

[A] Media Placement and the 73.8% LPA Standard

1. LPA Compliance Standard. A placement will be considered to be in compliance with this LPA standard if:

i) The advertiser has a reasonable expectation, determined by using reliable, up-to-date audience composition data, that the LPA audience composition will be at least 73.8%;

• Note – Reliability of Downloadable Application and Podcast Data: Collection of audience composition data for downloadable applications and podcasts is limited. Accordingly, relying on this data alone is not sufficient for these mediums and advertisers must also comply with the specific best practices included below.

ii) The advertiser conducts internal, semi-annual, after-the-fact audits of a random portion of past placements to verify that such placements were in compliance with the 73.8% LPA audience composition standard; and

iii) The advertiser, upon learning of a non-compliant placement, takes appropriate, corrective action for future placements.

2. Reasonable Expectations and Market Realities. A reasonable expectation for meeting this demographic standard takes into account marketplace realities, the medium, and available demographic audience composition data, including:

i) Recognition that a company's media buys generally are determined prior to its upcoming fiscal year for placement during the course of that fiscal year;

ii) Recognition that a company's media buys rely upon historical demographic data to estimate the future LPA+ audience composition; and

iii) Recognition of the availability and publication intervals of syndicated audience composition data; for example, MRI TwelvePlus data are published annually and Nielsen Audio data are published quarterly, whereas national broadcast networks have the most frequently measured syndicated audience composition data (national Nielsen data) thereby affording, among other things, more data for advertisement placement and for more expeditious after-the-fact audits, as compared to, for example, local (spot) TV and cable, as well as radio and print media. Syndicated audience composition data, such as comScore or Nielsen Online (formerly Nielsen//NetRatings), for internet/digital communications also are published on a more frequent basis and are taken into account in these guidelines for purposes of advertisement placement and post audits

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