



**1-2B**

**DIGITAL BUSINESS**

**PUBLICATION**

**STANDARDS**

**December 2021**



**BPA Worldwide Digital Publication Standards**  
**December 2021**

## **Table of Contents**

	<b><u>Page No.</u></b>
<b>Section I-2B 100 Eligibility – Digital Business Publications</b>	
101 General Eligibility .....	7
102 Extra (Special) Issues .....	7
103 Separate Editions .....	7
104 Supplements .....	8
105 Single Publication – Optional Separate Membership .....	9
106 Marketers .....	9
107 Associate Membership .....	9
<b>Section 1-2B 200 Obligations of Membership .....</b>	<b>9</b>
<b>Section 1-2B 300 Applicant Procedure</b>	
301 through 303 Application for and Acquisition of Membership Status .....	11
304 Applicants with Single Copy Sales .....	11
305 Website Applicants .....	12
306 Notice of Admittance .....	12
307 and 308 Incomplete Records .....	12
<b>Section 1-2B 400 Transfer of Membership .....</b>	<b>12</b>
<b>Section 1-2B 500 Merging Publications</b>	
501 Merged Publication .....	13
502 Merging Publications: Non-Paid Circulation .....	13
503 Merging Publications: Paid Circulation (Purchase of Transfer of Subscriptions from List of Suspended Publications) .....	13
<b>Section 1-2B 600 Onsite Or Cross Border Audits .....</b>	<b>14</b>
<b>Section 1-2B 700 Brand Report – General Information .....</b>	<b>14</b>
701 through 703 General Information .....	14
704 Types of Brand Reports .....	15
705 Statements and Rights of Corporation .....	15
706 Typographical Setup .....	15
707 Brand Report Processing Fees .....	15
708 Brand Report Filing Period – Applicants .....	15
709 Brand Report Filing Period – Member .....	16
710 Brand Report Filing Dates – Member .....	16
711 SRDS, CARD, BRAD or Other Advertising Rates/Informational Listing Services .....	17
712 Report Purchase Options .....	17
713 Subject Matter of Reports .....	17

# **Table of Contents**

## **Page No.**

### **Section I-2B 800 Brand Report - Contents**

801 Overview .....	17
802 Name of Publication .....	18
803 About the Brand (Optional) .....	19
804 Magazine Channel Format.....	19
805 through 808 Brand Report Purpose Statement .....	19
809 Overall Brand Focus (Table of Contents) .....	20
810 Channels .....	20
811 Executive Summary.....	20
812 Integrated Database Analysis (Integrated Brand Reports only).....	22
813 Communication Channels of the Brand (Integrated Brand Reports only) .....	22
814 Channels Received (Integrated Brand Reports only).....	23
815 Combined Demographic Profile of Unique Individuals (Integrated Brand Reports only; reported at the media owner's option).....	24
816 Channel Frequency Table (Optional) .....	24
817 Geographic Distribution .....	25
818 Brand Channel's Profiles.....	25
819 Field Served and Definition of Qualified Recipients .....	27
820 Average Non-Qualified Circulation.....	27
821 Paragraph 1: Average Qualified Circulation Breakout for Period.....	28
822 Paragraph 2: Paragraph 2: Qualified Circulation by Issues for Period.....	28
823 Paragraph 3a: Business/Occupational Breakout of Qualified Circulation.....	29
824 Paragraph 3b: Qualification Source and Age Breakout .....	30
825 Paragraph 3b, Optional Addendum: Recency of Engagement.....	33
826 Paragraph 4: Geographical Breakout of Qualified Circulation .....	34
827 Prices and Promotional Incentives Tables: Qualified Paid Subscription Sales for Period (Optional).....	35
828 Three Calendar Year Analysis (Optional) .....	36
829 Renewal Percentage of Qualified Circulation (Optional).....	35
830 Additional Data/Explanatory Notes and Information.....	36
831 Media Owner's Affidavit.....	37
832 Date Received .....	37

### **Section 1-2B 900 Definitions and Reporting Requirements**

901 Additions and Removals .....	37
902 Advertiser and Agency Copies .....	38
903 Allocated for Trade Shows and Conventions .....	38
904 Back Copies.....	38
905 Brand Report .....	38
906 Channel .....	39
907 Definition of Recipient Qualification .....	39
908 Digital Magazine .....	39
909 Field Served .....	39
910 Integrated Database.....	39
911 Net Unique Individuals .....	39
912 Non-Integrated Data .....	39
913 Non-Qualified Circulation .....	40
914 North American Industry Classification System (NAICS) .....	40
915 Qualified Circulation.....	40

# **Table of Contents**

## **Page No.**

### **Section 1-2B 900 Definitions and Reporting Requirements (continued)**

916 Qualified Non-Paid Circulation .....	40
917 Qualification Period .....	40
918 and 919 Qualified Recipients .....	40
920 Shared Media Channels .....	41
921 Statement of Content Platform .....	41
922 Supplementary Question .....	41

### **Section 1-2B 1000 Requirements and Records Necessary for an Audit**

1001 and 1002 General Information .....	41
1003 Non-Integrated Audit Requirements .....	41
1004 Integrated Database Audit Requirements .....	41
1005 Pre-Audit Requirements .....	42
1006 Records – Proof of Production and Distribution .....	42
1007 Alerts .....	42
1008 through 1010 Alert Bounces .....	43
1011 Reporting Downloads .....	43
1012 Reporting Usage .....	43
1013 Non-Paid Access via Tablet/Mobile .....	44
1014 Site License .....	44
1015 Records – Qualified Sources .....	45
1016 Records – Paid Subscriptions .....	45
1017 Requirements for Storing Documents Digitally .....	46
1018 Single Copy Sales .....	46
1019 Non-Qualified Sources .....	46
1020 Audit Methodology .....	46
1021 Delayed Audit – Suspension of Service .....	47
1022 Circulation List .....	47
1023 Requirements and Records for Computerized Data Files .....	47
1024 Validation of the Circulation File .....	47
1025 Qualification Sources .....	48
1026 Direct Request from Recipient .....	48
1027 Direct Request: Written .....	48
1028 Direct Request: Telecommunication .....	50
1029 Direct Request: Electronic .....	53
1030 Request from Recipient’s Company .....	55
1031 Request from Recipient’s Company: Written .....	55
1032 Request from Recipient’s Company: Telecommunication .....	57
1033 Request from Recipient’s Company: Electronic .....	58
1034 Other Than Request .....	58
1035 Membership Benefit .....	59
1036 Communication (Other than Request) .....	59
1037 Communication (Other than Request): Written .....	59
1038 Communication (Other than Request): Telecommunication .....	60
1039 Communication (Other than Request): Electronic .....	61
1040 Passive Sources .....	62
1041 Independent Field Reports .....	62
1042 List Sources .....	62

# **Table of Contents**

## **Page No.**

### **Section 1-2B 1000 Requirements and Records Necessary for an Audit**

(continued)

1043 Business Directories .....	63
1044 Other Sources .....	63
1054 Questionnaire Design .....	63
1046 Obtaining Primary Business Information .....	64
1047 Job Title – Obtaining Job Title Information .....	64
1048 Job Function – Obtaining Job Function Information .....	64
1049 Qualified Paid.....	64
1050 Qualified Paid Subscriptions .....	64
1051 Paid as Qualifying Standards.....	66
1052 Subscriptions Purchased Through Tablets/Mobiles .....	66
1053 Terminology/Definitions and Disclosure Comments (where applicable) .....	66
1054 Advanced Renewals .....	66
1055 Arrears (Post Expire Copies Included In Qualified Paid Circulation).....	66
1056 Average Annual Order Price .....	67
1057 Base Prices.....	67
1058 Combined Sales.....	67
1059 Combined Sales: Multiple Media Channels of the Same Brand .....	68
1060 Credit Subscriptions .....	68
1061 Expiration Date – Terminating the Date of Subscription .....	68
1062 Extension .....	68
1063 Gift Subscriptions .....	68
1064 Group Subscriptions .....	69
1065 Membership Benefit Subscriptions – Defined .....	69
1066 Membership Benefit Subscriptions –Disclosure Standards .....	69
1067 Non-Deductible Subscriptions .....	70
1068 Post Expiration Copies Included in Paid Circulation Up To Three Months .....	70
1069 Promotional Incentive .....	70
1070 Renewal.....	71
1071 Renewal Rate .....	71
1072 Single Copy Sales.....	71
1073 Sponsored Individually Addressed Circulation.....	71
1074 Subscriptions.....	72
1075 Subscription Extensions.....	72
1076 Term of Subscription .....	72
1077 Third Party Agents.....	72
1078 Sweepstakes, Prize Draws or Contents .....	72

### **Section 1-2B 1100 Audit Procedures .....73**

### **Section 1-2B 1200 Membership Advisories of Correction .....73**

### **Section 1-2B 1300 Special Three or Six Month Audit .....74**

# **Table of Contents**

	<b><u>Page No.</u></b>
<b>Section 1-2B 1400 Publicity .....</b>	<b>75</b>
1401 through 1412 General Compliance .....	75
1413 through 1419 Applicants .....	76
1420 through 1445 Filing Publicity Complaints .....	77
 <b>Section 1-2B 1500 Complaint Process For All Matters .....</b>	 <b>81</b>
 <b>Section 1-2B 1600 Appeals from Administrative Decisions .....</b>	 <b>83</b>

## **1-2B 100 ELIGIBILITY – DIGITAL BUSINESS PUBLICATIONS**

### **1-2B 101 General Eligibility**

- 1) An only digital media brand applying for membership shall qualify as stated in Section B2.0 of the Bylaws, and shall conform to the following requirements:
  - a) It shall be a business publication which is hereby defined as one where every issue is sent to one or more specific businesses, industries, trades, occupations, or professions with clearly defined limits, recognized by the industries or groups that it serves.
  - b) It shall be a magazine delivered periodically in a digital format (PC, APP, Mobile, Tablet, etc.) with metered (i.e. linear) navigation that is edited, designed, and contains date-stamped content that includes advertising. Though editing, design, and issue identification (i.e. date-stamped content) are significant differences, the primary distinction between a digital magazine and a website is the metering (this can be pagination or any other method of going through the issue from beginning to end).
  - c) It shall practice qualified circulation as defined in Section 1-2B 915 of these Standards, and shall have done so for at least three months before being eligible for an initial audit.
  - d) It may be a catalog independently operated and independently distributed and one which accepts competitive advertising, if otherwise qualified under the Bylaws and Standards.
  - e) If a brand has sub-brands or channels such as multiple e-newsletters, and/or multiple websites, the CEO of BPA shall determine whether the brand is eligible for a single membership or is, in effect, two or more separate brands requiring separate memberships and brand audits for each.
- 2) When a brand has two or more magazines refer to BPA Bylaw B2.1.6.

### **1-2B 102 Extra (Special) Issues**

- 1) When a publication has extra issues such as directories, catalogs or buyer's guides, the CEO of BPA shall determine whether the publication is a single qualified publication or is, in effect, two or more separate publications requiring separate memberships and separate brand reports and audit reports for each issue on the basis of the following conditions:
  - a) The extra issue is distributed to all or a specifically designated portion of the circulation list of the regular publication.
  - b) The extra issue is identified on its cover as a special issue of the primary publication.
  - c) The masthead of each issue reflects the frequency which includes the extra issue.
- 2) If, after consideration of the above conditions, the CEO of BPA determines that the publication is, in effect, a single publication, the publication shall report the extra issue (directories, catalogs or buyer's guides) in paragraph 2 of the brand report but not in paragraph 1 if the extra issue is distributed to less than the identical circulation list as that of the regular publication, and a suitable explanation shall be made in the explanatory paragraph, Additional Data subject to audit.

### **1-2B 103 Separate Editions**

- 1) When a publication has separate Editions, such as demographic or geographic, the CEO of BPA shall determine whether the publication is a single, qualified publication or is, in effect, two or more separate publications requiring separate memberships and brand reports.
- 2) To qualify as a single publication, the separate Editions shall meet all of the following conditions:
  - a) Shall have the same recipient qualification and shall serve the same field within a business or service market.

- b) The qualified recipients on the lists shall be in the same business, occupation, etc.
  - c) Fifty percent of the editorial content shall be common in words, not layout, between/among all Editions. Geographic Editions require only common editorial scope. In both types of Editions, advertising need not be common between/among Editions.
  - d) The Editions shall be identified separately on advertising rate source material and in circulation promotion. In advertising rate source material, separate reference to each Edition's frequency, issuance and closing dates is required.
- 3) If, after consideration of the above conditions, the CEO of BPA determines that the publication is, in effect, a single publication, the media owner will be given the option to report the circulations for each edition separately.
  - 4) If the media owner opts to report each edition separately, the media owner shall be required to report as follows:
    - a) Separate tables may be used rather than columns to report the editions in paragraphs 3a, 3c, and 4.
    - b) Separate paragraphs 1 and 3b analyses are required for each edition.
    - c) Additions and removals, if reported, shall be reported by issue, not edition, in paragraph 2 (See 1-2B 901).
    - d) All editions shall be reported in accordance with the above.
  - 5) If the frequency of the edition does not give cause to publish the edition with the analyzed issue, a reporting of the edition shall still occur in paragraphs 3a, 3b, 3c, and 4 by reporting the results of the edition's circulation selection criteria against the analyzed issue's circulation file.

### **1-2B 104 Supplements**

- 1) When a digital publication has a supplement, BPA will refer to local postal regulations for the definition of a supplement, and the CEO of BPA shall use that definition for guidance in determining whether the publication is a single qualified publication or is, in effect, two or more separate publications requiring separate memberships, brand reports and audit reports for each publication.
- 2) However, in order to qualify as a single publication, the host publication and the supplement shall meet all of the following conditions:
  - a) A supplement may be devoted to a single topic and may contain material different from that in the host publication, but there shall be common editorial scope.
  - b) The supplement shall have the same recipient qualification and shall serve the same field within a business or service market as the host magazine.
  - c) The qualified recipients on the lists shall be in the same business, occupation, etc.
  - d) The supplement's recipients may be a subset of the host magazine's qualified recipients.
  - e) The supplement shall be identified separately on advertising rate source material and in circulation promotion. In advertising rate source material, separate reference to each supplement's frequency, issuance and closing dates is required.
- 3) If, after consideration of the above conditions, the CEO of BPA determines that the supplement may be reported within the host circulation report, the media owner shall be required to report as follows:
  - a) Supplements shall be listed in Paragraph 2 by issue date.

- b) Additions and removals, if reported, shall be reported by issue, not by supplement.
  - c) Separate tables shall be used to report the supplement in Paragraph 3a.
  - d) Paragraph 3a shall include a footnote disclosing the recipient selection criteria.
- 4) If the frequency of the supplement does not give cause to publish the supplement with the analyzed issue, a reporting of the supplement shall still occur in Paragraph 3a by reporting the results of the supplement's circulation selection criteria against the analyzed issue's circulation file.

### **1-2B 105 Single Publication – Optional Separate Memberships**

When the CEO of BPA determines that the publication is, in effect, a single publication, but the media owner wishes separate brand reports for each edition or supplement, separate memberships and audit fees will be required.

### **1-2B 106 Marketers**

- 1) Marketer members shall qualify as stated in Section B2.0 of the Bylaws and be defined as companies that market or advertise properties, products or services and are interested in third-party verification and assurance.
- 2) Marketers and advertising agencies, in addition to, or in lieu of, one overall company membership, may obtain a separate membership for any one or all of their branch offices, divisions or subsidiaries. Each separate membership shall carry with it all of the privileges and obligations of membership set forth in the Bylaws and the Standards promulgated by the Board of Directors.

### **1-2B 107 Associate Membership**

- 1) Industry service providers, companies or individuals, applying for associate membership shall qualify as stated in Section B2.0 of the Bylaws and shall conform to the following requirements:
  - a) Provide the names and contact details of three professional references that can attest to the applicant's successful completion of BPA Worldwide related projects.
  - b) It is allowable to provide one reference if a minimum of three projects were completed.
- 2) Associate members who maintain successful ongoing completion of BPA projects are permitted to renew their membership on an annual basis.
- 3) Reviews of performance will be completed for any associate member's work that negatively impacts BPA members or the industry.
- 4) Those associate members who are found to be negatively impacting BPA members or the industry will be reviewed under Section B9.0 of the Bylaws (offenses and penalties).

## **1-2B 200 OBLIGATIONS OF MEMBERSHIP**

### **1-2B 201**

All members shall comply with the Bylaws and Standards of the Corporation.

### **1-2B 202**

Should it be necessary for the Corporation to take any action, whether internal or by litigation, to enforce any Bylaw or Standard, or to collect any monies due it, the member or former member against whom such action is taken shall be responsible for and shall pay to the Corporation all costs and expenses incurred by the Corporation in connection with such action, including, by way of illustration and not limitation, the cost of auditor's and other staff time spent in connection with the enforcement procedure, postage, printing, supplies, reasonable attorney's fees, whether incurred in an internal enforcement procedure or in litigation in the courts or before an arbitration tribunal, and legal disbursements.

### **1-2B 203**

Should it be necessary for the Corporation to participate in a legal proceeding as a witness, the member or former member for whom such action is taken shall be responsible for and shall pay to the Corporation all costs and expenses in connection with such action. This includes, by way of illustration and not limitation, the cost of auditor's and other staff time charged at a rate established by the Board of Directors, postage, reproduction, supplies, and reasonable attorney's fees. This is applicable whether incurred to respond to a subpoena, or appear for deposition, litigation in the courts, an arbitration tribunal, or any other legal proceeding.

### **1-2B 204**

Should any member, or vendor to a member providing information for the member's audit, employ BPA personnel within three months of having conducted that member's audit, or internal audit review, the Corporation shall conduct a review of the audit at the cost of the corporation. If such review presents issues requiring a re-audit, one shall be conducted. If the re-audit results in adjustments to the previously audited circulation, the member, or associate member, involved shall pay to the Corporation all costs and expenses (travel and otherwise) in connection with conducting such re-audit.

### **1-2B 205**

If any engagement cannot be completed within thirty calendar days from its start because of the failure of the member to either maintain or provide necessary documents required by the Bylaws and Standards, the CEO of BPA will review the engagement and shall have the authority to suspend services to the member until the engagement is completed, and the CEO of BPA may issue a bulletin to the BPA Worldwide membership to that effect.

### **1-2B 206**

Services shall be suspended by the CEO of BPA for any publication whose audit takes over 75 days to complete or such further time as granted by the CEO of BPA. The media owner may appeal the CEO of BPA's decision in writing to the Executive Committee of the Board of Directors within seven days from receipt of the CEO of BPA's decision. The decision of the Executive Committee shall be final. In the event of suspension, a notice shall be posted on BPA's web site and/or released to the membership and the media owner may not publicize any circulation data until the successful completion of that audit.

### **1-2B 207**

Members seeking audit/compliance/assurance must install, maintain and make available to the staff of the Corporation at all times, true and correct records capable of being verified/audited in accordance with the established Standards of the Corporation.

### **1-2B 208**

Members shall file true claims and statements regarding their properties, products or services to be verified or assured with the Corporation in accordance with the Standards of the Corporation. These claims and statements shall be attested to by a duly authorized representative of the member. Each report issued to the members shall contain figures and facts bearing on the members' compliance with industry standards for their properties, products or services. These reports shall be released and distributed promptly by the Corporation and audited by the Corporation in accordance with its Standards.

### **1-2B 209**

- 1) Duly authorized representatives of the Corporation shall have the right of access, at any time, to all records deemed necessary by the Corporation to accomplish the objects of the Corporation. By way of illustration but not of limitation, such access may be required by the Corporation:
  - a) ...to make an engagement.
  - b) ...to confirm any details of a claim submitted to the Corporation, whether that claim has been released or not.
  - c) ...to investigate the accuracy of a report or claim already released.
  - d) ...to obtain information which, in the opinion of the CEO of BPA, may be pertinent to a future claim or report.

## **1-2B 300 APPLICANT PROCEDURE**

### **1-2B 301 Application for and Acquisition of Membership Status**

- 1) Each applicant for membership shall deposit with the Corporation, the fees as determined by the Board of Directors. For those applicants requiring audit/compliance/assurance, the CEO of BPA shall screen the application and within a reasonable time after the receipt of the application and deposit, shall determine whether the applicant's records are adequate for audit/compliance/assurance purposes in accordance with the standards and requirements of the Corporation.
- 2) If the applicant's records are inadequate the CEO of BPA shall request the applicant to install and maintain records in accordance with the Standards of the Corporation. If the applicant refuses to do so, or has failed to do so within the time limits imposed by the CEO of BPA, or if the application is withdrawn, the application shall automatically be rejected and the entire fee deposited with the application, shall be forfeited to the Corporation.

### **1-2B 302**

- 1) An applicant eligible for membership in BPA Worldwide shall, in addition to filing an application, proceed as follows:
  - a) Fill out and sign an appropriate submission statement for the service to be performed and file it with the Corporation.
  - b) All reports filed with the Corporation shall be in conformance with the appropriate sections defined in these standards and shall be the basis for any initial audit report.
  - c) Provide, maintain and make available to BPA staff, all requirements and records as stated in these Standards.
- 2) On receipt of the applicant's first claims, the corporation shall, as soon as possible, make an examination of the applicant's records and complete an initial audit.

### **1-2B 303**

The CEO of BPA shall cause an audit/compliance/assurance engagement to be made of the applicant's records in accordance with the Standards of the Corporation. Upon the successful completion of the engagement, the applicant will be admitted into membership.

### **1-2B 304 Applicants with Single Copy Sales**

- 1) For auditing single copy sales final settlement figures shall be available for at least half the issues in the period. The balance of issues may be projected based on a historical average of the settled issues.

- 2) Examples of three-month initial audit eligibility dates:
  - a) Weekly publications shall have seven issues settled
  - b) Monthly publications, one issue shall be settled
  - c) Bi-monthly publications shall have one issue settled
  - d) Quarterly publications shall settle one issue
  - e) Semi-Annual and Annuals shall be settled
- 3) An established publication may project single copy sales for any issue in the three-month initial audit period so long as a documented record of at least six prior months of net sales is available.

### **1-2B 305 Website Applicants**

- 1) A website applying for BPA services shall complete an application and contract for such services.
- 2) On receipt of the application the corporation shall, as soon as possible, forward instructions to the applicant, complete an initial tag code audit, verify the code has been added to every web page, and ensure the collected data is accurate.

### **1-2B 306 Notice of Admittance**

Upon acceptance and release of a Brand Report or letter of assurance by BPA, the applicant shall be notified that they have been admitted into membership.

### **1-2B 307**

If it is found that the media owner's records are incomplete and the initial audit cannot be made, the media owner shall be required to install and maintain such auditable records as recommended by the Corporation. A Brand shall not become a member until an auditable report or claim is submitted and the records are audited in accordance with the instructions from the Corporation (See Bylaws, Section B.2.1.4).

### **1-2B 308**

If the CEO of BPA finds, after a sufficient time has elapsed, that the applicant's records are incomplete and an acceptable initial audit cannot be made, BPA Worldwide may release a notice to its members officially notifying them that the application has been rejected. This notice may take the form of a posting on BPA's website and/or a mailing to the membership and BPA's press list.

## **1-2B 400 TRANSFER OF MEMBERSHIP**

### **1-2B 401**

- 1) Membership shall not be transferable unless the following conditions are met:
  - a) The member seeking the transfer is in good standing.
  - b) The records of the member have been approved by the CEO of BPA.
  - c) The purchaser of the member entity executes and files a transfer of membership form with the Corporation.
  - d) All outstanding charges owed by the member entity to be transferred have been paid in full.
  - e) Prior written approval from the CEO of BPA Worldwide is obtained.

