

DROWNED IN ADVERTISING CHATTER

When the television industry was first brought out of state control more than a decade ago, many portended the coming of a new dawn in Pakistan. Where some hailed the entry of private players into the industry as the dawn of a new era, others heralded it as the harbinger of greater public freedoms, democratic deepening, unfettered speech, public accountability, and the maturation, modernization, and diversification of the media industry in the country. Now, nearly a decade since its first steps, the electronic media industry in Pakistan has stood on its feet, and become an important stakeholder in society, politics, economy, and religion.

When *electronic media* in Pakistan – as we know it today – came to life a little more than a decade ago, the state made an important and necessary shift. It traded its role as the unitary supplier in the industry to that of a regulator of the industry. While sustaining Pakistan Television (PTV), the Government opted to create regulatory infrastructure and allowed private investors and actors to offer their own rival broadcast services in news and entertainment streams. And with this shift, Pakistan Electronic Media Regulatory Authority (PEMRA) was born, to oversee, regulate, and arbitrate the nascent industry.

The creation of Pakistan's electronic media industry, its nascent days and its evolution, and its impact on the sociopolitical, cultural, and economic landscape in Pakistan elicits a wide range of opinions and discussions. This discourse is certainly worth having and must be appreciated, albeit greater emphasis on informed dialogue and practical outcomes would certainly be welcome. In the young history of Pakistan's electronic media industry, the odd television channel or network has had high profile entanglements with PEMRA and its web of regulations designed to shepherd and monitor the operations of the industry. These instances have sometimes been triggered by, or experienced intervention from, the judiciary. Unfortunately, these rare instances are about the only time when public attention and focus was invested in PEMRA's regulations and their practical implementation.

An oft-neglected segment of the media and communications chatter is the nature, scope, and role of advertising in Pakistan's budding electronic media industry. We all seen advertisements broadcast to our television screens across all television channels currently operating in the country. However, these advertisements and the regulatory provisions that govern television advertising in Pakistan are largely ignored, unfamiliar, and misunderstood. This serious lacuna impoverishes the ability of the viewers, as well as watchdogs, to understand the rights that are designed to protect and entrench public interests and rights, and streamline the business operations of the electronic media industry.

Gallup Pakistan has gathered data to help fill this gap in understanding by collecting and collating data on advertising in Pakistan's electronic media. More specifically, Gallup has gathered data to quantify and map the size of advertising that is beamed across television screens in Pakistan. This effort is designed to trigger public attention towards television advertising, and instigate a healthy, meaningful, and robust debate on the role and regulation of advertising in Pakistan's electronic media, with an eye on protecting viewers' interests.

WHAT DOES THE LAW SAY?

Before formulating an understanding of the quantity of advertising on electronic media in Pakistan, it is important to clearly demarcate PEMRA's guidelines on the subject. The most directly relevant observations regarding advertising on electronic media can be found in PEMRA's statutory instruments. Two distinct legislative provisions/instruments help in the contextualization and interpretation of the quantity of television advertising. First, PEMRA Ordinance 2002, as Amended by PEMRA Act, 2007, provides the following guidance on advertisement for those issued Licenses to operate television stations in the country:

Section 20:¹

(c) ensure that all programmes and advertisements do not contain or encourage violence, terrorism, ethnic or religious discrimination, sectarianism, extremism, militancy, hatred, pornography, obscenity, vulgarity or other material offensive to commonly accepted standards of decency;

(f) comply with the codes of programmes and advertisements approved by the Authority and appoint an in-house monitoring committee, under intimation to the Authority, to ensure compliance of Code;

(g) not broadcast or distribute any programme or advertisement in violation of copyright or other property right;

Section 20 and its aforementioned provisions relate to the nature of permissible television advertising and the method for complying with the "Code" that PEMRA issues in lieu of this subject matter. In the second statutory instrument, **Television Broadcast Station Operations Regulation 2012**; PEMRA's regulatory architecture goes on to explain the technical provisions relating to the quantity of television advertising. These provisions define advertising as:

