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Telecom Regulatory Authority of India (TRAI)
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi (110002)

Subject : Comments on 'Issues related to Community Radio Stations' Consultation Paper

Dear TRAI,

In response to the comments invited on the consultation paper on 'Issues related to Community Radio Stations', below are my responses.

Q1. Should the not-for-profit companies, registered under section 8 of the Companies Act 2013, be permitted to establish Community Radio Stations (CRS)? Should the existing terms and conditions for establishment of Community Radio Stations and Government's supporting scheme be made applicable to such not-for-profit companies? Please provide justification for your response.

Response :

It depends on how our society wishes to allocate limited natural resource and public good (i.e. airwaves) on thematic objectives.

There are two points to consider, one at the fundamental level, and the other one on effects of it :

On a fundamental level, not-for-profit companies registered under section 8 of Companies Act 2013 specifically deal with "promotion of commerce, art, science, sports, education, research, social welfare, religion, charity, protection of environment or any such other object" and disregard the geographical aspect of the community which is very important when it comes to medium which inherently is meant to be narrowly limited to a certain geography because of its very nature i.e. it is **geographically** based **community** radio.

A community with above mentioned objects will cover only a limited geography viz. 10-15 kms and produce content not relevant for the population residing in that geography, and subsequently defeating raison d'etre of community radio.

Second. Effects of such change should be considered. One of them is that of value generation.

The value of the content produced by not-for-profit companies will be thematic in nature viz. artistic, scientific, religious. Non-for-profit companies are legally bound to produce one kind of thematic content which is their primary (and only) object i.e. art, commerce, sports, etc. This single kind of content will solely be distributed to a limited geography which will consist of heterogenous population, and for them this kind of content might be irrelevant, or at least not as much valuable as other type of content which might bring them more value.

In contrasting case where the content created brings extreme value for the listeners within that radius, it produces inequality as those not covered are not able to access the same. A whole great population is at disadvantage merely because they are residing outside of that coverage area.

By concentrating on that particular geography, a person who is not within radius of coverage will be unable to access that content and consequently will be unable to derive any value. It will lead to inequality in guise of promotion of those objects.

The solution might not be easy. We can adapt on the fundamental level given the need we might have to promote those objects by non-for-profit companies. However, we must carefully look at the effects of the same. We must abhor inequality in all forms. Same goes for information as well. Unless we specifically deal with it at the level of policy, it becomes hard to justify allocating precious limited resource for non-for-profit companies to pursue those objects, howsoever virtuous and noble they might be.

One way to deal with it is to make it mandatory for such companies to live-stream their radio content verbatim on internet.

Q2. What should be the prescribed license period for CRS in the Guidelines?

Response :

Ten (10) years. It is reasonable as it gives a sense of security to the organisation to prepare a sustainable strategy to operate community radio. Anything less seems unjustified.

However, there should be mechanism in place wherein if the radio frequency is not being used by the organisation for extended period of time, then they should be made to relinquish the frequency as it is a public good and a limited resource.

Q3. What should be the period of extension/renewal on the expiry of the initial permission?

Response :

Five (5) years. After having given sufficient time to create a sustainable strategy to operate the community radio, it should become easier for organisations to renew the permission frequently without any overhead or additional cost that might work as a hindrance.

Q4. What should be the terms & conditions for renewal/ extension of license period? Please provide list of compliances to be submitted by the organization operating a CRS for making an application of renewal

Response :

There should be multiple parameters that should be introduced that should relate to content.

One important parameter that must be introduced in renewal/extension of license is the amount of **original content** produced by the organisation. There should be a certain ratio of the content which should be produced in contrast to content being reused. This ratio can be initially be biased towards new community radio stations (CRS) where amount of content reused can be more than established CRS as it takes time, effort and money to create content. With each subsequent renewal/extension the ratio of original content produced should be more than reused, failing which extension should be of less than 5 (Five) years (or whatever the period of renewal/extension will be).

Another parameter that should be introduced is the **relevancy of content** i.e. how much relevant content is being produced for the community that is being served. Measuring this parameter will be a challenging task. However, it is important that it must be included.

Q5. Should the existing limit of 7 minutes per hour on duration of advertisement on CRS need to be revised? If yes, please suggest the limit on duration of advertisement on CRS with justification.

Response :

[Did not respond]

Q6. Should the not-for-profit organizations, operating in multiple districts, may be allowed to setup multiple CRS in their area of operation? If yes, should there be any additional terms and conditions governing such permissions? Should there be any cap on number of permissions granted to such not-for-profit organizations?

Response :

Yes. But only if the organisation is able to prove that their model of operation is **sustainable**, and that the content they are producing is relevant for the community that is being served, and that the ratio of original content versus reused content is more towards original.

There should be no cap on number of permissions that can be granted to such organisations as the value that they might be create with a successful model of community radio ought be replicated all over the country.

O7. What are the factors responsible for slow growth of CRS in India? Whether the current scheme for 'Supporting Community Radio Movement in India' is adequate to promote the CRS in India? What other measures can be undertaken to promote faster growth of CRS in India?

Response :

[Did not respond]

O8. Stakeholders may also provide their comments on any other issue relevant to the present consultation.

Response :

[Did not respond]

Yours sincerely,



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