TV audience metrics are) so that the numbers can be verified by interested others in the system.

Relevant

In order for the DMMF to be relevant to the Digital Content Producers, CBC/SRC would like to reiterate its recommendation that the metrics and KPIs be reduced and simplified. The only metrics needed to measure the majority of web-based projects are Unique Users, Views (page and/or video) and Time Spent.

We consider the other enumerated KPIs to be tactical measures that are best used to help content producers understand how their sites are performing, not performance measures as such. We believe that the CMF should identify the performance metrics that content producers are meant to grow, but should not tell content producers how to do so. Evaluating projects on the measures listed above will still be a complicated task, but we can envision a reliable system of evaluation built on that framework.

We further believe that the CMF should not try to implement the Digital Measurement Framework for all Digital initiatives at once but instead should proceed incrementally. Making comparisons between websites, mobile products, social media strategies, video games etc. is an exceedingly difficult proposition especially since we are living in a rapidly changing technological world. The CMF has acknowledged that has not yet been able to settle on a system to measure apps anyway. If the CMF tries to measure everything, we believe they will not succeed in measuring anything.

Therefore, the CMF should limit itself to measuring web-based projects in the first phase. Then, once that is reliably established, it should be possible to extend it, with appropriate modifications, to newer technologies.

We understand that the CMF will be under pressure to use this framework to measure all the digital projects it supports – not just the web-based projects. However, we believe that it is important for the CMF to recognise that digital measurement is an ever-evolving discipline. The DMMF will not succeed if it tries to do everything all at once. It needs to establish that it can reliably measure websites before expanding the framework to other platforms.

Reliable

Given that this Framework will be the basis for allocating CMF funds, its most important attribute must be its reliability. At this time, CBC/SRC has significant concerns about the reliability of the data upon which the CMF's measurement system will rely. At this time, the process seems to be for the producers/publishers put tags on the page and wait for data to be collected. We understand that the DMMF is in an exploratory phase, however, before the framework could be considered as a basis on which to either make decisions or to allocate funds, some very clear processes must be established in order to ensure that the data is reliable.

There must be a clear communication procedure between the CMF and the producers and the publishers. The CMF must ensure that all relevant parties are identified and informed in time to implement any tagging that must take place.

There must be a very clear set of instructions about how to place the tags on the page. This must include instructions on where on the page to place the tag as well as what types of pages should have tags (which should be counted and which should not).

There need to be clear rules on the dates that projects are to be measured. Given that sites can be up indefinitely, a clear measurement period must be defined at the outset.

Finally, there must be a robust Quality Assurance process in order to guarantee that data is being collected properly for all projects.

- There needs to be a tag validation process: the CMF should confirm that pages are tagged correctly prior to collection of the data.
- There needs to be a data correction process for those inevitable situations when data will be collected incorrectly.

If the CMF does not have the expertise required to implement and maintain a data validation process, it may be advisable to engage a third-party to guarantee the validity of the data.

If these considerations are addressed, we are confident that the CMF 's digital measurement system will hit the necessary goals of verifiability, relevance and reliability. However, we still see quite of a bit of work to be done before we reach that stage. We take it a given that none of the stakeholders would want to see the DMMF implemented before it is ready.

All that said we would like to reiterate our support for the project and to acknowledge the work that has been done so far in developing this framework. We remain committed to the process and willing to help it along where we can.

Regards,

CBC/SRC