Section 2 (a): "advertisement" means a set of visual and audio messages for the projection of a product, service, or idea with the object of propagating sale, purchase or hire of the product, service or idea for creating other related effects;"²

It is in Part V of this document, under the title "Standards of Programmes", that PEMRA details further guidelines with reference to advertising. These are as follows:

Section 18 *(b): Advertisements shall not be excessively noisy or strident. The maximum subjective loudness of advertisements shall be consistent and in line with the maximum loudness of programmes and junction material. Licensee shall endeavour to [m]inimize the annoyance that perceived imbalances could cause, with the aim that the audience need not adjust the volume of their television sets during programme breaks;*

¹ http://www.pemra.gov.pk/pemra/images/docs/legislation/Ordinance_2002.pdf

² http://www.pemra.gov.pk/pemra/images/docs/regulations/Television_Broadcast_Station_Operations_Regulations_2012.pdf

(c) the licensee shall ensure that nothing is contained in any programme, or any advertisement which is prejudicial to the interest of the sovereignty and integrity of Pakistan, ideology of Pakistan, security, friendly relations with foreign states, public order or which may constitute contempt of court, defamation or incitement to an offence or brings into disrepute the State institutions including armed forces;

(i) during a regular programme a continuous break for advertising shall not exceed three minutes and duration between two such successive breaks shall not be less than fifteen minutes:

Provided that during the transmission of any given one hour, the total duration of advertisements, shall not exceed a maximum of twelve minutes.

Section 18, sub-section i, details the precise guidelines with regards to the quantity of advertising that any given television station is permitted to broadcast. With this regulatory provision in mind, we can now move towards a factual assessment of the quantity of advertisement actually broadcast by television stations in Pakistan.

THE FACTS: What is balance of advertising and programming on Pakistani television?

During December 2012, Gallup Pakistan monitored 78 Pakistani television channels to demarcate the balance of programmes vs. advertisements, and deconstruct the magnitude and dispersion of the commercial air time throughout the day. The data indicates that by and large, most Pakistani channels are in open violation of PEMRA's rules and codes regarding the quantity of permissible advertising. Here is how the math plays out:

Total minutes in a 24 hour Programming cycle: **1440 minutes**

Maximum permitted advertising in any given hour: **12 minutes**

Maximum permitted advertising in a 24hr broadcast: **288 minutes (4.8 hrs)**

Permitted advertising in a 24hr broadcast cycle as a %age: **20%**

As per the definitions and guidelines laid down by PEMRA, the aforementioned figures are the ceilings for maximum permitted advertising for any television station. PEMRA has the legal backing to warn broadcasters, and revoke licenses for breaching these limits. With these parameters, what is the magnitude of advertising actually broadcast by Pakistani television stations? The Table below provides these figures in detail for all 24 hour entertainment broadcast channels:

Channel Name	Daily Average Ratio (Content vs. Ads)				
	(in Hours : hrs)			in %	
	Content	Ads	Total	Content	Ads
A Plus	14.8	9.2	24 Hours	62%	38%
APNA CHANNEL	12.3	11.7	24 H	51%	49%
ARY DIGITAL	15.7	8.3	24 H	65%	35%
ARY ZINDAGI	17.5	6.5	24 H	73%	27%