## **1-2B 500 MERGING PUBLICATIONS**

### **1-2B 501 Merged Publication**

- 1) Two or more publications which have merged due to suspended publication shall be identified as such on the front page of two sequential brand reports.
- 2) Request circulation, which has been combined as a result of the merger, shall be footnoted in paragraph 3b and identified separately for each publication (See 1-2B 802).
- 3) For "Request from Recipient's Company" circulation, see 1-2B 1030 15.

### **1-2B 502 Merging Publications: Non-Paid Circulation**

- 1) When a media owner merges the non-paid circulation of a publication with more than one other publication, the following shall apply:
  - a) The publications shall be homogeneous.
  - b) A record shall be available indicating the recipient's election to receive the surviving publication. This election may be done through a negative option questionnaire. If such documents are returned to the media owner, they shall be considered a request to receive the surviving publication.
  - c) The original source document establishing request circulation for the defunct publication shall be available.
  - d) The merged circulation shall continue to age based on the qualification date of the original source document.

### **1-2B 503 Merging Publications: Paid Circulation (Purchase or Transfer of Subscriptions from List of Suspended Publications)**

- 1) When a media owner purchases a publication and/or the subscription list of a publication that has ceased publishing and transfers the subscriptions to the media owner's own publication, the following shall apply:
  - a) The publications shall be homogeneous.
  - b) A record shall be available indicating the subscriber's election to receive the publication which has assumed the responsibility to fill the unexpired term of this suspended subscription. This election may be done through a negative option questionnaire. If such documents are returned to the media owner, they shall be considered a request to receive the surviving publication.
- 2) This service shall be started within six months after the last issue of this discontinued publication, or within such further time as may be granted by the CEO of BPA.
- 3) The original order and proof of payment of the suspended publication shall be available.
- 4) The unexpired portion of the subscription is ascertained by either of the following methods, decided by the CEO of BPA:
  - a) By dividing the sum of money due the subscriber at the base annual price of the discontinued publication by the price per copy of the surviving publication, said per copy price to be a pro rata price of the base annual subscription price of that publication.
  - b) By counting the number of copies of the discontinued publication still due the subscriber and crediting the subscriber with this number of copies of the surviving publication, regardless of the discontinued publication's basic price relative to the acquiring publication's.

- 5) A separate business and/or occupational analysis of transferred subscriptions shall be made in paragraph 3a for one brand report and all details concerning such subscriptions shall be reported in the explanatory paragraph, Additional Data as determined by the CEO of BPA.
- 6) The subscriptions cannot be reported as paid circulation beyond the expiration date.

## **1-2B 600 ONSITE OR CROSS BORDER AUDITS**

### **1-2B 601**

Whenever it is necessary for BPA to perform an audit in a country where BPA does not have an office, fees for services shall be charged based on prevailing rates as established by the Board of Directors for that region.

In addition, BPA shall invoice for the “economy or coach” air travel costs of BPA staff, computed from the staff’s departure point to the actual location where the audit is conducted.

### **1-2B 602**

A member requesting an overseas or out-of-country audit in countries without a BPA office shall make an advance payment to BPA Worldwide of the estimated charge.

### **1-2B 603**

BPA Worldwide may also require a media owner member requesting an overseas or out-of-country audit to sign a contract for such audit, the form of which may be fixed by the Board of Directors from time to time, but in any event shall include the substantive provisions of this Section.

### **1-2B 604**

- 1) Should any member in the United States request BPA staff to perform their audit on site or at a third-party location, the member shall pay the following fees and charges for such an audit:
  - a) The normal auditing and additional hourly charges for the media brand, in accordance with Section B3.0 of the Bylaws.
  - b) The “economy or coach” air travel costs of the auditor, computed from the auditor’s departure point to the actual location where the audit is made.
  - c) Hotel and ground travel expenses incurred during the course of conducting the audit.
- 2) The above does not pertain to U.S. applicants for membership who request an auditor to perform the initial audit on site or at a third-party location.

## **1-2B 700 BRAND REPORT – GENERAL INFORMATION**

### **1-2B 701 General Information**

- 1) The twelve-month Brand Report forms the basis for an annual Brand Audit Report.
- 2) The audit will be completed after the auditor's examination of the media owner’s records.
- 3) The audit period covered shall be no more than twelve months.

### **1-2B 702**

- 1) Brand data issued annually or semi-annually or has a lead distribution channel that releases data once in a twelve-month reporting period, shall file one twelve-month Brand Report, which will be checked upon receipt and, at the option of the media owner, printed and released by BPA Worldwide upon completion of processing.
- 2) It shall be the basis for the twelve-month Brand Audit Report.
- 3) The audit will be completed after the auditor's examination of the database records.

### **1-2B 703**

The audit will be performed wherever the records may be properly checked.

### **1-2B 704 TYPES OF BRAND REPORTS**

- 1) **Initial Audit Report:** May be released for any consecutive three or six-month period.
- 2) A publication shall transfer to the standard six-month reporting periods with its first brand report following the initial audit and include whatever issues were previously audited during the period reported (See 1-2B 709 and 710).
- 3) **Interim Brand Report:** The brand report covering the circulation for the first six months of the audit year (See 1-2B 709).
- 4) **Analyzed Brand Report:** The brand report which covers the circulation of the second six-month half of the audit year (See 1-2B 709).
- 5) **Audited Brand Report:** An annual report released by the corporation consolidating the interim and analyzed six-months brand reports (See 1-2B 709). The audit report attests to the accuracy and validity of the media owner's circulation claims in the brand reports.

### **1-2B 705 Statements and Rights of Corporation**

- 1) Media owner members shall report their circulation on forms supplied by the Corporation.
- 2) The filing of the media owner's circulation data shall operate as an automatic grant to the Corporation of a perpetual and irrevocable right and license to use, publish, distribute and market, solely or in conjunction with others, circulation data and other data, in any form and manner authorized by the Board of Directors.

### **1-2B 706 Typographical Setup**

In the interests of uniformity in appearance and typographical setup of the BPA Brand Report, BPA Worldwide will process all paragraphs which require special typesetting, ruling and extra pages. Where additional costs are incurred in setting up special paragraphs the publication member shall be billed those costs.

### **1-2B 707 Brand Report Processing Fees**

Time required to process a brand report shall be charged for at a uniform flat rate to be set from time to time by the Board of Directors.

### **1-2B 708 Brand Report Filing Period – Applicant**

- 1) An applicant shall file a three or six-month brand report as the basis for the initial audit for the consecutive three or six-month period during which qualified circulation has been practiced.
- 2) Upon completion of the audit, the media owner will be admitted to membership and the report shall be released as an initial audit report to rates and data services and BPA Worldwide members.

- 3) A publication applicant which has chosen a period end with a month other than June or December for its initial audit report, shall transfer to the standard June or December schedule with its first Brand Report following the initial audit report and include whatever previously audited issues are necessary to complete the six-month period. Likewise, for Canadian and Medical Journal reporting periods.

#### **1-2B 709 Brand Report Filing Period – Member**

- 1) With the exception of publications issued annually and semi-annually, BPA Worldwide Business Publication Audit Members will release two Brand Reports each year for the six months ended June and for the six months ended December, or for six months ending March and six months ending September (Canada only).
- 2) For Medical Journals, members will release two brand reports each year for the six months ended July and for the six months ended January.
- 3) A publication issued annually or semi-annually or has a publishing schedule that publishes one issue in a six-month reporting period, shall file one twelve-month brand report, which will be checked upon receipt and, at the option of the media owner, printed and released by BPA Worldwide upon completion of processing.
- 4) The six-month reports will be checked and released as brand reports upon receipt and completion of processing.
- 5) Six-month brand reports will be covered by one twelve-month annual Brand Audit Report.
- 6) The twelve-month report forms the basis for the annual audit report.
- 7) The audit will be completed after the auditor's examination of the media owner's records.
- 8) The audit period covered shall be no more than twelve months subsequent to the previous audit report.
- 9) The audit may be made in the media owner's office and/or wherever the records can be properly checked.

#### **1-2B 710 Brand Report Filing Dates – Member**

- 1) Reports as outlined in the preceding sections shall be filed with the Corporation within 15 days after the period which they cover.
- 2) Publication members reporting 50% or more average qualified paid circulation in paragraph 1 shall be granted a 15-day extension to this date.
- 3) No member shall be granted an extension of time to file except with the consent of the CEO of BPA, who shall not grant an extension greater than 30 days for publications reporting less than 50% average qualified paid circulation in paragraph 1 or 45 days for publications reporting 50% or more average qualified paid circulation in paragraph 1 without a showing that the filing delay is a result of extenuating circumstances clearly beyond the publication member's control.
- 4) Failure to file a report on or before the due date or the end date of an authorized extension shall result in a suspension of services to the publication member and will subject the publication member to disciplinary action as outlined in Section B9.0 of the Bylaws.
- 5) At any time after the end date of an authorized extension, if the required report has not been filed, BPA Worldwide shall post an advisory to the BPA Worldwide website notifying the membership of the publication's failure to file. All costs incurred in creating and posting an advisory, if any, shall be paid for by the subject publication member.
- 6) No later than 60 days after the close of each reporting period, the web site, [www.bpaww.com](http://www.bpaww.com), will display the status of production for each report that has not been posted to the web site. For example, status-of reports with the period ended June will be posted September 1st. These status reports will only include standard terminology approved by the Board of Directors.
- 7) The previous period's report would be moved to "history" at this time.

- 8) When a report is received by BPA Worldwide 1 – 14 days after the stated due date and a proof copy created, the media owner shall advise BPA of the acceptance of the proof copy within 10 business days after the proof copy has been issued. Reports received 15+ days after the stated due date shall have 5 business days to accept the proof.
- 9) However, for media owners filing reports prior to the stated due date and receiving a proof copy before the stated due date, the counting of business days for the acceptance process shall commence with the filing due date and not from the date the proof copy was created. For all others, final approval shall be received within 20 business days of receipt of the first proof.
- 10) The CEO of BPA shall not grant an extension without a showing that the delay in approving the proof copy is a result of extenuating circumstances clearly beyond the publication member's control.
- 11) Failure to advise BPA of the acceptance of the proof copy by this date shall result in suspension of services to the publication member and will subject the publication member to disciplinary action as outlined in Section B9.0 of the Bylaws. BPA Worldwide shall post an advisory on its website, notifying the membership of the publication's failure to approve the proof copy. All costs incurred in creating and posting an advisory to the website, if any, shall be paid for by the subject publication member.
- 12) All signatures on reports submitted to the Corporation shall be over the individual's typewritten name and title.

### **1-2B 711 SRDS, CARD, BRAD or Other Advertising Rates/Informational Listing Services**

- 1) The media owner has the option of submitting the special SRDS or CARD or BRAD or similar form supplied by BPA Worldwide and an additional copy of their six-month brand report.
- 2) When the report has been processed, typeset and approved for printing by the media owner, the SRDS or CARD and/or BRAD or similar form will be forwarded by BPA Worldwide to Standard Rate and Data Service or Canadian Rates and Data and/or British Rates and Data or similar company for inclusion in its next issue.
- 3) The additional report which has been approved by BPA Worldwide will be returned to the media owner in advance of their printed copies for their use in preparing promotional material.

### **1-2B 712 Report Purchase Options**

Printed copies of brand reports may be purchased by a member of the Corporation at a price established by the Board of Directors.

### **1-2B 713 Subject Matter of Reports**

- 1) All language and terminology shall be factual and auditable.
- 2) No facts, figures or written statements shall appear in BPA reports other than those expressly authorized in these Standards.
- 3) In the event of a disagreement with a decision of the CEO of BPA, a media owner member may request a hearing before an appropriate committee of the Board of Directors.

## **1-2B 800 BRAND REPORT – CONTENTS**

### **1-2B 801 Overview**

- 1) A media owner who wishes to report any variety of audited: publication circulations, web traffic, event attendance, email newsletter distribution, mobile data, webinar attendance, white paper downloads, social media and/or other media channels, shall do so in BPA Worldwide's Brand Report format (See 1-2B 905).

- 2) It is the media owner's option to include any combination of, or all channels of, content distribution in the Brand report. It may include a single channel i.e. a digital publication's distribution, or it may include multiple channels.
- 3) Any channel(s) associated with a brand may be included on a Brand Report provided each has the same clearly defined target audience. Should a question arise, the CEO of BPA shall determine if additional channels are separate Brands.
- 4) Acceptable proof of the target audience shall be provided by the media owner.
- 5) Channels not referenced in these Standards may be included in a Brand Report provided permission is granted by the CEO of BPA and sufficient documentary evidence is provided at the time of audit.
- 6) The first page of the report shall contain the name of the Brand; brand's corporate or company name; principal telephone number; fax number; email address; website URL; address of the corporation and corporate/brand logo. A Quick Response (QR) code may be included at the media owner's option.
- 7) For their publications, all media owners are required to report, in their brand report, the:
  - a) average qualified non-paid circulation and average qualified paid circulation separately in paragraph 1.
  - b) total qualified circulation in paragraphs 1 through 4.
  - c) qualified non-paid circulation in paragraph 3b.
- 8) The reporting of qualified paid circulation in paragraphs 2, 3a, 3b, 3c, 4, 5-6 is optional.
- 9) Members have the option of reporting their qualified non-paid and qualified paid circulation separately in paragraphs 2 through 4.
- 10) Media owners shall report the average annual order price for the period in the explanatory paragraph, Additional Data (See 1-2B 1056).
- 11) Within the brand report, a member may not claim, or imply, that BPA Worldwide audits readership or intent to read unless the source of the claim is a readership study which has been audited by BPA.

### **1-2B 802 Name of Publication**

- 1) The first page of the report shall contain the name of the publication; publishing company; principal telephone number; fax number; email address; Web site URL; address of publishing company; whether or not an official association publication; year of publication's establishment and number of issues per year.
- 2) A media owner member shall notify BPA Worldwide of any change in the name of their publication. At this time the media owner shall declare whether or not they wish to change the date the publication was established.
- 3) Any change in the date of establishment should be consistent with the volume number appearing in the masthead of the publication.
- 4) If the date of establishment and volume numbers are changed, the publication will be considered a new publication and subject to the standards requiring application for membership.
- 5) Whenever two or more publications are merged into one publication, or when one publication is merged with more than one publication, the following comment shall appear in the upper right hand corner of two consecutive brand reports and one audit report of the surviving publication(s):

*"Merged Publication – See explanatory paragraph, Additional Data."*

- 6) The explanatory paragraph, Additional Data shall report the date of merger and other applicable information (See 1-2B 501).

### **1-2B 803 About the Brand (Optional)**

If included, shall contain details regarding the scope and reach of the brand. Editorial content is permissible; however, the content may not be promotional (subject to publicity standards, see Section 1-2B 1400 and separate Guidance Document) and shall be factual and auditable.

### **1-2B 804 Magazine Channel Format**

- 1) A statement shall be included to disclose the magazine's type of format. The media owner may include a description of the features of the format and the types of devices for which the format is designed. The following is a sample statement:

*"MAGAZINE CHANNEL FORMAT – DIGITAL ISSUES*

*MAGAZINE NAME is produced in a digital format and is written and designed for the digital reading experience, accessed by a computer, mobile phone, or tablet. Digital formats may include features such as videos and surveys allowing for user interaction with the brand."*

- 2) Each page of the Brand Report, which includes magazine channel data, shall have a note in the footer to disclose

*"MAGAZINE CHANNEL FORMAT: This magazine is produced in digital format."*

### **1-2B 805 Brand Report Purpose Statement**

- 1) A standard comment broadly describing the nature of the report. The comment shall identify if the data in the report is "integrated" "non-integrated" or a possibly a combination of both.
- 2) The Purpose Statement is optional for a single-channel Brand Report.
- 3) The following comment shall be included in the integrated Brand Report and combined integrated and non-integrated reports:

*The Brand Report provides a deeper understanding and identification of all audited touch points with customers that have interest in the brand. It is designed to present a cross-section of all communication channels, including a brand's total recipients across multiple media platforms, unique users within each channel where it can be determined, and users accessing multiple channels.*

*The report contains a net, unduplicated count of individuals within an integrated database. When the end user is not identified, such as social media, integration for that channel is not possible, and therefore not required and reported separately as non-integrated channels.*

*Recipients receive multiple media channels of the Brand as indicated in the Executive Summary. The integrated Database Analysis Table reflects net unique individuals; individuals receiving only one channel; and the average number of channels received per individual. Channels for which the end user cannot be identified and therefore not integrated to identify unique individuals shall be fully disclosed in the report.*

- 4) The following comment shall be included in non-integrated Brand Reports:

*The Brand Report provides a deeper understanding and identification of all audited touch points with customers that have interest in the brand. It is designed to present analysis of all communication channels, including a brand's unique users within each channel of, but not across, multiple media platforms. This non-integrated report contains data for each separate media channel as indicated in the Executive Summary. No attempt has been made to identify or eliminate duplication that may exist across media channels.*

### **1-2B 806**

Brand Reports that include a magazine channel shall include a Field Served and Definition of Recipient Qualification (Business publications) or Market Served (Consumer magazines).

### **1-2B 807**

Brand Reports including supplementary or unit circulation data shall include the corresponding supplementary or unit Purpose Statement (See Separate Standards document for 2-5 and 2-6).

### **1-2B 808**

Non-Integrated reports with 2 or more channels reported shall include the following footnote on all pages of the report:

*No attempt has been made to identify or eliminate duplication that may exist across media channels.*

### **1-2B 809 Overall Brand Focus (Table of Contents)**

At the media owner's option, a table of contents for the Brand Report may be listed.

### **1-2B 810 Channels**

- 1) A visual listing labeled as "Channels" to reflect all channels reported within the Brand Report shall appear on page one of the report. The disclosure of frequency or number of deployments in the audit period for all applicable channels shall be reported.
- 2) Averages for the audit period, other top line data and images of each channel shall be included.
- 3) App downloads shall be the cumulative total of all apps downloaded as of the end of the reporting period.
- 4) The month end totals for the last month in the reporting period shall be reported for each type of Social Media.

### **1-2B 811 Executive Summary**

- 1) The Executive Summary table shall include all audited channels in the brand and contain the number of occurrences and average for the period for each channel.
- 2) Paid and non-paid averages shall be reported in separate columns for each channel (except for app downloads which are reported as the cumulative total of all apps downloaded as of the end of the reporting period. Month end total shall be report for the last month in the reporting period for each type of Social Media).
- 3) **CHANNELS (Appears above the EXECUTIVE SUMMARY):**
  - a) **Magazine Channels:**
    - i) The name of the magazine shall be stated with the indication of the magazine format.  
(1) MAGAZINE CHANNELS WHEN ONLY DIGITAL FORMAT EXISTS



- ii) Media owners may report digital magazine editions by the device/platform on which they are served (desktop/laptop computer; tablets; smartphones; other mobile devices; etc.).
  - b) **Email Newsletters:** Daily, weekly and monthly averages shall be reported as determined by the true frequency average for each separate email newsletter reported.
  - c) **Events and Webinar:**
    - i) The average number of attendees shall be reported.
    - ii) At the media owner's option, the average number of registrants may also be reported.
    - iii) If reported, the average number of registrants shall not be included in the Six Month Average total. If reported, a footnote is required indicating that average registrants are not included.
  - d) **Document Downloads (white papers, case studies, etc.):** The average number of downloads or average distribution in the period shall be reported.
  - e) **Websites**
    - i) The average number of monthly unique browsers shall be included.
    - ii) If the media owner has a registration process for website access to content, the average number of unique monthly accesses may be reported.
    - iii) The media owner may report the average number of registered users; however, the number of registered users shall not be included in the six-month average total (if reported).
  - f) **Social Media**
    - i) Each type of social media, such as [but not limited to] Facebook, Twitter or LinkedIn shall be identified separately.
    - ii) The month end total for the last month in the reporting period shall be reported for each type of social media.
    - iii) Users of social media can be reported at a more granular level than simply the total for the brand. For example, social media may be tied to specific content or journalists.
  - g) **Apps**
    - i) The name of the App shall be included.
    - ii) The total number of downloads as of the end of the reporting period (cumulative figure, not the average) shall be reported in the Executive Summary.
    - iii) The app download table shall report the cumulative total app downloads as of the end of the prior reporting period and the number of app downloads each month.
    - iv) The cumulative total at the end of the period shall agree with the Executive Summary.
- 4) Media owners may include a Venn diagram illustrating overlap of channels at their option.

## 5) Example of Executive Summary Table:

### EXECUTIVE SUMMARY

Below are the average contacts per occurrence, including frequency per period reported.

	Non-Paid	Paid	Average
<b>THE CRITERION DIGITAL MAGAZINE</b> (6 issues in the period) (See Paragraph 3b for Source)	48,362	-	48,362
<b>THE CRITERION E-NEWSLETTERS</b>			
a. The Criterion E-Newsletter - 1 (12 issued in the period)	21,185	-	21,185
b. The Criterion E-Newsletter - 2 (6 issued in the period)	17,019	-	17,019
c. The Criterion E-Newsletter - 3 (3 issued in the period)	13,318	-	13,318
<b>THE CRITERION EVENT TOTAL UNIQUE ATTENDEES</b>	-	6,500	6,500
<b>THE CRITERION IPAD APP</b>	*5,700	-	*5,700
<b>THE CRITERION WEBSITE</b> (Monthly Users with 75,519 average Pageviews)	24,496	-	24,496
<b>THE CRITERION SOCIAL MEDIA</b>			
a. Twitter followers	*528	-	*528
b. Facebook likes	*1,969	-	*1,969
c. LinkedIn group members	*927	-	*927

\*App downloads and Social Media claims are cumulative figures, not averages.

Note 1: Shared media channel - The Criterion E-Newsletter - 1, The Criterion E-Newsletter - 2 and The Criterion E-Newsletter - 3 - serving both \_\_\_\_\_ and \_\_\_\_\_.

Note 2: Shared media channel - www.thecriterion.com - serving both \_\_\_\_\_ and \_\_\_\_\_.

Note 3: Shared media channel - Twitter followers and Facebook likes - serving both \_\_\_\_\_ and \_\_\_\_\_.

## 1-2B 812 Integrated Database Analysis (Integrated Brand Reports only)

- 1) Shall report the total Net unique individuals; Individuals receiving only one channel, and; Average channels received per individual.
- 2) Average channels received per individual is calculated by taking the gross of recipients of each channel, and dividing this total by the number of unique individuals.
- 3) A comment detailing the method of calculating the average channels received is required in the additional data section of the report.
- 4) Media owners may include a Venn diagram illustrating overlap of channels at their option.

## 5) Example of Integrated Database Table:

### INTEGRATED DATABASE ANALYSIS

<b>1a. INTEGRATED DATABASE ANALYSIS</b>		
	<b>NET UNIQUE INDIVIDUALS</b>	<b>65,613</b>
	<b>INDIVIDUALS RECEIVING ONLY ONE CHANNEL</b>	<b>22,826</b>
	<b>AVERAGE CHANNELS RECEIVED PER INDIVIDUAL*</b>	<b>2.3</b>
*See Additional Data		

## 1-2B 813 Communication Channels of the Brand (Integrated Brand Reports only)

- 1) Reports the gross number of individuals receiving each channel and cross tabulated by the additional channels the recipients receive.
- 2) Shall include rows and columns for all channels in the brand in the same sequential order as they appear in the Executive Summary.
- 3) Non-integrated channels shall be identified and reported separately from integrated channels on the right side of the table.

