



Check My Ads Institute Comments Regarding IAB Europe's CTV Measurement Framework and Transparency Principles

**Ilesha White, Director of Intelligence
Anastasia Micich, Research Analyst**

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About Check My Ads Institute

Check My Ads Institute is an independent 501(c)3 non-profit global digital advertising watchdog, headquartered in the US. Our organization serves the stakeholders that are most impacted by the digital advertising ecosystem: publishers, advertisers, policymakers, small businesses, and the public. We help these stakeholders navigate the complex industry and understand not only how advertising budgets flow, but how they shape the information ecosystem, often disappearing before ever reaching real people.

Our mission is to bring transparency and accountability to the notoriously opaque and purposefully complex digital advertising ecosystem. The global advertising industry has grown to be worth more than \$750 billion USD and is among the world's largest unregulated industries. Check My Ads has advanced market reform by providing stakeholders with new ways to demand accountability from Big Tech and AdTech. We work globally with policymakers to advance many common-sense safeguards to protect the public. We are pushing for reforms to apply the same rigorous standards required in the finance industry to the digital advertising industry, including supply chain transparency, Know-Your-Customer requirements, best interest duties for adtech brokerage intermediaries, and common ownership rules.

Our work with advertisers and advertising practitioners demonstrates how the current system allows advertising budgets to unintentionally fund harm and waste, to the detriment of brands and their growth. We also explore how adtech business practices contribute heavily to starving quality publishers of digital advertising revenues. We do not accept any money from tech companies. We are proud to be fully independent and free from industry influence. Our advocacy is driven by facts and the desire to make the internet fairer for all who use it. Check My Ads exists to empower the people and organizations most affected by the broken adtech system. By shining a light in the dark corners of this opaque ecosystem, we push for systemic changes that will reform how the internet is funded – and, in turn, how it serves and protects all of us.

Learn more about our research and our policy platform at www.checkmyads.org.

Check My Ads Comments Regarding IAB Europe's CTV Measurement Framework and Transparency Principles

Summary

The CTV Measurement Framework and Transparency Principles set out to address the measurement challenges within the programmatic television landscape. Its aim is to ensure accountability in the delivery of despite fast growth in video driven by subscription video on demand (SVOD) and broadcast video on demand (BVOD). Check My Ads welcomes the efforts of IAB Europe to provide a clear standard and commitment to an operating set of principles for all CTV ecosystem participants in the spirit of efficiency, fairness, and transparency.

However, a standard advances transparency only if it is mandatory, independently audited, publicly disclosed, and consistently enforced. A framework that is merely “encouraged,” self-graded, and authored by the parties it governs only provides a convenient cover for involved parties to engage in quality fixing.¹ Our concern here is that the current draft of the CTV Framework and Transparency Principles risks entrenching quality fixing and further eroding innovation and accountability within the ad-supported CTV ecosystem. Weak codification of transparency cannot be used a veneer for accountability across four main concerns:

1. Clear Guidance on Data Governance
2. Lack of Diversity of Industry Viewpoints
3. Established Definitions Aren't Fit-for-Purpose
4. External verification must not be a substitution for independent, third-party auditing

¹Roger P Alford, *Hearing before the United States Senate Committee on the Judiciary, Subcommittee on Competition Policy, Antitrust, and Consumer Rights: The Impact of Consolidation and Monopoly Power on American Innovation*, <https://scholarship.law.nd.edu/cgi/viewcontent.cgi?article=1006&context=testimony/> (“Second, innovation concerns raise the issue of powerful market actors engaging in what may be called ‘quality fixing.’ If harm to competition concerns both price and quality, why do we focus so much attention on price fixing but almost never discuss quality fixing? Let me offer a few examples. Why is there is so little enforcement action with respect to standard setting organizations blocking new innovations?”).

1. Clear Guidance on Data Governance

The Measurement Framework & Transparency Principles are intended to standardize various activity events captured by digital advertising platforms for advertiser use, with the goal of creating greater interoperability and establish clear expectations for measurement providers and ecosystem partners in the name of transparency as outlined in Principle 3:

Principle 3: Support for Client-Initiated Data Collection Advertisers and agencies should be empowered to deploy their own measurement tags, SDKs, or data collection mechanisms, ensuring independent validation and flexibility in analytics. External verification strengthens trust, ensures methodological rigor, and supports consistent cross-publisher comparability.

However, the Measurement Framework & Transparency Principles are missing guidance regarding the transmission of events that may reveal or contain sensitive personal information (“Sensitive Event Data”). Privacy compliance is critical in various event-driven systems that the Measurement Framework & Transparency Principles list,² such as SDK event triggers and tag fires. Beyond legal risk, brands are subject to reputational risk where they inadvertently share sensitive information about their customers. Future versions of the Measurement Framework & Transparency Principles should include a disclaimer that client-initiated data collection theoretically could expose sensitive information if utilized by advertisers working in informationally sensitive advertising verticals such as healthcare, financial services, education, among others.

While IAB Europe cannot provide legal advice to stakeholders, it is remiss to omit the outside exposure advertisers will bear if IAB Europe encourages advertisers and their agencies (and by extension, their vendor platforms) to collect data without the inclusion of proper guardrails.

Recommendation: Provide an explanation and guidance for advertisers regarding the collection and processing of Sensitive Event Data. It must go beyond instructing advertisers to comply with local law and regulation. This guidance should provide clear examples and instructions – with particular emphasis on advertisers in higher-risk verticals – e.g. healthcare, financial services.