ATV	15.7	8.3	24 H	65%	35%
AVT Khyber	19.6	4.4	24 H	82%	18%
Awaz	18.4	5.6	24 H	77%	23%
AXN	20.7	3.3	24 H	86%	14%
Dharti TV	20.3	3.7	24 H	84%	16%
Express Entertainment	15.5	8.5	24 H	64%	36%
Film World	13.1	10.9	24 H	55%	45%
Filmax	13.8	10.2	24 H	57%	43%
FILMAZIA	12.3	11.7	24 H	51%	49%
GEO ENTERTAINMENT	16.8	7.2	24 H	70%	30%
GEO KAHANI	16.5	7.5	24 H	69%	31%
HBO	19.9	4.1	24 H	83%	17%
HUM SITARAY	15.4	8.6	24 H	64%	36%
HUM TV	14.5	9.5	24 H	60%	40%
INDUS VISION	12.1	11.9	24 H	50%	50%
Kohenoor	9.9	14.1	24 H	41%	59%
KTN	17.2	6.8	24 H	72%	28%
Mehran TV	18.4	5.6	24 H	76%	24%
PLAY MAX	17.7	6.3	24 H	74%	26%
PTV Bolan	23.2	0.8	24 H	97%	3%
PTV HOME	18.4	5.6	24 H	77%	23%
PTV NATIONAL	23.0	1.0	24 H	96%	4%
Punjab TV	20.4	3.6	24 H	85%	15%
Raavi	11.3	12.7	24 H	47%	53%
SILVER SCREEN	8.6	15.4	24 H	36%	64%
SINDH TV	16.3	7.7	24 H	68%	32%
Star Lite	4.3	19.7	24 H	18%	82%
TIMES	15.4	8.6	24 H	64%	36%
TV ONE	11.5	12.5	24 H	48%	52%
URDU 1	16.3	7.7	24 H	68%	32%
VIBE	19.5	4.5	24 H	81%	19%
WASEB	16.8	7.2	24 H	70%	30%

Entertainment channels that breach the permissible ceiling limits for advertising in a given hour are shaded in red. In total, **28 out of the 36 entertainment** channels monitored by Gallup were violating the limit on the quantity of advertisement allowed in a given 24 hour cycle. As a percentage, **78% of all monitored entertainment channels were violating PEMRA's ceiling** for balancing programming and advertisements.

Of the observed channels, **Star Lite** was the biggest violator, where a whopping **19.7 hours during the day, or 82% of all broadcasting** was dedicated to advertisements. In sharp

contrast, the state-sponsored **PTV Bolan**, broadcast primarily in Balochistan runs advertisements for barely **0.8 hours in any given 24 hour** broadcast cycle.

News channels in Pakistan have come to occupy the vanguard of Pakistani electronic media industry's public persona. Gallup's programme vs. advertisement split analysis for 24 hours News channels is given in the Table below:

Channel Name	Daily Average Ratio (Content vs. Ads)				
	(in Hours : hrs)			in %	
	Content	Ads	Total	Content	Ads
AAJ NEWS	15.7	8.3	24 H	65%	35%
ABB TAKK NEWS	16.3	7.7	24 H	68%	32%
ARY NEWS	16.6	7.4	24 H	69%	31%
AVT Khyber News	21.0	3.0	24 H	87%	13%
BUSINESS PLUS	16.0	8.0	24 H	67%	33%
Capital TV	16.7	7.3	24 H	70%	30%
Channel 24	18.4	5.6	24 H	77%	23%
CHANNEL 5	18.5	5.5	24 H	77%	23%
City 42	15.5	8.5	24 H	64%	36%
DAWN NEWS	16.9	7.1	24 H	70%	30%
DIN NEWS	20.3	3.7	24 H	85%	15%
DUNYA NEWS	16.4	7.6	24 H	69%	31%
EXPRESS NEWS	14.8	9.2	24 H	61%	39%
GEO NEWS	18.2	5.8	24 H	76%	24%
GEO TEEZ	19.7	4.3	24 H	82%	18%
JAAG	16.6	7.4	24 H	69%	31%
KTN NEWS	22.0	2.0	24 H	92%	8%
METRO ONE	17.3	6.7	24 H	72%	28%
NEWS ONE	15.1	8.9	24 H	63%	37%
PTV NEWS	22.7	1.3	24 H	95%	5%
PTV World	22.7	1.3	24 H	94%	6%
SAMAA	17.0	7.0	24 H	71%	29%
SINDH TV NEWS	20.2	3.8	24 H	84%	16%