- 4) Media owners reporting Event and Webinar channels at their option may include registrant data in addition to required attendee data.

**Example of Communication Channels Table:**

**COMMUNICATION CHANNELS OF THE CRITERION BRAND**

**1b. COMMUNICATION CHANNELS OF THE CRITERION BRAND**  
Each column/row reports the gross number of individuals receiving that channel, and the additional channels those recipients receive.  
Since any one individual may receive more than one channel, the totals should not be added together as they exceed the total of unique individuals.

CHANNEL	INTEGRATED CHANNELS					NON-INTEGRATED CHANNELS				
	The Criterion Magazine	The Criterion Daily E-Newsletter	The Criterion Weekly E-Newsletter	The Criterion Monthly E-Newsletter	The Criterion Event Attendees	The Criterion Apps	The Criterion Website	Twitter followers	Facebook likes	LinkedIn group members
The Criterion Magazine	48,275	21,553	26,485	29,874	3,100	-	-	-	-	-
The Criterion Daily E-Newsletter	21,553	25,801	23,966	24,750	822	-	-	-	-	-
The Criterion Weekly E-Newsletter	26,485	23,966	31,965	25,665	1,525	-	-	-	-	-
The Criterion Monthly E-Newsletter	29,874	24,750	25,665	35,111	2,459	-	-	-	-	-
The Criterion Event Attendees	-	-	-	-	6,500	-	-	-	-	-
The Criterion Apps	-	-	-	-	-	1,254	-	-	-	-
The Criterion Website	-	-	-	-	-	-	24,870	-	-	-
Twitter followers	-	-	-	-	-	-	-	499	-	-
Facebook likes	-	-	-	-	-	-	-	-	1,940	-
LinkedIn group members	-	-	-	-	-	-	-	-	-	921

Note 1: Unique Browsers: See Website Glossary in Channel profile.

**1-2B 814 Channels Received (Integrated Brand Reports only)**

- 1) Identifies the total number of unique individuals who received single or multiple channels cross tabulated by all channels.
- 2) Shall include rows and columns for all channels in the brand in the same sequential order as they appear in the Executive Summary.
- 3) Non-integrated channels shall be identified and reported separately from integrated channels on the right side of the table.
- 4) Media owners reporting Event and Webinar channels, at their option, may include registrant data in addition to required attendee data.
- 5) If website data is reported for the brand, a footnote referring to the Unique Browsers is required.

**Example of Channels Received Table:**

**CHANNELS RECEIVED**

**1c. TOTAL UNIQUE INDIVIDUALS**

CHANNEL	INTEGRATED CHANNELS					NON-INTEGRATED CHANNELS					TOTAL UNIQUE INDIVIDUALS
	The Criterion Magazine	The Criterion Daily E-Newsletter	The Criterion Weekly E-Newsletter	The Criterion Monthly E-Newsletter	The Criterion Event Attendees	The Criterion Apps	The Criterion Website	Twitter followers	Facebook likes	LinkedIn group members	
MULTIPLE CHANNEL RECIPIENTS	39,460	23,491	29,956	31,482	3,800	-	-	-	-	-	42,631
SINGLE CHANNEL RECIPIENTS	8,815	2,310	2,009	3,629	2,700	-	-	-	-	-	22,982
<b>TOTAL</b>	<b>48,275</b>	<b>25,801</b>	<b>31,965</b>	<b>35,111</b>	<b>6,500</b>	<b>1,254</b>	<b>24,870</b>	<b>499</b>	<b>1,940</b>	<b>921</b>	<b>65,613</b>

Note 1: Unique Browsers: See Website Glossary in Channel profile.

**1-2B 815 Combined Demographic Profile of Unique Individuals (Integrated Brand Reports only; reported at the media owner's option)**

- 1) An analysis of the Business/Occupational demographics for the non-duplicated net unique individuals in the brand.
- 2) This data may be cross tabulated with other audited demographics for unique individuals.
- 3) Data reported shall be from the analyzed issue for each channel. A footnote detailing the issue analyzed for each channel shall be included.
- 4) If the media owner elects not to report this table, but includes a magazine channel, the following comment shall appear on the Brand report:

*Not reported at the option of the media owner. Magazine demographic profile reported on page (number).*

**Example of Combined Demographic Profile of Unique Individuals Table:**

**COMBINED DEMOGRAPHIC PROFILE OF UNIQUE INDIVIDUALS (ALL APPLICABLE CHANNELS)**

1d. BUSINESS/OCCUPATIONAL BREAKOUT						
CHANNELS	TOTAL	PERCENT OF TOTAL	TITLE			
			Executive Directors/VPs	Managers	Other Titled and Non-Titled Personnel	Unknown/No Answer
Aerospace/Defense	3,841	5.9	1,976	882	372	611
Agriculture/Mining/Gas/Oil	1,963	3.0	1,176	343	40	404
Automotive/Transportation	1,800	2.7	1,231	321	37	211
Business Services/Consultants	4,728	7.2	3,829	-	-	189
Construction/Architecture/Engineering	9,991	15.2	8,145	-	-	422
Education/Training	13,428	20.5	10,432	-	-	840
Energy/Utilities/Communications	7,001	10.7	4,896	-	-	63
Finance/Accounting/Banking	4,026	6.1	2,022	-	-	30
Government: Federal/State/Local/Military	5,977	9.1	2,797	-	-	150
Manufacturing	4,188	6.4	1,850	1,911	309	120
Other	3,347	5.1	999	532	209	1,607
Unknown/No Answer	5,332	8.1	-	-	-	5,332
<b>TOTAL RECORDS</b>	<b>65,613</b>	<b>100.0</b>	<b>39,353</b>	<b>14,187</b>	<b>2,094</b>	<b>9,979</b>

\*The Criterion Magazine as of November 2020, daily E-Newsletter as of November 28, 2020, weekly E-Newsletter as of November 29, 2020, monthly E-Newsletter as of November 2020. Criterion App as of December 31, 2020.

**1-2B 816 Channel Frequency Table (optional)**

- 1) If reported, this table displays the six-month activity for the period for each channel of the brand.
- 2) All channels in the Executive Summary shall be included and appear in chronological date order by channel.
- 3) Channel frequencies with weekly or less distribution/deployment or occurrence shall be reported as the actual date of distribution or occurrence.
- 4) A footnote shall be included to indicate whenever the reporting of an average is used for any channel that has distribution/deployment/occurrence that is greater than weekly.
- 5) The six-month average for each channel shall be included.
- 6) Specific requirements for each channel is as follows:
  - a) Magazines shall report the total qualified circulation for each issue in the period. Columns for Paid and Non-Paid, and additions and removals may be reported at the media owner's option.
  - b) E-Newsletters may report daily and weekly e-newsletters as weekly or monthly averages.

- c) All event data such as attendance at live events or webinars shall be reported on the date of each occurrence. Registrant data may be reported at the media owner's option.
- d) The average monthly document downloads (white papers, etc.) shall be reported. Additional download data may be reported at the media owner's option and footnoted that the figures are total downloads per month.
- e) For websites, the monthly unique browser figures shall be reported. Weekly figures may be reported at the media owner's option.
- f) Social Media may be reported by type as monthly total or aggregated per month.
- g) App download activity for each month shall be reported. The total downloaded averages are reported at the bottom of the table.

### **1-2B 817 Geographic Distribution**

- 1) Shall report the distribution by geographic region for each channel in the brand using standard geographic reporting.
- 2) Data shall be actual figures from the analyzed issue for each channel.
  - a) Channels required to report geographic data:
    - i) Magazines
    - ii) Events (attendees required, optional to report registrants)
  - b) Channels that may report detailed geographic data at the media owner's option:
    - i) E-newsletters
    - ii) Webinars (attendees required, optional to report registrants)
    - iii) White Papers
  - c) Channels that cannot report geographic data unless it is collected. However, if collected it may be reported at the media owner's option:
    - i) Websites
    - ii) Social Media
    - iii) Apps

### **1-2B 818 Brand Channel's Profiles**

- 1) Channel profiles detailing data specific to each unique channel shall be separately reported in these sections in the Brand Report.
- 2) The sections shall appear in the same sequential order as in the Executive Summary.
- 3) The analyzed issue, event or occurrence, etc., and topline average figures for each channel shall be disclosed.
- 4) The use of graphics to identify each channel (logo and coversheet) shall be optional.
- 5) Top line average figures, logo and cover shot (optional).
- 6) Source tables are required to be reported for all magazines channels. (Age data for Source is optional for business publications) (See Section 1-2B 824).
- 7) Source and age tables may be reported for other channels at the media owner's option provided that the data can be proven at the time of audit.
- 8) Additional Brand channels not detailed in this section may be reported provided complete and accurate audit trails exist. Reporting factors shall be determined at that time.

a) **Business Publication Brands (See 1-2B 800)**

The Business Publication reporting format shall include the following elements:

- i) The official publication of:
- ii) Year established
- iii) Frequency
- iv) Paragraph 1-Average Non-Qualified Circulation for the Period
- v) Paragraph 1-Average Qualified Circulation for the Period
- vi) Paragraph 2-Issue by issue totals that may be reported in the optional Frequency table are required to be reported in this section. The media owner has the option to report additions and removals, paid and non-paid breakouts.
- vii) Paragraph 3a-Business/Industry Breakout of Qualified Circulation (optional to report supplementary data)
- viii) Paragraph 3b-Qualified Source/Age Breakout of Qualified Circulation. This source and age data is required for non-paid circulation only. (Age data for Source is optional for business publications. See Section 1-2B 824).
- ix) Paragraph 4-Geographic distribution table
- x) Prices and Promotional incentive tables (optional)
- xi) Three-Year Calendar Analysis (optional)

b) **Email Newsletters (See 1-2B 801)**

The Email Newsletters reporting format shall include the following elements:

- i) Date of distribution of all deployments
- ii) Name or title, images, demographics and other details regarding content, focus or distribution (optional)
- iii) Email Newsletter members shall report the average number of net delivered newsletters and qualified paid and non-paid distribution separately.

c) **Events**

The Events reporting format shall include the following elements:

- i) Name, date, location and number of attendees
- ii) Statement of Verification Methodology
- iii) At the option of the media owner full demographic information for a specific event, number of registrants, images and other details about the event may be reported.

d) **Webinars**

The Webinars reporting format shall include the following elements:

- i) Name, date and number of attendees
- ii) At the option of the media owner full demographic information for a specific webinar, number of registrants, images and other details about the webinar may be reported.

e) **Document Downloads (white papers, case studies, etc.)**

The reporting format shall include the following elements:

- i) Total downloads by name and month
- ii) At the option of the media owner images, details regarding content and date released may be reported.

f) **Websites**

The Websites reporting format shall include the following elements:

- i) Month by month figures for: Page Views, Sessions, Users, and Average Session Duration
- ii) Average monthly total for the period
- iii) Website glossary
- iv) Website address and headline information
- v) Third party demographic information (optional)

g) **Social Media**

The Social Media reporting format shall include the following elements:

- i) Beginning balance from the end of prior reporting period

- ii) Monthly totals for the period
- iii) Month-end total for the last month in the reporting period shall agree with the figure reported in the Executive Summary.

h) **App Downloads**

- i) The App downloads reporting format shall include the following elements:
  - (1) Name of App
  - (2) Beginning balance of cumulative downloads from the end of the prior reporting period
  - (3) Total monthly gross downloads
  - (4) Cumulative total downloads by month
  - (5) Cumulative total downloads agree with the figure reported in the Executive Summary
- ii) The following comment shall appear on all brand reports that include Apps:

*Total downloads represent the aggregate number of downloads of the (name) App, not copies. Information regarding the App deletion and/or removal is not available from third party vendors and has not been removed from these figures.*

**1-2B 819 Field Served and Definition of Qualified Recipients**

- 1) Shall contain a factual statement by the media owner describing in auditable terms the standards or qualifications employed by the media owner in determining who will receive the publication.
- 2) This shall be done by type of businesses or industries served in the Field Served and by job title or job function in the Definition of Recipient Qualification.
- 3) Paid subscribers and single copy sales may be standards to establish qualification.
- 4) If paid circulation without demographics is reported as qualified circulation throughout the BPA Worldwide brand report, this shall be disclosed in the Definition of Recipient Qualification.
- 5) Whatever the qualification standards may be, they shall be reported in classification breakouts in paragraph 3a of the brand report.
- 6) Only recipients who conform to these standards shall be included in the qualified circulation.
- 7) A regional publication shall include a description of the geographical area in the Field Served, if this information is not apparent in the title of the publication.
- 8) Field Served and Definition of Recipient Qualification may NOT contain any reference to:
  - a) Requests to receive the publication.
  - b) Recipient's reading or intent to read the publication, unless supported by auditable documentary evidence.
  - c) Recipient's buying authority or influence, unless supported by auditable documentary evidence.
  - d) Any claim that all people of a certain category receive the publication.
  - e) Function, unless supported by auditable documentary evidence.
  - f) A classification which is not reported in paragraph 3a of the report.

**1-2B 820 Average Non-Qualified Circulation**

- 1) Shall report the distribution of digital copies for the period covered in the following categories:

- a) Other Paid Circulation.
  - b) Advertiser and Agency.
  - c) Allocated for Trade Shows and Conventions.
  - d) All Other
- 2) Any unsold or returned copies intended for single copy sales shall not be included in Average Non-Qualified Circulation.

**1-2B 821 Paragraph 1: Average Qualified Circulation Breakout for Period**

- 1) All copies listed in the main section of Paragraph 1 fall in the Field Served and are directed to recipients qualified under the provisions of the Definition of Recipient Qualification.
- 2) This Paragraph will report:
  - a) Individual,
  - b) Sponsored Individually Addressed,
  - c) Membership Benefit,
  - d) Single Copy Sales, and
  - e) Total Qualified Circulation.
- 3) Separate columns will list Qualified Non-Paid, Qualified Paid, and Total Qualified Circulation.

**1-2B 822 Paragraph 2: Qualified Circulation by Issues for Period**

- 1) Shall report the total qualified circulation for each issue.
- 2) Total copies distributed must be equal to, or exceed the sum of total qualified circulation, advertiser/agency circulation, non-qualified paid/request circulation for each issue.
- 3) Additions and removals for each issue may be maintained and may be reported at the option of the media owner.
- 4) **Late Distribution:** If 15% or more of the total copies distributed for an issue reported in Paragraph 2 are distributed on or after the stated distribution date or placed on sale date, whichever comes first, of the next issue, the completion date of distribution for that issue shall be reported in the explanatory paragraph, Additional Data (See 1-2B 904).
- 5) In the absence of a stated distribution date for a publication on either its rate card, or in industry rates and data sources, the cover date shall be used to determine if copies of the publication are distributed late, i.e.:
  - a) *Monthlies* Copies would be late if distributed on or after the first day of the next issue (a January issue would be late if distributed on or after February 1st).
  - b) *Bimonthly* Copies would be late if distributed on or after the first day of the next issue (a January/ February issue would be late if distributed on or after March 1st).
  - c) *Semi-Monthly* Copies would be late if distributed on or after the first day of the next issue (a January 1st issue would be late if distributed on or after January 15th).

- d) *Weeklies* Copies would be late if distributed on or after the first day of the next issue (a January 1st issue would be late if distributed on or after January 8th).
- 6) The explanatory paragraph, Additional Data shall report the percentage and number of copies which are distributed late.
- 7) When publications report separate editions in Paragraph 2, this standard shall be applied separately to each edition.
- 8) If the publication serves special issues (See 1-2B 102), the special issue reported in Paragraph 2 shall mail before the stated mailing date of the next regular issue. In the absence of a stated date of mailing, the special issue shall mail prior to the actual mailing date of the next regular issue.

### **1-2B 823 Paragraph 3a: Business/Occupational Breakout of Qualified Circulation**

- 1) The analysis shall be of any issue reported in the period, as selected by the media owner.
- 2) The issue analyzed shall be compared separately with the average of the other issues reported in the report to reveal how typical the issue is, as compared with all the others.
- 3) Whenever the issue analyzed is 10% or more, above or below the average of the other issues reported an appropriate comment shall be made in the explanatory paragraph, Additional Data.
- 4) Only classifications included in the Field Served and Definition of Recipient Qualification may be included in the qualified circulation breakout except to show that a "classification" is not served and therefore void of circulation.
- 5) Publications serving essentially the same field should endeavor to agree upon a mutually acceptable and reasonably uniform schedule of classifications to be employed in paragraph 3a. However, no media owner member shall be required, as a condition of membership, to accept a particular method of schedule of classifications employed by other publications for the same field.
- 6) "Others allied to the field" and "other titled and non-titled recipients" shall be reported separately when reported in a table with other demographic categories. However, when reporting demographic categories as a paragraphical expression and not in a demographic table, "others" does not need to be broken out separately from the paragraphical expression.
- 7) A newly admitted media owner member may elect to defer reporting "Others allied to the field" and "other titled and non-titled recipients" separately until the second audit. If elected, the following comment shall appear in the explanatory paragraph: "Paragraph 3a: Since this is an initial audit report, figures for 'Others Allied to the field' and 'other titled and non-titled recipients' are not required. They will be reported in the second audit report."
- 8) Business and industry classifications may be listed vertically in the left-hand column of this paragraph if or when reported.
- 9) Classifications by size, volume, job titles or job functions may be listed in one of the following ways:
  - a) Horizontally in a cross-tabulation breakout.
  - b) Vertically in the left hand column
  - c) Separately.
  - d) As a subdivision of a business or industry classification.
- 10) Publication members electing to analyze their circulation by the recipients' job functions shall obtain approval of the CEO of BPA to ensure that acceptable qualification proof is available for a functional analysis.

- 11) Classifications which are reported with subtotals will be arranged in paragraph 3a with the total reported beneath the subtotal in such a way that no confusion can occur about the exact number of copies being reported. The BPA Worldwide staff shall arrange this breakout in accordance with this instruction.
- 12) A publication member may elect to cross-tabulate paragraph 3a by any paragraph reported on the BPA Worldwide brand report providing the data reported for such paragraphs are based on actual counts of the analyzed issue.
- 13) The classifications for such subscribers shall be based upon the most recent qualification source for each piece of demographic information used to qualify subscribers.
- 14) Single Copy Sales shall be reported separately.
- 15) The quantity of Single Copy Sales sold with a promotional incentive at the point-of-purchase to the purchaser (end recipient) shall be reported in the explanatory paragraph, Additional Data (See 1-2B 1069 and 1072).
- 16) Publication members electing to analyze their circulation by North American Industrial Classification System (NAICS) shall abide by the following special standards:
  - a) Only wording appearing in the current NAICS government manuals and reports may be used.
  - b) Media owner members reporting under NAICS shall disclose which NAICS government manual was used to collect/report NAICS data. Copies of the NAICS manuals maybe obtained online from the US Census Bureau at <https://www.census.gov/eos/www/naics/>.
  - c) All qualified circulation shall be classified as defined by NAICS manuals on the basis of the processes used to produce goods or services.
  - d) All qualified recipients in each establishment shall be uniformly classified in accordance with the NAICS for the establishment. The method used in the uniform assignment of NAICS data shall be approved by the CEO of BPA.
  - e) Central administrative offices and auxiliary units shall be assigned the NAICS classification of the primary business activity.

**1-2B 824 Paragraph 3b: Qualification Source and Age Breakout**

- 1) Shall contain an analysis (count and percentage) of the qualified non-paid (and at the option of the media owner may contain an analysis of all qualified paid circulation) circulation by source.
- 2) Media owners have the option to report age of source of the non-paid circulation in one, two, and three-year columns. **However, effective February 2022, if this option is not exercised, and there is circulation from a source aged 25 months or more from the analyzed issue, a table reporting "Recency of Engagement" is required for this segment of the circulation** (See 1-2B 824).
- 3) If, at the option of the media owner, paid circulation is reported by age and subscriptions sold for greater than three years have aged beyond three years that circulation may be reported in the "three years" column with the change to "three+ years" as the column heading.
- 4) Only paid circulation may be qualified for a period greater than 3 years.
- 5) Paid subscriptions older than 3 years may not report demographic information in paragraph 3a, Business/ Occupational analysis unless the demographic information is current within three years of the analyzed issue.
- 6) All paid subscriptions without demographics, or with demographics, but older than three years, shall be reported as "other paid circulation" in paragraph 3a.

- 7) A note shall be included in the explanatory paragraph, Additional Data, stating the number of paid circulation aged beyond three years.
- 8) Non-paid circulation may not be aged beyond three years.
- 9) The issue analyzed shall be the same one as analyzed in paragraphs 3a, 3c (if reported) and 4, except for the interim brand report where the qualification figures for circulation may be obtained by repeating the percentages for circulation from the latest audit report.
- 10) In reporting qualification, figures submitted by the media owner covering the number of recipients qualified from each source shall be determined by an actual count of the entire list for the issue analyzed. This count may be obtained from either a master file or from the entire qualified mailing list.
- 11) For those media owners exercising their option to report source by age, but not to report qualified paid circulation by source using one, two, and three-year columns, the following footnote in the explanatory paragraph, Additional Data shall be included:

*Paragraph 3b includes (number) qualified non-paid circulation. Qualified paid circulation of (number) combined with the qualified non-paid circulation equals (sum of numbers) total qualified circulation for the analyzed issue.*

- 12) Whenever qualified paid circulation is deleted, the heading for paragraph 3b shall indicate that only qualified non-paid circulation is reported.
- 13) A newly admitted media owner member may elect to defer reporting the number of recipients qualified from each source until the second audit. If elected, paragraph 3b of the initial audit report shall contain a statement describing the source of names on the qualified list and provisions made for keeping the list current. The number of names obtained from each source shall not be reported. This statement shall be preceded by the following:

*Since this is an initial audit report, figures for this paragraph are not required. In lieu thereof, the media owner makes the following statement concerning the source of names on the qualified circulation list.*

- 14) The initial reporting of qualified circulation figures for paragraph 3b shall be in an audit report.
- 15) A media owner has the option of issuing a revised brand report incorporating the audited qualification source data; however, the revised report shall be released simultaneously with or after the audit report. Thereafter, new figures for paragraph 3b are required at least annually, concurrent with the end of the publication's audit year.
- 16) The new data for paragraph 3b shall appear in the second brand report and in the twelve-month audit report.
- 17) On the interim brand report, qualification figures for paragraph 3b for circulation may be obtained by repeating the percentages for the circulation from the latest audit report and applying them to the qualified circulation for the issue analyzed for the interim report to arrive at the total copies for each source.
- 18) This option is only available when the total qualified circulation for the issue analyzed in the interim brand report is less than 10% above the total qualified circulation for the issue analyzed in the latest audit report.
- 19) If the total qualified circulation for the issue analyzed in the interim brand report has increased by 10% or more due to a merger of publications during the reporting period, the media owner may elect to report actual figures for the interim brand report or omit the paragraph for the interim brand report.

20) If, as a result of a merger, the media owner chooses to omit the paragraph, the following footnote is required:

*Due to a merging of publications during the reporting period paragraph 3b cannot be projected and has not been reported. Paragraph 3b will be reported in the subsequent brand report.*

21) If a publication conducts a special six-month audit to change the audit year-end period (cycle), subsequent interim circulation data may only be projected from the printed/posted audit report.

22) A media owner may report new figures in paragraph 3b in the interim brand report if new figures are obtained from an electronic file or label printout count of all names on the qualified distribution list for the issue analyzed, which shall be subject to audit.

23) Detailed coding information for each source classification shall be maintained for all qualified circulation.

