AUTORITÀ PER LE GARANZIE NELLE COMUNICAZIONI
AGCOM

RESOLUTION NO. 87/26/CONS

GUIDELINES ON AUDIENCE MEASUREMENT IN THE DIGITAL ECOSYSTEM: CONCLUSION OF THE INVESTIGATION INITIATED BY RESOLUTION 199/25/CONS

THE AUTHORITY

In the Council meeting of 25 March 2026;

HAVING REGARD TO Law No. 249 of July 31, 1997, establishing the Italian Regulatory Authority of Communications (*Autorità per le garanzie nelle comunicazioni* - AGCOM);

HAVING REGARD TO Legislative Decree No. 208 of November 8, 2021, on the *"Implementation of Directive (EU) 2018/1808 of the European Parliament and of the Council, of November 14, 2018, amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation, or administrative action in Member States concerning the consolidated text on the provision of audiovisual media services in view of market developments"* (hereinafter also referred to as the Consolidated Law);

HAVING REGARD, in particular, to Article 71, paragraph 5, letter b) of the aforementioned Consolidated Law, which amends Article 1, paragraph 6, letter b), no. 11) of Law No. 249 of July 31, 1997, providing that the Italian Regulatory Authority of Communications be entrusted with the role of ensuring, *also in light of multimedia convergence processes, that the measurement of audience and readership ratings for the various media, on any distribution and dissemination platform, complies with criteria of methodological correctness, transparency, verifiability, and certification by independent entities, and is carried out by bodies that are fully representative of the entire relevant sector* (…);

HAVING REGARD TO Regulation (EU) 2024/1083 of the European Parliament and of the Council of April 11, 2024, establishing a common framework for media services in the internal market and amending Directive 2010/13/EU - European Media Freedom Act (hereinafter also referred to as EMFA);

HAVING REGARD TO Regulation (EU) 2022/1925 of the European Parliament and of the Council of September 14, 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 - Digital Markets Act (hereinafter also referred to as DMA);

HAVING REGARD TO its Resolution No. 85/06/CSP of May 16, 2006, *"Guidelines on the measurement of audience and circulation of the media*," published in the *Gazzetta Ufficiale* of the Italian Republic No. 123 of May 29, 2006;

HAVING REGARD TO its Resolution No. 55/07/CSP of March 22, 2007, containing *"Measures and Recommendations for the company Auditel regarding the measurement of audience* ratings";

HAVING REGARD TO its Resolution No. 236/17/CONS, dated June 12, 2017, concerning *"Closure of the sector inquiry on media into audience measurement systems*";

HAVING REGARD TO its Resolution No. 168/19/CSP, dated July 9, 2019, concerning *"Closure of the sector inquiry initiated against Audiweb regarding the verification of the methodology proposed within the Audiweb* project"

HAVING REGARD TO its Resolution No. 194/21/CONS, dated June 10, 2021, entitled *"Guidelines on audience measurement systems in the new digital ecosystem*" (hereinafter also referred to as the "Guidelines");

HAVING REGARD TO Resolution No. 18/22/CONS, dated January 20, 2022, concerning *the "Closure of the preliminary sector inquiry initiated against DAZN regarding the verification of its audience measurement methodology";*

HAVING REGARD TO its Resolution No. 262/22/CONS, dated July 5, 2022, by which a public consultation was launched to prepare a report on the status of implementation of the policy document referred to in Resolution No. 194/21/CONS*;*

HAVING REGARD TO its Resolution No. 43/23/CONS, dated February 22, 2023, which announced the results of the public consultation initiated by Resolution No. 262/22/CONS aimed at preparing a report on the status of implementation of the policy document referred to in Resolution No. 194/21/CONS;

HAVING REGARD TO its Resolution No. 199/25/CONS of July 23, 2025, which launched a preliminary sector inquiry into audience measurement in the digital ecosystem for the analysis of methodologies for measuring content distributed by digital platforms and the formulation of guidelines;

HAVING REGARD TO Resolution No. 223/12/CONS of April 27, 2012, on the *"Adoption of the new Regulations concerning the organization and functioning of the Authority*," last as amended by Resolution No. 58/25/CONS of March 6, 2025;

CONSIDERING the following regarding the context in which this measure is implemented:

1. The Authority's powers regarding audience ratings and broadcasting are defined by Article 1, paragraph 6, letter b), no. 11, of Law No. 249/97. The provision, as amended by Article 71, paragraph 5, letter *b*) of Legislative Decree No. 208/21, establishes that the Authority *"ensures, also in light of multimedia convergence processes, that the measurement of audience and readership ratings for the various media, on any distribution and broadcasting platform, comply with criteria of methodological correctness,*

transparency, verifiability, and certification by independent entities, and are carried out by bodies that are fully representative of the entire relevant sector. The Authority issues the necessary guidelines to ensure compliance with the aforementioned criteria and principles and oversees their implementation. Should the Authority ascertain non-compliance with the provisions set forth in this paragraph, following a formal warning, it may impose a penalty on the non-compliant party of up to 1 percent of the turnover for the year preceding that in which the violation is alleged. The manipulation of data through knowingly erroneous methods or through the deliberate use of false data is punishable under Article 476, first paragraph of the Criminal Code" (emphasis added).

2. In the sector inquiry conducted by the Authority (Resolution No. 236/17/CONS), which examined audience measurement activities for the various media subject to the Authority's supervision, critical issues were identified that generally stem from numerous entities offering web analytics services based on different tracking techniques and methods. In the final decision of the sector inquiry, it was noted that the possibility of entrusting the measurement of online traffic to impartial entities equipped with a governance system and measurement methodologies subject to regulatory oversight and recognized by the market as a benchmark *currency* assumes, especially for the internet, particular significance due to the presence of other web analytics services offered by international operators who, at present, do not participate in surveys conducted by national systems recognized as the benchmark, nor do they guarantee independent third-party certification of the data produced. The conclusions also highlighted the need to increase transparency regarding both measurement methodologies and the production of data and metrics related to online audience measurement activities, in order to avoid the risk of potential distortions in the dynamics of downstream internet markets and the related online advertising sector. At the same time, the need for a precise definition of the scope of JIC activities was highlighted to avoid providing the market with data that is not comparable.

3. In Resolution No. 194/21/CONS, titled *"Guidelines on Audience Measurement Systems in the New Digital Ecosystem,"* the Authority, consistent with the guidance it has provided since 2006 in Resolution No. 85/06/CSP, and taking into account the challenges posed by the new digital ecosystem, has reaffirmed that independent verification and transparency of processes are fundamental principles of any audience measurement and tracking solution, and that measures must be put in place to ensure the absence of any potential conflict of interest and to provide guarantees regarding certification and replicability at every stage of the data production process. The Authority has formulated certain guidelines regarding the sectoral framework and the general principles to which entities conducting surveys on the audience and reach ratings of various media must conform. The aforementioned policy document effectively called for the adoption of the JIC (*Joint Industry Committee*) model by entities conducting audience measurement surveys in order to ensure effective representativeness of the entire relevant sector (Art. 1, para. 1). In the same measure, the Authority required audience measurement companies to submit their surveys to periodic review and evaluation by independent technical experts capable of operating transparently. The survey must be periodically reviewed, leaving it to the JICs to choose the forms and methods of such verifications (Art. 1, para. 4). The aforementioned resolution addresses also a series of policy guidelines to

the market to lay the groundwork for an efficient rationalization of the audience measurement system and states that the JICs must make every effort to ensure that all phases of the data collection and elaboration process—whether census-based or sample-based—are replicable, in addition to ensuring full traceability of the phases of the information transfer process between the various data sources that constitute the measurement system. Furthermore, it is stated that it is highly desirable for the entities conducting audience measurement surveys to hold the intellectual property rights to the strategic assets (software, databases, panels, technologies, algorithms) of the research. To this end, they must exercise control over all components of the data production chain, playing a guiding and directing role, and arranging audits of all suppliers at every stage of the process. In Annex A to Resolution 43/23/CONS, in the Final Report concluding the public consultation, the Authority further noted that audience data represent a measure of the success achieved by editorial and advertising programming in terms of viewership and are, consequently, an essential element in the valorisation of advertising and editorial contents. It is further emphasized that the activity of measuring audience ratings is of general interest, *"in light of which the Authority's role as guarantor is justified to protect the prevailing public interest in the transparency and accuracy of the data disseminated, given its importance for the market*.**"** The Authority also reiterated that every effort must be made to avoid the overlap of multiple metrics for measuring online audiences, so as not to provide the market with data that is not comparable or, in any case, measurements derived from metrics based on different conventions. In this regard, the Authority stated that if census-based measurement of digital content were to be carried out via SDKs, it should ideally be done through a single SDK, and expressed strong appreciation for the decision made by the working group coordinated by UPA to share a single SDK.

4. Audience measurement services across different media have a decisive impact on the valuation of advertising placements, as well as on the assessment of return on investment and the planning and optimization of future investments. In order to plan an advertising campaign, it is therefore essential to estimate the audience size that a given medium can reach, and it is thus important to have up-to-date, objective, and valid data for all parties, especially regarding the audience reached. Consequently, it is of significant importance for investors to have reliable data produced according to certain and transparent metrics and, above all, by a third party.

5. The data published by the Authority in the 2024 Annual Report show that since 2019, internet advertising revenue has surpassed television advertising revenue, becoming the leading "medium" in terms of resources, accounting for 40.9% of total advertising revenue, compared to 39.3% for TV. In 2020, the internet surpassed the 50% threshold (50.2%), and in 2023, a further rise is confirmed: internet revenues exceed 60% (61.2%). The Auditel-Ipsos 2025 report highlights the growth in the number of connected screens thanks to smart *TVs*: on average, each household has 5 screens, 4.1 of which are connected, confirming that the gap widened in favor of *smart TVs* in 2024. In the realm of online advertising, the most significant component is that found on platforms, which accounts for 85% of the sector's advertising revenue, compared to 15% for web publishers.

6. The issue of audience measurement has also become increasingly central in the European landscape. The provisions of Article 24 of the new European media

regulation (EMFA - European Media Freedom Act), which entered into force in May 2024, specify that *providers of audience measurement systems shall ensure that their audience measurement systems and the methodology used by their audience measurement systems comply with the principles of transparency, impartiality, inclusiveness, proportionality, non-discrimination, comparability and verifiability*. Since the preparatory work on the text of the Regulation, the Authority has had the opportunity to emphasize the importance of a comprehensive and systematic approach at the European level regarding audience measurement, in light of the challenges posed by the measurement of internet-based services. In particular, it highlighted how major online platforms and, more generally, so-called OTT (Over-The-Top) services—including on-demand audiovisual media services—have, to date, declined to participate in census-based measurements conducted by third parties (such as JICs) that require the installation of software (e.g., SDKs—Software Development Kits) by those third parties. These services are, however, capable of independently measuring traffic using proprietary software or software that is otherwise unvalidated or uncertified, thereby increasing the risk of introducing data into the market derived from metrics, conventions, and measurement techniques that differ from one another. The Authority has also emphasized the need to develop unambiguous and shared metrics for measuring the audience generated by digital platforms, both with regard to methodologies and their verification, as well as the selection and organization of the entities responsible for conducting the measurement, and the scope of the measurement.

7. In recent years, the measurement of digital platform audiences has inevitably involved the role of the JICs themselves. In this context, in compliance with the requirements issued by Resolution No. 18/22/CONS at the conclusion of the preliminary inquiry, the certification of viewership data for events broadcast by DAZN has been, and continues to be, guaranteed through measurement conducted by a JIC using a single SDK.

8. In January 2024, Audicom launched the *Osservatorio Platform* (hereinafter "Platform Observatory") to engage with digital platforms interested in editorial and advertising audience measurement. The Observatory has launched a work program to verify the consistency/comparability between SDK census-based measurement and alternative *server-to-server* measurements. At present, the methodology and scope of action have not been defined.

9. In this context, it is important to highlight the supervisory and guiding role that the legislature intended to assign to AGCOM with regard to audience measurement, to ensure that surveys comply *with criteria of methodological soundness, transparency, verifiability, and certification by independent bodies, and are conducted by organizations that are fully representative of the entire sector in question*.

10. The issuance of directives is therefore necessary to ensure compliance with the aforementioned criteria and principles, also in light of relevant EU legislation and international best practices.

CONSIDERING that the structural changes currently taking place in the consumption of multimedia content are transforming the sector, including audience measurement systems.