SUCH TV	17.9	6.1	24 H	75%	25%
VSH	19.7	4.3	24 H	82%	18%
WAQT	19.9	4.1	24 H	83%	17%

Much like the entertainment channels, the majority of news channels in Pakistan are also in breach of the maximum permissible advertising limits in a 24 hour broadcast cycle. The results show that **17 out of 16 News channels** monitored by Gallup Pakistan, **or 65%, are in breach of the 4.8 hour, 20% advertisement limit placed by PEMRA.**

A closer look at these numbers should also reveal that **Express News** has the **highest proportion of advertisements of the monitored channels here, with 9.2 hours**, or 39% of a 24 hour broadcast sold as commercial airtime. Contrarily, **PTV NEWS and PTV World provide the most value to viewers**, with an **advertisement ratio of 1.3 hours in a standard 24 hour broadcast schedule** (state subsidies go towards filling the gap for this broadcaster).

THE FACTS: How do television channels apportion commercial airtime?

While the overall quantity of advertising vs. programming certainly reveals the gaps in the industry, another interesting approach to the issue is the review of how television stations apportion their commercial airtime i.e. how are time slots divided between advertising and programming. The Table below provides this distribution for Entertainment channels in Pakistan:

Channel Name	Ads [Commercial Air Time : Timeslotwise Share %]						
	Early Morning	Morning	Afternoon	Before Primetime	Primetime	Late Primetime	Night
	6-9 AM	9-12 AM	12-6 PM	6-8 PM	8-10 PM	10PM-12AM	12-6 AM
A Plus	8%	13%	28%	9%	9%	9%	23%
APNA CHANNEL	19%	14%	25%	9%	9%	6%	17%
ARY DIGITAL	9%	15%	26%	9%	9%	9%1	23%
ARY ZINDAGI	12%	14%	24%	8%	9%	8%	25%
ATV	9%	12%	29%	11%	11%	10%	17%
AVT Khyber	8%	12%	25%	11%	22%	11%	11%
Awaz	7%	14%	29%	11%	12%	10%	17%
AXN	13%	12%	25%	9%	8%	8%	24%

Dharti TV	8%	11%	32%	13%	11%	7%	18%
Express Ent	12%	12%	26%	9%	9%	8%	25%
Film World	26%	26%	31%	4%	4%	4%	4%
Filmax	29%	28%	31%	3%	3%	4%	3%
FILMAZIA	25%	24%	29%	4%	10%	4%	3%
GEO ENTERTAINMENT	10%	9%	30%	10%	10%	7%	24%
GEO KAHANI	12%	13%	26%	7%	9%	9%	23%
HBO	13%	14%	30%	10%	10%	10%	12%
HUM SITARAY	12%	11%	24%	9%	9%	9%	25%
HUM TV	15%	11%	27%	9%	9%	9%	21%
INDUS VISION	13%	9%	37%	6%	5%	3%	27%
Kohenoor	15%	19%	36%	5%	5%	5%	15%
KTN	9%	14%	24%	14%	17%	11%	12%
Mehran TV	16%	16%	40%	7%	8%	5%	8%
PLAY MAX	13%	9%	26%	9%	8%	8%	27%
PTV Bolan	17%	9%	38%	6%	15%	12%	3%
PTV HOME	9%	17%	27%	11%	12%	9%	15%
PTV NATIONAL	6%	19%	22%	14%	12%	1%	27%
Punjab TV	12%	12%	25%	9%	15%	10%	18%
Raavi	16%	20%	44%	4%	4%	4%	9%
SILVER SCREEN	19%	19%	38%	4%	10%	5%	5%
SINDH TV	12%	12%	25%	11%	13%	7%	20%
Star Lite	13%	12%	27%	10%	9%	10%	20%
TIMES	9%	15%	29%	10%	9%	9%	20%
TV ONE	10%	12%	22%	11%	12%	11%	23%
URDU 1	13%	12%	23%	9%	8%	8%	25%
VIBE	5%	17%	51%	8%	8%	2%	9%

