

A hand holding a black remote control is shown in the foreground, with a blurred background of multiple television screens displaying various content. The scene is lit with blue and purple tones, creating a modern, tech-oriented atmosphere.

The Advertiser's Bill of Rights

Fostering CTV

Transparency and Trust

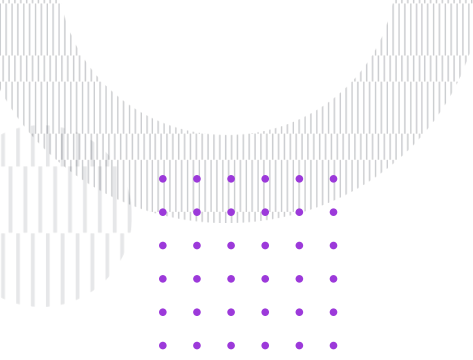
in Advertising

November 2023



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In today's fast-paced advertising landscape, we've transitioned from traditional analog and broadcast media to the dynamic world of digital advertising through connected television. This shift to CTV marketing offers great benefits, such as precise targeting, increased interaction, and personalized messaging. Yet, when it comes to [CTV Targeting](#) and [CTV Measurement](#), one critical aspect remains unclear: transparency. The core idea of digital advertising was always to give advertisers a clear view of who saw their ads and how effective they were. Sadly, the reality in connected television hasn't met our expectations.

CTV advertising has had its share of challenges, from dealing with bots to inconsistent measurement methods and a lack of industry standards. This has made it tough to accurately measure how many people watch our ads and how to measure the return on our investment. In the early days of digital advertising, the focus was mainly on driving incremental reach, especially as people cut the cord. We didn't worry much about fraudulent activity because all that mattered was scaling their CTV programs amid scarce inventory and keeping costs in check. But things have changed. Today, with the rise of streaming consumption, connected TV has become a significant part of TV budgets. We're now witnessing a major merging of budgets between traditional TV and digital.



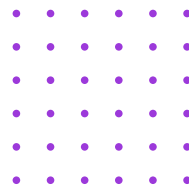
This bill of rights is meant as a starting point to drive an industry-wide conversation and evolve best practices.

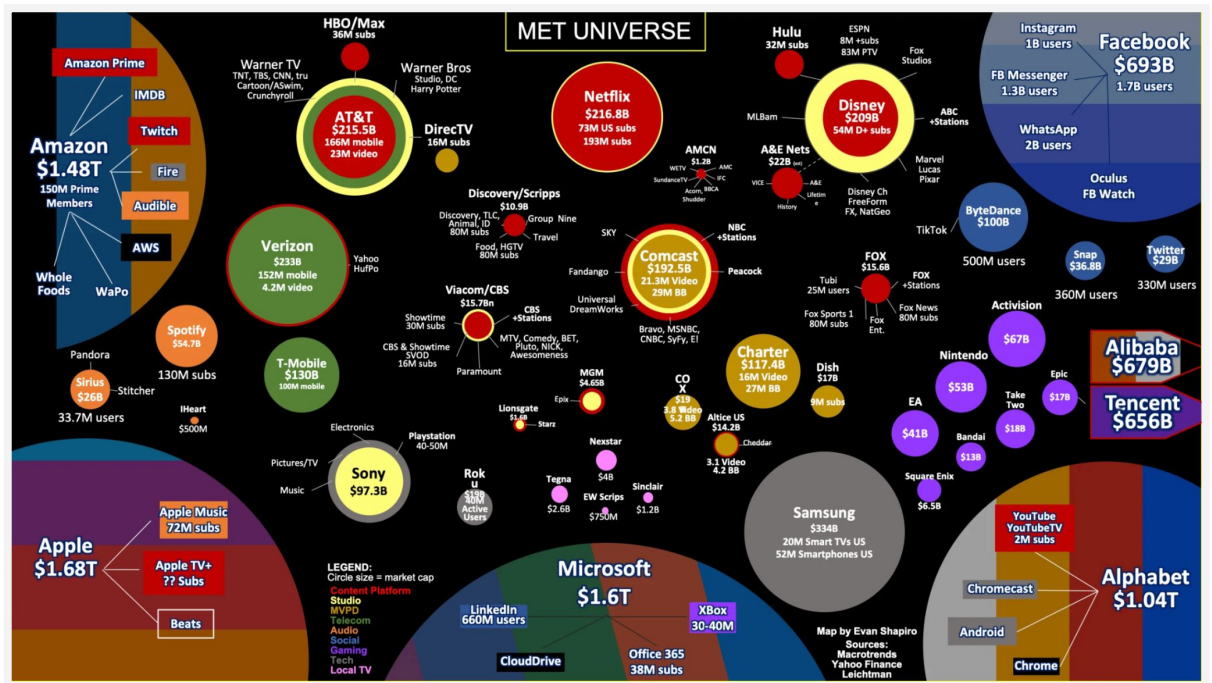
This convergence highlights a significant problem – the transparency that was a given in the broadcast and cable industry is now notably absent in the digital realm. In the world of connected TV, transparency challenges extend beyond different channels; they also encompass major platforms like Google, Amazon, and Disney, where a substantial portion of viewing occurs behind their walls.

To address this, Simulmedia and other industry leaders have been discussing what should be the standard for transparency as traditional TV and connected TV converge. Simulmedia is proud to introduce the "[Advertisers' Bill of Rights for Transparency in Streaming and Linear TV](#)." At its core, this bill of rights is founded on the belief that a lack of transparency across the streaming and linear TV advertising ecosystem erodes trust, accountability, and the efficiency of the medium.

The [Transparency Bill of Rights](#) empowers advertisers with the information they need to thrive in today's complex media landscape (see image in the next page). We firmly support advertisers' fundamental rights to transparency, giving them the information needed to foster trust and ensure a thriving advertising environment. We are convinced that full transparency benefits everyone involved, especially in the long run, from publishers and advertisers to consumers. It promotes clear communication, accountability, and, most importantly, enhances the effectiveness and trustworthiness of advertising partnerships.