CONSIDERING that audience measurement services impact the valuation of advertising placements, the planning and optimization of communication investments, and the assessment of their economic return;

CONSIDERING, in particular, that the market for online advertising and advertising on various platforms, including resources gathered from search engines, social media, and sharing platforms, is part of the SIC. The efficient and transparent functioning of this market is essential for safeguarding pluralism, which may be compromised by the loss of conditions ensuring effective equality among all market participants.

CONSIDERING that advertising represents *" a key revenue source for the media* sector" (Recital (69) of the EMFA), and that, therefore, accurate, objective, and timely assessments of content performance are an essential prerequisite for the proper allocation of advertising investments, so as to avoid market distortions that would undermine the pluralistic structure of information sources.

CONSIDERING that *"in principle, audience measurement should be carried out in accordance with widely accepted industry self-regulatory mechanisms*," and that proprietary measurement systems, however legitimate, could produce data *that is "non-comparable, information asymmetries among media market players and potential market distortions, to the detriment of the equality of opportunities for media service providers in the* market" (Recital (69) of the EMFA);

CONSIDERING, furthermore, that, pursuant to Article 24(1) of the EMFA, the recognition of proprietary systems is subject to their providers' compliance with the same principles as shared systems, and that all systems, whether shared or proprietary, must provide an adequate level of transparency, impartiality, inclusivity, proportionality, non-discrimination, comparability, and verifiability.

CONSIDERING, furthermore, that, pursuant to Article 24(2) of the EMFA, providers of proprietary systems are subject to specific obligations, such as the obligation to provide accurate, detailed, complete, comprehensible, and up-to-date information on the methodology used, the obligation to provide media service providers with information on the results of audience measurement for their content, and the obligation to subject methodologies to independent *audits* at least once a year. These obligations are further reinforced by the provisions of the DMA, and in particular Article 6(8), according to which a company providing core platform services (*gatekeeper*) shall provide to *"advertisers and publishers, as well as to third parties authorized by advertisers and publishers, upon their request and free of charge, with access to its performance measuring tools of the gatekeeper and the data necessary for advertisers and publishers to carry out their own independent verification of the advertisement inventory, including aggregated and non-aggregated data. Such data shall be provided in a manner that enables advertisers and publishers to run their own verification and measurement tools to assess the performance of the core platform services provided by* gatekeepers";

CONSIDERING that the lack of shared *standards* and certified, independent, and verifiable methodologies regarding the measurement of digital platforms affects the proper allocation of investments and necessitates action to ensure that the market has access to reliable and comparable audience data to address information asymmetries and potential distortions;

HAVING REGARD TO the responses to the specific requests for information addressed by the Authority to a large number of entities from various sectors, as well as the information gathered during the hearings conducted as part of the preliminary sector inquiry;

CONSIDERING the following:

1. CONDUCT OF THE PRELIMINARY SECTOR INQUIRY

1.1 The course of the preliminary sector inquiry

1. The Authority, by Resolution No. 199/25/CONS, ordered the initiation of the preliminary sector inquiry aimed at analyzing the methodologies used to measure content distributed by digital platforms and at formulating guidelines for defining the scope of the survey and any requirements necessary to ensure transparent, comparable, and reliable data.

2. The preliminary sector inquiry also aimed to verify the compatibility of current methodologies, both with respect to the new European provisions set forth in Article 24 of the EMFA and with respect to the Authority's own guidelines set forth in Resolution 194/21/CONS and the provisions of the Consolidated Law, in accordance with the functions assigned to the Authority therein.

3. On July 31, 2025, a request for information was sent to Audicom Srl, hereinafter Audicom (ref. no. 195438). Specifically, the request was aimed at gathering information regarding the "convergence of measurement metrics," discussed during the *MediaTelling* conference, held in March 2025, during which the Chairman of Audicom announced the expansion of the JIC's scope of action through the Platform Observatory with the aim of identifying a system for including streaming platforms in the measurement and verifying the consistency/comparability between SDK census-based measurement and *server-to-server* alternatives. The company provided the requested information on September 16, 2025 (ref. nos. 0226308 and 0227207) and on October 17, 2025 (ref. no. 0261131);

4. On August 11, 2025, a request for information was sent to the following companies: The Walt Disney Company (Benelux) B.V., hereinafter Disney (ref. no. 202866); Meta Platforms Ireland Limited, hereinafter Meta (ref. no. 202867); Google Ireland Ltd, hereinafter Google (ref. no. 202868); DAZN Limited, hereinafter DAZN (ref. no. 202871); Apple Distribution International Ltd, hereinafter Apple (ref. no. 202872); Amazon Digital UK Limited, hereinafter Amazon (ref. no. 202875); La7 SpA, hereinafter La7 (case no. 202881); Discovery Italia Srl, hereinafter Warner Bros. Discovery (ref. no. 202882);

Netflix Services Italy Srl, hereinafter Netflix (ref. no. 202886); Paramount Global Italia Srl, hereinafter Paramount (ref. no. 202887);

5. On August 12, 2025, a request for information was sent to the following companies: Sky Italia Srl, hereinafter "Sky" (ref. no. 202989); R.T.I. Reti Televisive Italiane SpA, hereinafter RTI (ref. no. 202993); Rai - Radiotelevisione Italiana SpA, hereinafter Rai (ref. no. 202994); Anitec-Assinform - Italian Association for Information and Communication Technology, hereinafter Anitec-Assinform (ref. no. 203006); Interactive Advertising Bureau – Italy, hereinafter IAB Italia (ref. no. 203008);

6. On September 9, 2025, a request for information was sent to the following companies: Federazione Italiana Editori Giornali (F.I.E.G.), hereinafter FIEG (ref. no. 219467) and Federazione Operatori Web, hereinafter Fedoweb (ref. no. 219471);

7. On September 29, 2025, a request for information was sent to the company IAA Italy Chapter, hereinafter IAA (ref. no. 240356);

8. On November 5, 2025, a request for information was sent to AudienceProject A/S, hereinafter AudienceProject (ref. no. 282201), as a participant in international audience measurement projects;

9. On November 14, 2025, a request for information was sent to the companies listed below: Audicom (ref. no. 291554); UPA - Utenti Pubblicità Associati, hereinafter UPA (ref. no. 291568); UNA - Aziende della Comunicazione Unite, hereinafter UNA (ref. no. 291573);

10. On November 20, 2025, a request for information was sent to Auditel Srl, hereinafter "Auditel" (ref. no. 298112);

11. On December 2, 2025, a request for information was sent to the companies listed below: Nielsen Media Italy Srl, hereinafter Nielsen (ref. no. 310144); Ipsos Srl, hereinafter Ipsos (ref. no. 310162); GfK Italia Srl, hereinafter GfK (ref. no. 310166); Comscore B.V., hereinafter Comscore (ref. no. 310167);

12. The following entities have requested an extension of the deadline for responding to the requests for information received: IAB Italia (August 17, 2025 – ref. no. 209168); Rai (September 8, 2025 – ref. no. 218597); Amazon (September 12, 2025 – ref. no. 223422); Sky (September 12 – 224044); Audicom (December 10, 2025 – ref. no. 317369); GfK (January 7, 2026 – ref. no. 2266); Meta (September 16, 2025 - ref. no. 226385); Apple (September 17, 2025 - ref. no. 227853); La7 (September 17, 2025 - ref. no. 228905); RTI (September 18, 2025 - ref. no. 230454); Confindustria Radio Televisioni, hereinafter CRTV (September 19, 2025 - ref. no. 230686); Disney (September 19, 2025 - ref. no. 230696); UNA (November 19, 2025 - ref. no. 296545 and December 5, 2025 - ref. no. 314148); Auditel (November 27, 2025 - ref. no. 305856); UPA (December 1, 2025 – ref. no. 307609); Audicom (December 10, 2025 – ref. no. 317369). The Authority, having taken note of the reasons provided in support of the requests received, granted the requested extensions;

13. On October 17, 2025 (ref. no. 260647), a request for a hearing was received from Amazon, to which the Authority responded on November 27, 2025, with ref. no. 0305606, summoning the Company to a hearing on December 10, 2025;

14. On December 2, 2025, a hearing was held with representatives of the Aeranti-Corallo Association, which on October 8, 2025 (ref. no. 251672) submitted a document containing its comments to the Authority;

15. On December 16, 2025, a hearing was held with representatives of Netflix, pursuant to the summons dated November 27 (ref. no. 0305558);

16. On February 24, 2026, a hearing was held with representatives of Comscore, pursuant to the summons dated February 16 (ref. no. 0059038);

17. On March 5, 2026, a hearing was held with representatives of Google, pursuant to the summons dated February 12 (ref. no. 0055202);

18. On March 10, 2026, a hearing was held with representatives of the company RTI, pursuant to the summons dated February 12 (ref. no. 0055181);

2. ARGUMENTS OF THE PARTIES INVOLVED

2.1 Summary of the main positions that emerged

19. During the inquiry phase, 27 entities were identified, divided into the following six categories: i) Associations representing the advertising demand and media companies (UNA and UPA); ii) Associations representing the digital and advertising sectors (Anitec-Assinform, IAA, IAB Italia, FIEG, Fedoweb); iii) Publishers (CRTV, La7, Rai, RTI, Sky); iv) Research firms (Comscore, GfK, Ipsos, Nielsen); v) National JICs (Auditel, Audicom); vi) Platforms (Amazon Prime Video, Apple, DAZN, Disney+, Netflix, Google, Meta, Paramount+, Warner Bros. Discovery). Each of the aforementioned categories was presented with a specific set of questions tailored to the role they play within their respective sectors. In response to the questions sent, contributions were received from the parties involved, with the exception of FIEG, which did not respond. In the overall assessment of the findings, consideration was also given to the contributions received independently from Aeranti-Corallo and the MPA (Motion Picture Association), as well as to the elements that emerged during the hearing held with Audience Project.

20. The responses and additional supporting information were then examined and grouped into five overarching thematic areas, identified to facilitate the analysis and comparison of the evidence gathered, relating to: A. Digital audience measurement methodologies and technologies; B. Governance and the role of JICs; C. Transparency, verifiability, and auditing of measurement systems; D. Economic, advertising, and pluralism impacts; E. European framework.

A. Methodologies and technologies for measuring digital audiences

A.1 Platforms

21. Within the broader area of methodologies and technologies for measuring digital audiences, the contributions received paint a mixed picture, in which positions diverge both on the technical solutions that can be used and on the methodological assumptions necessary to ensure reliable, comparable, and verifiable measurement. In particular, the contents provided by platform operators focus on the implementation of *Software Development Kits* (SDKs), *server-to-server* (S2S) models, and hybrid solutions, as well as on the relationship between technological neutrality and measurement standardization.

22. One operator **(*omissis*)** states that it adopts a fully proprietary event-based data collection model, whereby the video players it develops send information to the internal back-end throughout the full duration of content playback. The company does not use third-party SDKs for data collection, nor does it share consumption data with measurement service providers. Using an S2S system, verification signals (so-called *audit pings*) allow partners to continuously monitor and validate that back-end data maintains accuracy without underestimating or, conversely, overestimating viewership, ensuring the comparability of the measurement architecture integrated with the SDK. Every integration undergoes a certification process in collaboration with the JIC or the measurement service provider.

23. The company in question states that it is technically unable to integrate third-party SDKs due to multiple technical constraints, including the need to ensure a high-quality viewing experience, increased memory usage, slower download times, buffering, and device battery consumption, as well as because of incompatibility with obsolete operating systems.

24. The company recognizes the value of using a JIC-certified solution, such as an S2S solution. At the same time, it acknowledges the benefits of an SDK solution for certain operators. In summary, the company does not support the use of *one-size-fits-all* solutions due to the differing operational nature of individual operators: while broadcasters operate primarily on a national scale, the company notes that streaming services have an international scope; consequently, if third-party SDKs specific to individual territories were incorporated, it would not be possible to maintain existing global standards regarding application playback quality and latency.

25. A second operator **(*omissis*)**, which also uses proprietary measurement systems, does not support the use of third-party SDKs. Such integration is considered technically unfeasible as it would also raise significant concerns regarding security and privacy protection. In this case as well, the incompatibility with older operating systems and the operational gap between national broadcasters and global service providers are emphasized. In light of these considerations, the Company does not support a *one-size-fits-all* model.

