



March 18, 2021

To: Users of Consumer Data Sets and Attribution Products

From: George Ivie, Anthony Torrieri, David Gunzerath, Ron Pinelli, Laris Oliveri

re: Outcomes and Data Quality Preliminary Guidance

### **Introduction**

The Media Rating Council (MRC), in its ongoing effort to develop standards for media measurement, has begun an effort to set standards for data quality and attribution of outcomes to ad exposure and engagement.

More specifically, MRC has embarked on an effort to set standards to provide guidance and requirements for data collection, cleaning and integration as well as include a focus on the use of data sets and the process of determining the user actions that lead to desired outcomes between ad exposure, interaction/engagement and conversion.

MRC has been working with our partner industry associations for many years to evolve standardized digital metrics so that digital media could be compared and combined with legacy media such as TV to truly enable cross-media planning, buying and selling. After all that work, which included intense efforts to coalesce a large group of industry participants around minimum standards and to reduce advertising waste, we had finally reached an inflection point where we could write a cross-media framework (which was completed in September 2019).

This framework was also necessary to begin work on the ultimate goal, measurement of Outcomes and Return on Investment (ROI), but was a step that had to be completed, as outcome measurement without corresponding accurate delivery and exposure measurement is not actionable and will lead to misallocation of media spend. With this framework in place, MRC hopes there can be coordination to build systems for industry participants with global interests that include independent, validated data with sufficient granularity to support consistent measurement and enable connections to accurate Outcomes measurement.

As the media measurement landscape evolves to include more cross-media and hybrid measurement models and as privacy regulation makes demographic data more fragmented and less ubiquitous, large scale data sets become increasingly important, not only as the sole source for analytics products, but also as a key input into exposure, engagement and Outcomes measurement models.

While the MRC believes our Minimum Standards and previous Data Integration Guidelines serve as a helpful framework for evaluating large data sets, we also believe more specific and

focused guidance is required to be developed related to data acquisition and processing, likely in conjunction with standards for attribution of outcomes to ad exposure and engagement.

Such standards will focus on the quality, validity, recency, granularity and accuracy of datasets as it relates to their intended use.

Outcomes measurement without corresponding accurate delivery and exposure measurement is not actionable and will lead to misallocation of media spend. Sales data have always been measurable and are becoming increasingly so with digital and direct to consumer transactions. However, existing attribution methods tend to remain aggressive and favorable to the platforms measuring them. As such, it's critical to have an independent and accurate view of delivery and exposure to form a base eligible for attribution of outcomes.

Attribution to ads that were never delivered, never had an opportunity to be seen or served to invalid and robotic users will lead to inaccurate decision-making. Sophisticated Invalid Traffic (SIVT) filtration will be required for this purpose, as it is for other audience measurement.

MRC is embarking on an effort to set standards for the process of determining and measuring the user actions that lead to desired Outcomes between ad exposure, interaction/engagement and conversion or attribution measurement.

### **Executive Summary**

As part of the initial information gathering efforts for this Standard, MRC spoke to several MRC member organizations about their points of view, issues and recommendations in several areas across data quality and attribution. Our discussions included eleven different organizations, comprised of 2 industry trade organization, 4 agencies, 2 advertisers and 3 media organizations. All discussions were held on the condition of anonymity as our intent was to summarize findings in aggregate and not attribute any specific points of view to any one respondent.

As a next step, MRC is embarking on having direct discussions with practitioners in the measurement space, as well as working with a large working group of over 200 participants to develop a written Standard. But, as noted above, we thought it important to first speak to the ultimate end users of these products for a perspective that is not informed by any direct ties or vested allegiances to specific approaches or methodologies. Overall, the observations were varied in terms of preferred approaches. Advertisers and agencies we spoke to had very unique perspectives, depending on either the consumer space they relate to or specific campaign goals. Agencies in particular had a wide array of perspectives, as they often serve a multitude of clients with vastly different campaign goals and preferred approaches. Other media organizations had perspectives that ranged from an ultimate belief in delivery of audience and targeting within it, to a mix of approaches.

There were staunch supporters of "Top-Down" Marketing Mix Modeling (MMM) approaches given perceived difficulties connecting omni-channel data in a meaningful and privacy-safe way. On the other side of this perspective, there were firm believers in "Bottom-Up" attribution models. This has led MRC to recalibrate our approach to standardization, from encouraging one

method over another, to enumerating the various approaches and requiring disclosure, empirical support and alignment of approaches with appropriate use cases.

Despite the disparate viewpoints regarding approach, there were some consistent responses from participants:

- Nearly all participants expressed the need for high quality and robust datasets underlying various methodologies.
- Many participants expressed challenges related to privacy regulations and declining match rates across disparate datasets, as well as difficulty tracking and managing various permissions.
- Very few participants fully understood how the various services they rely on work, and expressed a need for greater transparency, disclosure, and performance metrics related to errors and bias, as well as reliability.

These topline findings are detailed further below and will form the basis of MRC's efforts to expand on standardization in this area.

