

INTERNET/DIGITAL BUYING GUIDELINE

In developing this guideline, the DISCUS Code Review Board met with experts in the field, syndicated “internet” demographic data sources and various media companies to obtain their respective best thoughts in devising a “buying guideline” for this medium to implement the 70% 21 years of age and older demographic provisions of the Code. As a result of a host of meetings and discussions, the Board developed the internet/digital buying guideline set forth below that will apply to advertising and marketing materials placed on that medium on and after January 1, 2008. Placements on this medium also will be subject to the Code’s provision for semi-annual after-the-fact audits of a random portion of past advertising/marketing placements. To the best of our knowledge, we are the first trade group to issue an internet buying guideline that will be used across an entire industry.

The guideline was designed to anticipate many different scenarios and circumstances for the use of this medium. For example, for new websites not measured by a syndicated data source, the guideline provides that one could use the website’s “registered user” database to place advertising or marketing materials to individuals 21 years of age and older viewing the website. Alternatively for new websites, the guideline provides for the option of obtaining from the publisher of the website an independent demographic survey using the most recent three-month site average of available audience data of unique visitors. If those options are not available, the bottom line would be no advertising on that new website. In many ways, the digital guideline is similar to the “unmeasured magazine” initiative whereby maiden/new publications intended for general circulation (even if it is a prototype of another magazine) require a third-party survey of subscribers before an advertisement placement. If there is nothing to measure, then there will be no ad placement pursuant to this Code initiative.

i.) Scope: The internet/digital buying guideline applies to all paid and unpaid (including value-added) placements made by or under the control of the advertiser, including advertising on third-party websites, video advertisements, audio mentions, internet banners, pop-ups, sponsorships, user-generated content (including blogs), and other types of internet/digital advertising or marketing.

ii.) Use of a syndicated data source: Purchase or place using “2 +” syndicated audience composition data, such as comScore or Nielsen//NetRatings, based upon the most recent three-month site average of available audience data of unique visitors (where seasonal fluctuations are evident, prior year data also should be taken into account if available).

(a) An advertiser consistently will use one of these syndicated data sources as its primary demographic measurement by brand and an alternate syndicated data source will be used only when the advertiser’s primary source does not measure that particular medium.

(b) Given that the methodologies and measurements of internet/digital media are evolving, this data source guideline will be reviewed as further developments warrant and, if appropriate, revised accordingly.

iii.) Independent measurement of unmeasured medium: If the digital medium is not measured by a syndicated data source, the advertiser prior to purchasing or placing an advertisement or any marketing materials shall obtain from the publisher of the medium an independent demographic survey based upon the most recent three-month site average of available audience data of unique visitors conducted by a third-party research company using established research methods.

iv.) More specific data to meet the demographic standard: Where the average of the syndicated audience composition data or an independent third-party survey over the three-month time period (as described in subsection iii above) does not show a 70% 21 years of age and older (LPA) demographic, the advertiser can use the website's "registered user" database to place their advertising or marketing materials to users 21 years of age and older if the website has that capability.

v.) Unmeasured medium with a "registered user" database: If the digital medium is not measured by a syndicated data source or an independent third-party survey as described in subsection iii above, but has a "registered user" database that can link a user to an age, the advertiser can use the website's "registered user" database to place their advertising or marketing materials to users 21 years of age and older.

vi.) "Limited edition" websites: For "one-time" only, event-specific and/or other similar websites, the advertiser shall review and evaluate comparable websites, the proposed content of the website in question, data provided by the publisher regarding the target audience, and any other relevant factor to project a reasonable expectation of the demographic audience prior to purchasing or placing an advertisement or any marketing materials.

vii.) Compliance standard: A placement will be considered appropriate when the percentage of unique visitors reflected in the above-referenced data show that the placement is in compliance with the Code.

viii.) Post audits: A past placement will be considered appropriate where demographic data for the month(s) in which the placement ran show an LPA audience composition that was in compliance with the Code.

ix.) Post audit corrective measures for future placements: In the event that the post audit indicates that the placement did not meet the LPA demographic standard, the advertiser will, as soon as practicable, make schedule adjustments, cancellations, or other appropriate changes to comply with the standard in future placements.