26. Another entity involved **(*omissis*)** conducts measurements through an SDK implemented on its own app and managed by Auditel, a process supplemented in parallel by another measurement process conducted using an SDK developed by Conviva. To ensure the comparability of data produced with the SDK with that of other measurement

systems, the company specifies that this could be achieved if the two different providers were willing to share the details of the technical parameters with which their measurement systems operate.

27. Another company **(*omissis*)** uses proprietary technology integrated into the video player to collect event-level data, without using an SDK. With regard to advertising, the operator uses data from its own *adserver* and analyzes it using third-party technologies. In this case as well, regarding a potential SDK integration, implications in terms of privacy and governance are highlighted, as well as relevant technical aspects that risk impacting the user experience.

28. Another operator **(*omissis*)**, unlike the cases described above, states that its audience measurement is based on a combination of census and panel methodologies, supported by specific tools, which produce a variety of data types: data at the individual playback level, used only with the explicit consent of panelists; encrypted identifiers of content owners and associated metadata; and aggregated data regarding view counts and viewing times, processed using differential privacy techniques to ensure user protection. At the same time, data from user panels is integrated via browser meters, router meters, and measurement apps on mobile devices, while *3*rd Party Panels employ a model based on commutative encryption that guarantees the anonymity of panelists and the protection of non-panelists. All collected data is subject to stringent security and confidentiality measures, and the affiliated companies hold the intellectual property rights to the software, algorithms, and tools used in the surveys.

29. A platform **(*omissis*)** provides and uses various tools for measuring organic and advertising metrics. The intellectual property of the software, algorithms, and tools belongs to the company itself or, in some cases, is shared with third-party partners, such as in the case of Application Programming Interfaces (APIs) for monitoring advertising performance. The company specifies that it does not use, nor does it intend to adopt, a common and/or third-party-certified SDK.

30. Another service provider **(*omissis*)**, which also uses proprietary software, is able to collect all data related to viewing sessions, including detailed metadata on the content played (geolocation, user identity, play, pause, resume, rewind, fast-forward, and stop). Although the operator is willing to be monitored by a JIC using techniques that ensure high standards of transparency and reliability, as well as robust security measures, it does not use third-party SDKs for consumption tracking and is unwilling to adopt a common SDK certified by a JIC. This is due to technical and security obstacles, management issues, and concerns regarding the SDK's ability to detect fraud. The operator believes that, with the adoption of the S2S model, the information is sufficiently granular, specific, and above all identical to the requirements outlined in the SDK documentation, offering a comprehensive and accurate view that is uninterrupted and more secure from an IT perspective.

31. Another operator **(*omissis*)**, which currently does not offer advertising services, measures views of its content using proprietary systems, although these also include third-party technologies. These measurements are used for the analysis and evaluation of the performance of original and/or licensed titles and are not disclosed to external parties. The company believes that national markets should evolve spontaneously and organically

toward a uniform measurement of all services: any top-down impositions, on the contrary, risk being discriminatory or disproportionate. With regard to the adoption of an SDK, the company highlights clear issues, regardless of any business considerations, even from a purely practical standpoint.

A.2 Research firms

32. Market research firms are, in part, directly involved in the measurement methods currently used by the operators that are part of the JIC. One of them **(*omissis*)** uses four distinct technological approaches to measure digital content, including software meters installed on client devices, customized SDK integrations - which allow for the measurement of any event within an application - *client-side redirect*, which can be used when a client already has a measurement system installed, and S2S integrations.

33. The respondent believes that SDKs and S2S can, in theory, measure the same elements but points out that, in the absence of large-scale comparative studies, operational differences (granularity, metadata, non-human traffic) require a structured system of external audits to ensure functional equivalence. To make the measurements fully comparable, it would therefore be necessary to develop third-party certification mechanisms and periodic audits that are not limited to a single technical-formal verification but instead consist of a granular comparison between S2S data and SDK data.

34. In this scenario, OTTs would therefore need to accept the installation of an SDK intended not for the direct collection of census data that feeds into audience data, but solely for certification by an independent third-party entity. The data obtained in this way would make it possible to objectively identify and quantify any discrepancies between the two systems, while also enabling the identification of potential corrective measures. The respondent specifies that they have never had the opportunity to test S2S data against data obtainable from an SDK.

35. Another entity **(*omissis*)** draws a clear distinction between measurements via a single SDK—developed in accordance with JIC standards through uniform and verifiable tracking of all granular events and behaviors—and S2S data streams from platforms, described as inherently non-standardizable, with varying levels of aggregation and descriptive capability.

36. According to the respondent, the comparison between the two systems should be based on the functionality and performance of a specific SDK versus a specific S2S collection method. Furthermore, they state that no meaningful comparability can be achieved without a rigorous *Functional Equivalence* process, which therefore includes telemetry requirements, event construction rules, and independent audits of non-aggregated data. To make measurements based on S2S solutions as comparable as possible with those based on a single SDK, the fundamental operational requirement is to treat S2S streams as a measurement system whose functionality must be demonstrated and verified according to the same standards as SDK-based collection.

37. Comparability is achieved when the S2S approach exposes underlying signals and declared processing rules sufficient for an independent third party to verify how metrics are produced and reproduce the data, rather than merely accepting the reported results. The respondent highlights that measurement via a single SDK represents the solution most aligned with the objectives of transparency, traceability, and verifiability established by the national and European regulatory framework, while it believes that the use of S2S data can be permitted only where strict criteria of functional equivalence, independent certification, and full availability of the data necessary for the reconstruction and verification of the process are met.

38. Another respondent **(*omissis*)** operates in various markets using a proprietary SDK-based measurement system, integrating and merging this data with panel data. The respondent states that it has no experience with S2S solutions or with comparative analyses between SDK and S2S.

39. Another research firm **(*omissis*)** uses a proprietary SDK-based system designed to track the *playhead* position and granular events. At the same time, it integrates S2S streams which, although representing data transmitted from servers, are based on information collected on the client side by the platforms, according to instructions provided by the operator and approved by the JICs. According to the respondent, it is possible to achieve methodological solutions in which the SDK and S2S approaches coexist with full comparability and equivalence, guaranteed by the uniformity of definitions and data collection rules. Specifically, the company believes it is necessary to align the granularity of the data received, define the metrics and elementary data (e.g., the single stream view), define the procedures for certifying the technological integrations of the SDK and/or S2S by the publisher, and establish procedures for continuous monitoring during the production phase.

A.3 Publishers

40. All publishers **(*omissis*)** have adopted, for the measurement of digital viewership, a census-based survey using a single SDK selected by the Auditel JIC. Respondents also highlighted the advantages of this choice, such as the fact that the use of a single technology, under the full control of JIC, can ensure consistent measurement that is not subject to distorting factors. The publishers specify that implementing different SDKs—even if calibrated and configured according to common standards and operating under the constant control and certification of the JIC—would result in significant variability in the survey results—ranging from 10% to 20%—depending on the tool used. Comparability, therefore, would not be limited to the definition of common rules, conventions, or metrics, but should be ensured *from the outset*, minimizing discrepancies and inconsistencies in the raw data in preparation for subsequent processing and metrics.

41. Furthermore, all publishers reported that they had not observed any impact whatsoever on performance or user experience, nor any significant costs associated with SDK integration and maintenance. In fact, two operators **(*omissis*)** have also adopted a second SDK, running in parallel with the single SDK, which serves as one of the

components supporting Auditel's quality check process. At present, therefore, different SDKs "coexist" on the digital properties of some publishers without any conflict in their operation and without any impact on performance or user experience. This is a position also emphasized by a trade association **(*omissis*)** representing the same respondents.

A.4 Associations representing the digital and advertising sectors

42. One respondent **(*omissis*)** agrees with the approach aimed at avoiding the overlap of multiple methodologies in order to prevent the market from receiving data that is not comparable or, in any case, measurements derived from metrics based on different conventions. Consequently, in the opinion of this respondent, the census-based measurement of digital content should be carried out using a single SDK.

43. A second association **(*omissis*)** believes that in any regulatory framework governing audience measurement, it is imperative to respect the principle of technological neutrality with respect to the method implemented. A fundamental principle requiring that regulations neither impose nor favor specific technical solutions or methodologies, provided that the means employed can meet the Authority's criteria regarding methodological correctness, data granularity, verifiability, and interoperability. In the Italian context, the respondent emphasizes, the application of this principle should entail the absence of regulatory obligations regarding the use of SDKs as the exclusive or preferred method of audience measurement. The association instead hopes that media service providers and other relevant operators will be authorized to use alternative entities or different methodologies, such as the S2S model or others, provided that such methods meet the fundamental requirements specified by the Authority.

44. One respondent **(*omissis*)** emphasizes that the founding mandate of the JICs is to carry out audience measurement by exercising full, constant, and effective control over all stages of the measurement process, starting with data collection and gathering. The respondent reiterates that before making cross-media metric processing and calculation systems common and comparable, it is essential to ensure that the collection of audience volumes is uniform, independent, and carried out using tools that prevent interference by the entities being measured.

45. A hybrid system combining a single SDK and S2S would, according to the association, result in structural asymmetry as well as a regression of the JIC system, both technically and methodologically, reducing the JIC itself to a marginal role and compromising the credibility of the official *currency*. Conversely, a system entirely controlled by the JIC would ensure transparency, impartiality, and robustness of measurement, while preserving the system's sustainability and a level playing field among all measured entities.

46. Another association **(*omissis*)** believes that the evolution of digital measurement systems requires a rethinking of data collection architectures, in light of the gradual disappearance of cookies and the growing importance of privacy and transparency. In this context, the adoption of a hybrid SDK/S2S model should represent a highly attractive prospect for JICs. The adoption of a mixed SDK/S2S system is therefore considered, by

this respondent, a necessary evolution for modern JICs, thereby allowing for the reconciliation of census coverage, transparency, and independence.

47. One respondent **(*omissis*)** notes that the structural differences between SDK and S2S measurements lie in the collection methodology, different accuracy level, and granularity. This association, in fact, records discrepancies of up to 20% between the same entity measured using the two technologies, but nevertheless believes that interoperability between measurement systems is technically feasible, while noting that privacy represents the most complex challenge in this context.

48. One of the associations involved **(*omissis*)** emphasizes the importance of clarifying and distinguishing between the concepts of measurement methodology and the technological implementation tool: the former represents the theoretical and strategic approach that identifies the object of measurement, the conceptual logic, and the criteria for interpreting data in order to obtain meaningful information about the audience; the latter consists of the specific operational tool used in a given context to collect useful data in application of a certain methodology. In the context under consideration, SDK and S2S are two different technological implementation tools used to collect and share data: the former implements a technological component within the client, the latter a direct connection between the platform's server and the server of the entity collecting the data. Therefore, according to the respondent, SDK and S2S are capable of managing the same data within the same collection methodology, albeit using different technical methods of collection and transmission, each within its own scope.

A.5 Associations representing advertising demand and media companies

49. One respondent **(*omissis*)** highlights that the measurement of digital audiences is a matter of method: audience, editorial, and advertising data stem from shared conventions and rules that allow the market to assign an economic value to consumption behaviors. Hence the need to precisely define the scope and objects of measurement (e.g., linear vs. on-demand, consumption medium, content type) and, above all, the baseline data and metrics useful for advertising evaluation. The association considers SDK and S2S to be two different methods of collecting basic data (start/stop of the stream, time, etc.), the adequacy of which depends on the data being traced back to a set of common rules, which must be governed by an identical framework. The coexistence of census-based measurement systems using different technologies does not pose an obstacle, provided that counting rules and metrics are defined by the JIC and all processes are certified and verifiable.

50. A second industry association **(*omissis*)** agrees on the need to address digital measurement with shared standards and high comparability, noting that the digital ecosystem is characterized by diverse definitions and inconsistent metrics. Currently, while the JIC system ensures transparency and regular audits, it covers only a limited portion of the media ecosystem and thus an equally small portion of the advertising market (approximately 25%), while the remaining portion does not adhere to shared measurement systems, failing to make granular and interoperable data available. In principle, the

respondent considers it appropriate to accept different data sources, provided they are documented, interoperable, and subject to independent audits, and emphasizes the need for such methodologies to be suitable for post-campaign evaluation through technical requirements such as the Codice Univoco Spot Video (Unique Video Spot Code or CUSV).

A.6 National JICs

51. Regarding the macro-area of digital audience measurement methodologies and technologies, the positions reported by the two national JICs are united by the recognition of the centrality of common standards, the importance of certification, and control over the data production chain, but they diverge regarding the degree of openness toward alternatives to the current single SDK.