To foster greater transparency, trust, and accountability in the advertising industry, the [Advertiser's Bill of Rights for Transparency](#) establishes baseline principles advertisers should expect and demand from media partners. This bill of rights is meant as a starting point to drive an industry-wide conversation and evolve best practices, not as an exhaustive or fully complete list.





The five core rights are as follows:

1. **Placement transparency.** The right to know where ads appear - the specific programs, networks, services, and apps.
2. **Device transparency.** The right to know what devices ads are viewed on - TVs, phones, etc.
3. **Audience transparency.** The right to understand how ad targeting and measurement works, including data sources and methodologies.
4. **Independent verification.** The right to accredited third-party measurement for ad campaigns.
5. **Independent fraud detection.** The right to verify ads are viewed by real humans, not bots.

We'll explore each of these rights in detail, analyzing why transparency around each principle is so critical. We'll also examine the downstream impacts that opaque practices can have on the entire advertising industry.

By codifying and embracing these rights, advertisers and media partners can build greater trust. This will lead to more efficient and effective ad investments that better reward content creators and platforms for quality programming that engages real audiences. Transparency is a journey, not a destination — but establishing core rights is the first step.

1. Placement Transparency. Advertisers have the right to know the programs, networks, services and apps where their ads appear.

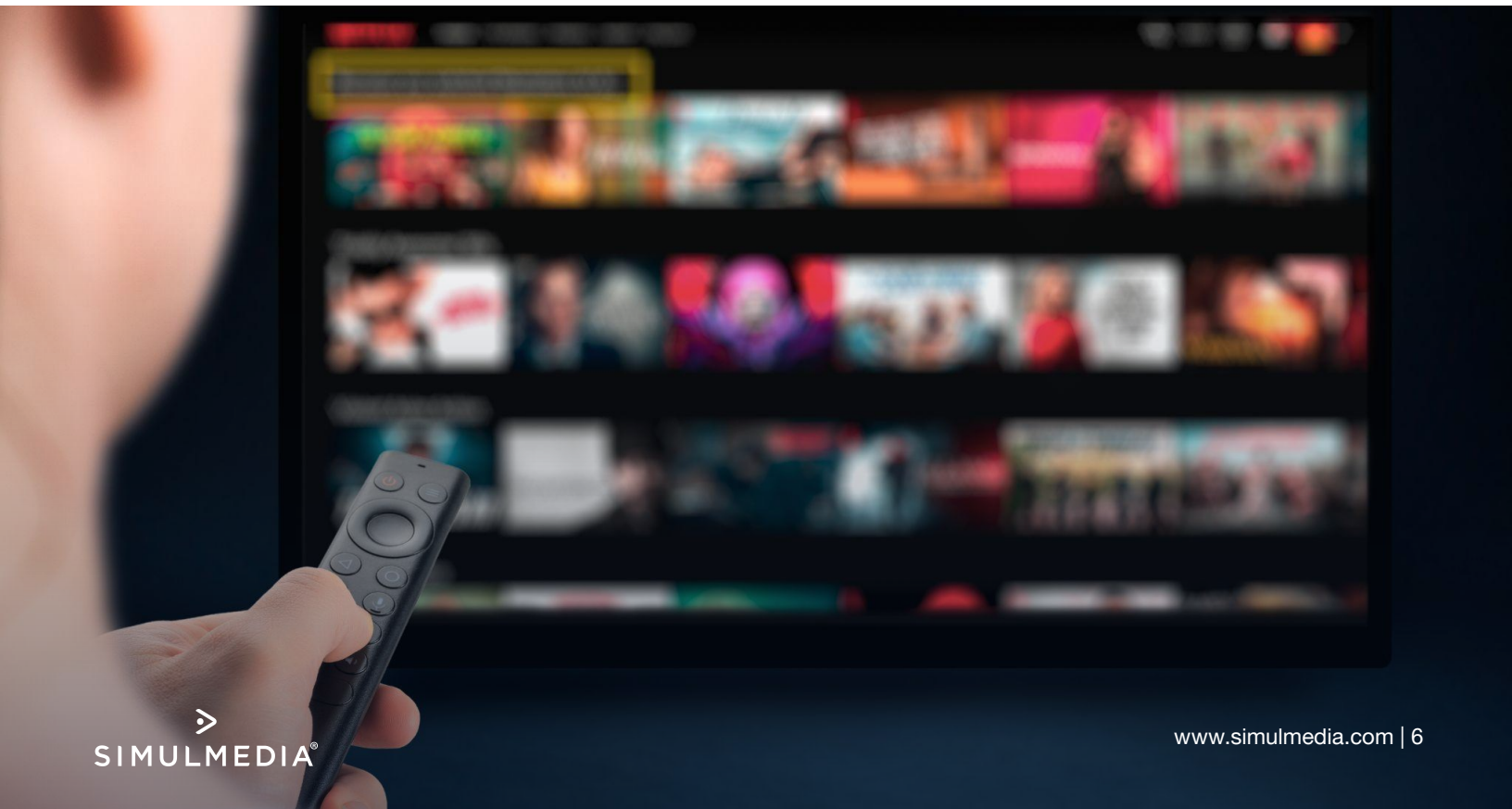
Advertisers should have the right to know exactly where their ads are being displayed. This includes knowing the specific programs, networks, services, and apps where their ads appear.

Why is content obfuscated? Publishers sell their ad spaces either:

1. Directly to advertisers
2. Through a large number of partners, who resell the spot to advertisers.

Prices can vary across each situation, and publishers sometimes deliberately hide content and episode information to maintain high prices. They worry that advertisers can buy a spot on the same show from one of their partners at a lower price and use this as a bargaining chip to demand that the publisher lower their own prices.

