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8th January 2010

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To,

- PUBLISHER MEMBERS,
- BUREAU AUDITORS
- PUBLISHER (APPROVED) AUDITORS

NOTIFICATION NO. 803

AMENDMENTS / CLARIFICATIONS TO BUREAU'S AUDIT GUIDELINES

Council at its recent meeting had decided to put in place the under mentioned amendments / clarifications applicable to publisher members effective audit period January-June 2010.

PART `A' – AMENDMENTS:

Surprise Recheck Audit:

- Circulation figures of two audit periods would be compared with similar audit periods i.e. January-June audit period to be compared with previous January-June audit period and July-December audit period to be compared with previous July-December audit period since circulation levels tend to have seasonal variations.
- Increase in prescribed limits for considering publications for surprise recheck audit by Bureau Auditors applicable to individual edition and / or printing centre would be as under –

		New limits	Existing Limits
Each edition and /or printing centre (as applicable)		Increase in average circulation for an audit period	
•	Upto 50,000 ave. copies	25% and above [minimum 10,000 copies]	20% and above
•	Between 50,001 ave. copies and upto 200,000 ave. copies	20% and above	15% and above
•	Above 200,001 ave. copies & upto 500,000 ave. copies	15% and above	10% and above
•	Above 500,001 ave. copies	10% and above	-

(after giving due weightage to the reasons filed by the publisher)

Surprise Recheck audit of new printing centre prior to admission:

- New printing centre of an existing edition started during an audit period may be put through a surprise recheck audit by Bureau Auditors at publisher's expense prior to certification provided the average circulation of the said printing centre is above 25,000 copies (based on actual printing days).
- New printing centre having average circulation of less than 25,000 copies, may be put through a surprise audit by Bureau Auditors in the immediate next audit period at publishers expense.
- This step would go a long way in expediting issue of ABC Certificate of circulation to those publications who have recently started additional printing facility.

Monthly confirmations from agents / sub-agents:

- Payments received from agents / sub-agents by cheque would be deemed to be considered as confirmed. Monthly confirmations for atleast 60% of the total copies distributed per edition and/or printing centre as the case may be, if available with the publisher / principal agent as the case may be, would be considered to be adequate for audit verification.
- Cheque payments received from agents / sub-agents would be included as part of the above 60% limit.

Payment covering notes for cash / demand drafts received from agents:

 Cash covering letters upto average 50 copies or less per day / per issue from agents / sub-agents are exempt.

Outstanding dues from local agents and upcountry agents:

- Onaccount payments received from agents / sub-agents may be appropriated on pro-rata basis amongst ABC well as non-ABC publications in cases where both ABC as well as non-ABC publications are billed together.
- Wherever there is separate billing for **magazines**, the period for calculating outstanding period may be revised to:

Local Agents	60 days
Upcountry agents	90 days

Such higher limits for magazines was considered necessary due to the longer shelf life of magazines as compared to daily newspapers.

Bulk subscription for magazines:

- It was accepted to increase the limit of Bulk Institutional Subscription for magazines upto 10% of net paid sales as the circulation base for magazines is low as compared to dailies.
- Also, details of individual addressees in case of bulk supplies to institutions where individual readers cannot be identified e.g. hotels, airlines, libraries etc. may not be necessary.

PART `B' – CLARIFICATIONS:

Surprise check by Bureau Auditors:

• Publisher members may invite, at their discretion, publisher auditors during their discussion with Bureau Auditors whilst discussing Bureau Auditors observations.

Surprise press and market visit by Bureau Auditors:

- Bureau Auditors undertake surprise market visit as a part of their audit. Publisher members at their discretion may depute their representative at various sales depots during Bureau Auditors surprise market visit. However Bureau Auditors independence in carrying out the surprise audit should not be compromised due to the presence of publisher's representative. Publisher's representative should not interfere in the working of the Bureau Auditors. Bureau Auditors at their discretion may seek assistance from the Publisher's representative as and when required.
- Two publications of the same group, if put through a surprise and / or surprise recheck audit, to be carried out simultaneously by Bureau Auditors. However, if two publications are a Daily & a Weekly of the same group, it would be necessary for Bureau Auditors to do independent surprise press and market visit as per the respective dates of their publication.

Non-submission of circulation figures by Publisher Members for any reason:

- In some cases, few readers schemes in vogue may not qualify for certification as per the Bureau's existing guidelines. Such circulation may be shown under "Part B" of the ABC Certificate of circulation as "Non Qualifying Sales".
- Users of the ABC certificate mainly media planners, media buyers, advertising agencies and advertisers, time and again had requested the Bureau to provide complete details of circulation of member publications.
- In order to give meaningful and complete information to the media planners and in order to assist them in their analysis and comparisons, it would be appropriate for all Publisher members to submit their circulation figures to the Bureau either as qualifying sales under "Part A" or under "Part B" as non-qualifying sales within the prescribed time frame.

Routine press and market visits by Publisher Auditors once a year:

- Press and market visits by Publisher Auditors should be strengthened. They are expected to certify circulation figures as per Bureau's audit guidelines only after satisfying themselves about the actual printing and distribution of a publication.
- Publisher Auditors should also follow the market protocol as decided earlier and satisfy themselves thoroughly about the distribution of a publication.

Maintenance of Machine Room Returns:

• The working sheet of the MRR prepared during actual printing of copies be retained alongwith the fair copy of the MRR prepared on the next day in the office records. The same to be produced for audit verification.

Combined certification:

- If a publisher member does not wish to avail of a certificate of circulation from the Bureau in respect of one of its printing centre and / or edition for any reason from amongst various editions / printing centres in a combined certificate, then the Bureau would certify the circulation figures of the rest of the editions / printing centres as submitted by the publisher subject to publisher submitting the circulation figures of the particular edition / printing centre atleast in "Part B" of the ABC Certificate of circulation.
- Total non-submission of circulation figures in either "Part A" or in "Part B" of a printing centre / edition amongst other editions included in a combined certificate will not be permissible and in such case the entire combined ABC Certificate of circulation cannot be issued.

Differential pricing / pagination of the same title in the same market:

- In some markets two print runs of the same title are available having two different cover prices, pagination, contents etc. Such market initiatives may be accepted for certification together in one certificate.
- However, circulation levels of such print runs are required to be separately shown on the first page of the ABC Certificate of circulation for the benefit of the users. In this respect the title, language, frequency and ownership of both the print runs should be similar. Separate incoming certificates in such cases for both print runs are required to be filed.

Tabloid and Broadsheet of the same title:

- Publisher members may publish a particular print run of a title in different sizes i.e. tabloid for one print run for a specific market and broadsheet for the rest of the print runs for other markets. The broadsheet as well tabloid would be considered for certification together provided the title, frequency, language and ownership of the publications remain the same.
- Break-up of circulation details of broadsheet as well as tabloid in a particular market place would then be separately shown on the first page of the ABC Certificate of circulation for the benefit of the users of the certificate. Publisher to provide the break-up in the incoming certificate filed with the Bureau.

Weekly print runs of a daily newspaper:

• A weekly print run of a daily newspaper cannot be certified together if a publication decides to publish a particular print run only once a week with the same title. The said publication would then be categorised as a weekly and therefore cannot be clubbed together with the circulation figures of a daily newspaper.

Should you desire any clarifications on the above points, please feel free to write to the Secretariat.

Thanking you,

Secretary General