52. Auditel defends the framework based on the single SDK, considering it the only tool capable of guaranteeing, within its operational scope, consistency in measurement, comparability of data, verifiability of the process, and full control over the entire supply chain - as an indispensable prerequisite for measuring the *Total Audience*. The company nevertheless offers its expertise to the work that Audicom's Platform Observatory is carrying out for the systematic comparison between the SDK and S2S methodologies within Audicom's specific scope. In this regard, Auditel believes that the coexistence of different systems, especially if based on proprietary logic or S2S systems managed by the same entity being measured, would introduce structural asymmetries, making control more difficult. While acknowledging that, in theory, alternative models could also offer high levels of granularity, it is emphasized that the decisive issue is not merely technical but concerns the degree of oversight the JIC can exercise over the phases of data collection, gathering, filtering, and processing.

53. Auditel clarifies that the coexistence of different collection systems appears to be the most likely working hypothesis within the Audicom framework to achieve a *total campaign* that includes SDK measurement within the Auditel scope and a mixed measurement approach for Audicom, while also incorporating global platforms into its scope. This would provide a comprehensive, reliable, and comparable view, integrating both advertising *currencies* —*Gross Rating Points* (GRP) for linear TV and *impressions* for digital campaigns—during the advertising planning and offering phases, the post-evaluation phase, and the analysis of competitor activity.

54. While recognizing the value of the single SDK as a historical benchmark and noting the technical synergy with Auditel, Audicom acknowledges the unwillingness of major online platforms to adopt this tool. For this reason, through the Platform Observatory, the company has initiated a technical analysis aimed at verifying whether, and under what conditions, alternative methodologies (in particular S2S) can be integrated or used in parallel, taking into account stringent requirements for granularity, transparency, comparability, verifiability, auditability, and oversight by the JIC. In this regard, Audicom believes that the coexistence of different methodologies may be permissible only if the equivalence of the information collected, the data processing rules, and the audit and certification safeguards is guaranteed upstream; Under these conditions, openness to mixed

models could allow for an expansion of the measurement scope to include major digital platforms, with benefits in terms of the completeness and representativeness of the advertising market.

55. Audicom states that the Observatory's work is focusing particular attention on analyzing how different tracking systems detect and collect consumption events, in order to assess any impacts on subsequent stages of *currency* production. Of particular importance are the methods for detecting viewership, the calculation of viewing durations for editorial and advertising content, and the information made available to the JIC to autonomously exclude non-human traffic or traffic generated outside the national territory—which must be standardized to enable the processing of comparable data.

B. Governance and Role of the JICs

B.1 Platforms

56. One respondent **(*omissis*)** assigns to the JIC the functions of ensuring criteria of methodological correctness, transparency, verifiability, and data certification, while believing, however, that the JIC should remain focused on ensuring methodological rigor and data accuracy, regardless of the chosen technical implementation. Another respondent **(*omissis*)** also believes that the JIC must be fair, open, and transparent in terms of governance and decision-making, as well as innovative, to enable the measurement of increasingly fragmented and diversified modes of fruition. The platform specifies that, in any measurement system, the JIC is still called upon to decide which components to control directly and which to subject to verification, so that the use of a mixed model would not exclude its role but would confirm its function of guidance and audit.

57. Another platform **(*omissis*)** takes a similar stance, arguing that the JIC should establish common measurement standards and ensure the existence of integration pathways capable of meeting the needs of individual broadcasters and OTT providers, while maintaining standardization through a combination of universal rules and audit procedures; even again, therefore, the hybrid model would not entail a downsizing of the JIC's role, but rather a reconfiguration of it with a focus on standard-setting and verification. One operator **(*omissis*)** acknowledges the JIC's role in providing accurate, transparent, and reliable measurement, but believes that it must evolve its approaches to ensure the highest levels of accuracy and compliance with the GDPR and e-Privacy Regulation, including through technologies other than a single SDK or S2S, such as, for example, an audio watermarking process for content measurement that does not require the involvement of publishers.

58. One platform **(*omissis*)** acknowledges the JIC's role in promoting trust, accountability, and transparency, but makes this role contingent upon compliance with stringent conditions regarding independence, non-profit status, open membership criteria, third-party audits, and clear governance structures that include all relevant stakeholders (media, agencies, and advertisers subject to measurement).

59. Finally, one respondent **(*omissis*)** states that it does not operate within a JIC model and, given its business model, does not plan to adopt one.

60. Overall, among the entities belonging to the platform category, a common line emerges regarding: i) the recognition of the need for reliable and transparent measurement standards; ii) the fact that the role of the JIC need not necessarily coincide with direct technical control of every single phase of data collection; iii) opposition, among those who have taken a position on the matter, to the imposition of a single mandatory technical standard based exclusively on a common SDK, favoring instead more interoperable frameworks, provided they are capable of ensuring the comparability, auditability, and reliability of the data.

B.2 Research Companies

61. An analysis of the contributions reveals a clear consensus among all research companies **(*omissis*)** in recognizing that digital audience measurement cannot be based on unverified proprietary systems and in entrusting the JIC with a central role in the new digital audience measurement model. The main differences that emerged among respondents concern the intensity of oversight, the technical scope, and the degree of openness toward hybrid models. In the new digital platform measurement landscape, the JIC should approve all methodological revisions, mandate independent audits of both SDK solutions and any S2S integrations, define metrics, and ensure the proper implementation of measurement systems.

B.3 Publishers

62. All publishers **(*omissis*)** have participated in a census-based survey for measuring digital audiences via an SDK selected by JIC Auditel. Respondents are, in fact, active members of the national JIC system, participating in various capacities—both in the Technical Committees and on the Board of Directors—either directly or through trade associations. JIC governance, in fact, requires the presence and participation in decision-making activities regarding methodologies and technologies, which also involves all components of supply and demand. This adoption has not generated technical difficulties and is managed within the normal flow of operational activities, confirming that the SDK system chosen by Auditel and adopted by the other JICs represents *state-of-the-art* international technology.

63. Furthermore, publishers report no issues regarding performance, user experience, or economic aspects. All respondents have participated from the outset in Auditel's *Total Audience Video* measurement process, progressively adding technological platforms to the survey and successfully testing the installation of the SDK across an extremely wide range of application contexts and devices.

B.4 Associations representing the digital and advertising sectors

64. One respondent **(*omissis*)**, while reiterating that the adoption of a mixed SDK/S2S system represents a necessary evolution for JICs - allowing for the reconciliation of census

coverage, transparency, and independence - adds that this requires a strengthening of institutional governance and technical auditing capabilities, as well as the establishment of shared standards for data interoperability.

65. A second association **(*omissis*)** believes that, from a technical and organizational standpoint, establishing a hybrid data collection system would have several significant impacts, particularly regarding the fragmentation of data collection, the economic sustainability, the level of control exercisable by the JIC, and the constant effort required in terms of certification, audits, and quality checks - factors that would entail unsustainable costs and complexity. The respondent emphasizes the need for regulation that obliges large platforms to comply with a set of minimum, binding, and mandatory requirements regarding transparency, data access, and independent audits - requirements already applicable to JICs.

B.5 Associations representing advertising demand and communications companies

66. One respondent association **(*omissis*)** attributes a central role to JICs in governing the measurement market, noting that its participation in this governance model serves to oversee the definition of rules and the consistency of measurements. In particular, it reiterates that the fundamental function of JICs is precisely to establish standards and rules that make data usable for advertising negotiation and planning purposes, ensuring continuous oversight of the process. The respondent specifies that market rules must prioritize safeguarding consistency in data granularity and the auditability of sources and data transmission/sharing processes. Regarding governance conditions, the respondent considers it desirable to replicate the proven model used in other JICs, whereby the various supply-side entities are each represented by their respective industry associations, just as is the case for demand-side entities. This condition applies particularly to the web, where several hundred players operate, since in this context it is unthinkable that a single entity could interact individually with a complex structure such as a JIC.

67. A second respondent **(*omissis*)** acknowledges the JICs' role as a shared system infrastructure and emphasizes that adhering to a governed framework is a necessary condition for establishing common standards, independent audits, and rules that remain stable over time. It points out, however, that a significant portion of the digital market still operates outside these systems, with negative effects in terms of transparency and comparability. Any integration of proprietary systems - such as S2S solutions - within a JIC would require compliance with specific technical and governance conditions. These conditions are considered essential to ensure the consistency, transparency, and verifiability of the data. Only compliance with rigorous technical and governance requirements can therefore preserve the system's trust and authority.

B.6 National JICs

68. The contributions from the JICs involved (Auditel and Audicom**)** converge in recognizing that their governance model serves to safeguard the transparency,

comparability, verifiability, and certification of data. Auditel emphasizes that full control over methodological and technological assets is an indispensable condition for preventing the proliferation of non-comparable metrics and for safeguarding the reliability of the *currency*.

69. Audicom, while sharing the basic approach, places greater emphasis on the procedural dimension of governance, highlighting that every methodological update occurs according to a process that is "shared, traceable, and consistent with the principles of independence, homogeneity, and reliability of measurement," based on technical analyses, controlled tests, impact assessments, and approval by decision-making bodies. Audicom, emphasizing the role of technical bodies and the various levels of internal consultation inherent in JIC governance, refers to the Platform Observatory, established to assess the feasibility - and the resulting methodology - of extending audience measurement to online platforms and structured as a forum for dialogue among representatives of the various market stakeholders.

C. Transparency, Verifiability, and Auditing of Measurement Systems

C.1 Platforms

70. Regarding the principles of transparency, verifiability, and auditing, the contributions reveal a mixed picture. Specifically, the principle of transparency is accepted by all, but with specific interpretations: for some, it coincides with independent audits and common standards; for others, it means reporting to clients or advertisers; for still others, it remains subject to the limits of confidentiality and autonomy. All stakeholders refer, directly or indirectly, to the need for system reliability, but they disagree on who should verify, with what tools, and whether such verifications should take the form of an independent audit. No operator, therefore, openly argues that transparency, verifiability, and auditing are irrelevant, although differing positions are found at the individual level.

71. One company **(*omissis*)** takes the position most closely aligned with the framework of Article 24 of the EMFA, acknowledging the need for proprietary systems to undergo an annual independent audit and stating that it is in the process of adapting its systems to ensure, by August 2026, the identification of relevant systems and methodologies and their verification by independent third parties.

72. Another platform **(*omissis*),** however, takes an intermediate stance regarding auditing: the company does not describe a defined system for periodic audits, but does not rule out forms of external verification. A third entity **(*omissis*)** takes a different approach: it does not present a fully structured annual audit model but rather refers to the possibility of relying on authorized third parties, selected according to specific criteria and subject to the standards of its partner program. In this way, transparency and verifiability are linked more to a system of relationships with qualified partners than to a periodic and independent audit.

73. One operator **(*omissis*)** cites, in support, collaborations with JIC and auditors **(*omissis*)**, as well as tests and certifications conducted in concrete implementations, and reiterates that the decisive factor is not the collection technique itself, but the ability to subject it to shared standards, continuous verification, and transparent oversight. Finally, two respondents **(*omissis*)** do not provide a detailed description of transparency, verifiability, and audit safeguards, as both place their internal systems outside the scope of the EMFA. Consequently, neither addresses the issue of auditing at the operational level, effectively sidestepping it by challenging the underlying premise of its application.

74. Positions thus range from more open approaches **(*omissis*)** to others with greater caution **(*omissis*)**, which allow for forms of sharing or external validation, albeit subject to conditions; still others **(*omissis*)** acknowledge these principles but strongly limit the practical implementation of sharing, tying it to legal obligations and their own challenge to jurisdiction. Furthermore, more restrictive approaches are emerging **(*omissis*)**, in which sharing with independent third parties and the disclosure of results remain subject to contractual limits, confidentiality requirements, security, competition, and control over the perimeter of the data. This outcome is consistent with the critical issues already highlighted in the initial resolution, which noted the lack of shared standards and certified, independent, and verifiable methodologies for measuring digital platforms.

C.2 Research Companies

75. Research firms reiterate the need to ensure a high level of transparency and verifiability in measurement systems, especially when integrating data provided by OTT platforms.