Resellers, on the flip side, may be motivated to strategically misrepresent their inventory to artificially enhance its appeal to potential buyers, thus justifying a higher asking price. While not all resellers have bad intentions, there are bad actors — or those participating in app spoofing. Here, resellers and intermediaries misrepresent or “spoof” an app to inflate the price of a piece of inventory and make it more attractive.























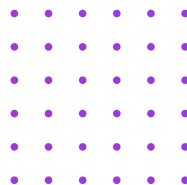
Placement transparency gives advertisers better control over their brand image and reputation by understanding the content their ad appears adjacent to.

Brand safety controls may also be another casualty of non-transparent inventory. According to [a study conducted by contextual ad-tech company GumGum](#), in an analysis of over 100 children's shows, which represent just a fraction of the vast CTV landscape, approximately 20% of all ad breaks featured at least one advertisement that was deemed unsuitable for children, as per the guidelines, regulations, and suggestions outlined by the Federal Trade Commission. While not every instance explicitly breached an FTC regulation, they all pertained to subjects on which the FTC has either issued recommendations or conducted hearings.

Understanding the context of ad placements is essential for advertisers to align messaging with content and target audiences. By gaining insights into the programs, networks, services, and apps hosting their ads, advertisers make informed decisions, optimizing campaigns for maximum impact and better control over brand image and reputation.

Applications ¹

Applications	CPM	Impressions ↓
 Paramount (Viacom... 	\$12.00	1,231,444
 NBCU 	\$12.00	921,489
 Hulu 	\$12.00	771,179
 Samsung TV Plus 	\$12.00	637,674
 DirecTV Stream 	\$12.00	593,552
 Philo 	\$12.00	466,039
 DiscoveryPlus 	\$12.00	431,920
 Pluto TV 	\$12.00	405,817
 Sling TV 	\$12.00	387,038
 Tubi 	\$12.00	210,212




Viewing an ad on a large television screen often leads to higher engagement compared to viewing on a small mobile device.

This transparency not only empowers advertisers to assess placement effectiveness but also builds trust and accountability in the advertising industry. Armed with insights into the platforms and content hosting their ads, advertisers can align advertising efforts with brand values and objectives, fostering a more strategic and impactful advertising landscape.

Tech providers like Simulmedia's TV+ already provide a level of placement transparency advertisers deserve. Simulmedia collects data regarding applications, publishers, and programs where CTV ads are shown and normalizes that data into logical mappings for our end users, removing ambiguity and redundancy so buyers have more information about what their media spend bought them.

Top Content 

Content	Impressions 
Court TV Live	18,272
Law & Order: Spec...	12,652
Hawaii Five-0	8,779
NCIS	8,530
Blue Bloods	8,387
Bones	8,195
Chicago P.D.	7,808
Chicago Fire	6,325
Murdoch Mysteries	5,388
Mann & Wife	4,839

2. Device Transparency. Advertisers have the right to know the devices on which their ads are viewed.

The device on which an ad is viewed can significantly impact its effectiveness. Viewing an ad on a large television screen often leads to higher engagement compared to viewing on a small mobile device. This is because larger screens offer a more immersive experience, captivating viewers' attention and filling their field of vision. The superior audio-visual quality on a large TV enhances the overall impact of the ad, making it more memorable and persuasive. On top of that, the larger screen makes it easier to notice and appreciate the details in the ad, such as product features and messages. Moreover, watching on a larger screen often becomes a shared social experience, encouraging discussions and

Advertisers may be paying premium rates for ads viewed on television when, in reality, a large portion are being shown on mobile phones.

word-of-mouth recommendations about the products or services advertised, ultimately increasing the ad's reach and effectiveness. As such, advertisers should have transparency into where their ads are being shown to ensure they leverage the benefits of larger screens for optimal engagement.









Without accurate device information, advertisers are operating somewhat blindly. They may be paying premium rates for ads viewed on television when, in reality, a large portion are being shown on mobile phones. This lack of transparency is akin to buying a gourmet meal and ending up with fast food – it's not what you expected.

Let's take a [real-life example](#) from the advertising world. A leading connected TV buying platform frequently preaches about the power of high-quality CTV inventory and why advertisers should settle for nothing less. However, every buy executed within this platform offers a mix of additional inventory types, including digital display and mobile, 'in order to maximize performance.' Essentially, this platform combines various types of inventory to reach as many viewers as possible. They do not permit buyers to choose only CTV inventory or even to dictate the percentage of the overall buy that must be CTV. Instead, they ask brands to sign off, hoping that a decent amount of the inventory purchased will be in the format they desire and near decent content. It's a bit like ordering a gourmet pizza but ending up with a mishmash of toppings you didn't choose. Unfortunately, this platform is not unique in this regard.

Knowing the breakdown of devices provides important context. Advertisers can ensure campaigns are being delivered as intended. They can optimize based on performance differences across devices. And they can verify ads are being shown in appropriate environments.

Now, let's talk about a dark side of the digital advertising world – device spoofing. Some resellers, who can be considered as bad actors in this industry, may misrepresent the device on which ads are shown to fetch higher CPMs. In the digital advertising context, it means a mobile device may pretend to be a high-value smart TV, which typically commands higher ad rates. This unethical practice artificially inflates the value of ad impressions.