24) The following schedule of sources of qualification shall be listed in Paragraph 3b:

- I. Direct Request
- II. Request From Recipient's Company
- III. Membership Benefit
- IV. Communication (other than request)
- V. Total sources other than above, including: association rosters and directories, business directories, manufacturer's, distributor's and wholesaler's lists, and other sources
- VI. Single Copy Sales

25) Media owners may report written, telecommunication, and electronic request at their option.

26) Media owners may report expanded breakouts of association rosters and directories, business directories, manufacturer's, distributor's and wholesaler's lists separately, at their option.

27) The media owner shall insert opposite each source the number of recipients for each source.

28) The source material shall be identified in a footnote in the explanatory paragraph, Additional Data, whenever 10% or more of the circulation is qualified through any one of the following:

- a) A single business directory;
- b) A single online business directory source;
- c) A single association roster or directory;
- d) A single "other source"

29) Disclosure of the identity of Manufacturer, Distributor, Wholesaler lists shall be optional.

30) Whenever 5% or more of the total circulation is qualified through any combination of Association Rosters or Directories, Business Directories, Manufacturer, Distributor and Wholesaler lists, or Other Sources, the number of sources used and the amount of circulation from those sources shall be disclosed in the explanatory paragraph, Additional Data as follows:

*Association Rosters and Directories include (number) sources of circulation for quantities of (lowest number) copies or (lowest) % to (highest number) copies or (highest) %.*

31) This note is to be included for each type of source used.

- 32) Publication members may elect to report a breakout of their qualified United States and international circulation by source and qualification time period in paragraph 3b.

### 1-2B 825 Paragraph 3b, Optional Addendum: Recency of Engagement

- 1) An optional table, which if reported, shall follow Paragraph 3b, "Qualification Source Breakout of Qualified Circulation" and contain an analysis (count and percentage) of the qualified non-paid (and at the option of the media owner paid) circulation by Recency of Engagement with the brand, to be reported using 1 and 2 year columns.

TRANSACTION/INTERACTION HISTORY OF QUALIFIED CIRCULATION AS OF (Date of Analyzed Issue)					
Qualification Source	Engaged Within			Total Qualified	Percent
	1 year	2 years	Data Not Available		
I. Direct Request, Request from Recipient's Company, Membership Benefit:	68,435	28,472	-	96,907	96.4
II. All Other Sources:	3,656	-	-	3,656	3.6
<b>TOTAL QUALIFIED CIRCULATION</b>	<b>72,091</b>	<b>28,472</b>	<b>-</b>	<b>100,563</b>	<b>100.0</b>
<b>PERCENT</b>	<b>71.7</b>	<b>28.3</b>	<b>-</b>	<b>100.0</b>	

TRANSACTION/INTERACTION HISTORY. The most recent date an individual transacted/interacted with the brand, including purchases, opened email newsletter, visited websites, requested magazine, attended webinar, attended event, or communicated with the media brand in some other way

- 2) The aging of the engagement shall be determined by the most recent date an individual engaged with the brand including purchases, opened email newsletter, visited websites, requested media, registered for or attended an event or webinar, or communicated with the media brand in some other way, etc.

- 3) For documentation purposes, the following is required for each form of engagement:

- Purchase - Dated record of a purchase by the qualified subscriber of any product or service sold by the publication Brand.
- Email Newsletter - Dated record of the activation of a tracking pixel by the qualified subscriber indicating an email newsletter published by the Brand has been opened or displayed in a viewing pane.
- Website - Dated record of an access by the qualified subscriber to a website of the publication Brand.
  - Only website visits to the site of the publication shall be considered an engagement for the publication brand.
  - One website may serve as the designated site for multiple publications provided the site destination is promoted as each publication's website. For example, assume three publications, Magazine One, Magazine Two, and Magazine Three. All three are served by the website, "NUMBERS.COM". Visits by recipient of Magazine One to NUMBERS.COM may count the visit as an engagement for Magazine One. Likewise, a visit by a recipient of Magazine Two to NUMBERS.COM counts as an engagement for Magazine Two. If a person receives both Magazine One and Magazine Two and visits NUMBERS.COM, that visit is counted as one engagement for both Magazine One and Magazine Two.
  - The brand of the website for each publication must be disclosed in the footnote to the Recency of Engagement table. For the above example, the footnote for Magazine One, Two or Three would read,

*"TRANSACTION/INTERACTION HISTORY. The most recent date an individual transacted/interacted with the brand, including purchases, opened email newsletter, visited www.numbers.com, requested the magazine, attended a webinar, attended an event, or communicated with the media brand in some other way".*

- Visits to a publishing company's corporate website may not count as an engagement for a media brand; only visits to the media brand's designated website qualifies as an engagement for the media brand.
- d) Document Download - Dated record of the qualified subscriber downloading white papers, case studies, marketing collateral, etc., posted by the publication Brand on any web site.

- e) Event or Webinar Registration or Attendance - Dated record of the qualified subscriber registering for, or attending, an event or webinar of the publication Brand.
- f) Other Communication - Dated record of the qualified subscriber otherwise communicating with the publication Brand.

**1-2B 826 Paragraph 4: Geographical Breakout of Qualified Circulation**

- 1) The issue analyzed shall be the same one as analyzed in paragraph 3a.
- 2) Shall contain an analysis (count and percentage) of the qualified circulation by geographic region.
- 3) Subscribers who do not also provide a physical land address in addition to their email address shall be reported as "email address only."
- 4) Regions representing 0-4.9% circulation shall report circulation by the geographic areas listed in section "16" of this Standard.
- 5) Regions with 5.0% - 24.9% circulation shall report circulation by country. Standard country breakouts are available for each region.
- 6) Countries with 25%+ circulation shall report circulation by state/province or other agreed upon market geographic breakdown within any one country, using standard BPA Worldwide tables (Canada, China, United Arab Emirates, United Kingdom, and the United States, available within BPA's on-line filing system website).
- 7) Where BPA Worldwide has not published a standard table and a publication has over 25% of its circulation to any one country, and the market would benefit from a standard table, BPA Worldwide will work with the media owners in the market to establish a standard table.
- 8) For regional reporting of circulation in the United States, paragraph 4 will report the following which is consistent with that of the U.S. Bureau of Census:
 

New England	East South Central
Middle Atlantic	West South Central
East North Central	Mountain
West North Central	Pacific
South Atlantic	
- 9) In addition, U.S. Territories, Canada, Mexico, Other International, APO FPO addressed copies shall be reported.
- 10) Media owners may report circulation by state and three-digit zip code prefixes or counties, at their option.
- 11) For regional reporting of circulation in Canada, paragraph 4 will report the following:
 

Newfoundland	Ontario
Prince Edward Island	Manitoba
Nova Scotia	Saskatchewan
New Brunswick	Alberta, N.W.T. and Nunavut
Quebec	B.C. and Yukon
- 12) For circulation in the United Kingdom, it is sufficient to solely report "United Kingdom" in paragraph 4.

- 13) Media owners may elect to report circulation in the United Kingdom by region using the following breakout:

Northern	Scotland
Yorkshire & Humberside	Wales
North West	East Anglia
East Midlands	Greater London
West Midlands	South East
Northern Ireland	South West

- 14) For regional reporting of circulation for China, paragraph 4, will report the following which is consistent with the People's Republic of China Administrative Standard Regions:

Northeast	East China
North China	Central South
Northwest	Southwest
Other	

- 15) Publication members reporting more granular than regional circulation within the People's Republic of China must report by province/city using the BPA Worldwide standardized breakout.

- 16) International circulation shall be reported using the following regional breakout:

Asia	Caribbean
MENA (Middle East North Africa)	Central America
Europe	South America
Africa	Asia Pacific
North America	

- 17) In addition to reporting the standard paragraph 4, publication members have the option of including a map to graphically display their circulation distribution.

**1-2B 827 Prices and Promotional Incentives Tables: Qualified Paid Subscription Sales for Period (Optional)**

- 1) If reported, shall report the gross total number and percentages of new and renewed qualified paid subscriptions ordered/sold during the period covered; this includes gross subscription sales/orders with unpaid invoices pending.
- 2) **Prices:** This paragraph shall separately report the gross number of qualified paid subscriptions sold during the period by prices and term in sequence of descending percentage of orders sold except for "All Others" which shall always be reported last.
- 3) Only offers representing 5% or more of subscription sales for the period shall be disclosed showing the quantity of orders and percent of total orders.
- 4) If "all others" represents 20% or more of the orders for the period, the average price of "all other" orders shall be reported.
- 5) Subscriptions sold on a renew until forbid basis with no fixed term, which are billed periodically throughout the year, without any renewal notification, shall be reported separately as "Perpetual subscribers (See note)." The media owner shall disclose the rate and terms of the perpetual subscriptions.
- 6) Subscriptions sold accepting redemption of affinity program points e.g., frequent flyer miles as payment, shall disclose the details of the offer, including the subscription price, redemption value of a point, and points redeemed in the explanatory paragraph, Additional Data and cross-referenced to paragraph 3a (See 1-2B 823).

- 7) **Promotional Incentives Table:** This paragraph shall report the number of gross new and renewed qualified paid subscriptions ordered/sold with promotional incentives during the period covered (See 1-2B 1069).
- 8) The nature of the promotional incentive and provisions of the offer shall be described in the explanatory paragraph, Additional Data.
- 9) The following categories of Promotional Incentives shall be listed in the table:
  - a) Sold without promotional incentive
  - b) Sold with editorial promotional incentive
  - c) Sold with other promotional incentives

#### **1-2B 828 Three Calendar Year Analysis (Optional)**

- 1) If reported, shall report the total audited average qualified circulation for six-month circulation intervals for the previous two years and the current unaudited brand report(s).
- 2) The data shall include a reporting of the Total Audited Average Qualified circulation, Qualified Paid circulation, Total Qualified Non-Paid circulation.
- 3) The percent of post expiration copies over total qualified circulation for the analyzed issue, and average annualized subscription price (inclusive of premium value) shall also be reported.
- 4) Also reported shall be the stated rate base, if any, a comparison between the audited average qualified circulation and the rate base.

#### **1-2B 829 Renewal Percentage of Qualified Circulation (Optional)**

- 1) Media owners may opt to report the renewal rate for the qualified paid circulation in the explanatory paragraph, Additional Data.
- 2) All publications have the option of reporting information in this paragraph upon the availability of the necessary records to complete the percentage of the renewal formula.
- 3) If the renewal percentage is reported, the media owner may report a renewal rate for paid subscribers or state separately the number of qualified paid Individual, Membership Benefit subscriptions expiring during the twelve months ended eight months prior to the end of the period covered by the report, the number of these expirations which were renewed, and the renewal percentage.
- 4) A subscription shall be considered a renewal if it has been renewed within six months of its expiration date and paid for within six months following receipt of the renewal order.
- 5) The initial reporting of the renewal rate shall be in an audit report.
- 6) At the option of the media owner, international, APO and FPO addressed circulation may be omitted in calculating and reporting the renewal percentage. If this option is exercised, suitable explanation shall be made in the explanatory paragraph, Additional Data and shall read:

*At the media owner's option, the renewal percentage reported excludes international, APO and FPO circulation.*

#### **1-2B 830 Additional Data / Explanatory Notes and Information**

- 1) Shall contain any additional explanatory information necessary to supplement facts reported elsewhere in the report.

- 2) Only data approved by the CEO of BPA shall be shown in this section.
- 3) All required disclosures are delineated within each standard or appropriate section of the standards.

### **1-2B 831 Media Owner's Affidavit**

- 1) A brand report shall carry the media owner's affidavit containing two signatories.
- 2) At least one of the two signatories shall be that of an officer of the publishing company or its authorized representative.
- 3) The names and titles of the persons signing the brand report shall be displayed in the affidavit.

### **1-2B 832 Date Received**

## **1-2B 900 DEFINITIONS AND REPORTING REQUIREMENTS**

### **1-2B 901 Additions and Removals**

- 1) Additions and removals may be maintained and may be reported at the option of the media owner.
- 2) An Addition shall be defined as a new name, either individual, "title only", or "company name only" record appearing on the qualified circulation list for the first time.
- 3) A removal shall be counted when an individual, "title only", or "company name only" record is permanently removed from the qualified list.
- 4) On labels addressed to individuals, with or without titles, any replacement of one individual's name with another shall constitute a removal and an addition.
- 5) A change in an individual's title shall not constitute a removal and an addition.
- 6) On labels addressed to a title only, the inclusion of an individual's name with or without a title shall constitute a removal and an addition.
- 7) The deletion of an individual's name from a label shall constitute a removal and an addition.
- 8) In the case of labels addressed to titles only (no individual's name), the change of, or deletion of a title shall constitute a removal and an addition.
- 9) On company-name only addressed labels, the inclusion of an individual's name, or the inclusion of a title, or both, shall constitute a removal and an addition.
- 10) Labels addressed to a department only, shall be considered the same as a label addressed to a title only, for determining whether or not a removal and an addition are required.
- 11) The following individual or company names already appearing on the qualified circulation list shall NOT constitute a removal and an addition when:
  - a) Moving from one location to another.
  - b) Changing from one qualified classification status to another.
  - c) Changing from qualified non-paid to qualified paid circulation status or vice versa.
  - d) A digital subscriber receives an issue/issue delivery alert, but does not download the issue.

### **1-2B 902 Advertiser and Agency Copies**

Includes checking copies and prospective advertising copies and shall be reported as non-qualified distribution on the first page of the brand report and audit report.

### **1-2B 903 Allocated for Trade Shows and Conventions**

Non-qualified copies distributed at trade shows, conventions or by the media owner's salespeople to prospects. They may be reported separately, or with "All Other" on the first page of the brand report and audit report.

### **1-2B 904 Back Copies**

- 1) Any issue of the publication dated prior to the current issue shall be considered a back copy, whether served to a new or requalified/renewed recipient. The "current issue" is defined as the most recent issue distributed or placed on sale, whichever comes first.
- 2) Back copies may be counted as either qualified paid or non-paid circulation only for one issue immediately preceding the issue current at the time the recipient is distributed the back copy for publications other than weeklies, or for two issues for weekly publications.
- 3) To illustrate, XYZ monthly publication distribution analysis for the May issue (with a stated date of mailing of the seventh of the previous month):

	1st Copy Placed	1st Copy Distributed	Subsequent Distribution Dates
<u>Issue</u>	<u>On-Sale</u>		
May	April 1	April 7	May 9*, June 11**, July 20**
June	May 11	May 12	NA
July	June 1	June 16	NA

\*Late Mailing/Distribution (See Section 1-2B 822).

\*\* Late distribution and ineligible back-copy distribution; back copies of the May issue were distributed after the July issue was placed on sale, and are therefore non-qualified, regardless if copies are for paid or non-paid, new or renewed circulation.

- 4) Special issues such as directory or buyers' guides are not considered when determining the numbers of back copies sent to qualified recipients.
- 5) When the recipient has specifically requested back copies of a publication, such copies may be counted as qualified circulation up to three issues preceding the date of the subscription order for all publications.
- 6) If a media owner wishes to back-start a controlled publication beyond one issue, the media owner shall separately ask the recipient if he/she wishes to begin the subscription with the back copy, and the recipient shall respond affirmatively.
- 7) This question shall be separate from the original "request" to receive the magazine, for example:

*Do you wish to receive XYZ publication? Yes\_\_\_ No\_\_\_*  
*If yes, do you wish to begin your subscription with the (back copy) issue?*  
*Yes\_\_\_ No\_\_\_*

- 8) All subscribers to receive back copies shall have qualification sources dated within the three-year qualification period for the audit of the issue served (See 1-2B 917).

### **1-2B 905 Brand Report**

A report containing one or more audited media channels of a media owner's brand. Media owners may choose to report an integrated database of media channel recipients (a single relational database) or report data for each channel separately (See 1-2B 806).

### **1-2B 906 Channel**

A specific method of communication used to reach an intended audience.

### **1-2B 907 Definition of Recipient Qualification**

A statement by the media owner describing one or more specific groups of recipients who have common interest with clearly defined limits, to whom the publication is directed (See 1-2B 819).

### **1-2B 908 Digital Magazine**

- 1) A digital magazine may be dynamically created or have targeted content.
  - a) *Dynamic* – Editorial can be created and/or selected at point of delivery. Each recipient may receive a copy with different content and that content can change at any time.
  - b) *Targeted* – Editorial is changed for specifically defined groups and/or platforms before point of delivery. Each group of recipients, whether they are segmented demographically or because of the platform they use to receive the digital product, receive a copy with different content specifically selected for that group. Apart from minor updates, the content cannot change once the issue is made available.
- 2) Whenever there is a change in editorial format for an issue, media owners shall disclose in brand reports under the Additional Data section, a “Statement of Content Platform” to disclose the form or combination of forms of digital magazine used per the definition/description (See Section 1-2B 921).

### **1-2B 909 Field Served**

A statement by the media owner describing one or more specific businesses, industries, trades or professions with clearly defined limits (See 1-2B 819).

### **1-2B 910 Integrated Database**

- 1) Shall be defined as a relational database platform that allows for a single data entry for each individual’s first name, last name and contact details within the file, applies a unique identifier to each name, and stores other information required to qualify the individual such as, job title, current company information, and any demographic data.
- 2) It links the individual with all forms of various media that has been requested or is being sent, or with which the individual is engaged.
- 3) The database tracks and records all requests to receive or engage with the various channels available, and the date of the request/engagement.
- 4) Dates for each activity are housed separately and enable the media owner to search the most recent data to provide accurate reports of contacts of their various channels.
- 5) Tracking mechanisms shall be included enabling the media owner to locate all sources of the request/engagement activity.

### **1-2B 911 Net Unique Individuals**

- 1) The total number of unique (unduplicated) recipients appearing in an integrated database.
- 2) Individuals who receive more than one channel of the brand are included only once in the unique individual count.

### **1-2B 912 Non-Integrated Data**

- 1) Individual databases and/or files for each channel within the brand.

- 2) Each database shall contain contact information for each individual including [but not limited to] all information required to qualify the individual such as, job title, current company information, any demographic data, source and age qualification data.

### **1-2B 913 Non-Qualified Circulation**

That circulation which does not conform to the Field Served and Definition of Recipient Qualification. This distribution is reported on the first page of the brand report.

### **1-2B 914 North American Industry Classification System (NAICS)**

The North American Industry Classification System (NAICS) was developed under the direction and guidance of the Office of Management and Budget (OMB). NAICS is based on a production-oriented concept, meaning that it groups establishments into industries according to similarity in the processes used to produce goods or services. (See 1-2B 823).

### **1-2B 915 Qualified Circulation**

- 1) That circulation for which the mailing address conformance to the Field Served and Definition of Recipient Qualification, and correct classification in Paragraph 3a, are verified by auditable documentary evidence dated as shown in Paragraph 3b of the brand report (Reporting Paragraph 3b is required for non-paid circulation and optional for paid circulation.)
- 2) When publications report separate Editions in Paragraph 2, this standard shall be applied separately to each Edition.

### **1-2B 916 Qualified Non-Paid Circulation**

- 1) That circulation which meets the definition for qualification which is distributed free of charge to the recipient (See 1-2B 913).
- 2) Details regarding offers with promotional incentives (for both qualified paid and non-paid circulation) shall be reported in the explanatory paragraph, Additional Data of the brand report identifying the premium and quantity used for the analyzed issue (See 1-2B 1069).
- 3) Details regarding offers (for both qualified paid and non-paid circulation) with sweepstakes, prize draws or contests, shall be reported in the explanatory paragraph, Additional Data of the brand report, regardless of whether or not paragraph 3b, source/age table, is reported (See 1-2B 1078).

### **1-2B 917 Qualification Period**

- 1) The age of documents used to qualify circulation in paragraph 3b of the brand report.
- 2) The maximum qualification period is three years ended with any day between and including the “close” date to produce the label file through the end of the month of the issue analyzed.
- 3) The cutoff date may change from year-to-year.
- 4) The media owner is free to choose the end date provided it is in compliance with the above.
- 5) The auditor shall not accept any qualification source dated outside the qualification period.

### **1-2B 918 Qualified Recipients**

Recipients who meet the media owner’s definition of recipient qualification within the field served.

### **1-2B 919**

Only one copy of a magazine may be considered qualified per single addressee.

### **1-2B 920 Shared Media Channels**

- 1) Media channels that are shared across multiple brands such as [but not limited to]: web portals that host several vertical market websites operated by a single media owner; email newsletters and/or events that serve multiple brands (See Section 1-2B 825 3).
- 2) Reporting of shared media channels is permitted on Brand Reports.
- 3) Disclosure is required on the first page of the Brand Report and a reference note in each table where shared media channels are included.
- 4) Example of the disclosure for a website portal on page one, and everywhere the shared data is reported:  
*Shared media channel (XYZ website) - serving both [brand name] and [brand name].*

### **1-2B 921 Statement of Content Platform**

- 1) The Statement of Content Platform, reported in the “Additional Data” section of Brand Reports, discloses the form or combination of forms of magazines/editions included in the qualified circulation whenever there is a change in editorial format for an issue.
- 2) The forms are defined in the Statement according to the appropriate definitions and descriptions that include: Dynamic, or Targeted (See Section 1-2B 907).
- 3) Media owners have the option to report digital magazines/editions by the device/platform on which the copies are served (desktop/laptop computer; tablets; smartphones; other mobile devices; etc.).

### **1-2B 922 Supplementary Question**

A supplementary question is defined as a question eliciting any data regarding respondents’ purchasing authority and/or multiple response categories, or any data which relates to purchasing authority of only a specific portion of the qualified subscriber file.

## **1-2B 1000 REQUIREMENTS AND RECORDS NECESSARY FOR AN AUDIT**

### **1-2B 1001 General Information**

Paid and non-paid digital copies to individuals who meet the qualification criteria stated in the Field Served and Definition of Recipient Qualification may be reported as qualified circulation on the BPA Worldwide brand reports.

### **1-2B 1002**

The media owner may choose to report and audit an integrated database (single relational database) or report and audit the database of each channel separately.

### **1-2B 1003 Non Integrated Audit Requirements**

For non-integrated audits, refer to the following standard sections for specific requirements and records needed for the following audits:

- 1-6 500 Email Newsletter
- 1-7 Event Attendance and Conferences
- 1-11 500 Social Media
- 1-12 500 Webinar
- 1-13 500 Website

### **1-2B 1004 Integrated Database Audit Requirements**

- 1) The integrated database files shall be a snapshot (data set frozen at a point in time) for the analyzed issue in the reporting period (See 1-2B 910).

- 2) The integrated file shall contain a unique identifier for each name and links them to all forms of various media that has been requested or is being sent, or with which the individual is engaged.
- 3) It shall include all relevant qualifying details (if applicable) such as [but not limited to] contact information, address information, any necessary qualifying characteristics such as, company information, job title, any other demographic data, all requests to receive or engage with the various channels available, and the date of the request/engagement.
- 4) The media owner shall be able to determine from the file the net number of unique individuals it contains.

#### **1-2B 1005 Pre-Audit Requirements**

- 1) Data for all channels shall be checked to ensure that the systems of the media owner companies and their vendors are in compliance with BPA Worldwide standards and policies before such data may appear for the first time on a Brand Report.
- 2) A special audit may be undertaken to verify the channel data.
- 3) A media owner in good standing may request an audit for additional channels, not already included, on the Brand Report.
- 4) The Corporation shall make an examination of the records and complete the channel specific audit at the same time as the regular annual brand audit or prior to the release of the next Brand Report.
- 5) If it is found that the records are incomplete and the audit of the additional channel cannot be completed, the media owner shall install and maintain such auditable records as recommended by the Corporation.
- 6) The media owner may attempt another audit at a later date.
- 7) If a media owner opts to include a new channel that has been previously approved and included on another Brand Report owned by the same media owner, a special audit will not be required.