76. One respondent **(*omissis*)** emphasizes the need for external audits and continuous validation, with the aim of ensuring that data provided by platforms is used only upon approval by the JIC, and subject to independent verification. The firm proposes an audit system capable of performing granular comparisons between SDK and S2S, including the potential installation of an SDK intended not for the direct collection of census data that feeds into audience data, but solely for certification by an independent third-party entity. The company states that there are various initiatives by media agencies and companies on the market that address the lack of a certified and shared cross-media *currency* by combining the audience data produced by the JIC with that produced by OTT platforms based on multiple models and approaches. However, these initiatives are not comparable to neutral and transparent measurement by a JIC; they are based on methodologies that are less robust and certainly less costly than those adopted by JICs, and they do not produce the shared and uniform metrics that characterize *currencies*.

77. A company **(*omissis*)** uses OTT platforms' self-measurement data to produce its own independent research and reports but is not involved in the data generation process carried out by the platforms. The self-measurement data consists of video impressions at the census level, transmitted through the platform's server infrastructure. The authorized use of the data is governed by a mutually agreed-upon license agreement between the individual OTT platform and the company. The data is then aggregated prior to delivery, in accordance

with privacy regulations and reporting thresholds. The respondent distinguishes between existing audits (e.g., MRC, TAG, IAB) and what it considers necessary for *currency*, namely a reconstruction process based on non-aggregated data. With regard to the audit procedures known in S2S systems, the respondent proposes a *Functional Equivalence* model that is not intended to replace existing audit procedures. Its value lies in adding a *currency-level* equivalence test for S2S flows that includes the reproduction and recalculation, under the supervision of an auditor, of event results from non-aggregated inputs, using declared construction rules evaluated against a baseline owned by the JICs.

78. Another entity **(*omissis*)** states that census data collection is performed according to precise specifications that do not depend on the measurement systems themselves but on the *crediting* rules and definitions decided prior to each project dedicated to audience measurement. During the certification phase of integrations for both SDKs and S2S systems, the company conducts tests - whose specifications can be customized according to JIC requirements - that involve replicating real-world consumption behaviors to verify consistency with the data collected by the system. Furthermore, it conducts large-scale checks via *audit pings* as an additional tool for verifying S2S volumes. With regard to audits conducted by third parties, the company is willing to discuss and implement the controls that JICs deem useful and necessary on its services.

C.3 Publishers

79. All publishers **(*omissis*)** affirm that the measurement approach based on a single SDK, which allows the JICs full control over measurement and data collection in a centralized and real-time manner, is the preferred and most reliable method in terms of comparability, transparency, independence, and control. To ensure maximum comparability of digital audience measurements, it is therefore considered necessary to use, within the scope of census-based methodologies, a single, common measurement technology for all parties involved.

80. Respondents agree that, in order for an audience measurement process to be methodologically sound, transparent, fair, and non-discriminatory, it requires the adoption of collection techniques, processes, and processing rules that are as uniform and unambiguous as possible. Such uniformity constitutes the minimum necessary condition for a JIC to maintain, even in census-based measurement, a level of control comparable to that traditionally exercised in sampling methodologies, as it prevents the amount of viewing measured for each subject from varying depending on the technology adopted.

C.4 Associations representing the digital and advertising sectors

81. Among the respondents involved, three of them **(*omissis*)** view the principles of transparency, verifiability, and auditing positively. However, a fourth entity **(*omissis*)** expresses concerns about the introduction of new mandatory regulations and independent audits to enforce transparency, considering the existing regulatory framework to be substantially adequate.

C.5 Associations representing advertising demand and communications companies

82. For one respondent **(*omissis*)**, transparency and verifiability of measurement systems are an indispensable prerequisite for the proper functioning of the advertising market. The association notes that the current digital ecosystem is characterized by significant methodological heterogeneity and the prevalence of proprietary, non-auditable solutions, which prevent reliable comparisons and generate distortions in audience measurements. The absence of independent audits, the fragmentation of metrics, and the lack of interoperability between systems constitute, according to the respondent, a significant obstacle to the ability to measure the *total campaign* consistently and undermine investor confidence. To overcome this situation, a uniform and technologically agnostic regulatory framework is required, capable of ensuring common standards of transparency, verifiability, and comparability of data across the entire market.

83. A second association **(*omissis*)** points out that the current system exhibits significant shortcomings in terms of data transparency, reliability, and comparability, particularly in the digital and OTT sectors, where platforms use proprietary, non-public, and non-auditable methodologies with extremely varied metric definitions. The lack of access to the data chain (logs, anti-fraud filters, deduplication rules, exposure criteria) prevents independent verification and results in a fragmented and non-comparable picture. As things stand, the respondent explains, advertisers and agencies do not have the necessary elements to verify the consistency of cross-media data, and it is therefore considered essential to mandate independent audits for all methodologies. At the same time, they consider it necessary to adopt standardized metrics, starting with a shared definition of cross-media contact - currently being formalized in industry working groups - to ensure a common basis for qualified exposure across linear TV, OTT, and digital platforms.

C.6 National JICs

84. Regarding the transparency, verifiability, and audit profiles of measurement systems, the positions of the two national JICs converge in holding that these requirements must cover the entire data production chain and constitute essential conditions for legitimizing market *currency*. Auditel maintains that the JIC model is particularly aligned with the principle of verifiability, as it allows for audits of suppliers and processes, certification of implementations, continuous quality controls, and rules for suspension/correction in the event of anomalies. Consistent with this approach, Auditel states that its methodology has been certified by PwC (PricewaterhouseCoopers) and that E&Y (Ernst & Young) has conducted technical audits on the security and tamper-proof nature of the systems. Furthermore, the Company specifies that daily quality check processes, periodic reports, and periodic recertifications of the properties are in place.

85. Audicom refers to Auditel's approach in several places and emphasizes that the principle must be established whereby a JIC can conduct the broadest and most independent controls, verifications, and audits possible across all phases of measurement,

regardless of the entity responsible for its implementation. Audicom further specifies that, should alternative systems to the single SDK be evaluated, their acceptability must be verified in light of stringent requirements for transparency, uniformity, comparability, and auditability. In this context, the JIC notes that the post-certification monitoring process for Audicom members is still being defined and highlights the role of the Platform Observatory in evaluating the expansion of online audience measurement.

D. Economic, Advertising, and Pluralism Impacts

D. 1 Platforms

86. With regard to economic, advertising, and pluralism impacts, the contributions confirm that audience measurement affects advertising value and, therefore, competitive balance, in line with the findings of the launch resolution, which highlights the risk of non-comparable data and consequent market distortions to the detriment of equality among operators and pluralism. The analysis shows, in fact, that the issue of pluralism is addressed more extensively than the functioning of the advertising market and technological neutrality, rather than pluralism in the strict sense.

87. Several entities **(*omissis*)** agree that a measurement system that is more inclusive and representative of the entire media landscape is necessary, but they oppose the imposition of a single, mandatory technical standard, favoring instead flexible, interoperable, or non-prescriptive models. One respondent **(*omissis*)** takes the most restrictive position, ruling out that market or pluralism requirements could justify prescriptive national measures regarding methodologies and tools applied to global services. One final respondent **(*omissis*)**, however, believes that the current inclusion of certain operators in the *Total Audience* measure while excluding others is creating an asymmetry capable of distorting competitive equality, and that any alternative methods must therefore be preliminarily verified under the Authority's supervision.

D.2 Research Companies

88. The contributions from research companies agree that the growing prominence of digital platforms operating with uncertified proprietary systems, in the absence of comparable and verifiable measurement systems, may produce distorting effects on the advertising market with potential repercussions on resource allocation, as well as on media pluralism.

89. On this specific issue, one respondent **(*omissis*)** highlights the risk of operators with privileged access to data influencing competitive dynamics. Another respondent **(*omissis*)** points to market initiatives that combine JIC and OTT data without certified criteria, generating inconsistent metrics and unfair competition.

D.3 Publishers

90. All publishers **(*omissis*)** note that audience data is decisive in setting sales prices and commercial policies and reflects commercial potential by determining the size and type of audience. Audience measurement also influences broadcasters' ability to compete in the market based on the viewership performance generated. In this context, audience data constitutes the quantitative foundation upon which two distinct value chains are based. On the editorial side, it determines the economic value of content, intellectual property rights, and creative contributions across the entire cultural industry. On the advertising side, metrics such as contacts, reach, frequency, and target audience define the cost of campaigns, to which each advertising agency then applies its own commercial policies.

91. In this regard, an industry association **(*omissis*)** highlights that several passages in the Authority's conclusions, contained in Annex A to Resolution 43/23/CONS, already point in this direction, stating, among other things, that *"Audience data represent the measure of the success achieved by editorial and advertising programming in terms of viewership and, consequently, constitute an essential element in the valuation of advertising and editorial content."* The licensing or production price of a piece of content therefore depends on its ability to generate viewership, which constitutes the objective and quantitative basis for evaluating its editorial success and determining, over time, the value of the content, intellectual property rights, and creative contribution.

92. For respondents, audience data is the fundamental *currency* not only of the television market but of the entire cultural industry market, and audience data is obviously a central element in determining the price of an advertising campaign and thus the cornerstone of one of the essential revenue sources of the national cultural industry.

93. Finally, all respondents note that the sale of advertising space in traditional media is based exclusively on audience measurement by the JIC.

D.4 Associations representing the digital and advertising sectors

94. One association **(*omissis*)** notes that audience data represents the fundamental *currency* of the market, as it determines the value of advertisements, measures the effectiveness of campaigns, and allows for the evaluation of return on investment (ROI). For operators, for whom advertising is their primary or sole source of revenue, the ability to generate certified contacts and impressions is what underpins investments, as well as the improvement of the digital product. In this context, the dissemination of self-reported data - which is not subject to independent verification and is not comparable - cannot help but have a direct impact on investment decisions, with the consequent risk of market distortion. Transparency, shared standards, and independent measurement are the key levers for a functioning, competitive, and fair advertising market, in which publishers of all sizes can participate and obtain a proportional share of the value generated.

95. According to another respondent **(*omissis*)**, the absence of a shared standard fosters the fragmentation of negotiations among individual operators, weakening the unit value of the contact, preventing a clear and fair comparison of the audiences actually reached and

their respective targets, and creating a situation where data is potentially distorted or interpreted inconsistently. This opacity in measurement has significant consequences for investment planning, which tends to focus on specific environments - such as OTT platforms - not necessarily because they are more effective in absolute terms, but because they appear so due to non-comparable metrics. The prospect of introducing a survey quality control system verified by a third-party body is viewed positively.

96. One association **(*omissis*)** believes that the lack of data comparability constitutes a systemic issue that distorts competition and can undermine market transparency. Only the adoption of common, interoperable standards certified by independent third parties (such as JICs or regulatory authorities) can ensure fair evaluation conditions and the efficient use of advertising resources.

97. One respondent **(*omissis*)** notes that the lack of shared standards and the non-comparability of data are of fundamental importance to the streaming services sector: the focus should not be on the uniformity of the technological tools used, but rather on the comparability of the final results. The key point, therefore, is not the homogeneity of technical tools, but the ability to produce a certified and comparable final output. The inability to produce certified data risks translating into a tangible competitive disadvantage in attracting investment. Since the models currently adopted by the JICs do not allow for the participation of global streaming service providers, this results in an incomplete representation of both the content supply landscape and the entire audience reached by the services.

D.5 Associations representing advertising demand and media companies

98. One association **(*omissis*)** directly links the lack of data comparability to the inability to evaluate a campaign as a whole. Consequently, the absence of integrated measurements makes it impossible to determine with certainty the number of people reached across different channels. This fuels market fragmentation and drives the adoption of non-standardized compensatory practices and the proliferation of proprietary solutions. The association also highlights that the absence of shared conventions and the lack of transparency regarding investments within the scope of major platforms make it difficult to produce competitive analyses comparable to those available for traditional media.

The respondent specifies that all counterpart associations within the *World Federation of Advertisers* (WFA) are facing the same issues related to the conventions and rules necessary to achieve reliable and consistent cross-media measurements. The discussion did not concern technological aspects (SDK or S2S) but rather the methods for ensuring that the market has comparable data and measurements - that is, data that is consistent, verifiable, and therefore reliable.

99. A second respondent **(*omissis*)** emphasizes the operational and economic impact of inconsistent measurements: without standard and comparable metrics, campaign valuation risks becoming misaligned and distorted, leading to inefficiencies in planning and investment allocation. In terms of pluralism, it is emphasized that a non-comparable measurement system can affect the competitive balance among operators, influencing the

distribution of advertising resources and creating information asymmetries that benefit less transparent players.