WASEB	10%	14%	23%	10%	13%	6%	24%
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This approach to dissecting data gathered by Gallup Pakistan reveals interesting patterns within the Entertainment stream of the broadcast television industry in Pakistan. As the data shows, all observed entertainment channels (36 in total) violated the 20% per hour threshold during the Noon-6pm Afternoon time slot. Critically, in the next four hours, which straddle and include the primetime slot of 8-10pm, entertainment television channels ensure that the advertising limits aren't breached. A significant proportion of channels, (15 out of 36) also apportion their late-night time slot (12-6am) for increased advertising.

The timeslot programming vs. advertising data for News channels is presented in the Table below:

Channel Name	Ads [Commercial Air Time : Timeslotwise Share %]						
	Early Morning	Morning	Afternoon	Before Primetime	Primetime	Late Primetime	Night
	6-9 AM	9-12 AM	12-6 PM	6-8 PM	8-10 PM	10PM-12AM	12-6 AM
AAJ NEWS	9%	14%	24%	10%	10%	9%	24%
ABB TAKK NEWS	10%	16%	23%	9%	12%	10%	20%
ARY NEWS	13%	13%	24%	8%	9%	10%	23%
AVT Khyber News	11%	23%	22%	8%	10%	7%	20%
BUSINESS PLUS	15%	14%	21%	7%	7%	7%	29%
Capital TV	12%	12%	21%	9%	10%	10%	26%
Channel 24	14%	11%	24%	9%	8%	9%	26%
CHANNEL 5	14%	9%	25%	9%	10%	9%	26%
City 42	14%	15%	29%	10%	13%	10%	15%
DAWN NEWS	14%	12%	23%	9%	9%	10%	26%
DIN NEWS	14%	11%	25%	8%	7%	8%	27%
DUNYA NEWS	14%	13%	25%	9%	8%	9%	26%
EXPRESS NEWS	14%	13%	22%	8%	8%	9%	27%
GEO NEWS	14%	13%	23%	8%	8%	9%	27%

GEO TEEZ	14%	14%	24%	8%	7%	9%	26%
JAAG	14%	9%	22%	7%	8%	9%	29%
KTN NEWS	14%	8%	21%	16%	23%	13%	13%
METRO ONE	14%	17%	22%	9%	9%	10%	17%
NEWS ONE	14%	15%	26%	11%	10%	12%	17%
PTV NEWS	14%	13%	22%	11%	11%	10%	22%
PTV World	14%	11%	21%	6%	6%	6%	37%
SAMAA	14%	12%	23%	8%	9%	10%	25%
SINDH TV NEWS	14%	12%	27%	11%	9%	10%	19%
SUCH TV	14%	17%	27%	6%	10%	8%	17%
VSH	14%	16%	26%	9%	12%	10%	19%
WAQT	14%	7%	16%	9%	13%	11%	29%

There is overlap and divergence between the advertising vs. programming strategies adopted by News and Entertainment television channels. As the data in the Table above shows, that in convergence with Entertainment channels, most News channels significantly violate PEMRA's advertising limit of 20% advertising/80% Programming in the Noon-6pm time slot. Similarly, in the late night time slot (12-6am) most News television stations increase the share of advertising over programming. And unlike entertainment channels, outside of these timeslots, the violation of the limit on advertising is rare by news channels.

THE LESSONS:

What can we deduce from reading the balance of programming content vs. advertising in Pakistan's electronic media industry? There are numerous insights that emerge from reading this data, which lend themselves to open discussion and analysis.