#### **1-2B 1006 Records – Proof of Production and Distribution**

- 1) Media owner members shall provide for the auditor's examination a copy of each issue and summary reports of alerts and distribution/downloads with corresponding logs (See 1-2B 1007).
- 2) The auditor may request access to any ledger accounts relative to circulation and such inspection shall be made with a representative of the publication present.

#### **1-2B 1007 Alerts**

- 1) All intended recipients of digital magazines must receive a digital push alert (email or mobile notification) for each issue.
- 2) Media owners may provide the subscriber with an opportunity to “opt-out” of receiving an alert notification of availability.
- 3) If a media owner offers an opt-out to receiving the alert, the media owner shall separately offer an opt-out of receiving the digital magazine.
- 4) Subscribers who opt-out of receiving the alert but have not opted-out of receiving the digital magazine, need not receive an alert to be reported as qualified distribution.
- 5) All others must receive an alert for each issue.
- 6) Recipients who have not requested to receive the digital publication must be provided the opportunity to opt out of receiving the digital publication.

### **1-2B 1008 Alert Bounces**

- 1) Digital magazines with a daily frequency may provide the subscriber with the option to “opt-in” to receiving an alert of availability.
- 2) An alert is not required for publications with a daily frequency.

### **1-2B 1009**

- 1) If an email alert to a qualified subscriber (paid and non-paid) is undeliverable, and information of such is sent back to the email service provider that sent it, the alert is defined as a “bounce”.
- 2) A bounce is classified as either “hard” or “soft.”
  - a) Hard bounces are the failed delivery of email due to a permanent reason, such as a non-existent address.
  - b) Soft bounces are the failed delivery of email due to a temporary issue, such as a full inbox or an unavailable ISP server.

### **1-2B 1010**

- 1) The media owner shall remove bounces from their circulation file as follows, (or ensure that the delivery details are corrected).
  - a) Hard bounces are to be removed before the next issue alerts are sent or, at the very least, if they are sent an alert for subsequent issues, they may not be counted as qualified circulation.
  - b) Media owners may continue to send alerts to “soft bounces” as qualified circulation for whatever issues occur within 90 days of having received the first soft bounce. Thereafter, soft bounces may not be counted as qualified copies served.

### **1-2B 1011 Reporting Downloads**

- 1) Publication members may report at their option whether subscribers have automatically received the magazine or manually downloaded; retrieved; received; the magazine.
- 2) If downloaded; retrieved; received; data is reported, such data shall be reported in paragraphs 1, 2, 3a, 3b and 4.
- 3) A download; retrieved; received issue may be counted within the table as long as the issue was downloaded; retrieved; received within 60 days of the alert.
- 4) At the time of brand report filing, any issues for which final download; retrieved; received counts are not available may be estimated based on a historical average.
- 5) At the time of audit, the estimation will be compared to actual data. If the variance is material, an audit report will be issued to adjust the circulation accordingly.

### **1-2B 1012 Reporting Usage**

- 1) Members may elect to report the following usage/engagement metrics:
  - a) Active Views:
    - i) An active view is defined as a single copy of a publication actively opened by a device for viewing.
    - ii) A minimum of one page of an issue opened/served onto a device.
    - iii) There must be a distinct action/event by the end user to view.
    - iv) A single action/request which results in both the content being downloaded/made available and the automatic opening of a page of the publication is not considered a distinct action/event.
    - v) A further distinct action would be required such as opening a second page.
    - vi) If reported, the active view shall be reported on an issue by issue basis.

- b) Number of Sessions per issue: defined as the aggregate number of times an issue was accessed by all unique browsers (individual devices).
- c) Time Spent in Issue per Individual Device: defined as the time spent, on average, in the issue across all unique browsers (total audience).
- d) Number of Sessions in Issue per Individual Device: defined as the average number of times each unique browser accesses the issue being reported.
- e) Number of Pages Accessed: defined as the total unique pages accessed for each issue by unique browsers.
- f) Copies downloaded or accessed using third party digital subscription services: May report such copies as “multi-title digital subscriptions” only for the issues the user downloads or accesses for the reporting period. The following also applies:
  - i) Only unique issue opens shall be reported.
  - ii) Multiple accesses or downloads of issues are only reported as one circulation unit.
  - iii) Paid subscriptions shall adhere to Standard 1-2B 1050.
  - iv) Reporting Average Annual Order Price for these subscriptions is optional.
- g) Single Copy, non-paid, copies may be reported as qualified circulation if the recipient downloads or accesses the issue. The following also applies:
  - i) One copy may be claimed as qualified circulation for each unique user that accesses/downloads an issue, regardless of the number of times the unique user accesses the issue.
  - ii) Registration or authentication is not required.
  - iii) Media owners and their vendors have the responsibility to install and maintain systems that accurately capture individual download/access activity.

### **1-2B 1013 Non-Paid Access via Tablet/Mobile**

- 1) Non-Paid circulation: coming through tablets/mobile shall be reported from the first copy accessed.
- 2) The recipient must authenticate (access code tied to subscriber registration/information) the subscription through the mobile device and access the publication once each six-month reporting period.

### **1-2B 1014 Site License**

- 1) Site licenses are defined as a contract or agreement between a media owner member and a company/association to provide multiple individuals access to a digital magazine hosted on the subscribing organization’s intranet.
- 2) The contract/agreement shall require the subscriber/administrator of the site license notify all the individual seats (individuals) of the availability of each issue.
  - a) Site Licenses may only be reported on Brand Reports as a channel of communication and not as copies circulated.
  - b) The media owner may disclose throughout the Brand Report the number of authorized Digital Magazine Site Licenses and Seats (individuals) served as part of the license.
  - c) Site licenses and Seats shall not be reported as qualified circulation.
  - d) A media owner may disclose paid and non-paid data, demographic data, license source and age data, and geographic data, using standard BPA Worldwide tables.
  - e) Reporting the name of the company to which the content has been licensed shall be optional.

- f) Licenses may be reported for definitive amounts only, “global” or “companywide” license agreements may not be reported.
- g) Qualified circulation and site license seats may not be summed on the BPA reports.
- h) Non-paid site licenses shall adhere to “Request from Recipient’s Company,” Standards 1-2B 1030 through 1032.
- i) Paid site licenses shall adhere to Standard 1-2B 1050, paid circulation.

### **1-2B 1015 Records – Qualified Sources**

- 1) Proof of classification as reported in paragraph 3a shall be available for all recipients on the qualified circulation list.
- 2) This proof may be no older than three years from the close date of the qualification period.
- 3) If the classification in Paragraph 3a contains data that cannot change – such as year of medical school graduation – the proof may be older than three years from the close date of the qualification period.
- 4) All documents used in verifying the qualified circulation mailing list as of the issue analyzed for each reporting period shall be available to the auditor.
- 5) Qualification evidence submitted by the media owner shall support the email and mailing data (if the latter is collected).
- 6) Whatever data is claimed in the BPA report shall be supported by evidence that the recipient is within the Field Served, Definition of Qualified Recipient, and has been correctly classified in Paragraph 3a.
- 7) In the event that qualification of a single recipient is supported by evidence from more than one source, the media owner may choose any one, but not more than one of those sources under which to classify the recipient in reporting in paragraph 3b of the brand report. However, when copies of a publication are directed to specific individuals by name, the media owner shall report the sources from which the recipient's name was obtained.

### **1-2B 1016 Records - Paid Subscriptions**

- 1) Original orders, dues invoices, membership application forms and proof of payment for all qualified paid subscriptions shall be available to the auditor as to price, term, expiration date, and use of promotional incentive, if any.
- 2) Media owners shall maintain on file for use of the auditor, copies of all subscription offers, and copies of all contracts made with solicitors, subscription agencies or any other parties through whom subscriptions are obtained for their publications as well as for handlers (national distributors and/or wholesalers and/or retailers) of single-copy sales.
- 3) The auditor may request access to any ledger accounts relative to circulation, and such inspection will be made on-site with a representative of the magazine present, if desired.
- 4) Publications shall code to denote on computer records and display on a resulting printout, price paid, demographic classification (if any), source and date of qualification, length for each subscription, use of promotional incentive and subscription expiration date.
- 5) For publications reporting their qualified paid circulation throughout their brand report, the media owner shall run tabulations separating counts of the qualified paid circulation and qualified non-paid circulation, respectively.

- 6) Publications reporting their qualified paid circulation throughout their brand report are required to maintain a daily, weekly, or monthly subscription register (the journal of original entry), or a system in lieu thereof, which records the following information concerning each and every subscription received:
  - a) Price paid
  - b) Date of payment
  - c) Length of subscription
  - d) How ordered
  - e) Promotional incentives, if any
  - f) Membership Benefit subscriptions.

#### **1-2B 1017 Requirements for Storing Documents Digitally**

- 1) Media owners electing to store documents digitally shall adhere to the following:
  - a. The stored qualification documents shall support the following information for each recipient:
    - i) Business/Occupational classifications for paragraph 3a.
    - ii) All other demographic data captured for future use.
    - iii) Source and date of qualification documents for paragraph 3b.
    - iv) Recency of Engagement if reported.
    - v) Geographical breakout for paragraph 4.
- 2) The date of qualification for paragraph 3b shall be the date the recipient signed the document or the date of receipt stamped by the media owner. It is not necessary that the postmark cancellations be imaged.
- 3) Completely legible hard copy or digital images shall be provided for the stored qualification documents selected on the auditor's test.
- 4) At BPA Worldwide's discretion, periodic confirmations shall be made to verify the origin of the document.

#### **1-2B 1018 Single Copy Sales**

- 1) Publications reporting Single Copy Sales in paragraph 1 shall maintain records to substantiate the claim.

#### **1-2B 1019 Non-Qualified Sources**

- 1) The following types of records shall NOT be acceptable as evidence of qualification:
  - a) Official Post Office change of address notification forms shall not constitute acceptable qualification proof unless they also provide proper qualifying information.
  - b) Any reports originating within the publications own organization or from the media owner staff with the exception of telephone interviews which have been approved by BPA Worldwide (See 1-2B 1028).

#### **1-2B 1020 Audit Methodology**

- 1) The BPA audit methodology is based upon a perpetual inventory record by issue of the names on a circulation list.
- 2) It is a media owner member's responsibility to insure the accurate maintenance of their circulation list and records in accordance with these Standards. The audit is designed to verify and authenticate the media owner's circulation claims.

### **1-2B 1021 Delayed Audit – Suspension of Service**

- 1) Services shall be suspended by the CEO of BPA for any publication whose audit takes over 75 days to complete or such further time as granted by the CEO of BPA.
- 2) The media owner may appeal the CEO of BPA's decision in writing to the Executive Committee of the Board of Directors within seven days from receipt of the CEO of BPA's decision. The decision of the Executive Committee shall be final.
- 3) In the event of suspension, a notice shall be posted on BPA's web site and/or released to the membership and the media owner may not publicize any circulation data until the successful completion of that audit.

### **1-2B 1022 Circulation List**

- 1) A printout proof or electronic file of all names on the qualified circulation list for the issue analyzed shall be provided for the auditor for each reporting period.
- 2) A physical count of the circulation list shall be made by geographical distribution, and by the classifications shown in Paragraph 3a of the brand reports, including the date the demographic data was obtained.
- 3) A media owner reporting new qualification figures in Paragraph 3b in their interim brand report shall provide the auditor with a physical count of the mailing list.
- 4) All records supporting qualified and non-qualified paid circulation, non-qualified request circulation, and single copy sales as required by the Standards, shall be maintained and shall be available to BPA Worldwide.

### **1-2B 1023 Requirements and Records for Computerized Data Files**

- 1) Media owner members shall:
  - a) Provide an electronic file for each reporting period of all qualified names on the qualified distribution list for the issue analyzed, including all of the coding information for each recipient.
  - b) Provide separate computer tabulations for:
    - i) Additions and removals for each issue, if reported, as defined in Section 1-2B 901 of these Standards
    - ii) Business/occupational classifications for paragraph 3a.
    - iii) Source and age of qualification documents for paragraph 3b.
    - iv) Recency of Engagement if reported.
    - v) Geographical breakout for paragraph 4.
    - vi) Post expiration copies (arrears), status of subscription payments if reporting qualified paid circulation separately throughout the brand report.
  - c) Retain a "frozen" file (in any form of memory) of the issue analyzed for each reporting period until the annual audit has been completed. The auditor may conduct any tests to verify the accuracy of the above reports.
  - d) Allow the auditor to examine the computer procedure manuals, including the coding instructions and system flow charts.
- 2) In the interim Brand Report, a media owner may project only circulation data in paragraph 3b from a printed and posted report (See 1-2B 824 17 and 18).

### **1-2B 1024 Validation of the Circulation File**

- 1) Upon completion of the circulation audit and affirmation of the qualified list, the media owner, with the written approval of the CEO of BPA, will be permitted to discard the qualification source documents which have been "validated" provided the list proof of all the names on the qualified circulation list for the issue analyzed are coded to denote:
  - a) Business/occupation and any other classifications for Paragraph 3a (except the existence of units).

- b) The date the demographic data reported in Paragraph 3a and supplementary data was obtained.
  - c) Source of qualification and original date of qualification documents for Paragraph 3b.
  - d) Source and original date of engagement for the Recency of Engagement paragraph (if reported).
  - e) Length and expiration date for each paid subscription.
- 2) It shall be the media owner member's responsibility to insure the proper safeguards for the protection and retention of the validated mailing lists, or electronic files thereof, which have been sealed by the auditor for the exclusive use of BPA Worldwide in subsequent audits.
  - 3) Any qualification source documents received by the media owner after the validated audit issue shall be retained for the auditor's examination at the time of the next regular circulation audit.
  - 4) A publication member may request a validation audit of its circulation list if the publication's records are to be relocated in another city or state, or if the publication has been sold. Doing so avoids the need to transfer the actual documents; the electronic validated file may be transferred instead.
  - 5) If the CEO of BPA determines that the validation audit should be made, the media owner shall be billed in accordance with the standard circulation audit charges and any and all other costs which may be incurred by the corporation in conducting such audits.
  - 6) All records necessary for an audit shall be retained by the media owner until the next annual audit has been completed.

### **1-2B 1025 Qualification Sources**

Several types of records shall be acceptable as evidence of qualification:

### **1-2B 1026 Direct Request from Recipient**

### **1-2B 1027 Direct Request: Written**

- 1) Written indication from individually qualified recipients requesting the publication may be reported as request circulation.
- 2) For those media owners electing to use a standardized questionnaire to develop request circulation, including those transmitted via fax or scanned image, a question approximating the following shall be asked on the form: "Do you wish to receive (continue to receive) this publication? Yes ... No ..."
- 3) Non-paid questionnaires shall be restricted to a specific time period only if the actual or specific period of time is indicated as part of the question: "Do you wish to receive (continue to receive) this publication for 10 months? Yes ... No...."
- 4) Media owners may utilize, as an option, an alternate question approximating the following: "Please sign here if you wish to receive (continue to receive) this publication." Forms utilizing this alternate must be signed to be reported as personal written request circulation.
- 5) Multiple-publication written request circulation forms or letters are acceptable and may be counted as written request circulation, provided the following requirements are met:
  - a) Publications offered shall be homogeneous in that they have similar definitions of recipient qualification and serve businesses, industries, trades, occupations or professions with clearly defined limits.
  - b) A separate signature, initial, or selection indicator (media owner's option) from the subscriber is necessary to establish a request for each publication.

- c) The questionnaire form must be signed.
- d) The text of the solicitation shall disclose that multiple publications are being offered.
- e) A description of the editorial content that differentiates the publications offered shall be included on the qualification card. The offer form shall display the different publication logos to increase differentiation among titles. If a publication offered is published in a language different than the language used in the solicitation, this shall be noted on the qualification form.
- f) A question approximating the following shall be asked on the form:

SIGN, INITIAL, OR CHECK HERE IF YOU WISH TO RECEIVE  
PUBLICATION XXX

SIGN, INITIAL, OR CHECK HERE IF YOU WISH TO RECEIVE  
PUBLICATION YYY

SIGN, INITIAL, OR CHECK HERE IF YOU WISH TO RECEIVE  
PUBLICATION ZZZ

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

- 6) BPA Worldwide's approval will be given to any questionnaire which is consistent with the Field Served and Definition of Recipient Qualification and the classifications reported in paragraph 3a of the brand report.
- 7) Qualification questions may be populated with information obtained through the individual's previous communication with the brand, or third party sources of demographic data, provided the subscriber verifies the data. Recipients must be asked to review the populated data and respond to a separate confirmation question to indicate the populated data is accurate. The request question ("Do you wish to receive/continue to receive XYZ Magazine?") cannot be pre-populated.
- 8) Whenever a questionnaire is used, recipients who indicate they do not wish to receive the publication shall be removed from the qualified circulation list within 90 days of receipt of the communication. However, be advised, this standard is not acceptable under GDPR. Respondents opting-out must be removed within 30 days. This 30-day period can be postponed if the media owner (data controller) informs the respondent of the material issues preventing performance of request, and it must be justified.
- 9) Qualification forms that are entitled or indicated an approximation of "new subscription forms" shall be counted as request circulation. These forms need not contain the question asking the recipient if they wish to receive the publication. Some examples are:
  - a) "Complete this form to start delivery of..."
  - b) "Start my new subscription now!"
  - c) "I am a new subscriber!"

Kindly submit your approximation to BPA for approval.

- 10) Be advised, this standard is not acceptable under GDPR absent of an explicit consent. In addition, the media owner, as data controller, must ensure that the “new subscription forms” directed toward or accessible to European Union residents include an information notice pertaining to the collection of their personal data therewith.
- 11) Reader service cards may be counted as request circulation if the recipient has signed the card and answered the question “Yes, I wish to receive (continue to receive) this publication” (See 1-2B 1037).
- 12) Voluntary contributions to a publication to offset production and shipping costs may be reported as request circulation if the donation is to defray costs of “continued service of the publication”. Any solicitation by the media owner for a contribution to defray costs shall be very clear that the donation is for continued service. Media owners shall offer the option to continue receiving the publication without making a donation, and the option to discontinue receiving the publication.
- 13) An address change may be reported as request circulation for a single publication provided such change has been initiated by the recipient.
- 14) Questionnaires shall contain a provision for the recipient's signature and provision for the date.
- 15) Prior testing of electronic scripts, systems and procedures for soliciting requests may be required to determine auditability.
- 16) The following types of qualified paid circulation shall be considered as written request circulation (provision for signature is not required on paid subscription forms):
  - a) Individually paid subscriptions direct to the media owner.
  - b) Individually paid subscriptions received through third party agents.
  - c) Deductible membership benefit subscriptions.
  - d) Subscriptions sold in quantities of two or more paid for by an employer for their employees.
- 17) The qualified recipient’s spouse may request the publication on behalf of the qualified recipient. This may be reported as “Direct Request: Written”.
- 18) The qualified recipient may request the publication for themselves and up to one other co-worker and have both requests reported as “Direct Request: Written”.
- 19) A co-worker may request the publication on behalf of two other qualified co-workers through one questionnaire and the two requests may be reported as “Direct Request: Written” provided the “co-worker” making the request isn't also requesting for themselves (maximum two requests). Requests for multiple (three or more) persons shall be reported as Request from Recipient’s Company (See 1-2B 1031).
- 20) The following types of paid circulation are NOT to be reported as request circulation:
  - a) Subscriptions sold in quantities of two or more
  - b) Subscriptions ordered by sponsors, donors or gift copies
  - c) Non-deductible subscriptions, except in those cases where the media owner has obtained a specific request to receive the publication from the member.

#### **1-2B 1028 Direct Request: Telecommunication**

- 1) Telecommunications from individually qualified recipients requesting the publication may be reported as personal telecommunications request.

- 2) All outbound Direct Request: Telecommunication requests, with the exception of subscriptions to individuals who refuse to be recorded, must be recorded and made available to the auditor at the time of audit.
- 3) Subscriptions to individuals who refuse to be recorded, inbound telecommunication, and interactive voice response (IVR) requests shall comply with the following conditions:
  - a) A question approximating the following shall be asked and answered during the telephone interview:
  - b) "Do you wish to receive (continue to receive) this publication? Yes ... No ...
  - c) A personal identifying question must be asked and answered.
  - d) Some examples... "To permit future verification of your request, please give us your month and/or date of birth - Month ... Day..., or mother's maiden name or high school graduated from."
  - e) Other forms of personalized questions which only the recipient and not the media owner is likely to know, may be asked as an alternate should the recipient not provide an affirmative response to the original question.
  - f) Once a particular question is used and the answer stored, a different question shall be used for future request questions.
  - g) If the respondent refuses to answer any and all personal questions, the interview may be considered a request if the interview is recorded and the respondent indicates affirmative to the request question.
  - h) The personalized question is not required for faxes, or if the interview is recorded.
  - i) If the call is being recorded, the media owner may use any of the following script options to obtain the request:
    - i) Option #1  
Do you wish to receive this publication?  
Do you wish to continue to receive this publication?
    - ii) Option #2  
All that I need to do is update your address information and ask you a couple of questions to send out your free subscription. We show that the subscription should go to (address). Is that correct?  
  
All that I need to do is update your address information and ask you a couple of questions to send out your free subscription. We show that the subscription is going to (address). Is that still the correct address?
    - iii) Option #3  
In order to receive your free subscription to (publication name), I just need a few moments to update some information, ok? I have your name as...  
  
In order to continue receiving your free subscription to (publication name), I just need a few moments to verify some information, ok? I have your name as...
    - iv) Option #4  
Hello. This is (caller's name) for/from (publication name) calling to update the information that we have on file so that we may begin sending you a free subscription to our publication, ok?  
  
Hello. This is (caller's name) for/from (publication name) calling to update the information that we have on file so that we may continue sending you a free subscription to our publication, ok?
    - v) Option #5  
Hello. This is (caller's name) from (publication name). I'd like to start your free subscription and just need to ask you a couple of questions to be able to do so. I have your address as (address). Is this correct?

Hello. This is (caller's name) from (publication name). I'd like to renew your free subscription and just need to ask you a couple of questions to be able to do so. I have your address as (address). Is this correct?

- 4) A telephone interview form shall:
  - a) Contain adequate instructions (script) to the telephone interviewer (outbound calls) or to the recipient (inbound calls), including a statement, in accordance with local laws, that the call is being recorded;
  - b) Contain the name, title, company address and telephone number of the recipient;
  - c) Contain an acceptable request question with a personalized data question, coupled to the request for subscribers who refuse to be recorded (as defined in Section 1-2B 1028 3).
  - d) The personalized data question is required only if the telephone call is not recorded;
  - e) Be consistent with the "Field Served" and "Definition of Recipient Qualification"; and
  - f) When calls are recorded it is acceptable to confirm name, address, title, email, fax, phone number, and prior-year demographic information during the telephone interview.
- 5) The qualified recipient's spouse may request the publication on behalf of the qualified recipient. This may be reported as "Direct Request: Telecommunication".
- 6) The qualified recipient may request the publication for themselves and up to one other co-worker and have both requests reported as "Direct Request: Telecommunication".
- 7) A co-worker may request the publication on behalf of two other qualified co-workers through one phone call and the two requests may be reported as "Direct Request: Telecommunication" provided the "co-worker" making the request isn't also requesting for themselves (maximum two requests).
- 8) Requests for multiple (three or more) persons shall be reported as Request from Recipient's Company (See 1-2B 1032).
- 9) Media owners contacting a co-worker to elicit direct request: telecommunication shall comply with the same conditions concerning telecommunication requests set forth in these standards.
- 10) In addition, the media owner shall obtain the full name and job title of the individual spoken with. If recipient's name and title is not received. Refer to standard 1-2B 1038, Communication (Other than Request): Telecommunication.
- 11) Telecommunication requests for a multiple of different publication brands obtained in a single telecommunication may be counted as telecommunication request circulation, provided the interviews are recorded, a separate request question is asked and answered for each of the publication brands, and such circulation is in conformance with standards 1-2B 1027 5 and 1028 14.
- 12) Prior testing of scripts, systems and procedures for soliciting telecommunications requests may be required to determine auditability.
- 13) For incoming requests received through telecommunications, adequate records verifying the time and date of call shall be maintained. In addition to the personalized request question, the recipient may be instructed to provide a unique identification code taken from the media owner's label.