D.6 National JICs

100. In the contributions from the two national JICs, the issue of pluralism is addressed as a reflection of the proper formation of market data, the transparency of the *currency*, and the absence of competitive distortions. The positions of Auditel and Audicom converge in the view that audience data, when serving as a benchmark for the market, directly impacts advertising and content valuation. Both emphasize the need for such data to be generated in a context capable of ensuring impartiality, controllability, plurality, comparability, verifiability, and transparent, mutual publication to the entire market, thereby reducing the influence of opaque measurements or those not subject to equivalent safeguards.

101. Auditel places greater emphasis on the risk that self-produced or unverifiable data could lead to information asymmetries, foster the emergence of a *de facto* alternative *currency* to the shared one, and produce competitive distortions. Overall, the two organizations share the view that the quality and traceability of measurement have direct effects on the sector's economic and advertising balance and, indirectly, on pluralism.

E. European Framework

E.1 Platforms

102. This inquiry has focused specifically on the European context, posing questions to the parties regarding compliance with the principles of Article 24 of the EMFA, which requires transparency, impartiality, comparability, and verifiability for audience measurement systems, including proprietary ones, and compliance with the DMA, which requires gatekeepers to provide free, on-demand access to performance measurement tools and data for independent verification by advertisers and publishers.

103. Regarding the EMFA, some respondents **(*omissis*)** tend to claim compliance with the principles, while others **(*omissis*)** focus primarily on the inapplicability of Article 24 based on the status of the subjects. One operator **(*omissis*)** stated that it does not have proprietary measurement systems, thereby ruling out the applicability of Article 24 to itself. Regarding the DMA, two companies **(*omissis*)** report concrete forms of access to data and tools, while three entities **(*omissis*)** deny falling within the scope of application. One respondent **(*omissis*)** does not explicitly mention the DMA; another **(*omissis*)** focuses on the national and regulatory framework; another respondent **(*omissis*)**, however, challenges the Authority's jurisdiction and does not address the substance of the question.

E.2 Research Companies

104. Research companies were not directly asked about compliance with European regulations regarding audience ratings. However, for all respondents **(*omissis*)**, elements

of compliance with EU principles emerge. One respondent **(*omissis*)** explicitly refers to the EMFA principles, reiterating that S2S measurements do not comply with them when they lack verifiability and consistent audit processes.

E.3 Publishers

105. All publishers **(*omissis*)** stated that audience measurement for national and local publishers is carried out exclusively by JICs, which are third-party entities independent of the measured parties and operate with transparency regarding methodologies and with the participation of all market stakeholders.

106. The active presence of all market stakeholders on technical committees is essential to ensure accurate and comparable audience measurements, as it reduces conflicts of interest among competing entities from the outset. Thanks to dialogue among operators and the Authority's ongoing efforts, JICs have evolved toward digital measurement, integrating data collection to create a shared *currency* and cross-media measurements.

107. Furthermore, a respondent **(*omissis*)** highlighted how the EMFA places great emphasis on the importance of the JIC model without identifying it, at the European level, as the only possible model. This choice appears linked to the fact that JICs are not present in all European Union member states and that not all countries have uniform national regulations supporting them. The principles reaffirmed by the EMFA are therefore particularly relevant in countries where JICs are not yet operational, while in contexts where they are already present, conditions must be created to ensure they can operate uniformly across the entire digital market.

108. Any legislative and regulatory implementations should therefore take into account the systems already in place in individual Member States where JICs ensure transparency, independence, and verifiability in audience measurement. This legacy must be preserved, the respondent concludes, recognizing the JICs' role in ensuring fair competition in the relevant market.

E.4 Associations representing the digital and advertising sectors

109. One respondent **(*omissis*)** highlights how the EMFA and the DMA establish fundamental principles aimed at strengthening the obligations of service providers and large digital platforms, even though the provisions remain somewhat general. For example, it is unclear what is specifically meant by data accessibility or independent audits, and, above all, there is no requirement to adhere to third-party, independent measurement systems that are uniform for all measured entities. These regulations may have a more significant impact in countries where JICs are not present, whereas in Italy it is necessary to ensure that such governance models can continue to play their role fully, preventing the platforms' self-measurements from relegating those models to the background. For these reasons, it may be appropriate to complement the initiatives adopted at the European level by also taking action at the national level: not only to elaborate on abstract principles and translate them into concretely comparable and truly reliable measurements, but also to

introduce a clear regulatory obligation for platforms to adhere to JIC measurement systems, in order to promote the proper allocation of advertising resources and the protection of media pluralism.

110. One respondent **(*omissis*)** notes that these regulations provide valuable support in establishing a sufficient regulatory framework, although the DMA is particularly relevant due to its numerous provisions specifically targeting the digital advertising sector, imposing stringent obligations on gatekeepers to share information and data, with particular attention to measurement-related issues (Art. 5, paragraph 9, and Art. 6, paragraphs 8 and 10). However, one of the main challenges lies in the effective implementation of these rules, compounded by the complexity arising from differing market dynamics across Member States. In Italy, for example, various ad agencies operate on behalf of publishers to support the monetization of their respective advertising inventories. On the advertiser side, however, advertising and media agencies assist them in planning and managing campaigns. Given this context, it is clear that these entities must also be involved and taken into account in the development of effective measurement regulations. Therefore, the respondent believes that further additions are necessary at the national level.

111. One association **(*omissis*)** believes that European regulations already provide a sufficiently robust regulatory framework to ensure transparency and reliability, with an approach based on setting out principles to be followed rather than prescribing strict requirements. In particular, Article 24 of the EMFA entrusts national regulatory bodies with the task of encouraging the adoption of shared implementation models based on the consensus of the operators involved, without introducing obligations to adhere to measurement systems or specifying requirements regarding any technological tools to be adopted. For these reasons, it believes that any national additions would not only be out of step with the European approach but also, above all, counterproductive, as they would introduce fragmentation, overlaps, and competitive distortions.

E.5 Associations representing advertising demand and communications companies

112. One responding association **(*omissis*)** emphasizes that the European Union does not require technical uniformity, but rather the adoption of common standards, independent audits, and third-party governance, in line with EMFA principles and the Authority's guidelines.

113. A second respondent **(*omissis*)** also cites the European context as a path toward cross-media, hybrid, and deduplicated measurement models and highlights the experiences and initiatives of European JICs - specifically in France, Germany, and Belgium - that combine panels, big data, and evolutionary approaches, emphasizing data quality, transparency, and auditability. From this perspective, the European reference reinforces the idea that methodological innovation must advance within a shared framework capable of producing outputs that are fully integrable and certifiable.

E.6 National JICs

114. According to Auditel, the JIC model constitutes a particularly solid foundation for implementing the European principles of transparency, impartiality, inclusivity, proportionality, non-discrimination, comparability, and verifiability set forth in Article 24, paragraph 1, of the EMFA. In this context, the JIC would be the setting that most naturally ensures these principles, provided there are uniform rules, continuous monitoring, audits across the entire supply chain, and full governance oversight, as well as clear regulations on the use of data and assets.

115. Auditel, in highlighting the need to update the regulatory framework in line with European standards, identifies among the key priorities the need to strengthen the role of JICs in recognizing *currency* as a market asset of general interest. Audicom expressly agrees with and fully endorses Auditel's view on the compliance of the JIC model with the principles of Article 24 of the EMFA.

3. THE AUTHORITY'S ASSESSMENTS

3.1 Regulatory Framework

116. As specified above, the Authority's powers regarding audience and circulation ratings are defined by Article 1, paragraph 6, letter b), no. 11 of Law No. 249/97, as amended by Article 71, paragraph 5, letter *b*) of Legislative Decree No. 208/21.

117. Based on the powers conferred by the primary legislation, over the years, the Authority has adopted various measures regulating the matter of audience ratings, setting forth the general principles and guidelines to which industry operators should adhere.

118. In assessing the appropriateness of the methodologies proposed by the operators, the Authority has consistently emphasized, as a preliminary point, that the adoption of the JIC model by survey providers is the preferred governance approach to ensure the use of shared methodologies that comply with the principles set forth in primary legislation and the guidelines issued by AGCOM, and thus meet the criteria of accuracy, transparency, and third-party data certification.

119. Italian legislation on audience measurement is unique in the European context, as it is the very law establishing the Authority that has assigned it, since 1997, a specific supervisory and regulatory function, which has since been strengthened over time in this area, thus demonstrating the attention paid to an issue that, by profoundly affecting the advertising market, is capable of influencing the degree of pluralism in the media system. Only recently has the EU legislature, within the framework of the EMFA[1], adopted, for the first time, a series of measures on this matter.

120. It is worth noting that the instrument of the Regulation makes the rules immediately applicable in individual national legal systems, without the need for transposition acts;

[1] Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market.

indeed, the choice of such a legislative instrument aims to harmonize national laws, avoiding frequent discrepancies that arise when dealing with regulatory instruments of minimal harmonization. In particular, Article 2(16) of the EMFA defines audience measurement as *"the activity of collecting, interpreting, or otherwise processing data about the number and characteristics of users of media services or users of content on online platforms for the purpose of decisions regarding advertising allocation, pricing, purchases or sales, or regarding the planning or distribution of* content". Furthermore, the Regulation acknowledges that in addition to *"measurement systems developed as agreed by industry standards within self-regulatory organisations, like the Joint Industry Committees," there are also "measurement systems developed outside such self-regulatory* approaches" (Recital 12). The latter, according to the same recital, *"tend to be used by certain online operators, including online platforms, that self-measure or provide their proprietary audience measurement systems to the market without abiding by the commonly agreed industry standards or best practices*."

121. This type of audience measurement, which does not comply with industry standards and best practices agreed upon through self-regulatory mechanisms, is defined as "proprietary audience measurement" in Article 2(17) of the EMFA. In other words, all entities that conduct self-measurement outside of mechanisms shared with other operators and the market are likely to fall within the category of providers of proprietary audience measurement systems. Recital (69) clarifies that these are "online operators," which include, but are not limited to, online platforms[2]. In this regard, in the Authority's view, entities other than online platforms - such as, for example, providers of non-linear audiovisual media services (VoD) - should also be considered "providers of proprietary audience measurement systems" if they conduct self-measurement and supply the data to the market, and as such fall within the scope of the EMFA.

122. Although the EMFA acknowledges, to some extent, the primacy of shared systems when it states that "In principle, audience measurement should be carried out in accordance with widely accepted industry self-regulatory mechanisms," the Regulation nevertheless recognizes the legitimacy of proprietary measurement systems.

123. However, since there is a risk that the latter may produce non-comparable data, *"information asymmetries among media market players, and potential market distortions, to the detriment of the equality of opportunities for media service providers in the* market" (Recital (69)), the recognition of proprietary systems is contingent upon their providers adhering to the same principles as shared systems.

124. Based on the above assumptions, Article 24 of the EMFA requires that providers of all systems, both shared and proprietary, ensure an adequate level of transparency, impartiality, inclusivity, proportionality, non-discrimination, comparability, and verifiability.

125. Providers of proprietary systems are subject to specific obligations, such as providing accurate, detailed, complete, understandable, and up-to-date information on the methodology used; providing media service providers with information on the results of

[2] As defined in Article 3(i) of the Digital Services Act (DSA), Regulation (EU) 2022/2065

audience measurement for their content; and subjecting their methodologies to independent audits at least once a year.

126. The obligations set forth in Article 24(2) of the EMFA are supplemented by the provisions of the DMA (Digital Markets Act),[3] , which, in Article 6(8), requires so-called *gatekeepers*[4] to provide *"to advertisers and publishers, as well as to third parties authorized by advertisers and publishers, upon their request and free of charge, with access to the performance measurement tools of the gatekeeper and the data necessary for advertisers and publishers to carry out their own independent verification of the advertising inventory, including aggregated and non-aggregated data*."

127. As is well known, the Authority ensures, pursuant to Article 7(1) of the EMFA, the application of the rules set forth in Chapter III thereof, including, therefore, those of Article 24 of the Regulation, in its capacity as the designated authority pursuant to the combined provisions of Article 2(13) of the EMFA and Article 30 of Directive 2010/13/EU. It is therefore incumbent upon the Authority to ensure that audience measurement system providers comply with the principles set forth in paragraph 1 of Article 24 of the EMFA, as well as to supervise compliance with the obligations of paragraph 2 of said article by providers of proprietary audience measurement systems.

