

**Comments received on Consultation Paper on  
Foreign Investment Limits for Broadcasting Sector**

by

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Dear Sirs,

As a stakeholder in the Media and Telecoms sector, I would like to state my views on foreign investment limits on the broadcasting sector below for your consideration.

Broadband infrastructure investments are rapidly expanding and we are also faced with the eventuality that the mobile telecom networks will also become broadband.

At a policy level, I believe that the foreign investment policy must therefore be designed taking convergence as a fait accompli. And must focus on the opportunities that this unleashes for the citizens of India.

Convergence will drive increasing consumer specific delivery of audiovisual content as opposed to the broadcast framework of today- which, the media companies principally operate. Convergence and superior capabilities of cheap devices and technologies will also create a large new set of content creators and publishers. Down to individuals operating independently – just about anybody will be able to create a video and publish it for the whole world to view. There will also be new media companies – the future avatar of companies like Youtube who will become platforms for just about anybody to publish audiovisual content.

We will be seeing and we must encourage, as a liberal, progressive, democracy -wide ranging, free flowing, information to our citizens. This will empower the citizen and therefore society as a whole – to create more wealth and prosperity, enhance productivity and enhance the quality of life.

As a nation, we can either choose to place restrictions on the quality and quantity of information or we can trust our freedom and our citizens to make the choice.

The most successful societies in the world - North America, Western Europe, Australia – have demonstrated through their development into successful, free, liberal societies, that restrictions on free flow of information will not enrich any population.

It is important that there is free flow of information within the country – from sources that are local as well as global. Encompassing a wide range of subjects across information and entertainment.

National security is too weak an argument to place restrictions. It is indicative of a paranoid, siege, control, mindset that assumes that as a nation we are too weak and as a people, our citizens do not have the capability to discriminate. It is also pertinent to note that as we hurtle towards convergence, the ability of governments or agencies to enforce information flow

restrictions will diminish and the exercise will be fundamentally futile and wasteful of scarce monetary resources that the government can put to better use.

As a corollary to the above argument, if there is no case for restricting the flow of information, there is no case for restricting the creators and publishers of information. There is no case therefore for any restrictions on foreign ownership of media companies – broadcasters or otherwise. Such restrictions are counterproductive and not at all friendly to the well being of the citizens of India.

A regulatory framework to prevent misuse and victimization of sections of the population or on grounds of a threat to National Security can and must exist. That is a different thing altogether from restricting investment into media companies from global corporations or foreign entities.

It is also important to note that our population is information starved. The quality of information available in mainstream media is predominantly poor. Significant sources of quality information from various parts of the world are available to an extremely small proportion of our population.

Encouraging foreign ownership of media companies will enhance access to this information and mitigate this massive asymmetry that exists.

With Best Regards

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