- 14) Media owners shall be responsible for maintaining the following records, which are to be made available to the auditor at the time of audit and/or during random visits:
  - a) All telephone company invoices
  - b) All computer-generated data, including summaries by date of calls received, telephone numbers of calls placed and received, and computer logs of tasks performed
  - c) Recordings, where permitted and available, shall be inspected by the auditor to verify adherence to the BPA Worldwide-approved interview form and the proper recording by the interviewer of the recipient's response.
  - d) Whenever conversations are recorded, the recipient shall be advised, in accordance with local laws, that he/she will be recorded. Monitoring of live interviews also may be conducted for the same purpose.
- 15) The media owner shall be responsible for the documentation and accuracy of telecommunication requests, including those requests obtained through outside telemarketing firms.
- 16) The auditor will compare and cross-check all records and make any other tests deemed necessary, including follow-up telephone contact and/or mail confirmations, for complete and accurate authentication of the request and qualification information. The media owner shall be billed for the extra costs incurred for any special confirmations conducted by BPA Worldwide or its agent, unless included in a current "fixed price agreement".
- 17) All other specific standards pertaining to the use of promotional incentives for personal written request circulation or in the merging of publications' circulation apply to telecommunication requests (See 1-2B 1069 and 501).
- 18) For those media owners wishing to use Short Message Service (SMS) to renew previously requested subscriptions, an outline of the program and transcript of the text message shall be submitted to BPA Worldwide for approval prior to use. BPA Worldwide's approval will be given to any renewal SMS program that meets the following conditions:
  - a) Media owner must have expressed consent from the subscriber to communicate via SMS.
  - b) The outgoing text message contains adequate description of the nature of the request.
  - c) The outgoing text message contains adequate request question and instruction to the recipient.
  - d) The outgoing text message, or a subsequent text message sent after the recipient renews their request, provides the recipient an opportunity to update their information.
  - e) The program captures the outgoing phone number, the phone number of the recipient, the time and date of the outgoing message, the time and date of the recipient's reply, and the recipient's message.
  - f) Publications must maintain proof of the initial request.
  - g) Documentation of the respondent's conformance to the Field Served and Definition of Recipient Qualification shall be available either through previous request or secondary source and be current within three years of the analyzed issue.

#### **1-2B 1029 Direct Request: Electronic**

- 1) For those media owners wishing to accept requests via electronic medium (Web, email, other) a transcript (screen-by-screen panels) shall be submitted to BPA Worldwide for approval prior to use. BPA Worldwide's approval will be given to any electronic request transcript that meets the following conditions:

- a) Contains adequate instruction (menu and screen panels) to the recipient end user.
  - b) Contains a provision for the name, title, and company address of the recipient.
  - c) Contains an acceptable request question and a provision for the date.
- 2) Outbound solicitations for email requests must include a notification that the subscriber may be contacted by a third party to verify the publication request.
  - 3) Subscriber access to copies may be used to renew a request to continue receiving the subscription provided access occurs within the following schedules:
    - a) A publication issued 49 issues a year or more must be accessed nine times during the six-month period ending with the analyzed issue
    - b) A publication issued 37 – 48 issues a year must be accessed seven times during the six-month period ending with the analyzed issue
    - c) A publication issued 25 – 36 issues a year must be accessed five times during the six-month period ending with the analyzed issue
    - d) A publication issued 19 – 24 issues a year must be accessed four times during the six-month period ending with the analyzed issue
    - e) A publication issued 13 – 18 issues a year must be accessed three times during the six-month period ending with the analyzed issue
    - f) A publication issued 9 – 12 issues a year must be accessed twice during the six-month period ending with the analyzed issue
    - g) A publication issued 4 – 8 issues a year must be accessed once during the six-month period ending with the analyzed issue
    - h) A publication issued 1 – 3 issues a year must be accessed once a year
  - 4) Publications must maintain proof of initial request and subsequent engagement activity for auditor review.
  - 5) Documentation of the respondent's conformance to the Field Served and Definition of Recipient Qualification shall be available either through the electronic medium or a secondary source.
  - 6) Web based, qualification questions may be populated with information obtained through the individual's previous communication with the brand, or third party sources of demographic data and provided the subscriber proactively verifies the data by clicking a single "confirm" button at the bottom of the form for the data populated.
  - 7) Recipients must be asked to review the data and press the "confirm" button to agree that all the data is accurate. The request question ("Do you wish to receive/continue to receive XYZ Magazine?") cannot be pre-populated, unless the subscriber has demonstrated through an action ("i.e. click to subscribe") prior to visiting the qualification page.
  - 8) Multiple publication electronic requests are acceptable and may be counted as request circulation, provided that the following requirements are met:
    - a) Publications offered shall be homogeneous, in that they have similar definitions of recipient qualification and serve businesses, industries, trades, occupations or professions with clearly defined limits.

- b) A separate request from the subscriber is necessary to establish a request for each publication.
- c) The text of the solicitation shall disclose that multiple publications are being offered.
- d) A description of the editorial content that differentiates the publications offered shall be included on the qualification card.
- e) The offer form shall display the different publication logos to increase differentiation among titles.
- f) A question approximating the following shall be asked:

Please check here if you wish to receive *Publication XXX*

Please check here if you wish to receive *Publication YYY*

Please check here if you wish to receive *Publication ZZZ*

- 9) The qualified recipient's spouse may request the publication on behalf of the qualified recipient. This may be reported as "Direct Request: Electronic".
- 10) The qualified recipient may request the publication for themselves and up to one other co-worker and have both requests reported as "Direct Request: Electronic" (maximum two requests per form).
- 11) A co-worker may request the publication on behalf of two other qualified co-workers through one questionnaire and the two requests may be reported as "Direct Request: Electronic" provided the "co-worker" making the request isn't also requesting for themselves (maximum two requests).
- 12) Requests for multiple (three or more) persons shall be reported as Request from Recipient's Company (See 1-2B 1033).

### **1-2B 1030 Request From Recipient's Company**

- 1) Compliance with Privacy and Data Protection Regulation:
  - a) Regarding compliance with any privacy or data protection regulation, BPA members should take note that such regulation supersedes BPA standards.
  - b) From time to time, BPA may update its standards and provide cautionary advisories as BPA becomes aware.
  - c) With respect to the European General Data Protection Regulation (GDPR) it is probable that opt-in activity performed by one person (or company) for another person is acceptable provided the end recipient of the media understands another person may be opting-in for them.
  - d) In the case of a company person requesting media for employees, such authority would usually be stated in an employee handbook.
  - e) Regardless, if the employee is advised that someone else has opted-in for them, but that they can opt-out at any time, the media owner will likely be found in compliance.

### **1-2B 1031 Request From Recipient's Company: Written**

- 1) Questionnaires or letters on a company letterhead from firms, including franchises, requesting copies of a publication for three or more employees identified by name, title and/or function may be reported as written request from recipient's company.

- 2) For the purposes of clarity please note, if the respondent is requesting for themselves and one other co-worker (or not for themselves but for two co-workers) in one writing, then the respondent subscription and that of the co-worker are to be reported as "Direct Request".
- 3) Media owners electing to use a standardized questionnaire to develop such company request circulation shall comply with the following conditions:

- a. A statement approximating the following shall appear on the form:

*Please send this publication to the following employees.*

- 4) Such questionnaires or letters shall include instructions to the company to verify each name appearing on the list for correct mailing address information.
- 5) In addition, the company shall be instructed to fill in or otherwise indicate for each name on the list the recipient's industry, title and/or functional description.
- 6) Such letters of instruction shall be submitted to BPA Worldwide for approval prior to printing.
- 7) Questionnaires shall contain a provision for signature and a provision for date.
- 8) Each name deleted from the list by the company shall be removed from the qualified circulation within 90 days of receipt of the communication.
- 9) The format and terminology used in standardized questionnaires and requalification forms to develop "written request from recipient's firm" shall be approved by BPA Worldwide prior to use.
- 10) BPA Worldwide's approval will be given to standardized questionnaires and requalification lists which meet the above conditions and which are consistent with the Field Served and Definition of Recipient Qualification and the classifications reported in paragraph 3a of the brand report.
- 11) The auditor may conduct direct mail confirmations and make any other tests considered essential to the complete and accurate authentication of this source (See 1-2B 1028 16).
- 12) The following type of non-paid circulation may be considered as written request from recipient's firm:
  - a) Non-paid request from recipient's firm.
- 13) The following types of paid circulation are NOT to be reported as written request from recipient's firm:
  - a) Non-deductible subscriptions (except in those cases where the media owner has obtained a specific request to receive the publication from the member).
  - b) Gift subscriptions.
- 14) Whenever a promotional incentive is offered as an inducement to obtain either qualified non-paid or qualified paid request circulation from recipient's firm, the media owner shall identify the premium and the quantity used in a footnote in paragraph 3b.
- 15) Whenever two or more publications are merged, request circulation from recipient's firm shall be footnoted in paragraph 3b indicating the percentage of request circulation from each of the merged publications.
- 16) Whenever "company name only" addressed subscriptions are purchased (paid) or requested (non-paid), this circulation shall be reported as "request from recipient's company".

### **1-2B 1032 Request from Recipient's Company: Telecommunication**

- 1) Telecommunications such as telephone interviews with a co-worker at a company requesting copies of the publication for other co-workers (one person requesting for three or more persons) of that company may be reported as telecommunication request from recipient's company provided the "co-worker" making the request isn't also requesting for themselves.
- 2) If the latter, the respondent requesting for themselves and one co-worker are to be reported as "Direct Request", and the balance as "Request from Recipient's Company".
- 3) Such calls may be eligible to be considered as Direct Request: Telecommunication provided they comply with Standards 1-2B 1028 5 and 7).
- 4) Media owners electing to use telecommunications for company request shall comply with the following conditions:
  - a) Outbound solicitations for request from recipient's company: telecommunication must be recorded and made available to the auditor at the time of audit; however, if the recipient refuses to be recorded, a personal identifying question must be asked and answered. Some examples...To permit future verification of your request, please give us your month and/or date of birth - Month ... Day ... or mother's maiden name or high school graduated from."
  - b) Other forms of personalized questions which only the interviewee and not the media owner is likely to know, may be asked as an alternate should the interviewee not provide an affirmative response to the original question.
- 5) Once a particular personal identifying question is used and the answer is stored, a different question shall be used for future request questions.
- 6) The names and titles and/or functions of the employees shall be provided.
- 7) The name and title and/or function of the requestor shall be provided along with the company, address, and telephone of the company.
- 8) A question of a co-worker approximating the following shall be stated during the telecommunication: "Do you want this publication sent to any other employees? Yes ... No ...
- 9) In the case of a requalification effort the co-worker may be asked:
  - a) "May we continue to send (name of publication) to (name of qualified subscriber)."
  - b) "All I need to do is update the address information and ask a few quick questions and we'll be able to continue (name of qualified subscriber's) subscription for another year, ok?"

Other options:

    - i) Option #1  
Do you wish to confirm (name of qualified subscriber) should receive this publication?  
  
Do you wish to confirm that (name of qualified subscriber) should continue to receive this publication?
    - ii) Option #2  
All that I need to do is update the address information and ask you a couple of questions to send out a free subscription to (name of qualified subscriber). We show that the subscription should go to (address). Is that correct?

- All that I need to do is update the address information and ask you a couple of questions to send out a free subscription to (name of qualified subscriber). We show that the subscription is going to (address). Is that still the correct address?
- iii) Option #3  
In order for (name of qualified subscriber) to receive a free subscription to (publication name), I just need a few moments to update some information, ok? I have his/her name as...
- In order for (name of qualified subscriber) to continue receiving a free subscription to (publication name), I just need a few moments to verify some information, ok? I have his/her name as...
- iv) Option #4  
Hello. This is (caller's name) for/from (publication name) calling to update the information that we have on file so that we may begin sending (name of qualified subscriber) a free subscription to our publication, ok?
- Hello. This is (caller's name) for/from (publication name) calling to update the information that we have on file so that we may continue sending (name of qualified subscriber) a free subscription to our publication, ok?
- v) Option #5  
Hello. This is (caller's name) from (publication name). I'd like to start a free subscription for (person's name) and just need to ask you a couple of questions to be able to do so. I have the address as (address). Is this correct?
- Hello. This is (caller's name) from (publication name). I'd like to renew a free subscription for (name of qualified subscriber) and just need to ask you a couple of questions to be able to do so. I have the address as (address). Is this correct?

- 10) All other conditions in sections 1-2B 1028 and 1038, except in conditions specified for "personal request" telecommunications, shall be followed.

### **1-2B 1033 Request from Recipient's Company: Electronic**

- 1) Electronic communications such as email, Internet and other forms, coming either from authorized individuals or from a company, which request copies of the publication for three or more employees of that company, may be reported as "Request from Recipient's Company: Electronic."
- 2) For the purposes of clarity please note, if the respondent is requesting for themselves and one other co-worker (or not for themselves but for two co-workers) in one electronic communication, then the respondent subscription and that of the co-worker are to be reported as "Direct Request".
- 3) Media owner electing to use this form of company request shall comply with the following conditions:
  - a) A question approximating the following shall be asked and answered as part of the electronic communication: "Please send this publication to the following employees", or "Do you want this publication sent to any other employee? Yes ... No..."
  - b) The names and titles and/or functions of the employees shall be provided.
  - c) The name and title and/or function and email address of the requestor shall be provided, along with the company name, address, and telephone number of the company.
- 4) All other conditions pertaining to Internet outlined in Section 1-2B 1027 15 shall be followed.
- 5) All other conditions as outlined in Section 1-2B 1029, except in conditions specified for "direct request," shall be followed.

### **1-2B 1034 Other Than Request**

### **1-2B 1035 Membership Benefit**

Individual and organizational memberships in bona fide associations or societies or clubs etc. where the subscription is paid for out of membership dues and the member does not have the option of deducting the subscription price from the dues (non-deductible membership benefit subscriptions).

### **1-2B 1036 Communication (Other than Request)**

#### **1-2B 1037 Communication (Other than Request): Written**

- 1) The following types of records may be reported as Written Communication circulation:
  - a) Standardized questionnaires to a media company, such as:
    - i) Census forms
    - ii) Editorial survey forms
  - b) Questionnaires that do not have the provision for the "Yes/No" request question
  - c) Arrears unpaid for three months and credit subscriptions unpaid for six months, where the subscriber has been transferred to controlled circulation
  - d) Reader service cards to an individual publication, where the recipient has not signed the card and/or answered the question: "Yes, I wish to receive (continue to receive) this publication."
  - e) Such communications shall have provisions for date and signature of recipient or by a member of the recipient's firm and shall bear evidence of the date of mailing by the recipient, or receipt by the media owner and proof of conformance to classification.
  - f) Non-deductible association or seminar subscriptions
  - g) Expired one- and two-year paid subscriptions
- 2) The following standardized questionnaires from another publication shall be reported as Communication (Other than Request): Written provided the other publication is of the same parent publishing company:
  - a) Personal written request forms direct from the recipient.
  - b) Written request forms from the recipient's company.
  - c) Written communication forms from the recipient or from the recipient's company.
- 3) These sources shall age based on the qualification date of the original source document.
- 4) Whenever 5% or more of the total circulation is qualified through questionnaires from another magazine, the number of sources used and the amount of circulation from those sources shall be disclosed in the explanatory paragraph, Additional Data as follows:

*Communication (Other than Request): Written includes [number] sources of circulation for quantities of [lowest number] copies or [lowest] % to [highest number] copies or [highest] %.*

- 5) The source shall be identified by name in a footnote in the explanatory paragraph, Additional Data whenever 10% or more of the circulation is qualified through questionnaires from a single magazine.

- 6) Questionnaires from another publication from another parent publishing company shall not be reported as Communication (Other than Request): Written. These are reported as "Other Sources".

**1-2B 1038 Communication (Other than Request): Telecommunication**

- 1) The following telecommunication to a media company shall be reported as Communication (Other than Request): Telecommunication provided the other publication is of the same parent publishing company:
  - a) Personal telecommunication request forms direct from the recipient.
  - b) Telecommunication request forms from the recipient's company.
  - c) Telecommunication communication forms from the recipient or from the recipient's company.
- 2) These sources shall age based on the qualification date of the original source document.

- 3) Whenever 5% or more of the total circulation is qualified through questionnaires from another magazine, the number of sources used and the amount of circulation from those sources shall be disclosed in the explanatory paragraph, Additional Data as follows:

*Communication (Other than Request): Telecommunication" includes [number] sources of circulation for quantities of [lowest number] copies or [lowest] % to [highest number] copies or [highest] %.*

- 4) The source shall be identified by name in a footnote in the explanatory paragraph, Additional Data whenever 10% or more of the circulation is qualified through questionnaires from a single magazine.
- 5) Telephone interview forms shall be submitted to BPA Worldwide for approval.
- 6) BPA Worldwide's approval will be given to any questionnaire which is consistent with the Field Served and Definition of Recipient Qualification, and the classifications reported in paragraph 3a of the brand report.
- 7) Questionnaires shall also contain the instructions to the telephone interviewers, the name and address of the firm to be called, the name and title of the person being interviewed, and provision for the operator's signature and date of interview.
- 8) These forms shall be adequately identified and dated to permit the auditor to satisfy him/herself of their authenticity and acceptability.
- 9) The auditor will compare and crosscheck telephone bills, interview forms, conduct confirmations and make any other tests considered essential to a complete and accurate authentication of this source. The media owner shall be billed for the costs incurred for any special tests.
- 10) Telecommunication questionnaires from another publication from another parent publishing company shall not be reported as Communication (Other than Request): Telecommunication. These are reported as "Other Sources".

#### **1-2B 1039 Communication (Other than Request): Electronic**

- 1) The following types of records may be reported as "Communication (Other Than Request): Electronic":
  - a) Standardized questionnaires to a media company, such as:
    - i) Census forms
    - ii) Editorial survey forms
    - iii) Questionnaires that do not have the provision for the Yes/No request question
- 2) Questionnaires shall be submitted to BPA Worldwide for approval. BPA Worldwide's approval will be given to any communication that contains adequate instructions (menu and screen panel(s) to the recipient end-user and a provision for the name, title, company address and email address of the recipient.)
- 3) Prior testing of electronic scripts, systems and procedures for soliciting this form of communication may be required to determine auditability.
- 4) BPA Worldwide's approval will be given to any questionnaire that is consistent with the Field Served and Definition of Recipient Qualification, and the classification reported in Paragraph 3a of the brand report.
- 5) These questionnaires shall be adequately identified and dated to permit the auditor to be satisfied with the authenticity and acceptability.

- 6) The following standardized questionnaires from another publication shall be reported as "Communication (Other Than Request): Electronic", provided the other publication is of the same parent publishing company:
  - a) Personal Electronic request forms direct from the recipient
  - b) Electronic request forms from the recipient's company
  - c) Electronic communication forms from the recipient or the recipient's company
- 7) These sources shall age based on the qualification date of the original source document.
- 8) Whenever 5% or more of the total circulation is qualified through questionnaires from another magazine, the number of sources used and the amount of circulation from those sources shall be disclosed in the explanatory paragraph, Additional Data as follows:
 

*Communication (Other than Request): Electronic" includes [number] sources of circulation for quantities of [lowest number] copies or [lowest] % to [highest number] copies or [highest] %.*
- 9) The source shall be identified by name in a footnote in the explanatory paragraph, Additional Data whenever 10% or more of the circulation is qualified through questionnaires from a single magazine.
- 10) Questionnaires from another publication from another parent publishing company shall not be reported as "Communication (Other than Request): Electronic." These are reported as "Other Sources."

## **1-2B 1040 Passive Sources**

### **1-2B 1041 Independent Field Reports**

- 1) Field reports obtained by independent field service organizations under contract to the media owner shall be adequately identified and dated to permit the auditor to be satisfied of their authenticity and acceptability.
- 2) Field service organization reports obtained by interview with the qualified recipients may be counted as request circulation provided the recipient signs the questionnaire requesting the publication.
- 3) The CEO of BPA may require the media owner to furnish such information about the organization and its procedures, and may make such independent investigations as deemed necessary to determine whether or not the reports constitute satisfactory evidence of qualification.

### **1-2B 1042 List Sources**

- 1) Association/Society or Club etc. membership lists (when the publication is not the official journal as a benefit of membership), manufacturers' or distributors' lists of customers, prospects and licensees are acceptable evidence of qualification providing such lists are adequately identified and dated to satisfy the auditor of their authenticity and acceptability.
- 2) If the executive director of an Association/Society or Club requests subscriptions for their members, the subscription request may be disclosed in a footnote in the explanatory paragraph, Additional Data.
- 3) Whenever manufacturers', distributors' and wholesalers' lists of customers and prospects are used for qualification purposes to support circulation information, the auditor may conduct direct test mailings and make any other tests considered essential to the complete and accurate authentication of this source.
- 4) Direct test mailings to verify the recipient's mailing address information, name and/or title and business/occupational data may be required for any portion of the audit sample qualified via list source. The media owner shall be rebilled for the costs incurred for any special test.

### **1-2B 1043 Business Directories**

- 1) All published directories (including directory issues of periodicals and industrial directories) may be available in print, in some form of electronic record, or online available for query through the internet.
- 2) Each shall be adequately identified and dated to satisfy the auditor of their authenticity and acceptability.
- 3) Online directory sources must be an online database source. Any other names obtained through internet look-up searches i.e. on company websites, shall be considered "other sources."
- 4) To determine the qualification date of a published directory, the month and year of the copyright or the date of printing (the earliest date) shall be used. In the event that a month does not appear, the following shall apply:
  - a) A directory dated on the cover, or electronic source dated for one year only shall have a qualification date of January 1 of that year.
  - b) A directory dated on the cover, or electronic source dated for two or more years shall have a qualification date of July 1 of the first year.
  - c) A directory dated on the cover, or electronic source dated with a specific month and year would have a corresponding qualification date.
- 5) If an online directory has a published date, it will be used to determine the age of that directory. If there is no published date, the age of online business directory sources shall be the date the source was obtained and/or downloaded. No source older than 36 months from the date of the analyzed issue may be used.
- 6) Online directory sources must be disclosed in the Additional Data/Explanatory notes section of the Brand report (and identified by name if any single online business directory exceeds 10% or more of the qualified circulation).