128. It is also the Authority's responsibility to encourage the adoption of codes of conduct by all providers of audience measurement systems, including proprietary systems, *"together with media service providers, providers of online platform, their representative organizations and any other interested parties*," or to encourage compliance with existing codes developed by the JICs. In this regard, the provisions of Resolution No. 85/06/CSP remain relevant, which provides that companies conducting audience measurement surveys are required to submit to the Authority an "information notice" containing details regarding their surveys, information on the company's registration data, the methodology used, the size of the sample under investigation, the survey methods and margin of error, the survey period, and the cost of accessing the survey services. This information is made public on the Authority's website, and companies must therefore also notify the Authority of the website (or other medium) where the document setting out the entire methodology used can be found.

129. As part of AGCOM's participation in the European Board of Media Services (EBMS), established under Article 8 of the EMFA, the Authority assists the European Commission in preparing guidelines for the application of the provisions of paragraphs 1, 2, and 3 of Article 24 of the EMFA. The issue is discussed within one of the EBMS working

[3] Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on fair and contestable digital markets and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act).

[4] "Gatekeeper" means an undertaking that provides core platform services (which may include online intermediation services, search engines, social networking services, video-sharing platform services, person-to-person communication services, operating systems, browsers, virtual assistants, cloud computing services, and online advertising services). To qualify as a *"gatekeeper*," an entity must also have been designated pursuant to Article 3 of the DMA.

groups for 2026 (Working Group 2 - Media Freedom and Pluralism in the Internal Market), chaired by AGCOM[5] .

130. The principles contained in the first paragraph of Article 24 of the EMFA largely mirror those already provided for in the aforementioned Article 1, paragraph 6, letter b), No. 11 of Law No. 249/97, which stipulates that audience measurements must comply with criteria of *"methodological correctness, transparency, verifiability, and certification by independent entities*," and further requires that such measurements *"be carried out by bodies that are fully representative of the entire sector in question*." Furthermore, through Resolution No. 194/21/CONS, AGCOM has imposed on audience measurement companies the obligation to subject their surveys to periodic review and evaluation by independent technical entities capable of operating transparently.

131. With regard to the principle of "comparability," introduced by the EMFA, the Authority notes that its lack of explicit inclusion in national regulations is easily explained by the absence of a specific need in this regard. The existence of "single-medium" surveys, conducted by entities organized as JICs, has, in fact, not made it necessary, until now, to ensure that measurement results from different sources were comparable with one another. However, following technological developments and the consequent evolution of audience measurement systems, the issue of the comparability of data relating to homogeneous content - which is targeted by the same advertisers - has become central. From this perspective, therefore, the Authority observes that, even where different audience measurement systems exist to measure the same type of content, it will be essential that the results produced by such systems be comparable with one another, and that the Authority is called upon to ensure compliance with the principle of comparability among the various measurements, pursuant to Article 24 of the EMFA.

3.2 Assessment of the preliminary findings. The need for a uniform framework for measuring digital audiences

132. Resolution No. 199/25/CONS, which initiated this preliminary inquiry, highlighted the absence of shared standards, as well as of certified, independent, and verifiable methodologies regarding the measurement of digital platforms, emphasizing how this situation directly affects the proper allocation of advertising investments and may lead to information asymmetries and competitive distortions. In a context where audience measurement services have a decisive impact on the valuation of advertising placements, investment planning, and the assessment of the corresponding return on investment, the availability of reliable, objective, and comparable data regarding the consumption of editorial and advertising content distributed by digital platforms is an essential prerequisite for the proper functioning of the market.

133. The preliminary findings indicate that there are still divergent views regarding cross-media measurement methodologies. In particular, while broadcasters (primarily

[5] https://media-board.europa.eu/document/download/7efc8362-533d-4e27-9ca1-b181e6a49313_en?filename=WG2%20Media%20Freedom%20and%20Pluralism%20%28Terms%20of%20Reference%202026%29.pdf

falling under the category of linear media service providers) operate within a measurement system (Auditel) based on shared metrics, audited procedures, and certification models recognized by the market, a significant portion of digital platforms use proprietary measurement systems or solutions not fully validated by independent third parties.

134. At present, the methodology adopted by Auditel (see *below*), characterized by the use of a single SDK, constitutes a best practice, recognized as such internationally. Nevertheless, the analysis of the contributions received does not reveal a single technical solution on which all parties involved in this analysis agree.

135. It is worth reiterating that data consistency does not stem from the technology itself, but can only be ensured if the technological solutions adopted are governed by a set of transparent rules, based on shared standards and conventions that ensure full comparability and verifiability of the data produced and the metrics.

3.3 Role of Governance and Control of Research Assets

136. The preliminary findings indicate that the governance model best suited to ensuring the transparency, independence, representativeness, and verifiability of audience data remains that of the Joint Industry Committee (JIC). This approach is consistent with the guidelines already expressed by the Authority in Resolution No. 194/21/CONS, which identifies the JIC as the reference organizational model for conducting audience measurements, requiring that it ensure audits, replicability of all stages of the process, full traceability of information flows, and control over strategic research assets, with a guiding role over the entire data production chain. The aforementioned measure highlights in particular how the adoption of the JIC model serves to ensure effective representativeness of the entire sector in question, as required by the primary regulation.

137. The evolution of measurement methodologies in the digital ecosystem, while allowing for the use of diverse technical solutions, must not in any way result in a weakening of system governance or a loss of control over research assets. On the contrary, the huge complexity of the digital context requires that the JIC retain a central role in guiding and overseeing all essential components of measurement and validation, thereby confirming its status as the reference body for defining standards, certifying data quality, and safeguarding comparability and transparency. Within this framework, the JIC must be able to ensure a standardized methodological framework.

138. Currently, there are two Joint Industry Committees that serve as benchmarks for measuring video/text editorial and advertising content: Auditel and Audicom. Auditel adopts the governance model of the Joint Industry Committee, a cross-industry body that brings together all stakeholders in the television market, namely broadcasters, advertisers, and media agencies. Auditel's mission is to collect and distribute data that captures the full range of television publishers' offerings across digital, satellite, live, and on-demand formats, on all platforms and devices. Television broadcasters are defined as providers of linear audiovisual media services that originally and primarily operate on broadcast transmission platforms (such as satellite, digital terrestrial, and cable), whose content distributed via transmission platforms other than those based on the internet cannot be

technically measured using a census-based system. In fact, the measurement of such content follows entirely independent logic, taking place via *meters* installed in households that are part of the panel and is possible exclusively within a centralized measurement system. Logically, census-based measurement of digital content from the same publishers participating in Auditel that is transmitted via internet-based platforms is also possible only if it is carried out using a single instrument controlled by the JIC, after which the data produced by the two measurement methods - sample-based and census-based - must be merged. The information represents a *currency*, that is, the unit of measurement recognized by the market to evaluate the return on investment, both from an editorial and an advertising perspective. To date, Auditel produces the television editorial *currency* (AMR - Average Minute Rating), which also serves as the basis for defining the advertising *currency* (GRP - Gross Rating Points), upon which commercial policies are defined by the supply side and communication campaigns are planned by the demand side.

139. Audicom, on the other hand, is the Joint Industry Committee, established in March 2023, resulting from the merger of Audiweb (the Joint Industry Committee responsible for collecting and distributing data on digital audiences) and Audipress (the Joint Industry Committee responsible for collecting and distributing data on print media readers) with the aim of developing and offering the market *Integrated Research* on the consumption of multimedia, editorial, and/or advertising content via the internet and daily and periodical print media. It is a company owned by trade associations representing both the "Publishers' Side" (Fedoweb - Federation of web operators - and FIEG - Italian federation of newspaper publishers) and the "Users and Advertising Agencies" (UPA - Associated advertising users - and Assap Servizi Srl). Its establishment responds to the need to create, for the first time, an integrated *digital + print* research system and to produce and distribute *total audience* data for editorial and advertising content. From the outset, among the announced pillars of Audicom's measurement were digital measurement, via panels and Video and Text SDKs (video SDK provided by Auditel); and print readership measurement via CAPI - CAWI interviews.

3.4 Overview of measurement methodologies and technologies

140. The analysis of the positions that emerged during this preliminary inquiry reveals a high degree of consensus on the indispensable role of JICs, while at the same time confirming a lack of uniformity of views regarding the technological tools best suited for audience measurement in a digital environment characterized by a wide variety of content and providers. The positions of the parties regarding the advantages of SDK or S2S (*server-to-server)* solutions appeared to be relatively polarized.

141. Beyond the technical characteristics of the solutions, each must also be evaluated in terms of its ability to adapt to shared measurements within a JIC. In general and from a strictly technical perspective, the *server-to-server* approach does not represent a different method of data collection and measurement compared to the so-called "SDK" approach.

142. In general terms, the data collection, measurement, and processing chain presents a substantially identical structure. In particular, it comprises an initial phase involving a

technology to track user consumption on personal devices at the application level; a raw data collection phase at a primary server, where initial cleaning and aggregation operations are also performed; and a final processing phase, geared towards the production of metrics and audience data.

143. What differs between the two approaches is who performs the initial measurement, who performs the initial data processing, and what operations and processing such treatment entails. From this perspective, the experience gained by Auditel in the field of television audience measurement appears highly significant. The Authority has reiterated on several occasions (see Resolution No. 43/23/CONS) that Auditel "performs an essential systemic function."

144. Starting in 2018, Auditel adopted a census-based measurement system for digital video content using a single SDK (provided by Comscore and licensed exclusively to Auditel) that ensures consistent measurement by applying the same rules to all participating publishers. Starting in April 2022, the results of digital content measurement via SDK have been combined with those of panel-based sample measurement of television content to obtain a single-source data set.

145. The adoption of a single SDK developed according to specifications defined by the JIC (as is the case in Italy) allows for independent third-party data collection that is absolutely identical for all surveyed entities in terms of signals, functionality, and collection methods, as well as the application of logic for calculating durations. This is a continuous process that, in addition to the setup phase, is constantly maintained in line with technological innovations (such as operating system developments), ensuring a simultaneous and consistent release of measurements for all surveyed entities.

146. The use of a single SDK is the proven *Gold Standard* methodology for ensuring consistency in data collection among publishers, as demonstrated by Auditel. Digital audiovisual audience measurement systems based on the adoption of a single video SDK, shared by all measured entities, therefore represent the most advanced standard available in terms of homogeneity, comparability, verifiability, and independence of measurement. Where already operational (Auditel), these systems constitute a mature and certified market infrastructure, based on rigorous and continuous certification of implementations and daily quality control.

147. S2S technology is relevant for those entities not currently part of any recognized measurement body, particularly global online platforms and VoD service providers, which have faced technical and/or operational challenges in implementing the single SDK.

148. In general, it is important to note that the two measurement methods have a structural difference determined by the data collection method: in the case of a third-party SDK, it is precisely this independent component that directly collects data from the end-user's device, ensuring methodological consistency and data integrity.

149. Differently, in the case of the *server-to-server* method, the data is collected directly from the measured entity using methodologies and standards that may vary; once collected, it is then stored in a *repository* - a server - where processing is performed to minimize the amount of information to be transferred and to adapt it to the transmission format in which

the data is made available to the JIC or the independent meter. It is therefore clear that the difference lies in the collection methodology, the varying accuracy and granularity of the data, and the differences in the processing operations performed prior to making the data available to the JIC.

150. An example related to this issue is how different tracking technologies handle cases of duration quantification in the absence of explicit events of interruption or conclusion of video playback, cases in which video playback is paused and then restarted, or cases in which video playback is subject to fast-forwarding or accelerated playback. This clearly implies that methodological rules, data exchange formats, and acceptability thresholds must be defined by the JIC and applied consistently by the measured entity. While the single video SDK, by definition, provides a unique and common census-based measurement foundation for all consumption events and all measured entities, the *server-to-server* methods for detecting viewing events may vary and differ from one another.

151. The *server-to-server* measurement methodology represents a general approach in which the measured entity performs the initial data measurement using its own measurement technology. Therefore, in the *server-to-server* approach, the generation of the initial raw data is managed and controlled by the measured entity; there are then multiple variations depending on how the measured entity pre-processes the viewing data before passing it to the measurement body. This pre-processing can be performed at various levels (it may involve data filtering such as privacy filtering to minimize or anonymize information, filtering of non-human traffic, and the correction of any errors or incomplete data).

3.5 Scope of Competence of the JICs

152. According to the guidelines formulated over time by AGCOM, and taking into account the experience gained within Auditel, the role and exclusive purpose of the JIC is to measure and certify the volume and profile of consumption of editorial and advertising content falling within its scope of competence. A JIC cannot be fully independent if it oversees only the methodological aspects: it must also control the technology and processing operations used to produce the data and have full access to them, as well as take into account the differences among the entities surveyed.