Device Manufacturers

Device Manufacturers			CPM	Impressions ↓
 Roku	Roku	<div style="width: 45%;"></div>	\$28.71	3,237,685
 Amazon	Amazon	<div style="width: 25%;"></div>	\$28.88	1,137,764
 Samsung	Samsung	<div style="width: 20%;"></div>	\$27.88	977,761
 Vizio	Vizio	<div style="width: 5%;"></div>	\$28.88	272,268
 LG	LG	<div style="width: 5%;"></div>	\$27.40	244,022
 Apple	Apple	<div style="width: 2%;"></div>	\$28.40	109,911
 Google	Google	<div style="width: 1%;"></div>	\$27.88	45,121
 Sony	Sony	<div style="width: 1%;"></div>	\$28.88	28,331

Device Types

Device Types	CPM	Impressions ↓
Streaming Device	\$28.88	5,024,615
Smart TV	\$27.78	1,935,078
Unknown	\$27.88	23,870
Gaming Console	\$28.88	11,019
Connected Device	\$27.88	71

We at Simulmedia take a different approach. We filter and only make bid requests for the big screen (CTV). This ensures we're focused on delivering ads in the format advertisers desire rather than mixing in various inventory types. Bad actors can spoof device IDs as well, which is another reason we buy direct and don't use third-party resellers.

As streaming plays a larger role in media plans, device transparency becomes increasingly vital. Advertisers, purchasing these impressions, rightfully demand accurate, third-party verified reporting on device breakdown. It's imperative for device transparency to be the norm, not the exception, ensuring advertisers understand the context in which their ads appear.

The pursuit of hyper-specific audience targeting often neglects whether data providers can define such audiences accurately or whether these audiences exist at a scale that fits campaign budgets.

3. Audience Transparency. Advertisers have the right to know the sources, composition, and methodologies of the data and models used to target and measure their ads.

Data and algorithms are used extensively to target ads and measure campaign performance. However, there is often a lack of audience transparency into the inner workings of these systems. Advertisers have the right to understand how the audience segments advertisers use to target and measure their campaigns are collected and vetted.

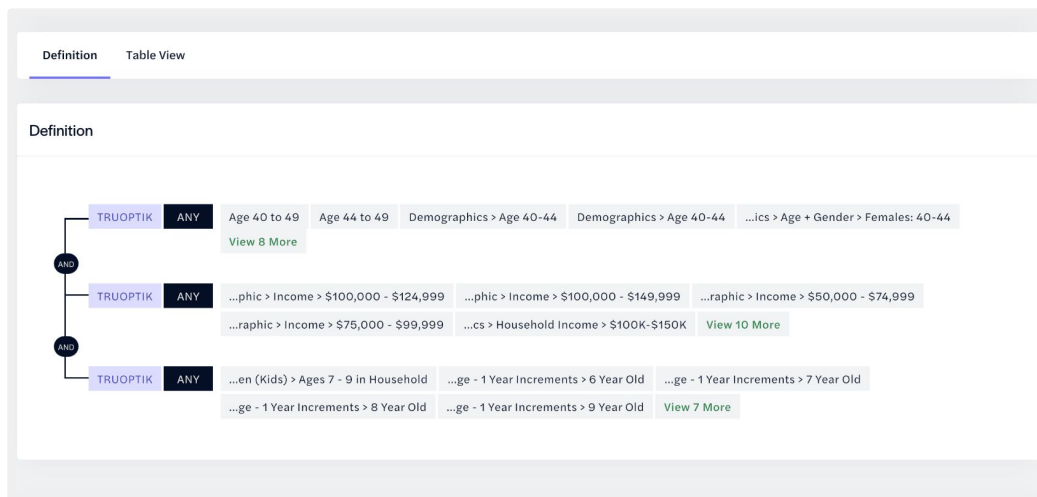
Advertisers look to target specific audiences on CTV so they can deliver their ads to the most relevant people. They turn to data provided by Data Management Platforms (DMPs), which are often integrated into major Demand-Side Platforms (DSPs). DMPs offer thousands of audience categories, such as age, gender, income, interests, hobbies, and ownership, allowing advertisers to find the perfect audience for their ad.

However, the quality and accuracy of these audience pools remain uncertain. Questions arise regarding the accuracy of demographic categories like “Women 18-45” and the methodology used to classify CTV viewers within these categories. Additionally, the effectiveness of these audience pools on CTV is a concern, as a low match rate can lead to unmet campaign goals.

Marketers share responsibility in the data quality issue. The pursuit of hyper-specific audience targeting often neglects whether data providers can define such audiences accurately or whether these audiences exist at a scale that fits campaign budgets. The entire supply chain, from brand managers to agencies and data providers, may overlook these critical questions in the quest for scale and efficiency.

Many data segments available in marketplaces, DMPs, and DSPs are modeled from a seed of real data collected from various sources such as web activity, surveys, or publicly available but complex datasets. The methods and quality of data science models used to create audience segments can vary widely, and understanding the source and size of the seed audience is essential as it impacts the quality of the resulting audience pool.

Different data vendors exhibited varying levels of accuracy, ranging from as low as 12.9% to as high as 32.3%.



In practice, audiences are often created by applying AND/OR/NOT logic to multiple data sources, resulting in a complex combination of modeled data. This approach can lead to a haphazard assortment of identifiers that only partially match the intended target audience.

Without audience transparency, advertisers face significant challenges, as highlighted in [a Forbes article](#) on the accuracy of programmatic ad targeting. Academic research revealed that when using a single targeting parameter like gender, the accuracy was only 42%. To put it in perspective, this accuracy falls below the natural population's gender distribution of 50%. In practical terms, a campaign using this targeting parameter is 15% less effective than a "spray and pray" approach without any specific parameters. Even showing ads to every possible user would achieve a 50% on-target rate, surpassing the accuracy of paid gender targeting parameters from data brokers.

Table 10: Data Broker Performance Across Studies

	Sample of data brokers	Data broker hit rate (%)	Population with attribute(%)	Ratio hit rate to population odds	Study
Gender & age optimized	6	59	26.5	2.23	1
Gender & age	11	24.4	26.5	0.92	2
Gender	14	42.3	50	0.85	2
Age 18-24	6	10.7	10	1.07	2
Age 25-34	9	25.7	18	1.43	2
Age 35-44	10	32.0	18	1.77	2
Sport	14	87.4	67	1.30	3
Fitness	8	82.1	48	1.71	3
Travel	16	72.8	56	1.30	3
Average single attributes	11	50.5	38.1	1.35	

Moreover, the study found that when two targeting parameters are applied for ad targeting, such as gender and a selected age range, the average accuracy drops to 24%. Different data vendors exhibited varying levels of accuracy, ranging from as low as 12.9% to as high as 32.3%.