### **1-2B 1044 - Other Sources**

- 1) Business letterheads, company personnel rosters, company annual reports, company telephone directories, business cards, trade shows registration lists, reader service cards and qualification questionnaires from other publications not owned by the same parent company. Such sources shall be adequately identified and dated to satisfy the auditor of their authenticity and acceptability.
- 2) Qualification questionnaires from another publication from another parent publishing company shall continue to age based on the qualification date of the original source document, see 1-2B 1037 2, 1038 10, and 1039 10.
- 3) Mailing house lists which have been approved by BPA Worldwide may be reported as other sources and shall carry an identifying footnote.
- 4) Mailing house lists which have not been approved by BPA Worldwide are not acceptable as qualification evidence. However, in order to obtain BPA Worldwide approval, a media owner may arrange with a mailing house to have the list checked against the original sources provided such sources are within the time limits prescribed in these standards and are available to the auditor.
- 5) If a media owner elects to report the original qualification sources in paragraph 3b of the-brand report, the mailing house shall prepare the data for this paragraph and shall be subject to all requirements for the auditing of paragraph 3b.

### **1-2B 1045 Questionnaire Design**

Whenever a questionnaire is used to elicit information from a recipient, the questionnaire and attendant material shall not improperly lead the recipient to give the desired qualification data in order to receive the publication.

### **1-2B 1046 Obtaining Primary Business Information**

- 1) Whenever a questionnaire is used to elicit specific information about a recipient's business, except the establishments NAICS, a question approximating one of the following shall be asked on the form:
  - a) What is your primary business? (Check one only.)
  - b) The primary business of my firm at this location is ..... (Check one only.)
  - c) Please check the one item which best describes your firm's primary business activity. (Check one only.)
  - d) Insert                      Please indicate the primary end product (or service performed at your business by writing the corresponding letter of the alphabet in the box at the left.  
Letter  
☐
- 2) Whenever a questionnaire is used to elicit specific information about an establishment's NAICS, a fill-in response question format approximating the following shall be asked on the form:
  - a) What is the primary end product manufactured (or service performed) at your business location? (Please be specific) \_\_\_\_\_
- 3) When eliciting information about an establishment's International Standard Industrial Classification (U.N.) a check-off response question format may be used with the above question.

### **1-2B 1047 Job Title – Obtaining Job Title Information**

- 1) Whenever a questionnaire is used to elicit specific information about a recipient's title, a question approximating one of the following shall be asked on the form:
  - a) What is your title? (Check one only.)
  - b) What is your title? (Please be specific.)

### **1-2B 1048 Job Function - Obtaining Job Function Information**

- 2) Whenever a questionnaire is used to elicit specific information about a recipient's job function, a question approximating one of the following shall be asked on the form:
  - a) What is your primary job function? (Check one only.)
  - b) Please check the one category that best describes your primary job function. (Check one only.)
  - c) Job function (Please rank in order of importance 1, 2, 3, etc.)
  - d) Insert                      Please indicate your primary job function by writing corresponding letter of the alphabet in the box at the left.  
Letter  
☐

### **1-2B 1049 QUALIFIED PAID**

#### **1-2B 1050 Qualified Paid Subscriptions**

- 1) That circulation which is not for resale, meets the definition for qualification and the requirements listed below.
- 2) Subscription payment orders shall conform to the following conditions:
  - a) It may be paid for at any price, and shall not be free of charge.
  - b) Subscriptions sold with a portion of the proceeds going towards a charitable contribution shall exclude the charitable contribution from the subscription order amount.

- c) A subscription for less than one year, the price of which was less than 50% of the base annual price, cannot be served copies after the expiration date.
  - d) Payment shall not be delinquent for more than six months after the beginning of the subscription service.
- 3) A subscription that is ordered for which no payment had been received is considered a credit subscription.
  - 4) A credit subscription shall be counted as paid circulation up to six months from the date of the first issue served.
  - 5) If payment for such subscriptions has not been received within six months from the date of the first issue served, such copies shall be deducted from the qualified paid circulation for all copies served during this period.
  - 6) A subscription sold on a “renew until forbid” basis may be reported as paid circulation until the subscriber cancels.
  - 7) All copies served from the moment the consumer cancels the subscription until the media owner receives notification of the cancellation, shall be reported as paid circulation as long as the media owner receives payment for the issues served (either from the consumer or agent).
  - 8) If the media owner is debited for unpaid copies served, then only the copies served which meets the arrears criteria may be reported in paid circulation (See 1-2B 1055).
  - 9) No promotional incentive or other inducement may be offered which has an advertised value, or cost to the media owner, of more than 50% of the subscription offer price.
  - 10) Subscriptions sold with an advertising contract shall be paid in addition to the regular advertising contract; and shall give the advertiser the option of deducting the subscription price from the contract if they do not wish to receive the publication.
  - 11) Subscriptions sold via the redemption of affinity program points, e.g. frequent flyer miles, loyalty program points, etc., shall adhere to the following guidelines:
    - a) Participants shall elect to participate in the program.
    - b) The earning of miles, points, etc., shall be transaction based. For example, points earned for credit card purchase/borrowing activity and purchase of air travel, hotel stays, or car rentals, etc. qualify.
    - c) Points earned without transaction activity (no financial transaction occurs) do not qualify for redemption as paid circulation.
    - d) Points shall be accruable towards future redemptions.
    - e) Points awarded upon enrollment shall be less than 50% of the lowest valued product/service offered in the program.
    - f) All affinity point programs shall offer non-magazine products/services. Magazines may not represent more than 75% of each program.
    - g) The value of all products and services shall be disclosed, in both monetary values and points.
    - h) The value of non-magazine products/services shall be equal to or greater than the lowest valued magazine.
    - i) The redeemable units of measure, e.g. miles, shall have a recognizable and accepted monetary value.
    - j) Adequate documentation of the transfer or redemption of frequent flyer miles and points shall be made available to the audit staff.

- k) The CEO of BPA shall have final approval of all affinity programs prior to acceptance for use in obtaining qualified paid circulation.
  - l) Subscriptions sold using frequent flyer miles as payment must be disclosed in the explanatory paragraph, Additional Data cross-referenced to paragraph 3a (See 1-2B 827 6).
- 12) Copies exchanged for goods or services, or sold without using money (barter) may be claimed as qualified paid (barter) circulation providing:
- a) The requirements relating to qualified paid circulation have been met.
  - b) The goods and services exchanged must have been sold in the public domain over the last twelve months and have a clearly identifiable and established market value.
  - c) The media owner is in possession of a written agreement with the purchaser, supported by invoiced transactions showing the quantities of copies/goods and services bartered and their value.
  - d) The media owner has provided proof that the barter transactions have been recorded in the publishing company's accounting system and subsequent financial statements.
  - e) The value of the copies sold is not subsequently redeemed by free advertising.
  - f) The goods or services provided in exchange for the publication are not related to the supply of the publication (e.g. costs for distribution or marketing of the publication).

#### **1-2B 1051 602 Paid as Qualifying Standards**

- 1) Paid Subscribers and single copy sales may be standards to establish qualification.
- 2) Paid circulation without demographics may be reported as qualified circulation provided that conformance to qualified paid circulation standards is present (See 1-2B 907 and 819).

#### **1-2B 1052 241-15 Subscriptions Purchased Through Tablets/Mobiles**

- 1) Subscriptions purchased through tablets/mobile shall be reported from the first copy accessed and for the full term of subscription.
- 2) Paid combination sales and bundled subscriptions: the subscription must be authenticated (access code tied to subscriber registration/information) through the device/app to report digital copies.
- 3) Paid sponsored subscriptions: the subscription must be authenticated (access code tied to subscriber registration/information) through the device/app to report the digital copies.
- 4) Paid circulation with a promotional incentive: the subscription must be authenticated (access code tied to subscriber registration/information) through the device/app to report the copies.

#### **1-2B 1053 603 Terminology/Definitions and Disclosure Comments (where applicable)**

#### **1-2B 1054 604 Advanced Renewals**

A subscription renewed prior to expiration date of previous subscription.

#### **1-2B 1055 605 Arrears (Post-Expire Copies Included In Qualified Paid Circulation)**

- 1) Subscriptions reported as paid that are retained on the circulation list after their expiration date, for up to 25% of the original term ordered, with a maximum of three months, six months for international circulation.

- 2) The number of arrears copies over total qualified circulation for the analyzed issue, expressed as a percentage, shall be reported in the explanatory paragraph, Additional Data as "Post-Expire Copies included in Total Qualified Circulation."
- 3) Publications issued on a regular frequency but less often than monthly or have a break in service, e.g., published seasonally, may serve arrears as paid circulation subject to the approval of the CEO of BPA (See 1-2B 1050).
- 4) Publications issued weekly may use a common monthly expire date. Following this common expiration date, service of arrears is permissible for the full three months.
- 5) If a common expire date by month is used by a weekly publication, the following comment shall be included in the explanatory paragraph, Additional Data:

*This publication has a weekly frequency and uses a common expire date in each production month. Therefore, a subscriber may receive one to three additional copies beyond the three months of service permitted as 'Arrears' after the subscription expired, and are not reported as such.*

- 6) Gift subscriptions may be served copies in arrears as paid circulation for three months after the expiration date for domestic circulation and six months after the expiration date for international circulation.

### **1-2B 1056 Average Annual Order Price**

- 1) "Average Annual Order Price" shall be reported in the explanatory paragraph, Additional Data.
- 2) Average price shall be calculated by totaling the gross dollar value of all orders received during the reporting period (inclusive of promotional incentives) and dividing this total by the gross total number of copies ordered. The resulting average unit price would then be multiplied by the basic annual term to yield the average subscription price for the period.
- 3) When multiple currencies are collected, the media owner shall convert the multiple currencies into one home currency of choice to compute Average Annual Order Price.
- 4) Publications with 50,000 or less average total qualified circulation, and less than 5% average qualified paid circulation in paragraph 1, are not required to report average annual order price.
- 5) Publications with more than 50,000 average qualified circulation in paragraph 1 have the same reporting option when the average qualified paid circulation is less than 2%.
- 6) For determining average annual price for combined sales, See 1-2B 1058.

### **1-2B 1057 Base Prices**

- 1) Subscription Sales - The established prices for each subscription term as defined in the masthead of a publication or online.
- 2) Only one base price per country may be established for each subscription term.
- 3) Single Copy Sales - The suggested retail cover price shall be the base price.
- 4) See 1-2B 1075 Subscriptions Extensions for guidance on changes to base price or frequency.

### **1-2B 1058 Combined Sales**

- 1) Subscriptions to multiple publications or publications and products or services sold together at a special rate, and charitable donations combined with non-deductible subscriptions (See 1-2B 827).

- 2) Comment shall be made in the explanatory paragraph, Additional Data, providing details of the number of copies of each publication sold in combination with another publication/product/service.
- 3) A media owner may disclose the value of each item of the combination sale. In the absence of individual item disclosures, the value of the subscription will be calculated as follows:
  - a. In order to determine the value of the subscription, first sum the recognized retail value (base value) of all the individual elements of the combination offer. The ratio of the bundled offer price to the sum of the individual elements determines the discount rate. This rate is applied to the base rate of the publication to determine the "Average Annual Subscription Order Price for the Period Reported."

Example offer:

12-month subscription to XYZ (base rate \$20.00)  
 1 widget (value \$15.00)  
 3 Months Risk Free access to a Web site (base value \$25.00)  
 Combination Rate: \$25.00

Calculation:  $\$20.00 + \$15.00 + \$25.00 = \$60.00$   
 Offer =  $\$25.00 / \$60.00 = 41.6\%$   
 Discounted Magazine Price:  $.416 \times \$20.00 = \$8.33$

The value of \$8.33 would then be used in calculating the "Average Annual Subscription Order Price for the Period Reported."

- 4) Publication subscriptions sold in combination with other publication subscriptions or products or services shall be reported in the explanatory paragraph, Additional Data.

**1-2B 1059 Combined Sales: Multiple Media Channels of the Same Brand**

- 1) Subscriptions to multiple media channels of the same brand, including but not limited to: publication, website access, email newsletters, webinars, white papers, etc. sold together at a special rate.
- 2) The price paid for the combined offer shall be used to determine the value of the subscription.
- 3) Comment shall be made in the explanatory paragraph, Additional Data providing details of the number of subscriptions sold in combination with other branded media channels.

**1-2B 1060 Credit Subscriptions**

A subscription that is ordered for which no payment has been received. Credit subscriptions shall adhere to qualification requirements per paid circulation (See 1-2B 1050).

**1-2B 1061 Expiration Date - Terminating the Date of Subscription**

Publications issued weekly may use a common monthly expire date.

**1-2B 1062 Extension**

Advancing the expiration date of a subscription because of a reduction in the frequency of issues or a reduction in the subscription price (See 1-2B 1075).

**1-2B 1063 Gift Subscriptions**

- 1) Subscriptions purchased for persons who are friends and family, and not the purchaser's employer.
- 2) Gift subscriptions may be served copies in arrears as paid circulation for three months after the expiration date for domestic circulation and six months after the expiration date for international circulation.

- 3) Gift Subscriptions shall be reported as “individual” only when the media owner has documentary evidence showing that the copies are individually addressed.
- 4) Money collected by an agent need not be remitted to the media owner, provided necessary records are in place to document the purchase and price paid by the original subscriber. However, each sponsorship sale transaction must be without monetary recourse to the purchaser (sponsor) (See 1-2B 1016).
- 5) If reporting paid circulation in the source/age table, gift copies are reported as “Other Sources.”

### **1-2B 1064 Group Subscriptions**

- 1) Purchased in lots of two or more, paid for by an employer for their employees and distributed by the media owner to individual email addresses furnished by the employer. These subscriptions shall be reported as “individual.”
- 2) Money collected by an agent need not be remitted to the media owner, provided necessary records are in place to document the purchase and price paid by the original subscriber. However, each sponsorship sale transaction must be without monetary recourse to the purchaser (sponsor) (See 1-2B 1016).

### **1-2B 1065 Membership Benefit Subscriptions - Defined**

- 1) *Deductible Membership Benefit Subscriptions*: Individual subscriptions paid for out of membership dues, where **recipients have the option** of deducting the subscription price from their dues if they do not wish to receive the publication.
- 2) *Non-deductible Membership Benefit Subscriptions*: Individual subscriptions paid for out of membership dues, where **recipients do not have the option** of deducting the subscription price from their dues, and automatically receive the publication.
- 3) Non-paid subscriptions shall only be reported as membership benefit if the publication is owned and published by the association, or if the board of directors of the association/membership passes a board resolution stating the publication is a membership benefit. The association/society does not need to own the publication for it to be a membership benefit.
- 4) Associations/memberships purchasing subscriptions for their members shall not be reported as membership benefit, such subscriptions shall be reported as sponsored sales (See 1-2B 1073).
- 5) Deductible and non-deductible membership benefit subscriptions need not be the “official” publication of the association/membership.
- 6) The non-deductible offer may not elicit a specific request to receive the publication (See 1-2B 1027 16). However, with each delivery of a copy (or its email alert), the member must be given the opportunity to opt out of receiving the publication. Those opting out shall be removed from the qualified circulation list within 30 days of receipt of the communication.
- 7) If reporting Paragraph 3b for source, deductible subscriptions are sourced as request circulation; non-deductible are sourced as Membership Benefit circulation.
- 8) An annual membership communication (e.g., dues invoice, membership packet, promotional letter) shall clearly state the amount of dues allocated for payment of the subscription, and whether the subscription amount is deductible or non-deductible. The communication must also include disclosure that the magazine is distributed only digitally.

### **1-2B 1066 Membership Benefit Subscriptions – Disclosure Standards**

- 1) Publications electing to report qualified non-paid and qualified paid circulation separately in paragraphs 2 through 4 and reporting membership benefit circulation in paragraphs 1 and 3a of the brand report shall report an analysis of that circulation in the explanatory paragraph, Additional Data as follows:
  - a) When applicable, shall state, "..... is the official publication of ..... “

b) In addition, the following shall be stated:

- i) "Qualified paid Membership Benefit subscriptions averaging ..... copies were sold to qualified recipients at the following subscription prices:
- ii) Members yearly subscription price is included in the dues and is ... (deductible/non-deductible) ... therefrom."

2) The media owner may add explanatory information to these notes to better define the membership organization.

### **1-2B 1067 Non-Deductible Subscriptions**

- 1) Individual subscription paid for as part of a reservation fee for conferences, meetings, seminars, etc., where the recipient does not have the option of deducting the subscription price and automatically receives the publication.
- 2) The offer shall clearly state the amount of money allocated for payment of the subscription.
- 3) Such offers shall qualify as paid circulation and shall be reported as "Communication" in paragraph 3b (when reported) of the brand report and shall have a footnote reading "See explanatory paragraph, Additional Data."
- 4) The explanatory paragraph, Additional Data shall include a comment describing the offer and the number of copies so reported.

**1-2B 1068 Post Expiration Copies Included in Paid Circulation Up To Three Months** - See: Arrears, Section 1-2B 1055.

### **1-2B 1069 Promotional Incentive**

- 1) Any inducement offered to a subscriber for free with their own subscription.
- 2) When subscriptions are sold with promotional incentive, the value of the incentive cannot exceed 50% of the total offer price of the subscription(s).
- 3) The value of the promotional incentive is considered to be the actual cost to the media owner plus 25% or the recognized retail value or the represented value, whichever is highest.
- 4) If a back copy is included in a subscription offer, it will be considered a promotional incentive unless the subscription is put on a retroactive basis.
- 5) Details regarding offers with promotional incentives (for both qualified paid and non-paid circulation) shall be reported in the explanatory paragraph, Additional Data of the brand report identifying the premium and quantity used for the analyzed issue.
- 6) For single copy sales, a promotional incentive is any inducement offered by the last agent in the chain of distribution (point-of-purchase).
- 7) The promotion, on the cover of a publication, of an advertiser's coupon within the publication is not considered a promotional incentive.
- 8) When single copies are sold with a promotional incentive, the value of the incentive cannot exceed 50% of the cover price.
- 9) The value of the promotional incentive is considered to be the actual cost to the media owner plus 25% or the recognized retail value or the recognized retail value or represented value, whichever is highest.
- 10) Details regarding promotional incentive offers, and the number of single copy sales sold to consumers with a promotional incentive shall be reported in the explanatory paragraph, Additional Data of the brand report (See 1-2B 227).

- 11) Free promotional incentives, the contents of which have been published are reported as “sold with editorial promotional incentive (including reprints).”
- 12) Editorial promotional incentives include:
  - a) Reprints of publication Sections,
  - b) Books,
  - c) Other printed reference matter (paid annual periodicals excluded)
  - d) Pamphlets,
  - e) Disks containing items such as compilations of publication editorials, software demonstrations, clip art, fonts, etc.
- 13) For additional standards regarding services or products sold in combination with a publication, see standards regarding Combination Sales (1-2B 1058).

### **1-2B 1070 Renewal**

A subscription which has been renewed within six months of its expiration date and paid for within six months following receipt of the renewal order.

### **1-2B 1071 Renewal Rate**

The number and percentage of expiring subscriptions which have been renewed within six months of their expiration date and paid for within six months following receipt of the renewal order (See 1-2B 829).

### **1-2B 1072 Single Copy Sales**

- 1) Those copies of a publication shall be reported separately in paragraphs 1, 3a, 3b, 4, and 3c (when reported). (See 1-2B 823).
- 2) All single copy sale prices for the period shall be reported in the explanatory paragraph, Additional Data.
- 3) Publications reporting any Single Copy Sales sold with a promotional incentive shall show an issue-by-issue analysis of the number of single copies sold with a promotional incentive.
- 4) The nature of the premium and provisions of the offer shall be described in the explanatory paragraph, Additional Data (See 1-2B 1069 10).

### **1-2B 1073 Sponsored Individually Addressed Circulation**

- 1) Individually addressed subscriptions which promote the interests of the sponsor/donor and which otherwise conform to the definition of qualified paid circulation shall be reported as “Sponsored Individually Addressed” circulation.
- 2) Sponsored Individually Addressed barter circulation shall be reported separately in paragraph 1, Average Qualified Circulation Breakout for Period.
- 3) If the purchaser has a financial interest in the publication, those copies purchased may not be included in qualified circulation unless it can be proven to the satisfaction of CEO of BPA that the sale was made for the benefit of the purchaser and not for the benefit of the publication.
- 4) Money collected by an agent need not be remitted to the media owner provided necessary records are in place to document the purchase and price paid by the original subscriber. However, each sponsorship sale transaction must be without monetary recourse to the purchaser (sponsor) (See 1-2B 1016).

### **1-2B 1074 Subscriptions**

Contractual agreement by an individual or a firm to purchase one or more copies of a publication for a given period at a price.

### **1-2B 1075 Subscription Extensions**

- 1) Number of subscriptions extended because of subscription price reductions or a reduction in the frequency of issue will be reported in the explanatory paragraph, Additional Data.
- 2) When a media owner reduces the base annual price of a publication, subscriptions are extended as follows:
  - a) The unexpired portion of the subscription shall be extended in the ratio that the value of such unexpired portion at the old base rate bears to the new base rate.
  - b) All calculations shall be made effective from the date of the issue with which the price change has occurred.
- 3) When a media owner has reduced the base annual price and has extended the expiration date as specified above, and then, at a later date, has raised the basic annual price the new expiration dates for subscriptions originally extended shall be cut back in the ratio that the newest base price bears to the last base price. All calculations shall be made effective from the date of issue with which the price change has occurred.
- 4) When a media owner increases the frequency without a change in subscription rates, the media owner may extend the subscription period ordered by the subscriber.
- 5) Details regarding subscription extensions shall appear in the explanatory paragraph, Additional Data.

### **1-2B 1076 Term of Subscription**

Length of time a media owner contracts with a subscriber to send issues of the publication, usually one, two or three years.

### **1-2B 1077 Third Party Agents**

- 1) Subscriptions sold through agencies shall be a recognized business concern. It shall be the media owner's responsibility to provide proof of qualification for such recipients.
- 2) Money collected by an agency need not be remitted to the media owner provided necessary records are in place to document the purchase and price paid by the original subscriber.
- 3) Agents shall not be sponsors of subscriptions or single copies. Having a "doing business as" (DBA) name is not sufficient to establish an agent's DBA operation as a sponsor.

### **1-2B 1078 Sweepstakes, Prize Draws or Contests**

- 1) Any subscription offer in which a prize is offered by lottery shall be considered as sold using a sweep-stakes, prize draw or contest.
- 2) Details regarding these offers shall be reported in the explanatory paragraph, Additional Data of the brand report, regardless of whether or not paragraph 3b is reported.
- 3) Whenever a sweepstakes, prize draw, or contest is offered to individual recipients as an inducement to obtain qualified paid request circulation, the media owner shall appropriately footnote the number of subscriptions sold through the use of these offers in paragraph 3b and provide an explanation of such offers in the explanatory paragraph, Additional Data as follows:

*. . . recipients reported as request circulation in paragraph 3b were obtained through the use of sweepstakes offers . . .*

- 4) Whenever a sweepstakes, prize draw, or contest is offered to individual recipients as an Inducement to obtain qualified non-paid circulation, these recipients shall be reported as "Other sources."
- 5) The media owner shall identify such sweepstakes offers and the quantity reported as other sources in a footnote in explanatory paragraph, Additional Data as follows:

*. . . recipients reported as other sources in paragraph 3b were obtained through the use of sweepstakes offers . . .*

## **1-2B 1100 AUDIT PROCEDURES**

### **1-2B 1101**

The auditor shall examine all available records pertaining to circulation, distribution, etc. as required in the Standards.

### **1-2B 1102**

The list of recipients of the digital copy and qualification records shall be counted and tested to verify analysis of circulation.

### **1-2B 1103**

Officers and employees concerned with circulation may be questioned with regard to work on the records in their charge.

### **1-2B 1104**

- 1) The auditor may compare and crosscheck data from these various sources, conduct confirmations and make any other tests considered essential to the complete and accurate authentication of the audit report.
- 2) The media owner shall be billed for the costs incurred for special tests considered to be essential to complete the audit.