2. Lack of Diversity of Industry Viewpoints

The proposed framework identifies contributors from across the digital advertising ecosystem, including other industry trade bodies, broadcasters, measurement providers, and adtech firms.³ However, it is unclear how advertisers’ specific viewpoints are represented throughout the proposed framework. Notably missing is an independent advertiser without additional commercial products tied to other advertising technology interests. It is noted that presumably IAB UK’s position as a consulted stakeholder would therefore include advertisers, but IAB is not even a specific advertiser-focused trade organisation such as

² IAB EUROPE TACKLES CTV TRANSPARENCY WITH NEW FRAMEWORK, OPEN FOR PUBLIC COMMENT [HTTPS://IABEUROPE.EU/](https://iabeurope.eu/), <https://iabeurope.eu/iab-europe-tackles-ctv-transparency-and-measurement-consistency-with-new-framework-now-open-for-public-comment/> (last visited June 2, 2026)

“Advertisers and agencies should be empowered to deploy their own measurement tags, SDKs, or data collection mechanisms, ensuring independent validation and flexibility in analytics. External verification strengthens trust, ensures methodological rigor, and supports consistent cross-publisher comparability.”

³ IAB EUROPE TACKLES CTV TRANSPARENCY WITH NEW FRAMEWORK, OPEN FOR PUBLIC COMMENT [HTTPS://IABEUROPE.EU/](https://iabeurope.eu/), <https://iabeurope.eu/iab-europe-tackles-ctv-transparency-and-measurement-consistency-with-new-framework-now-open-for-public-comment/> (last visited June 2, 2026)

ISBA or WFA.⁴ An independent measurement framework meant to promote accelerated CTV adoption that doesn't include specific named advertisers or advertiser-centred trade organisations as stakeholders is notable, particularly when advertisers are the parties being courted to increase investment.

The presence of Amazon Ads and Samsung Ads as authors underscore this concern. Each company is simultaneously (1) a seller of inventory and (2) a controller of audience and device data. These companies are uniquely qualified to benefit from the very metrics they get to define. A standard authored predominantly by sellers risks creating a fixed standard of quality in terms sellers can meet, but not a standard of quality that buyers need.

Recommendation:

- Provide public clarification of how each stakeholder participated, and with which specific lens each stakeholder's contributions were offered (advertiser, adtech firm, agency, broadcaster, etc).
- Include at least (2) two independent advertisers (without additional commercial products tied to other advertising interests).

3. Established Definitions Aren't Fit-for-Purpose

The proposed framework identifies several definitions taken from the U.S.-based measurement accreditation body, the Media Rating Council (MRC). However, the MRC has not yet written definitions that accurately encompass the specific measurement requirements needed to make this framework viable, and has defined none specifically pertaining to a CTV environment.

There are two (2) core issues: (1) The MRC has not updated its viewability definition since 2015, and (2) its OTT/CTV and SSAI Digital Video Measurement Guidelines (alternatively referred to as Server-Side Ad Insertion and OTT Guidance) simply redirects all measurement guidelines for CTV video impression measurement to the standard Digital Video Impression guidelines from 2021. Therefore, these definitions are not fit-for-purpose:

“To the extent it can be measured, CTV video Impression measurement is subject to the same guidelines applied to traditional online digital video measurement described throughout the Digital Video Impression Measurement Guidelines document, including client initiation, filtration for invalid traffic, and requirements for the ad to be loaded and at minimum begin to render (after the initiation of the stream, post-buffering, when the ad itself begins to appear or begins to play) in order to count it as a valid ad impression.”

Recommendation:

- Provide public clarification of how each stakeholder participated, and with which specific lens each stakeholder's contributions were offered (advertiser, adtech firm, agency, broadcaster, etc).
- Include at least (2) two independent advertisers (without additional commercial products tied to other advertising interests).
- Incorporating diverse viewpoints, develop CTV-specific, fit-for-purpose definitions.

⁴ See CHECK MY ADS INSTITUTE COMMENTS ON MRC DIGITAL ADVERTISING AUCTION TRANSPARENCY STANDARDS CHECK MY ADS, <https://checkmyads.org/statement/check-my-ads-institute-comments-on-mrc-digital-advertising-auction-transparency-standards/> (last visited Mar 2, 2026).

It should not be construed that inclusion of ISBA or WFA would entirely absolve this framework and principles of a lack of diversity. ISBA and WFA have their own capture issues with tech firms as explained on page 3.

4. External verification must not be a substitution for independent, third-party auditing

The Measurement Framework & Transparency Principles are intended to standardize various activity events captured by digital advertising platforms for advertiser use, with the goal of creating greater interoperability and establish clear expectations for measurement providers and ecosystem partners in the name of transparency. Agencies and advertisers absolutely should have the ability to conduct external verification using their own tools. However, this cannot become a substitution for the independent, third-party auditing of broadcasters, streamers, and digital-first platforms.

Principle 3: "Support for Client-Initiated Data Collection: Advertisers and agencies should be empowered to deploy their own measurement tags, SDKs, or data collection mechanisms, ensuring independent validation and flexibility in analytics. External verification strengthens trust, ensures methodological rigor, and supports consistent cross-publisher comparability."

Recommendation:

- Amend principle 3 to mandate that providers* also be required to submit their measurement tags, SDKs, or data collection mechanisms for third-party auditing, including but not limited to: IVT, co-viewing, incrementality, and viewability.
 - *namely broadcasters, streamers, and digital-first platforms providing measurement services as described the Measurement Framework & Transparency Principles