Follow the Ad Rupees: News vs. Entertainment

Data gathered by Gallup Pakistan in December 2014 shows that most advertising occurs on Entertainment channels in two major ways. First, more Entertainment channels than News channels tend to carry advertisements (78% vs. 65%). Second, Entertainment channels are more likely to dedicate a much higher proportion of their airtime to commercial interests, as compared to News channels.

Specifically, Entertainment channels breach the permissible ceiling for advertising more regularly, and for a far greater proportion of their 24 hour broadcast schedule than news channels. One probable explanation for this difference is that news channels are more likely to know of PEMRA's permissible limits, and therefore, tend to avoid going overboard with advertisements. Alternatively, news channels face stiffer competition in the news and current affairs programming market, and might be getting forced into balancing programming vs. advertising more closely, to bind viewers. Another interesting insight that emerges from this data is that news channels tend to converge around an upper limit, while entertainment channels are more widely dispersed in their apportionment of programming and advertising in their broadcasts. While it could be argued against, but the more wider penetration of advertising in the entertainment section of the electronic media industry might provide an indication of the direction of the advertising rupee: if more ads appear on entertainment channels than news channels, this might indicate that advertisers are aware that a greater proportion of television audience in Pakistan watches entertainment, rather than news – contrary to the popular perception.

In either case, empirical evidence tends to indicate the free and private electronic media industry in Pakistan tends to brazenly violate PEMRA's upper limits on advertising.

Failure of Regulation:

In the past, we have been accustomed to hearing PEMRA embroiled in license cancelling showdowns and warnings issued to television stations for beaming content that is deemed harmful. These events have previously generated controversy and disagreement amongst observers. However, it appears that for more straightforward monitoring of the airtime in Pakistan i.e. the split of programming content vs. advertisement, PEMRA appears oblivious to its duty to enforce its own rules. Most Pakistani television channels, barring the state-run PTV, are found to be in flagrant violation of the balance that they must strike between programming and advertisement. This failure in regulation must be juxtaposed with any critique of the nascent electronic media industry in Pakistan. While television stations and broadcasting networks have mushroomed in Pakistan in the last decade or so, the regulator charged with shepherding and monitoring this industry appears failing in its duty to protect viewers' rights and interests.

When regulators fail to do accomplish their mission, market failures occur, and losses are accrued by some parties. In this case, the Pakistani viewers' right to programming and content is not being adequately protected by PEMRA. This begs the questions: whose responsibility is it to push PEMRA and hold it accountable for its regulatory failures? Is it the Government, Judiciary, Civil Society, Consumer Rights Groups, Television Operators, Journalists, or Viewers who must ensure that full regulatory compliance is ensured in the Pakistani electronic media industry?

Strategic Commercialization of Airtime:

Data indicates that Pakistan's electronic media operators are deploying a canny approach towards breaching the maximum limit on running advertisements. For both entertainment and

news television channels, the most frequent violation of the maximum permissible advertisements occurs in two distinct slots: noon to 6pm; and midnight to 6am. These are two timeslots in which nearly all television operators exceed the limits for running advertisements. It is clear that the television operators construe and interpret these timeslots as opportune for violating the upper limit on the extent of advertising. Furthermore, it can be argued that the television stations are aware that PEMRA is unable or [intentionally] unwilling to monitor these two time slots to investigate the split between programming and advertising. Furthermore, given that the overwhelming majority of television operators tend to stay within the prescribed limit in the primetime slot, this might indicate an industry-wide understanding that PEMRA only tends to monitor broadcasts in the 6pm to midnight time slot. In either case, the regulatory body's failure to implement its own rules on the still developing electronic media must instigate public scrutiny and investigation into this matter.

Where are the monitoring committees?

Section 20(f) of the PEMRA Act 2007 stipulates that television broadcasters must appoint "in-house monitoring committees" to oversee compliance with the rules and laws governing the broadcasting of content and advertisements. PEMRA has to be intimated regarding the existence of these committees. If as the data suggests, television operators are going overboard with the ceiling limits on advertisements, theoretically in-house monitoring committees should step in and rectify this error. Empirical evidence shows that this method of check and balance is not deterring television stations and operators from maintaining the prescribed balanced between programming content and advertisements. This implies that television stations have failed to form effective in-house monitoring committees – if at all – and that such monitoring committees fail to perform their sole responsibility: ensuring compliance with PEMRA's laws.