153. The Authority considers it appropriate to reiterate that audience measurement activities are of general interest*, "justifying the supervisory role assigned to the Authority to protect the prevailing public interest in the transparency and accuracy of disseminated data, given its significance for the market*". In this context, every effort must be made to avoid the overlap of multiple metrics for measuring online audiences, so as not to provide the market with data that are not comparable with one another or, in any case, measurements derived from metrics based on different conventions. Therefore, within the scope of the JICs, and also to ensure the desired sharing of assets, it is important to prevent the use of non-comparable methodologies, while ensuring transparency, verifiability, independent certification, and consistency in the measurements.

154. In this context, the criterion for defining the scope of each JIC is not merely subjective or corporate, but functional: each operator is placed within the scope of the JIC and the technology used, that best allows for the measurement, in a unique and consistent manner, of the consumption of the content offered. In accordance with this principle, television broadcasters whose consumption volumes cannot be measured solely through census-based methods are assigned a dedicated JIC (Auditel). Similarly, video content publishers and distributors whose consumption volumes can be measured only through census-based methods are assigned a separate JIC (Audicom).

155. With regard to the Audicom survey system, it is worth noting that, as early as the evaluation phase of the bids received in response to *the Request for Proposal* (RFP) issued by Audicom to identify the institution(s) that would conduct the new study, one of the technical issues discussed preliminarily was whether or not different census survey techniques could be used for different players and, therefore, the acceptability of *server-to-server* integration for Audicom.

156. Therefore, although in its initial phase the JIC provided for the use of a single SDK model for measuring video content - which therefore remains the standard option for entities intending to join Audicom - as demonstrated by the responses provided by numerous respondents, who argued that integrating the SDK into closed and proprietary platforms would ensure methodological consistency and comparability with other measured entities - the *server-to-server* approach has been analyzed by the JIC, as evidenced by the work of the Platform Observatory.

3.6 Interoperability, Comparability, Auditability

157. The single SDK solution, currently adopted by Auditel, inherently ensures full and immediate compatibility with the principles established by EU and Italian legislation, as well as with the regulatory measures adopted by AGCOM. Consequently, this solution constitutes the methodology that serves as the benchmark for the Italian market. As already explained, this stems from the fact that SDK-based audience measurement systems are characterized by the direct collection of usage data on the end-user's device, according to uniform, declared, and verifiable methodological rules defined and governed by the appointed measurement entity or the Joint Industry Committee, whereas *server-to-server* systems provide that the measurement and initial data processing take place within the infrastructure of the measured entity, using technical methods and aggregation levels that are potentially heterogeneous.

158. The *server-to-server* model is therefore not a single method of handling census data, nor a single coherent and standardized measurement methodology, but rather a "general approach" that allows for multiple variations in how each entity collects, gathers, and pre-processes audience data before passing it to the JIC.

159. Compliance with the principles set forth by the EMFA - and previously outlined in this Authority's measures - namely transparency, impartiality, comparability, and auditability, therefore requires that the *server-to-server* approach be fully comparable to

the SDK approach (regarding the format of collected and produced data, collection methods, and auditability).

3.7 Requirements to ensure the comparability, transparency, and verifiability of audience data from a technology-neutral perspective

160. The tracking technologies implemented in a *server-to-server* system are required to demonstrate functional equivalence with the single reference video SDK. Comparability between data produced by SDK systems and data generated via *server-to-server* flows therefore requires compliance with specific technical and methodological requirements, including the availability of data with an adequate level of granularity, transparency in the rules for constructing events and sessions, their stability over time, as well as the subjection of the systems to independent audit processes.

161. To ensure this objective, the following are the minimum conditions under which audience measurement systems based on *server-to-server* architectures may be considered comparable to those based on a single SDK.

162. a) The first requirement is to ensure full comparability of tracking and measurement technologies with those derived from a single video SDK. To this end, the JIC must ensure - and therefore be in a position to verify - that tracking and measurement technologies other than the single video SDK detect or are capable of reproducing, from the raw data collected by the measured entity, a data stream "equivalent" to that produced by the single SDK: based on the measurement of audiovisual consumption of all editorial and advertising content directly within digital distribution environments, with the same granularity regarding viewing events (such as: start, stop, pause, fast-forward, skip, etc.), and with the same underlying time base (temporal granularity) for viewing acts. The measured entity may minimize the information to be transferred and anonymize certain parameters of this data stream to comply with privacy regulations, provided that it is nevertheless ensured that the data made available allows the JIC to carry out adequate and appropriate certifications, including data replicability. The procedures underlying this operation must be defined by the JIC. These activities should be preliminarily tested and continuously verified to ensure that no systematic deviations arise from the different technologies used;

b) The raw data collected by the measured entity, as well as the data stream "equivalent" to that of the SDK containing the vision events, must be stored by the measured entity and made available and accessible to the JIC (after carrying out any minimization and/or anonymization processes referred to in point a). The measured entity must, in accordance with the JIC's instructions, implement security policies and measures to protect such data from possible tampering or alteration. These security measures must be based on best practices and the most rigorous security protocols. The measured entity must grant the JIC full access to the raw data collection system during the processing stages prior to transmission to the JIC's servers. Such access allows the JIC to verify that all data provided to the JIC is fully and continuously controlled by it. In this regard, during the preliminary inquiry, solutions were proposed regarding the use of a *data clean room* - functionally

similar to a data intermediary the use of which will be subject to evaluation and validation by the JIC in relation to the principles of verifiability set forth above;

c) The data streams containing the viewing events referred to in point a) must be transmitted from the measured entity's server to the JIC's server, which will perform the necessary processing and data aggregation on them to determine viewing durations and other parameters useful for subsequent quantifications;

d) The processing rules applied by the JIC to the data stream containing viewing events must be consistent with those used by the JIC itself in measurements based on the single SDK;

e) The JIC must select one or more third-party firms to conduct audits to certify and validate all stages of the process: such third-party firms must be independent of and free from any conflict of interest with respect to the entities regarding which they will perform their activities. This is important to ensure that any data or information the JIC uses for the purpose of conducting the audience measurement process can be independently verified and controlled by the JIC itself, through logics, procedures, and methods defined autonomously by the JIC.

f) The JIC must also establish census-based verification systems to ensure the consistency and coherence between the consumption data for editorial and advertising content communicated via servers and the data received by the JIC directly from the digital properties of the measured entity. To this end, it should equip itself with census verification systems (so-called verification or *audit ping* systems) that allow it to validate and verify "from the outside" every single event of editorial or advertising content consumption across the entirety of the traffic detected[6] . This external verification system must be used as a filter for the validity and acceptability of the traffic reported via server.

g) It must be ensured that the measured entity implements stringent technical security solutions and measures aimed at preventing the alteration or manipulation of data during processing phases under its direct control.

163. The JIC is therefore called upon, in accordance with the above requirements, to define the rules and minimum requirements that a measurement system based on *server-to-server* (S2S) technology must meet to produce an official *currency* for the digital audiovisual audience. This objective appears to be closely linked to its governance architecture: methodological rules, data exchange formats, and acceptability thresholds

[6] The study produced by the Politecnico di Milano for Anitec clarifies, with regard to audit systems, that a verification strategy is sample-based auditing, focused on random checks known as audit-pings. It should be noted, however, that the audit-ping approach can be applied to a population equivalent to the census-level population of the S2S system. This means that a ping can be sent to all connections (thus using a census-based approach) to verify that the number of connections detected by the pings (pongs) matches the number transmitted by the S2S system.

must be approved by corporate bodies representing the entire market, thereby ensuring full uniformity among all measured entities.

164. Precisely from the perspective of governance, it is worth reiterating that the provision establishing AGCOM's supervisory power (Article 1, paragraph 6, subparagraph b), item 11 of Law No. 249/97) requires the Authority to ensure that the measurement of audience and readership ratings for various media, across any distribution and dissemination platform, not only comply with criteria of methodological correctness, transparency, verifiability, and certification by independent entities, but also that they are carried out by bodies that are fully representative of the entire sector in question. In this perspective, given that the measurement of the digital environment requires the inclusion of new entities in the JIC (as specified above), it appears necessary for these entities to be provided with adequate representation within the JIC, itself in order to contribute to the formation of corporate bodies and the adoption of decisions in accordance with the procedures defined in the articles of association. It follows that Audicom must promptly revise its articles of association and governance structure to ensure adequate representation of the newly measured entities so that they may participate, alongside other stakeholders, in defining the new composition of corporate bodies; this, therefore, can only occur after the amendment of the articles of association and the corresponding expansion of the governance structure.

165. Without prejudice to the provisions of the EMFA, it is nevertheless desirable that all entities conducting measurements relevant to the advertising market be included within a JIC.

CONSIDERING that certified audience data constitute the fundamental *currency* not only of the television market but of the entire cultural industry market and thus contribute to ensuring a fair and transparent structure of the advertising market. At present, in the absence of an interoperable measurement system across various media, the presence of broadcasters and publishers measured by JICs on the one hand, and new digital and OTT players that self-certify their volumes on the other, risks adversely affecting pluralism as well.

HAVING TAKEN NOTE of the findings of the preliminary inquiry;

NOTING the lack of shared standards and of certified, independent, and verifiable methodologies regarding the measurement of digital platforms;

CONSIDERING, in light of the above, the need to issue the directives necessary to ensure compliance with the principles of transparency, impartiality, comparability, and verifiability set forth in Article 24 of the EMFA, as defined in the Authority's measures and in this resolution, with regard to the methodologies for measuring content disseminated by entities not currently part of a JIC, where such content is originally and exclusively consumed in a digital environment;

HAVING HEARD the report of the President;

RESOLVES

Article 1

1. The Authority adopts this directive to ensure that the measurement of the audience for content distributed by digital platforms - whose consumption occurs, originally and exclusively, in a digital environment - is carried out by the Joint Industry Committee (JIC) designated for this purpose, Audicom, according to a methodology that respects the principles of transparency, impartiality, comparability, and verifiability as set forth in the preamble.

2. For census-based measurements, Audicom shall preferably adopt measurement systems based on the direct collection of consumption data on the end-user's device, in accordance with uniform, declared, and verifiable methodological rules defined and governed by the JIC itself (single SDK standard).

3. Where, in light of the foregoing, it is intended to complement the single SDK standard referred to in paragraph 2 with a *server-to-server* (S2S) approach, Audicom shall adopt the minimum requirements, as defined in the rationale and resulting provisions of this measure, that a measurement system based on *server-to-server* technology shall necessarily satisfy in order to produce the official *currency* of the digital audiovisual audience. The tracking technologies adopted in a *server-to-server* system must be functionally equivalent to the technology based on the single video SDK.

4. Audicom shall identify one or more independent third parties to be entrusted with the task of conducting audits and inspections, as well as external census-based verification - based on *ping/audit* technologies - of the methodology adopted.

5. The principles and criteria of digital audiovisual audience measurement systems - based on the adoption of a single video SDK shared by all measured entities - remain unchanged, as they represent the most advanced standard available in terms of uniformity, comparability, verifiability, and independence of measurement.

6. In order to ensure maximum representativeness of the entire sector, Audicom must promptly revise its governance structure to ensure adequate representation of the new entities being measured so that they may participate, together with the other stakeholders, in defining the new composition of the corporate bodies, which may only take place after the amendment of the articles of association and the related expansion of the governance structure.

Article 2

1. The JIC referred to in Article 1 shall communicate to the Authority, within one month of the publication of this resolution, the roadmap for implementing the directives set forth in this measure, including the revision of governance, taking care to specify the timelines

and procedures for the resulting initiatives. Until the system is fully implemented, Audicom shall submit to the Authority, on a semi-annual basis, a report on the progress of the phases set out in the roadmap, in compliance with the directives issued.

2. The Authority shall monitor the implementation of the directives issued in accordance with the submitted roadmap, reserving the right to adopt appropriate measures in the event of non-compliance.

This resolution shall be published on the Authority's website and notified to the JICs Auditel and Audicom.

An appeal against this resolution may be filed with the Lazio Regional Administrative Court within sixty days of its publication.

Rome, March 25, 2026

THE CHAIRMAN
Giacomo Lasorella

Certifying compliance with the resolution
THE SECRETARY GENERAL
Giovanni Santella