Table 5: Study Two: Data Broker Accuracy for joint identification of gender (male) and age (25-54)

Data broker	Accuracy	Sample size
Vendor A	12.9%	319
Vendor D	32.0%	388
Vendor E	27.1%	63
Vendor F	32.2%	90
Vendor G	27.1%	155
Vendor I	14.8%	1782
Vendor J	24.1%	9004
Vendor K	12.3%	253
Vendor L	22.2%	63
Vendor M	20.9%	129
Vendor N	42.4%	1392
Average	24.4%	1239.8

The consequences of such inaccuracies in targeting are significant, particularly in light of stricter privacy policies. As Mike Woosley, COO of Lotame, explained [in an interview with the Financial Times](#), consider the case of a men's brand that used to acquire one customer for every \$5.00 spent targeting 1,000 men. Now, to reach 1,000 men, the brand has to show ads to 2,000 people because of the uncertainty in distinguishing between men and women, resulting in doubled acquisition costs and a 50% loss in yield.

Advertisers have a legitimate right to inquire about the sources and the degree of customization of the audience pools they purchase, ensuring that these audiences are well-suited for CTV. When evaluating data sources at Simulmedia, we make sure to ask the right questions and get the important answers around privacy, sample sizes, and accuracy, such as:

- Is the data deterministic or inferred?
- If the data is modeled from a sample, what is the ratio of the final audience to the original seed?
- What privacy and opt-in/opt-out considerations were used in the data collection?
- What methods have you used to test the accuracy of your segments (surveys,deterministic samples)?

In the future, we will use AI to test audience data holistically, testing thousands of audience segments against known benchmarks and analyzing statistical relevance vs. random chance.

Requiring audience transparency does not demand advertisers to become data scientists themselves but allows them to receive clear explanations from platforms about their operational methods. Third-party audits and inspections can also help advertisers ensure data quality. Audience transparency enables advertisers to make informed decisions on whether to rely on a platform's proprietary measurement or require independent, accredited third-party measurement. Without audience transparency, advertisers cannot reasonably be expected to simply trust "black box" targeting and measurement systems.

Ensuring audience transparency in data and algorithms will lead to greater accuracy, accountability, and trust in the digital advertising ecosystem. This benefits not just advertisers but platforms as well by instilling confidence in their systems. Audience transparency should be a fundamental right, and advertisers must continue to demand it as connected TV advertising grows.

4. Independent verification. Advertisers have the right to independent, transparent, accredited, third-party measurement of their campaigns.

Measuring and verifying advertising campaigns is critical to the advertising ecosystem. Advertisers invest significant resources into campaigns with the goal of reaching target audiences and driving business results. Advertisers rely on campaign measurement and analytics to determine the effectiveness of those investments.

Historically, measurement of traditional media like TV, radio, and print has been conducted by independent third parties like Nielsen. However, with the rise of digital and streaming media, much of the measurement is now controlled by the media platforms themselves. This creates an inherent conflict of interest, as platforms are incentivized to report metrics that make their inventory look most attractive to advertisers.

Advertisers have a right to campaign measurement and analytics that are independent, transparent, and accredited. Independent third-party measurement mitigates the conflicts of interest that exist when inventory sellers control the measurement. Transparency through independent verification enables advertisers to evaluate methodologies and inspect data sources. Accreditation from oversight bodies like the Media Rating Council ensures measurement practices adhere to industry standards.

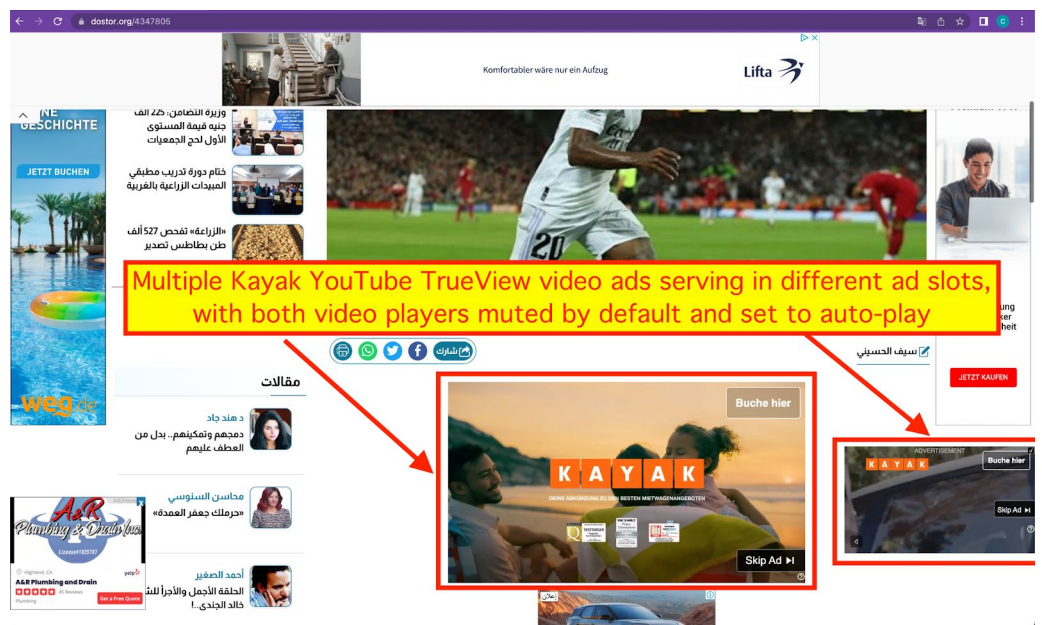
There are several benefits to independent, transparent, accredited measurement for advertisers:

- It mitigates conflicts of interest and bias that exist in seller-controlled measurement
- It provides a consistent and impartial source of truth for campaign performance
- It enables optimization and planning decisions based on unbiased insights
- It drives accountability and integrity across the advertising supply chain
- It ensures measurement practices adhere to industry standards and oversight
- It builds trust between advertisers, agencies, and media platforms

Advertisers should have the right to leverage accredited providers to independently verify campaign delivery and performance across walled gardens and closed ecosystems.