CONCLUSION:

Pakistan's budding electronic media industry is still finding its feet in terms of maturing responsibly in terms of operations and content. In this environment, it is critical for the relevant regulator (in this case PEMRA) plays an effective and proactive role in ensuring that the regulations or rules of the game are established and implemented effectively. In little over a decade since the opening up of the country's television broadcasting industry, PEMRA has attracted spotlight and public attention over its high profile engagements with individual operators. However, these engagements have mostly been restricted to the content of programmes. The Authority seems to be failing in its responsibility to implement operational rules and regulations. For an industry still growing and bedding its roots, this pathology of regulatory negligence, and operational violations by operators, will set a dangerous precedent.

In countries with advanced and mature broadcasting industries, the issue of advertising has gained significant salience and traction. Specifically, the magnitude of advertisements on television in Europe and North America has elicited public interest litigation, as well as regulatory interventions by the relevant Authorities. Unfortunately, despite established precedence of operating and regulating from these markets, our electronic media industry seems to have begun its journey by violating rules.

Advertising is not inherently damaging or negative. However, the excess of advertising tends to increase the probability of negative repercussions accruing. The glut of advertisements on Pakistan's television stations needs mandatory intervention from PEMRA to streamline and entrench operational rules for the broadcasters at this stage of the industry's development. The most obvious negative impact of excessive advertising is the reduction in programming content produced by the broadcaster. Furthermore, the advertisers' interests and objectives tend to become increasingly significant for broadcasters, as revenues and profits from ads increase, and become an unavoidable addiction of sorts. Moreover, excessive advertising also tends to promote consumption-based norms and values in society, especially when advertising becomes a dominant feature of the broadcast schedule. At this juncture it is important to bear in mind that PEMRA's creation, and the liberalization of the electronic media industry in Pakistan was envisaged as pathway that would lead to the democratization of thought and expression in the country, the production of high quality programming choices for the viewers, and the creation of a high quality television industry in the country. Most of these outcomes are dependent on effective regulation, as well as striking a balance between advertising and programming.

The data presented here indicates a disturbing and prevalent operational practice in Pakistan's electronic media industry. Television broadcasters need advertising revenues as a means to generate sustainable income. This reality cannot be eschewed by PEMRA. However, Pakistan broadcasters breach PEMRA's rule on the split between programming and advertising on a wide scale. In many ways, some television channels (particularly in the entertainment stream) are becoming broadcasters operating primarily for running advertisements, with little to no programming. Perhaps, this is an outcome of too-fast too-soon i.e. the electronic media industry has been liberalized and privatized at a rapid rate, thereby creating too many broadcasters in the process. This could be a problem on two fronts: too many operators implies PEMRA's regulatory capacity needs to expand to a commensurate degree; and too many operators tends to stiffen competition, dilute standards and incomes, and thereby begins a race to the bottom for advertising revenues. The major loss in the process is the harm caused to the viewers' public interest, and the deterioration of high quality programming choices available to an average Pakistani television viewer.

This state of affairs necessitates rectification via greater inquiry, discussion, and action to remove the programming-advertising imbalance. In the larger interest of developing a mature electronic media industry in Pakistan, whose presence generates positive social impact, PEMRA needs to step in and ensure the adoption and implementation of its guidelines, rules, and regulations. Without this necessary intervention, the Pakistani electronic media industry will internalize, operationalize, and protect dangerous and unsustainable pathologies in its infancy. The media industry, PEMRA, and television viewers need to assess and debate whether the Pakistani television viewer is increasingly being drowned in advertising chatter, and whether this situation requires immediate corrective action.