### **Detailed Preliminary Findings**

1) **No "One Size Fits All"**: As discussed above, when determining advertising impact and return on ad spend, there are two overarching approaches: "Top Down" MMM approaches that take into account advertising spend and media investment as well as other external and environmental factors to model impact on sales (lift, ROI, incrementality); and "Bottom-Up" attribution approaches that attempt to attribute conversions, outcomes or sales to single or multiple advertising exposures within a media vertical or across channel.

While MMM was supported by some participants as a more holistic or macro view of ROI without the need for user level data, there were challenges expressed, such as the historical nature of these approaches, the lack of granularity and the inability to take action timely based on them. Even still, as MMM approaches are viable for various use cases there will be a need to enumerate the various methodologies within them and standardize best practices for empirical support of the models used and the underlying data and weighting. In addition, disclosures related to this, as well as to any limitations related to periods analyzed and the recency of data or validation, will also be required, perhaps using a combination of attribution approaches.

Related to attribution, while benefits expressed for these approaches included increased granularity, more timely ability to activate insights and direct relationships between ad exposure and outcomes, there were many inconsistent approaches detailed, as well as healthy skepticism expressed based on a lack of full understanding of underlying data and methodology. Among those supporting attribution approaches, there were many who espoused the aims of Multi-Touch Attribution (MTA) and Cross-Channel Attribution (CCA) in considering different consumer touch points when attributing an outcome, but there were some who supported the power of single-touch approaches (such as last touch or first touch) depending on a campaign goal. Even among supporters of MTA there were varying perspectives regarding how to assign weight to

various touch points or which attribution windows are most effective, as well as how to account for external factors.

An emerging approach in this area attempts to design randomized control experiments to benchmark against control groups to determine incrementality was highlighted by some respondents and this approach is a promising and emerging methodology that can be used in isolation and as a means to validate other approaches delineated above. Certain advertisers indicated it is often difficult to obtain statistically reliable or recent data to perform this effectively, but it is a viable approach that will be included in the Standard.

***MRC Recommendation:*** *It has become clear to MRC that our standards setting efforts in this area should enumerate the various approaches of both MMM and Attribution as well as the various approaches within them and require empirical support for use cases, based on robust data quality with clear disclosure of capabilities and limitations related to each. This should include requiring validated empirical support that is periodically updated for methodology, weighting decisions, attribution windows and accounting for external factors.*

*It is likely each of these approaches will continue to persist and have meaningful value for various creative types and campaign goals, but it will be important for MRC's eventual Standard to include consistent definitions and requirements focused on the various aspects of each.*

**2) Data Considerations:** MRC embarked on this project with the understanding that large scale datasets were integral to Outcomes measurement, including consumer datasets for identity and behavioral targeting, media spend and allocation data, sales and Customer Relationship Management (CRM) datasets, as well as advertising exposure data itself. Participants we interviewed reinforced this understanding and while MRC will likely need to produce additional focused Standards related to data quality, it is clear that a significant aspect of the Outcomes Standard will incorporate data considerations.

In addition to privacy considerations related to these datasets discussed further below, participants raised issues related to the source and recency of data, as well as inconsistent and opaque collection methodologies (likewise, see further discussion regarding the need for transparency discussed further below). Participants also indicated a need for more rigorous and consistent sample size, statistical reliability, and other KPI reporting.

***MRC Recommendation:*** *The MRC believes we have already authored several Standards that include requirements for quality data aspects in our MRC Minimum Standards, Digital Audience and Cross-Media Video Measurement Standards and Data Integration Guidelines that should be incorporated and leveraged in the eventual Outcomes Standards, but that additional requirements will also be necessary specific to uses of data in Outcomes measurement. These requirements will cover data collection, sourcing, recency and quality as well as reporting and disclosures of performance and reliability. In addition, the MRC is likely to author specific additional data quality standards under separate cover that will be applicable to Outcomes.*

**3) Privacy Challenges:** Privacy was a common theme among participants. To be clear, MRC's position is that privacy regulations (GDPR, CCPA, CRPA, et. al.) are not a barrier to be

engineered around, but hard and fast requirements that must be adhered to and that must be considered when designing Outcomes measurement methodologies. MRC intends to reinforce the need to adhere to these (and any future) legally mandated privacy regulations, to author standards circumspect of them, and to avoid standardizing any requirements that contradict them. That said, many participants indicated privacy regulations are already impacting Outcomes measurement and that future browser and device restrictions will compound this impact.

Many MMM and attribution approaches and methodologies are reliant on matching of disparate datasets, often based on user-level identity and with differential permissions. Many participants indicated managing permissions is a process that is often manual and labor-intensive, as the ultimate goal is to use the data without violating consent, but currently it is often hard to ascertain or track permissions in a standardized way. Further, participants indicated that match rates are declining due to privacy regulations currently in effect, resulting in less robust, reliable and actionable Outcomes measurement as well as diminished granularity. Participants also expressed the belief that future browser and identity restrictions may exacerbate these challenges, which may, in turn, differentially impact attribution approaches, especially cross-channel. These same participants asked whether privacy regulations and restrictions would render some existing attribution approaches less viable and wondered whether this may place more importance on opt-in panel approaches, specific media vertical analysis, or mix modelling.