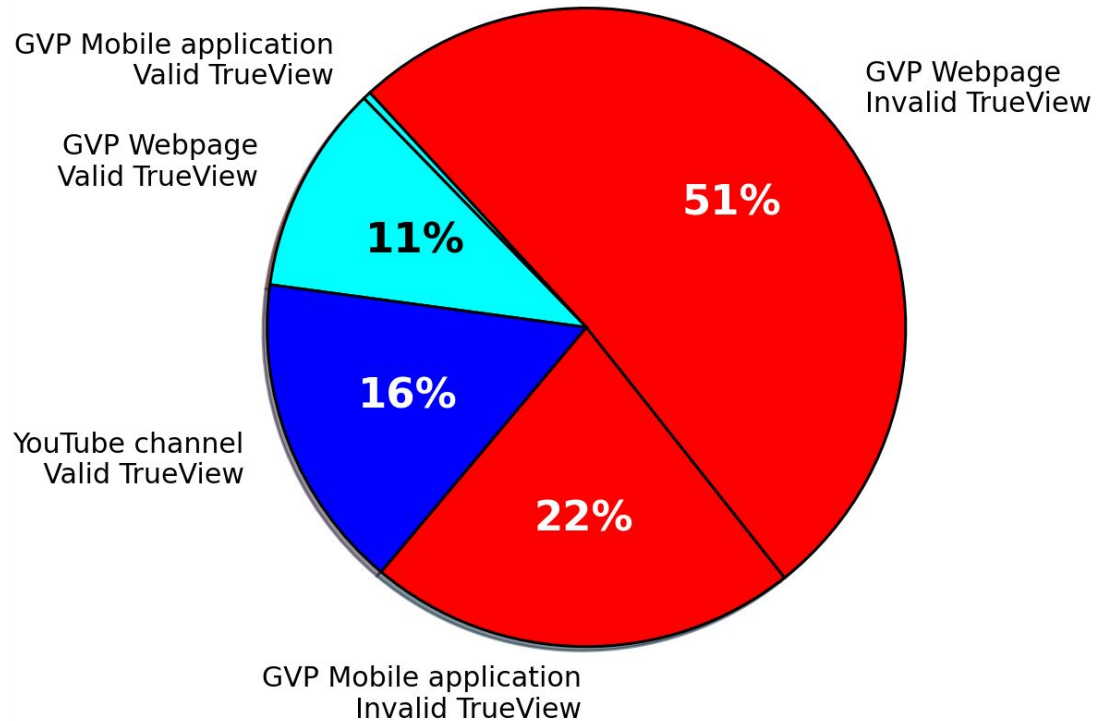
From a technical perspective, media platforms have the capability to support independent measurement via privacy-safe data sharing and matching through clean rooms. Advertisers should have the right to leverage accredited providers to independently verify campaign delivery and performance across walled gardens and closed ecosystems. This creates a fair and level playing field for advertisers regardless of which platforms their campaigns run on.

Take the [Google Video Partners Ad debacle](#). Advertisers invest big into YouTube — the media giant's total ad revenue for 2022 amounted to [\\$29.24 billion dollars](#). Advertisers pay Google to serve their ads on YouTube, but these ads are sometimes run on third-party sites and apps — also known as Google Video Partners.



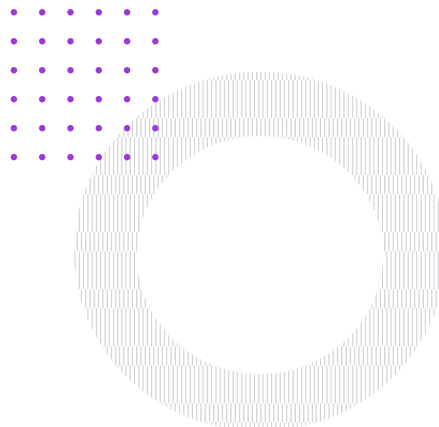
Google measures and verifies its own inventory — in other words, the platform grades its own homework. But while Google claims it vets partner sites to ensure they're of the utmost quality, [a report from Adalytics](#) reveals the opposite. According to the report, "many media buyers were surprised to learn that the majority of their ad budgets against a so-called "walled garden" environment was spent on muted, auto-playing video ads on third-party websites."

Distribution for YouTube TrueView in-stream ad campaign budget spend on YouTube versus Google Video Partner (GVP) network
Major infrastructure brand



Had advertisers been given an alternative option to measure and verify their campaigns — one that came from a neutral third-party — it's likely advertisers would have caught wind of low-quality impressions and inventory sooner.

While marketers may choose to rely on first-party measurement reports from media sellers, they should not be forced to do so. Just as brands have choices for media buying and creative development, they should also have choices on measurement. Advertisers who demand independent, transparent, and accredited measurement will accelerate progress for the industry as a whole.



The largest CTV ad fraud operations ever discovered employed over 28,000 fake websites and mobile apps to generate fraudulent ad impressions.

5. Independent fraud detection. Advertisers have the right to verify that their ads are being viewed by real users and not bots or fraudulent sources.

Advertisers have a fundamental right to ensure their advertising budgets are reaching real human audiences. With the rise of bots, spoofing, and other fraudulent tactics, it has become increasingly difficult to guarantee ads are being seen by real people. This undermines the effectiveness of advertising and wastes significant marketing dollars.