### **1-2B 1105**

The auditor may visit the vendor responsible for production and/or distribution of digital copies and secure records pertaining to the publication. For these purposes the cooperation of the media owner shall be expected.

### **1-2B 1106**

Should it be deemed necessary by the representatives of the Corporation, they shall be permitted by the member to remove pertinent records from the member's place of business for review and analysis at the office of the Corporation.

### **1-2B 1107**

- 1) If it becomes necessary for an auditor to remove from the media owner's premises any receipts, documents, etc., the auditor shall be required to have two identical receipts signed by the auditor and the media owner or a media owner's representative listing the material taken.
- 2) One receipt is to be kept by the auditor and the other by the media owner with both receipts to be destroyed upon the auditor's return of the material.

## **1-2B 1200 MEMBERSHIP ADVISORIES OF CORRECTION**

### **1-2B 1201**

- 1) As a result of an audit, whenever there has been a substantial change in the data as reported originally in the BPA report, a Membership Advisory of Correction shall be issued by BPA Worldwide.

- 2) It shall be posted to the BPA Worldwide website ([www.bpaww.com](http://www.bpaww.com)) and distributed to members that request copies of printed reports.
- 3) Prior to the issuance of a membership advisory, however, the media owner shall be notified by registered mail or other courier mail (return receipt requested) of the auditor's findings, and shall have 10 calendar days to appeal the auditor's findings prior to the release of a Membership Advisory of Correction.
- 4) In the event of an appeal, the auditor's findings will be reviewed by the CEO of BPA. If the media owner disagrees with the decision of the CEO of BPA, they may, within 10 calendar days, request a further review by the Board of Directors.
- 5) The media owner shall be billed a fee for the issuance of the Membership Advisory, as set from time to time by the Board of Directors.

### **1-2B 1202**

- 1) Whenever Membership Advisories of Correction are issued for a member for two sequential years for any reason, or audit reports are issued for three sequential years due to errors and omissions within the same BPA report paragraph, i.e. qualification source and age, that have been brought to the attention of the member in the previous audits the Corporation shall not release the subsequent report without auditing it first.
- 2) The media owner shall be billed the audit charge for this special audit in accordance with rates as established from time to time by the Board of Directors.
- 3) In addition, the matter will be brought to the attention of the Executive Committee for a review of the membership status of the media for possible further action as provided for under Section B9.0 of the Bylaws.

## **1-2B 1300 SPECIAL THREE OR SIX MONTH AUDIT**

### **1-2B 1301**

- 1) A publication may request the CEO of BPA to provide a special three or six-month audit ending with a month other than June or December, (July and January for physician journals). If, in the CEO of BPA's judgment, circumstances warrant the audit and the publication meet the following conditions:
  - a) The publication's request for the special three or six-month audit shall be in writing explaining the reason for the audit.
  - b) The publication shall pay the regular auditing charge for the special audit.
  - c) A publication which has chosen a period ending with a month other than June or December (July and January for physician journals) for its special three or six-month audit report, shall transfer back to the standard June or December schedule (July and January for physician journals) with its first brand report following the special three or six-month audit report, and include whatever previously audited issues are necessary to complete the six-month period.
  - d) The publication may continue to audit on its original audit cycle, or, with approval of the CEO of BPA, the audit cycle may be changed.
- 2) Any special three or six-month audit shall be issued as an official Audit Report.

## **1-2B 1400 PUBLICITY**

### **1-2B 1401 General Compliance**

#### **1-2B 1402**

The Corporation has rights in the Corporation's name, trademarks and figures appearing in the Corporation's released publications, magazines, newspaper, or other brand channel statements and reports (hereinafter referred to as "The Corporation's rights").

#### **1-2B 1403**

- 1) The Corporation owns the copyright in all statements, reports, and publications, magazines or other brand channels either filed with or published by the Corporation including, without restricting the generality of the foregoing, all BPA Reports, defined as, Brand Reports, Distribution Statements, Brand Reports, Corrected Brand Report, Audit Reports, Management Letters and Bulletins.
- 2) By executing the Application for Membership, each member thereby assigns and transfers to the Corporation any right, title or interest, whether in copyright or otherwise, that such member may have now or in the future in any data or information provided to the Corporation.

#### **1-2B 1404**

- 1) The proper and widest possible use of the Corporation's rights is highly desirable.
- 2) The use by a member of the Corporation's rights implies that the Corporation has approved or authorized their use in the form as used.
- 3) Members should, therefore, contact the Corporation if they wish to use the Corporation's rights in a manner other than as set out in these Standards and Regulations.

#### **1-2B 1405**

- 1) As every member has an interest in protecting the Corporation's rights, the Corporation has set out the following guidelines relating to the use of the Corporation's rights.
- 2) Although they are not designed or intended to restrict legitimate and proper use, they are set down to protect the integrity and reliability of the Corporation, the Corporation's rights and the audited circulation figures published by it.

#### **1-2B 1406**

- 1) Rights in the logos or trademarks are owned only by the Corporation and the right to use the logos or trademarks is a privilege of membership.
- 2) The use by a member of a logo or trademark carries the implication that the Corporation has approved the advertising or document in which the trademark appears.
- 3) Unauthorized or improper use of the logos or trademarks may be harmful to the Corporation, the Corporation's rights and its members, and may result in the loss of the right of the member to the use of the logos or trademarks.
- 4) A member shall make clear that the use of the logos or trademarks by the member is only as a member of the Corporation and there shall be no suggestion or implication that the member owns any rights in the logos or trademark.

#### **1-2B 1407**

As it is not possible to set out the many different uses of logos or trademarks that could be proper or improper, a member who wishes to use the Corporation's logos or trademarks in a manner other than as set out in these Standards and Regulations or is in doubt as to proper use should contact the Corporation for advice.

#### **1-2B 1408**

- 1) A member shall not disseminate nor permit to be disseminated on its behalf any fraudulent, inaccurate or misleading claims with respect to any aspect of its reporting of its properties, products or services or that of another member, whether such dissemination is in the form of marketing material, letters or internal memoranda.
- 2) A violation of this section may constitute both a violation of these publicity Standards and an offense which is subject to Section B9.0 of the BPA Bylaws.

#### **1-2B 1409**

The provision of the Bylaws and Standards relating to publicity shall apply equally to applicants for membership.

#### **1-2B 1410**

- 1) A member shall not reproduce correspondence with or literature of the Corporation, or excerpts there from, unless specific written permission to do so is obtained from the CEO of BPA.
- 2) This includes correspondence between BPA Worldwide and the parties to a formal complaint.

#### **1-2B 1411**

- 1) A member shall not make any false, fraudulent or misleading statements as to any aspect of circulation, distribution or coverage.
- 2) If questions arise concerning whether a document, advertisement, promotional material or written/ electronic communication is misleading, a determination shall be made by the BPA Worldwide CEO of BPA or designated agent, based on all available information.
- 3) A member shall not attribute BPA Worldwide authority, stated or implied, to any products, unless such products are traceable to a reporting tool on the BPA website.

#### **1-2B 1412**

No BPA report shall be released until the audit report for the previous audit year has been completed and released by BPA Worldwide.

#### **1-2B 1413 Applicants**

##### **1-2B 1414**

- 1) An applicant may publicize the fact that they have applied for membership.
- 2) However, if an applicant who has publicized this fact fails to become a member within six months after the date of its application, or within such further time as may be granted by the CEO of BPA, the application shall be automatically rejected and the fees on deposit shall be forfeited to the Corporation.

##### **1-2B 1415**

Applicants may not use the BPA Worldwide logo until they have successfully completed their initial audit and have been voted into membership by the Board of Directors.

##### **1-2B 1416**

A media owner whose membership in BPA Worldwide has been terminated for violation of Section B9.0 of the Bylaws and who reapplies for membership may not publicize the fact that they have reapplied for membership, and shall complete their initial audit within six months of the reapplication date.

**1-2B 1417**

An applicant whose application for membership has been rejected by the Corporation in accordance with Section B2.2.3 of the Bylaws and who reapplies for membership within one year of the date of rejection may not publicize the fact that they have reapplied for membership and shall complete their initial audit within six months of the reapplication date.

**1-2B 1418**

If a media owner reapplies for membership after the one-year anniversary of the rejected application, the media owner shall use the term "re-applied for membership mm/yy," and will have the full twelve-month term to complete their initial audit.

**1-2B 1419**

If a media owner reapplies for membership three years after the application rejection date, no reference to reapplication is required.

**1-2B 1420 Filing Publicity Complaints****1-2B 1421**

A complaint charging a member with a violation of any of the Publicity Standards may be initiated by any member, manager, officer, or the CEO of BPA.

**1-2B 1422**

- 1) All formal publicity complaints are considered confidential between the parties involved and BPA Worldwide, unless and until such complaints are resolved in a manner that calls for public notice either by BPA Worldwide or the complainee.
- 2) Media owners are enjoined not to reproduce any correspondence pertaining to a formal complaint without prior written permission of BPA Worldwide.
- 3) It is the responsibility of a media owner to ensure that the media owner's staff does not publicize a complaint beyond the scope allowed by these standards.

**1-2B 1423**

To initiate a complaint, a complainant shall:

- a) Submit to the CEO of BPA a written statement of the facts upon which the complaint is based and the Section of the Bylaws and Standards claimed to have been violated.
- b) A complaint shall only be lodged concerning a promotion distributed within the 12 months preceding the date of the complaint.
- c) This statement shall be limited to the actual facts and shall include copies of all documents upon which the complainant relies including copies of BPA reports when pertinent.
- d) The complaint shall be accompanied by a non-refundable filing fee as established by the Board of Directors to help cover BPA Worldwide's processing costs.
- e) No complaint shall be considered or acted upon unless the fee is paid in advance.

**1-2B 1424**

- 1) An appeal from the CEO of BPA's decision shall be accompanied by a filing fee as established by the Board of Directors to cover the additional costs of preparing the file for review by the Publicity Policies Subcommittee of the Board of Directors.

- 2) No appeal shall be considered or acted upon unless the fee is paid in advance.

#### **1-2B 1425**

Upon receipt of a complaint, the CEO of BPA shall deliver or send to the complainee a copy of the complaint and all the documents upon which the complaint is based.

#### **1-2B 1426**

The CEO of BPA shall have all complaints investigated without delay and shall, if warranted in the CEO of BPA's judgment, attempt to resolve the complaint informally.

#### **1-2B 1427**

- 1) To answer a complaint, the complainee shall submit to the CEO of BPA, within five business days of the receipt of the complaint, a statement of the facts upon which they rely to rebut or to mitigate the complaint.
- 2) The answering statement shall be limited to the actual facts and shall include copies of all documents upon which the complainee relies, including copies of BPA reports when pertinent.

#### **1-2B 1428**

It shall be the duty of a member to cooperate fully in any such investigation including, if necessary, making all pertinent records available for such investigation.

#### **1-2B 1429**

Upon receipt of the answering statement, the CEO of BPA shall deliver or send to the complainant a copy of the complaint and of all the documents upon which the complaint is based.

#### **1-2B 1430**

- 1) If the complaint is not settled informally, the CEO of BPA shall determine whether or not a violation of the publicity standards has occurred and what action, if any, shall be taken.
- 2) By way of illustration and not limitation, the CEO of BPA may direct that a bulletin to the membership be issued or that the member discontinues the dissemination of or modify the item about which the complaint was made.

#### **1-2B 1431**

- 1) If the CEO of BPA decides that no violation has occurred, the CEO of BPA shall advise all parties to the matter in writing.
- 2) The CEO of BPA's decision shall be final unless a member appeals, in writing, to the Publicity Policies Subcommittee within five business days from the receipt of the CEO of BPA's decision in which event, the complaint shall be further processed as provided hereafter.
- 3) If a member does not file an appeal within the time limit specified, no further action shall be taken.

#### **1-2B 1432**

- 1) If the CEO of BPA decides that a violation has occurred, the CEO of BPA shall, in writing, advise the member against whom the complaint was made of the decision and shall include with the decision a copy of any bulletin to be issued to the membership.
- 2) The CEO of BPA's decision shall be final unless the member against whom the complaint has been made appeals in writing to the Publicity Policies Subcommittee of the Executive Committee within five business days from the date of the receipt of the CEO of BPA's decision, in which event, the complaint shall be further processed as provided hereafter.

### **1-2B 1433**

In the event an appeal is taken from the CEO of BPA's decision, the CEO of BPA shall present all of the facts pertaining to the alleged violation to the Publicity Policies Subcommittee of the Executive Committee, and by vote of the majority of its members, the Publicity Policies Subcommittee of the Executive Committee shall have the authority to affirm, disaffirm or modify the decision of the CEO of BPA and its decision and determination shall be final.

### **1-2B 1434**

- 1) Violation of any provision of these Standards pertaining to publicity may be brought to the attention of the entire membership.
- 2) To cover the cost to BPA Worldwide of processing and administering the complaint and of the printing and distribution of the correction bulletin, a member found to be in violation of the publicity standards shall reimburse BPA Worldwide for its expenses.

### **1-2B 1435**

Any bulletin issued to correct the record with respect to Publicity Standards Violations shall have printed thereon the following legend:

"This bulletin is issued to correct the record and does not constitute an official censure as provided in Section B9.0 of the Bylaws."

### **1-2B 1436**

- 1) The issuance of a bulletin to correct the record shall not preclude or be in lieu of any action by the Executive Committee or Board of Directors under Section B9.0 of the BPA Bylaws with respect to the violation.
- 2) In every case in which a bulletin to correct the record is released, the case shall be reviewed by the Executive Committee at its next meeting to determine whether further action shall be taken under Section B9.0 of the BPA Bylaws.

### **1-2B 1437**

- 1) In lieu of the correction bulletin, the CEO of BPA may authorize the issuance (at the media owner's expense) of a letter by the media owner containing the substantive comments which would be included in a correction bulletin issued by BPA Worldwide. The text of the letter shall be approved by the CEO of BPA and may not contain any statements deemed promotional.
- 2) It shall be mailed by BPA Worldwide to the media owner's entire promotion list, and/or to the recipients of the offending document, and/or to the entire BPA Worldwide membership.

### **1-2B 1438**

- 1) Complainants have the option of having BPA reprint a complainee's letter of correction and distribute the letter to the complainant's advertiser/agency list.
- 2) This shall be at the expense of the complainant. The reprint will carry an imprint informing recipients that the notice has been reprinted at the request of the complainant.

### **1-2B 1439**

- 1) When violations of a serious nature are found within promotional materials, wide distribution will be assumed unless the media owner can provide to BPA Worldwide, evidence to the contrary.
- 2) When proper evidence cannot be provided, BPA Worldwide will require distribution of a letter of correction from the media owner to the media owner's entire advertiser and advertising agency sales and promotion list.

### **1-2B 1440**

- 1) If a media owner claims a promotion found to be in violation had limited distribution, but evidence later proves wider distribution in fact existed, a letter of correction shall be mailed by the member to the media owner's entire advertiser/agency promotion list.
- 2) BPA Worldwide may, if instructed by the CEO of BPA, distribute a notice of violation to the BPA Worldwide membership.

### **1-2B 1441**

If an advertisement on behalf of a media owner is found to be in violation of these standards and warranting public correction, the appropriate remedy shall be a correction in the medium as the original ad, e.g., SRDS, BRAD, CARD, or the brand channel itself. Insertion orders of the corrected advertisement shall be placed within 30 days of the staff decision.

### **1-2B 1442**

If a promotion by a media owner on the Internet or website is found to be in violation, the appropriate remedy shall be a correction on the Internet or same website for the greater of a period of thirty days or the same time period as the promotion was available.

### **1-2B 1443**

BPA Worldwide shall post all violations of Section 3-9 of these standards on its website [www.bpaww.com](http://www.bpaww.com) for a period of 30 days following the deadline for appeal, or resolution by the Publicity Policies Subcommittee or Board of Directors. There shall be no further distribution of a downloaded and printed version of this notice without permission of BPA Worldwide.

### **1-2B 1444**

- 1) Any bulletin regarding publicity violations released by the Corporation may be reprinted by the Corporation at the request of any member who shall be billed the charges incurred for the reprint.
- 2) Reprints shall have a special imprint at the top of the notice to identify the member distributing it.
- 3) The imprint shall read as follows:

*This exact copy of an original Notice to Correct the Record which has been sent to the entire  
BPA Worldwide membership is now being distributed by . . . . .*

### **1-2B 1445**

- 1) Any member may distribute the reprints described in Section 3-9 622 subject to the following conditions:
  - a) No covering letter or printed material may accompany the Notice to Correct the Record when distributed by a member of the Corporation.
  - b) No comment about the Notice shall be made by a member of the Corporation in any letter or literature that may be distributed separately from the Notice.
  - c) The reprint may not be distributed by any member after thirty days of the date of its issuance by BPA Worldwide.

## **1-2B 1500 Complaint Process For All Other Matters**

### **1-2B 1501**

Should any member file charges against any other member, or should any officer, director or the CEO of BPA have reason to believe that any member has been guilty of any offense enumerated in the Bylaws or these publicity standards, the CEO of BPA shall cause an investigation to be made without delay.

### **1-2B 1502**

It shall be the duty of a member to cooperate fully in any such investigation including, if necessary, making all its records available for such investigation.

### **1-2B 1503**

- 1) If, in the opinion of the CEO of BPA, no offense enumerated in the Bylaws or Standards has occurred, the CEO of BPA shall so notify the complaining member, and no further action shall be taken.
- 2) If the complaining member is still of the opinion that an offense has occurred, they may appeal to the Executive Committee.

### **1-2B 1504**

If in the opinion of the CEO of BPA an offense has occurred, the CEO of BPA shall have served upon the member involved a copy of the complaint made against them.

### **1-2B 1505**

The complaint shall be served upon the member either personally, by leaving the same at the member's business address as registered with the Corporation during business hours or by mailing it to said member at its business address by email, mail or courier.

### **1-2B 1506**

- 1) Said member shall have ten calendar days, or such further time as the CEO of BPA may grant, from the date of the service of the complaint or charges to answer the same.
- 2) The answer shall be in writing signed by the accused member.

### **1-2B 1507**

All decisions of the Executive Committee and of the Board of Directors with respect to any complaint made against a member, shall be served on such member, in writing, either personally, by email, mail or courier, directed to the member's address as registered with the Corporation, and the date when personal service is made, email has been received, or when the mail or courier package is signed for at the place of business of the member, shall be the date which shall start the time to appeal running, as provided to hereinafter.

### **1-2B 1508**

- 1) The Executive Committee at a regular or special meeting subsequent at the close of the ten calendar day period in which the answer was due, shall proceed to consider the charge or charges and make its decision.
- 2) Ten calendar-days written notice of such meeting shall be sent to the accused member.
- 3) The accused member shall be entitled to be present at the meeting and shall be permitted to examine or cross-examine any witnesses produced before the Executive Committee, or to present such testimony, defense or explanation as they may have.

**1-2B 1509**

- 1) The Executive Committee, by the affirmative vote of the majority of the members of the Committee present at a duly constituted meeting, shall have the authority to determine:
  - a) Whether a member has been guilty of any of the offenses enumerated herein.
  - b) The penalty to be imposed on such members.

**1-2B 1510**

In all cases where the Executive Committee finds the accused member guilty and imposes the penalty of censure, its decision shall be final and enforced immediately.

**1-2B 1511**

A bulletin announcing the censure of a member may be published and distributed to the members and such other organizations as the Executive Committee may authorize in its discretion.

**1-2B 1512**

In all cases where the Executive Committee finds the accused member guilty, and imposes the penalty of probation or expulsion, its decision shall neither become final nor publicized nor enforced until 15 calendar days after service of its written decision upon the accused member as provided hereafter.

**1-2B 1513**

- 1) The accused member, if placed on probation or expelled by the Executive Committee, shall have the right to file an appeal in writing, with the CEO of BPA, requesting that the Board of Directors review the decision of the Executive Committee.
- 2) Such written appeal must be filed with the CEO of BPA no later than 14 calendar days after service of the decision of the Executive Committee on said member, or within such extended period as may be granted by the Executive Committee.
- 3) Should the written appeal be filed in the time provided herein, the decision of the Executive Committee shall not be final but the Board of Directors shall review the decision of the Executive Committee at its next regular or special meeting held after the receipt of the Notice of Appeal.
- 4) The Board of Directors shall have the power to affirm or disaffirm in whole or in part, the decision of the Executive Committee, and its decision shall become final immediately.

**1-2B 1514**

The affirmative vote of the majority of all members of the Board of Directors, present at a duly constituted meeting, shall be required to confirm the penalty of probation or expulsion from membership.

**1-2B 1515**

- 1) The Board may, at its own discretion, permit the accused member to be present at the meeting at which the decision of the Executive Committee is reviewed.
- 2) In any event, both the accused and the complainant shall have the right to submit additional documentary evidence or written arguments to the Board for its consideration in reviewing the decision of the Executive Committee on the appeal of the accused member.

**1-2B 1516**

Should a member be found guilty of an offense and placed on probation as provided above, the Executive Committee, or the Board of Directors in the event it reviews the decision of the Executive Committee, may impose such conditions upon the member as the Executive Committee and/or the Board of Directors may, in their decision, determine to be necessary.

## **1-2B 1600 Appeals From Administrative Decisions**

### **1-2B 1601**

All appeals or requests for reconsideration of any decision by the Board of Directors, any committee, administrative officer or staff member shall be in writing. Such appeals shall be submitted to the CEO of BPA no later than fourteen days after such earlier decision was announced.

### **1-2B 1602**

Such appeals shall present new facts and include such information or circumstances which justify reconsideration by the Board of Directors.

### **1-2B 1603**

- 1) If the decision was the result of a complaint or request made by a member or members other than the member for or against whom the decision was made, a copy of the appeal or request for reconsideration shall be circulated to the member or members who initiated the complaint or request and to such other members as the CEO of BPA or the Board shall determine may be directly affected by any reversal or modification of the decision.
- 2) Prior to the consideration and action by the Board of Directors, all such parties shall be given ten business days to respond.

### **1-2B 1604**

- 1) The Board of Directors may, on its own initiative or on request from a member, reconsider a decision made by it after giving all parties, referred to in Section 1-2B 1603, notice and an opportunity to respond, in writing and, if the Board in its discretion so chooses, in person at a meeting at which the appeal will be considered.
- 2) Upon such reconsideration the Board may affirm, modify, or reverse its prior decision.

### **1-2B 1605**

- 1) Any member in good standing may request the further distribution of censure, probation or expulsion notices by the Corporation subject to the following conditions:
  - a) The release of the Notice shall be under the direct control of the Corporation.
  - b) Any member who requests further distribution of the Notice shall be billed the charges incurred for the reprinting and distribution of the Notice.
  - c) The reprint of the Notices of Censure, Probation, or Expulsion shall have a special imprint at the top of the notice to identify the member distributing it.
  - d) The imprint shall read as follows:

*This exact copy of an original Notice of Censure, Probation or Expulsion which has been sent to the entire BPA Worldwide membership is now being distributed by. . .*
  - e) No covering letter or printed material may accompany the Notice of Censure, Probation or Expulsion when mailed by the Corporation at the request of a member.
  - f) No comment about the Notice shall be made by a member of the Corporation in any letter or literature that may be distributed separately from the Notice, nor shall any employee of such member distribute the Notice independently.
  - g) The media owner to which the Notice refers shall be notified in advance by BPA Worldwide of any additional distribution of the Notice.
  - h) The request of any member to distribute the reprint of the Notice shall be received in writing by the Corporation within thirty days from the date of its issuance by BPA Worldwide.