***MRC Recommendation:*** *Again, MRC's position is that privacy regulations (GDPR, CCPA, CRPA, et. al.) are not a barrier to be engineered around, but hard and fast requirements that must be adhered to and that must be considered when designing Outcomes measurement methodologies. MRC intends to reinforce the need to adhere to these (and any future) legally mandated privacy regulations, to author standards circumspect of them, and to avoid standardizing any requirements that contradict them.*

*Further, MRC intends to collaborate and work in concert with other relevant groups to help standardize permissions and privacy-related tracking datapoints that will be included in the eventual Standard. Finally, it is clear that further standardization related to disclosures of privacy restriction impacts on data, along with minimum sample sizes and reliability KPIs, are necessary and should be incorporated into any Outcomes and other data Standards. This may need to be specifically focused on cross-channel and attribution approaches that rely on matching disparate datasets with differential permissions.*

*Future browser and identification restrictions are likely to continue to evolve during and after the Outcomes Standard-setting process and it will be important for MRC to stay abreast of and consider these throughout, as well as to update the eventual Standards as warranted.*

**4) Opacity and The Need for Transparency:** Very few participants fully understood how the various Outcomes measurement services they rely on truly work, and expressed a need for greater transparency and disclosure. Some participants indicated that even within the same approaches and methodology across vendors, different data, assumptions and adjustments may lead to different results, and without clear disclosure of these variables, the ultimate data may be hard to interpret and rely on. In addition, some participants indicated vendors may adjust

methodology or variables for different clients and campaigns and that this can lead to difficulty, confusion and inefficiency without clear disclosure, advance notice and impact analysis.

***MRC Recommendation:*** *Transparency to end-users of measurement is at the heart of several MRC Minimum Standards requirements, and this, along with existing requirements for Audience and Cross-Media, will be incorporated into the Outcomes Standards. This will include, but not be limited to, Descriptions of Methodology, change notification and disclosures, error and reliability reporting, and disclosures of known systematic biases. It will also be necessary to incorporate Outcomes-specific advance disclosure requirements related to changes and tests in methodology. While the eventual Standard will consider and respect protection of proprietary intellectual property of practitioners, it will aim to ensure sufficient disclosure is provided to end-users to enable them to understand and interpret results.*

### **Other Items:**

Additionally:

1. **Pilot Standardization:** Many participants indicated that they often undertake pilots with Data providers and Outcomes measurement services to validate them before onboarding them, and that many of these pilots have inconsistent and vague protocols and often do not prove conclusive due to time and budget restraints. MRC's hope is that eventual MRC audit and accreditation will assist in alleviating this burden, but we also plan to incorporate guidance for pilots that address pilot set up, communication of results (including on an interim basis), and consistency of KPIs.
2. **Standardized Terminology and Taxonomy:** Participants also indicated a need for standardization of nomenclature and taxonomy for data fields, and part of MRC's Standard-setting effort will be to leverage existing industry terminology and ensure it is presented and used in a consistent manner. We also expect to interact with industry organizations to assist in ongoing nomenclature and data/campaign taxonomy standardization efforts.
3. **Viewability and SIVT:** Attribution to ads that were never delivered, never had an opportunity to be seen or were served to invalid and robotic users will lead to inaccurate decision-making. A base of rendered and viewable impressions will be required for attribution of Outcomes. Further, as MRC considers measurement of Outcomes and actions attributed to a user audience measurement, Sophisticated Invalid Traffic (SIVT) filtration will be required. Attribution measures that do not incorporate viewability and SIVT filtration may still be reported *in addition* to fully compliant metrics with proper labeling, segregated reporting and clear disclaimer (these would not be considered fully compliant but can be audited and accredited as long as fully compliant corresponding metrics are also reported and audited). Finally, measurement controls that create stronger linkage between ad delivery and presence of a user or engagement will be encouraged and should be disclosed.

### **Ongoing Processes and Next Steps**

In addition to publication of this preliminary guidance, MRC has begun authoring the framework of an eventual Standards document. Due to the broad nature and scope of this project, these Standards may need to be phased and our goal is to begin iterating through them with a large and open working group through much of 2021. As is standard practice for MRC Standards activities, we will attempt to achieve consensus among working group participants, and then expose a draft version of the Standard(s) for public comment before final publication. Our goal is to reach this point for a meaningful portion of the Standards during 2021 and thereafter to begin applying these standards to practitioners through accreditation audits.

We expect this project to be our top Standards setting priority for 2021.

Please contact the [MRC Staff](#) with any questions or to communicate your desire to participate in these activities. Thank you for your interest in the MRC Outcomes and Data Quality Standardization efforts.