

June 11, 2014

COMMENTS ON THE CONSULTATION PAPER ON ISSUES RELATED TO COMMUNITY RADIO STATIONS
(Consultation Paper No.: 4/2014), 21st May, 2014

A. Term of Permission

1. What should be the period of permission for CRS to be prescribed in the CRS Guidelines? Is the present 5 year period adequate?

The initial grant of permission for a period of 5 years is adequate and compatible with practices in many other countries.

2. What should be the period of extension on the expiry of the initial period of permission for CRS?

3. Should there be any additional terms and conditions of extension/renewal of the permission for CRS?

The renewal process should begin at least six months prior to the expiry of the initial license. Unless there are complaints from the listening community and other local stakeholders that the station had used the initial license to broadcast and manage its organization in violation of the norms prescribed by the Ministry, renewal of licenses should be granted automatically for a further period of 5 years. In cases where there are complaints, transparent procedures, such as a public hearing in the station area, must be followed to ascertain the veracity of the complaints. There should be no fresh fee levied on stations at the time of renewal.

B. Broadcasting of community based 'News and Current Affairs'

4. Should CRS permission holders be permitted to carry the news bulletins of All India Radio (AIR) in unaltered format and community-based non-news and current affairs programs for the categories permitted to FM radio stations?

CR stations should be permitted to carry AIR news bulletins if they so desire. But, more importantly, all CR stations must be allowed to broadcast their own independently produced news and current affairs programs. While community-based content would be the most obvious part of news, stations need not be restricted to 'local' or 'community-based' news and information. Often, listeners may want to know the local implications of state, regional, national or international news for their own

lives and livelihoods. In a pluralistic media environment, it would be unfair to accord monopoly over national/international news to only certain mainstream news organizations. Citizens must have the right to receive multiple perspectives on events across the world. In any case, in the age of the Internet and the ubiquity of information sources, any restrictions on news content over CR stations appear unreasonable. Concerns over monitoring of content must be addressed by the MIB through setting up of appropriate technology. Any costs incurred by stations to set up such technologies to enable monitoring by government agencies should be borne by the Ministry.

C. Duration of Advertisements

5. In view of the availability of alternative revenue/ funding options, is there any reason to increase the duration of advertisement beyond the 5 minutes per hour limitation? If yes, please explain with full justification.

When the CR policy was devised, this restriction on the amount of advertising was determined based on globally prevalent practices that sought to ensure the non-commercial nature of community radio. The idea of time limit on advertising, therefore, is a sound one. From our research, it is evident that there are few CR stations that are able to raise advertising even up to the existing limit. This has been especially difficult in deprived regions of the country where a CR station is trying to cater to the needs of the most marginalized communities. It is a paradox that while CR stations do everything they can to reach their audiences, the advertisers are often not interested in reaching listeners who have little or no consumer power. Therefore, TRAI's endorsement in 2004 of the 5-minute time limit on the grounds that it would help prevent the undercutting of the commercial FM operators, was unfounded and not based on realities. CR stations functioning in areas far from urban agglomerations are doing so in relatively media-dark environments where no mainstream media, especially FM radio stations, cater to the information and entertainment needs of local communities.

However, in light of sustainability concerns raised by many in the sector, the Government may approve an upward revision in the total duration of advertising in community radio by not more 2-3 minutes to an hour. Anything more would take away from the sector its essentially not-for-profit, non-commercial character. In any case, advertising on CR stations, where permitted globally, is never meant to be the sole source of sustaining the operations of the stations. In fact, advertising, usually at low and affordable costs, is seen as another way of making the station accessible to the community and inviting its participation in the running of the station.

The restriction on broadcast of sponsored content on CR stations could also be revisited. Sponsored programmes may be permitted within the broad content guidelines mandated for CR, and ensuring that such content does not exceed a reasonable proportion of the station's total broadcast time (say, not more than 50%).

The changes suggested above are essential to provide valuable sustenance to CR stations even after the launching of the CR Support Scheme by the MIB. The Scheme is meant mostly to provide start-up technology grants and to encourage innovative practices. Stations have many day-to-day

maintenance issues, including payment of rent, utility charges, minor logistic support to participants in program production, and staff salaries, etc., for which they need to raise other sources of funding.

D. Operation of CRS during emergency situations

6. Do you agree with the above proposal for utilisation of CRS during natural calamities/ emergency situations?

Permitting the setting up of mobile transmission facility for an already licensed CR station during natural calamities/emergencies is advisable when such a station itself suffers damage to its fixed transmission facilities. When the CR station is a significant source of local information for the community, it is important that the station is not handicapped from serving its support function during a dire emergency.

However, the Community Radio Forum (CRF) and other advocates have been suggesting for many years that the Government permit the setting up of emergency transmitters to provide disaster information and aid in the relief and rehabilitation efforts, especially in regions where there are few or no CR stations already in existence. These emergency facilities could be set up collaboratively with disaster management authorities, local administration, local NGOs, and sectoral organizations such as the CRF or CRA (Community Radio Association). The actual duration for which these emergency facilities would last can be kept flexible and determined in consultation with disaster management officials and the local community that is affected by the disaster.

E. Growth and spread of CRS in India

7. What, in your opinion, are the measures required to ensure a faster growth in the number and spread of CRS in rural India?

a. The current procedures for issuing of licenses must be simplified. The CR Cell in the Ministry of Information & Broadcasting must become the single window for all applicants. The process of presentations in New Delhi to the Screening Committee is too cumbersome, intimidating, and places undue burden on communities and organizations that are seeking to establish CR stations in far-flung areas of the country.

b. The costs of setting up a CR station are still prohibitive for many small community-based organizations. Efforts should be made to reduce or eliminate taxes and duties on certain components that go into manufacture of equipment such as transmitters and, thereby, make them more affordable.

c. The Ministry by issuing some letters of intent (and licenses?) to applicants from states such as Jharkhand, Chattisgarh, and those in the Northeast have made a good beginning to break out of the earlier reluctance to open the airwaves in so-called 'troubled' regions of the country. The Government must be urged to thoroughly review this cautious approach to CR in conflict areas. Access to airwaves must be seen as a key development initiative in conflict-affected areas, similar to establishment of health, water, and transportation infrastructure. Further, availability of avenues for

democratic articulation of local issues would help wean away young people from pursuing violent means of advocating their causes. In regions like Latin America and Central Africa, community radio has been used as a non-violent tool for conflict resolution and to usher in sustainable peace.

F. Other issues

8. Stakeholders may also provide their comments on any other issue relevant to the present consultation.

a. The CR Policy Guidelines provide for the possibility of transmitter power higher than the currently permitted 100 W ERP where there is a demonstrable need. The government should actively consider this option in cases where community radio stations are sought to be established in hilly/mountainous terrain or in desert regions with scattered human settlements.

b. Campus (educational) community radio stations may be considered as a sub-category of the CR license, with a more flexible content mandate. The developmental content that is mandated for CR in general may be made optional in case of stations run primarily by young people in educational institutions to allow for more dynamism and creativity in programming. Of course, stations run by campuses may still decide to devote their broadcast time to community development issues.



Prof. Vinod Pavarala
UNESCO Chair on Community Media