In December 2020, Oracle revealed the [StreamScam OTT ad fraud scheme](#), recognized as one of the largest CTV ad fraud operations ever discovered. This operation employed over 28,000 fake websites and mobile apps to generate fraudulent ad impressions. StreamScam had its sights set on exploiting the booming CTV advertising market, potentially costing advertisers billions in wasted ad spend.

In October 2021, the [diCaprio OTT ad fraud scheme](#) came to light, as reported by Pivalate. This scheme specifically targeted the Grindr mobile app, operating through a fraudulent mobile app impersonating Grindr. It used fake domains and malicious apps to deceive advertisers, generating illicit ad revenue.

Following diCaprio, the [Monarch OTT ad fraud scheme](#) was exposed in November 2021. This scheme, also disclosed by Pivalate, exploited a combination of server-side ad insertion (SSAI) and client-side ad insertion (CSAI) to carry out its fraudulent activities. It significantly targeted CTV and OTT environments, deceiving advertisers into purchasing invalid inventory and resulting in substantial financial losses for the industry.

In addition to these specific fraud schemes, it's crucial to consider the broader context of ad fraud in 2022. According to [DoubleVerify](#), CTV ad fraud surged with a 69% increase in bot fraud during that year. This significant growth in CTV fraud schemes highlights an alarming trend in the industry. Fraudsters continually adapt their tactics to exploit the expanding CTV advertising market, which can have profound financial implications for advertisers. Staying vigilant, implementing advanced fraud detection measures, and fostering industry collaboration are essential to combat these evolving threats effectively.

With tens of billions in ad spending at risk of fraud, advertisers must be empowered with the tools and knowledge to verify campaign quality.

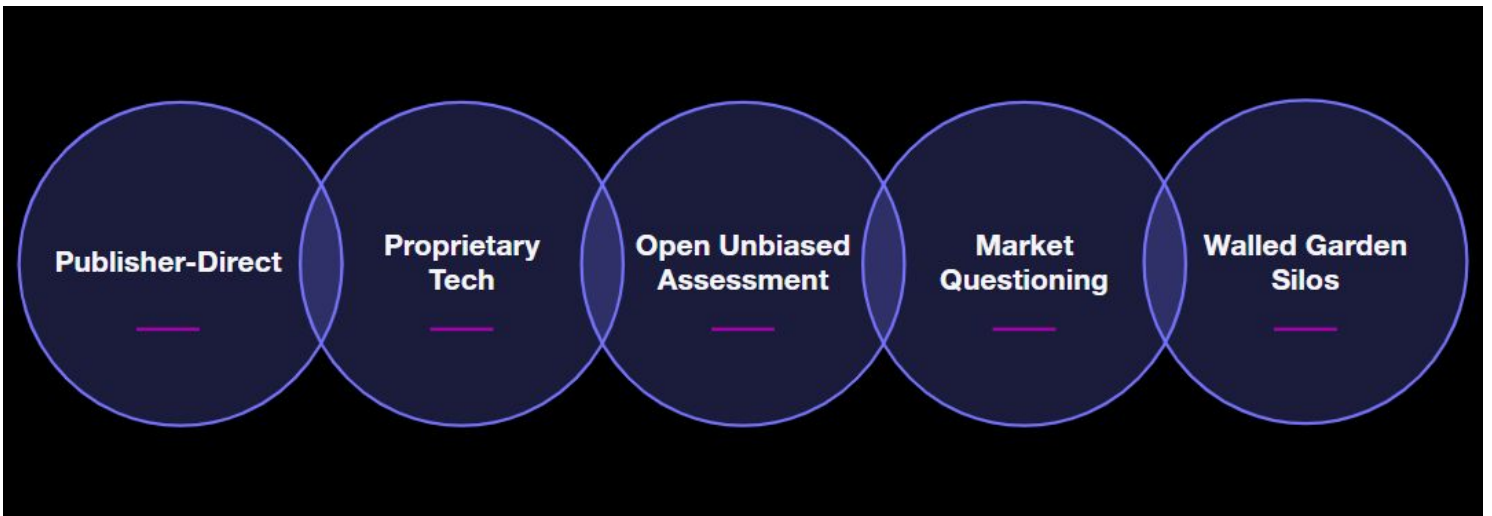
There are several key reasons bots and fraudulent traffic have become so pervasive:

- The technical infrastructure of digital advertising contains vulnerabilities that allow spoofing of users and devices. It is easy to make a mobile device appear as a connected TV, for example.
- Scarce inventory keeps CPMs high, which in turn appeals to bad actors. They can spoof an app and display a CPM lower than the genuine publisher's rate to attract more demand and bidders.
- Relying solely on "blacklists" of known bad actors is insufficient. Fraudsters can instantly spin up new sites, apps, and inventory sources faster than blacklists can keep up.

To combat this, advertisers have a right to verification that their ads are viewed by real human users, not bots or other fraudulent sources. This includes the ability to:

- Inspect the methodologies used to detect fake traffic and sources. Advertisers should have transparency into how platforms and partners identify real users.
- Analyze log data to look for patterns indicative of fraud, such as unusual spikes in traffic or concentrated geographic sources.
- Leverage independent verification partners not incentivized by campaign performance. Many dominant verification tools today also offer campaign optimization, creating potential conflicts.
- Confirm traffic quality across the entire supply chain, including resellers and intermediaries. Work only with partners you know you can trust.

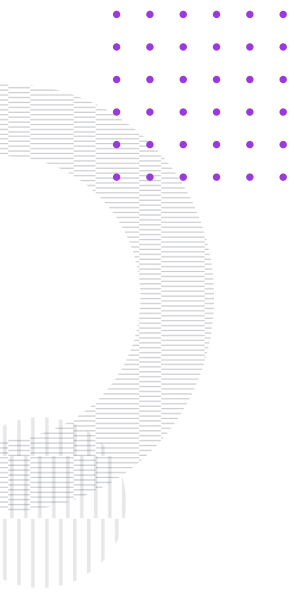
With tens of billions in ad spending at risk of fraud, advertisers must be empowered with the tools and knowledge to verify campaign quality. Trading short-term savings for ignorance of where ads actually appear harms marketing outcomes. By embracing transparency and verification, advertisers can optimize spend while supporting a healthy, sustainable, and fraud-resistant media ecosystem.



Transparency in Practice

On a macro level, there are five main areas where we focus to ensure we are as transparent as possible for our partners:

1. We limit the number of sources where we get our inventory from, through direct relationships with publishers and distributors. By doing so, we reduce the opacity in the supply chain, ensuring a more direct connection to quality inventory.
2. We leverage our proprietary tech to enhance the level of transparency we provide our partners. This includes advanced tools and technologies that offer a clear view of where ads are being shown and how they're being measured.
3. We open up our buys to third-party verification and fraud detection providers. Collaborating with these providers allows us to have an additional layer of scrutiny, ensuring that campaigns are genuine and reaching the intended audiences.
4. We ask the right questions around audience data that need to be asked in the marketplace. This proactive approach involves critical inquiries into the quality and accuracy of audience data, mitigating the risks associated with unreliable targeting.
5. We leverage clean rooms to provide holistic de-duplicated transparency across walled gardens. Clean rooms offer a controlled and neutral environment for analyzing data, enabling a comprehensive understanding of the data's accuracy and effectiveness.



Our Biggest Takeaways

Need a recap? Here's what advertisers should take away from our Transparency Bill of Rights.

The lack of transparency undermines trust and accountability. When advertisers cannot fully inspect where their ads are running and how they are being measured, it erodes confidence in the entire system. Platforms operating in "black boxes" make verifying if campaigns achieved what was promised extremely difficult.

More transparency would likely improve the health of the ad-supported media ecosystem. Increased visibility into the supply chain and measurement methodologies would reduce fraudulent traffic and ensure more ad budgets flow to content creators instead of unscrupulous middlemen. This would incentivize the production of quality programming that engages audiences.

Advertisers have a responsibility to demand transparency. Beyond just seeking the lowest CPM, advertisers must care about supporting a healthy media ecosystem. They should interrogate the data they receive and not stop digging until they get satisfactory answers.

It's important to note that this is just the beginning. Advertisers should continue to ask questions and be open to discussion. Questions we continue to think about at Simulmedia include:

- Will transparency requirements put certain platforms at a disadvantage?
- If CTV networks adopt transparency measures but walled gardens do not, will the playing field be uneven? Or will transparency become an imperative that all platforms must embrace?
- How can transparency be increased industry-wide? Should industry groups lead the charge in defining standards? Do government regulations need to play a role (hopefully not!)? What collaborative actions can move things in the right direction?
- What are the next steps for advertisers today? While working to advance industry-wide transparency initiatives, what can individual advertisers and agencies do right now to better inspect their campaigns? How can they get buy-in within their organizations to shift budget to verification?

These questions highlight that there is much work still to be done. But the Advertiser's Bill of Rights represents an important first step in driving this vital conversation forward. By caring deeply about transparency and tenaciously interrogating the systems, advertisers can pave the way to restoring trust and accountability across TV advertising.

A Promising Future

The Advertiser's Bill of Rights for Transparency is an important step in restoring trust and accountability in the media ecosystem. By codifying basic principles of transparency, it empowers advertisers to make informed decisions about their media investments.

Ultimately, the Bill of Rights is about more than just dollars and cents. It's about supporting a thriving media landscape that produces quality content and engages audiences. Transparency enables advertisers to direct budgets to content creators and publishers who uphold integrity in their reporting and programming.

While adopting the Bill of Rights will not solve all the complex challenges around bots, fraud, and mislabeled inventory, it ignites a crucial conversation. Each advertiser that embraces transparency propels the industry forward.

Progress will require perseverance from all stakeholders. Advertisers must interrogate their data and demand answers. Publishers and platforms need to embrace independent verification. Industry groups can develop standards and best practices. Together, we can cultivate an advertising ecosystem that serves audiences, advertisers, and society at large.

The Advertiser's Bill of Rights for Transparency represents a promising step on the path ahead. Shining a light on the inner workings of ad tech lays the foundation for fairness, effectiveness, and shared prosperity. Much work is left to do, but the first step is often the most important.

The "Advertisers' Bill of Rights for Transparency" reflects our commitment to empowering advertisers with the information they need to thrive in today's complex media landscape, and Simulmedia is taking action to ensure transparency for all its partners. In this ever-evolving landscape, our dedication to transparency sets us apart. We invite you to take the next step with us – [request a demo from Simulmedia today](#).



About Simulmedia

No one knows how to drive growth and business performance through TV advertising better than Simulmedia, a marketer's most trusted tech-powered partner. In today's complex, fast-moving TV industry, Simulmedia is the turnkey, one-stop shop to help you make the best decisions and solve your biggest and toughest challenges on TV. Simulmedia makes TV advertising as predictable, performant, and integrated with agencies and enterprises as paid search and social.

Powered by data science, automation software, and comprehensive integrations, our TV+ full-funnel TV advertising platform lets advertisers and agencies intelligently plan and buy linear, streaming, and gaming. With TV+, you'll have more certainty in achieving business goals by knowing how to best find and engage strategic audiences on linear and CTV as efficiently as possible. In addition, we allow advertisers to extend their reach and connect with elusive younger audiences via PlayerWON™, the first engagement and monetization platform for free-to-play PC and console video games.

With over 15 years of experience bringing data science into advanced TV media buying, Simulmedia is the first and only provider to create a patented predictive lookalike model based on years of viewership data to bring smarter media buying to clients like Experian, Choice Hotels, ABC, TNT, Monster.

Got questions?

Visit www.simulmedia.com/contact