

**To:**

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**Response to
TRAI Consultation Paper Dated 21.5.2014
By Ram Bhat**

Q1. What should be the period of permission for CRS to be prescribed in the CR guidelines? Is the present 5-year adequate?

The present 5-year license is adequate for permission for CRS holders. However, after 10 years of community radio in India, Information and Broadcasting (I&B from here onwards) Ministry has cancelled 90 Letter of Intent (LOI here onwards) as of May 2014¹. The dominant reason for the cancellation is that applicants have not operationalized in spite of obtaining all required permissions. Spectrum unused is spectrum wasted. Thus it would be beneficial for applicants to have an option of a “trial” license where those desirous of community broadcasting can avail of a temporary one-year license at the end of which they can either migrate to a five-year license, or they can decide against renewing their license. Additionally or alternatively, applicants who may not want to commit for a five year period could be asked to enter into a non-financial arrangement with their local AIR station² for a period of one year, wherein they can experiment with participatory communication without incurring the costs and time required to set up of CRS (in terms of infrastructure and licensing)³.

Q2. What should be the period of extension on the expiry of the initial period of permission for the CRS?

¹ Complete list of cancelled applications available at http://mib.nic.in/WriteReadData/documents/LOI_CANCELLAD_1.pdf

² We propose that I&B Ministry hold consultations with Prasar Bharti; to sensitize public service broadcaster to needs of community broadcasting and also to seek their cooperation in enabling this trial mechanism

³ This point is dealt with in more detail in response to Question 8



The period of extension on the expiry of the initial period of permission for the CRS should be five years.

Q3. Should there be any additional terms and conditions of extension/renewal of the permission for CRS?

The additional terms and conditions of extension/renewal of permission for CRS are:

- At the time of renewal/extension, permission holders should be asked to submit a key commitments form⁴, a document which can be placed in the public domain on a mandatory basis – on applicant’s website and/or Ministry of I&B’s website
- Applicants can seek a maximum of five years extension but also have an option for a lesser period (no lesser than two years)
- A self-regulatory body or TRAI will look at permission holder’s performance in terms of compliance with community radio guidelines. (Violations will damage the case for renewal, but permission holder should be given a chance to justify their case.)
- Permission holders, especially in urban and semi-urban areas (where demand for spectrum exceeds supply) should be asked to provide details about their financial situation, and self-regulatory body or TRAI should strongly consider their financial sustainability as a factor in whether to renew their license.

Q4. Should CRS permission holders be permitted to carry the news bulletin of AIR in unaltered format and community-based non-news and current affairs programmes for the categories permitted to FM radio stations?

CRS permission holders should be permitted to produce and broadcast their own news programmes – including political programming and current affairs. In addition to this, unaltered news bulletin from AIR should also be made available as an option for

⁴ This is similar to the CRS licensing model followed by Ofcom in the United Kingdom. Asking applicants to make key commitments is a reasonable and fair way of increasing accountability in the CRS sector. More details on the Ofcom model are available at <http://stakeholders.ofcom.org.uk/binaries/broadcast/radio-ops/kc-changes-guidance.pdf>



those CRS that do not desire to produce their own news programming. Having said this, there are many complications to consider before allowing news on radio.

Currently, this matter is under consideration, based on a Public Interest Litigation (PIL) filed by Common Cause, a NGO based in New Delhi⁵. The Apex Court has already given notice to the Central Govt asking why it should not allow news on both commercial and community radio⁶.

News is currently not allowed for two major reasons: 1) The inability of the Central government to monitor hundreds of radio stations broadcasting from remote locations and in various languages and dialects 2) The fear that community groups will sensationalize programming, potentially leading to disruption of law and order. These concerns notwithstanding, it is highly doubtful if the prohibition on news will survive. In light of Article 19 (1) (a) and Article 14 of the Constitution, it is likely that the Supreme Court will allow news on both commercial and community radio.

In addition, news on community radio is desirable for a number of reasons:

- Promotion of independent grassroots journalism
- Free flow of ideas in the public sphere
- Enhancing the quality and quantity of views, ideas and opinions
- Increase in media diversity and plurality

Thus news should be allowed on CRS not just because it is their constitutional right but also because it is a desirable policy outcome, which can bring about real benefit to the media sector as well as general public. At the same time, there is need for some planning in conjunction with regulatory measures, which ensure that news on radio plays out positively.

It is well known that in the broadcast sector, pre-censorship or monitoring is not practically possible or feasible. All monitoring and

⁵ A copy of the PIL can be accessed at <http://edaa.in/updates/pil-of-common-cause-on-restriction-on-broadcast-of-news-on-cr-and-private-radio-stations>

⁶ "SC Notice to Centre on allowing news on private radio" The Hindu, October 17, 2013. Available at <http://www.thehindu.com/news/national/sc-notice-to-centre-on-allowing-news-on-private-radio/article5243486.ece>

subsequent action can only be done on post-facto basis. Given this reality, we recommend the following steps:

- Create options for applicants through two categories of licenses – News and Non-News⁷.
- A higher level of compliance for CRS who opt for news licenses. These can be discussed in more detail at a later stage through consultative mechanisms. In order to prevent concentration of media ownership, biased political coverage, political ownership, cross-media ownership and other such issues observed in the mainstream media – we recommend that news license applicants be subject to strict disclosure norms – both on finances and ownership.
- All applicants who have applied for news licenses could be asked to undergo training. The training could be on ethics and standards of news broadcasting – but these should be implemented by civil society organizations and news organizations that have grassroots experience. It would be counter productive for Ministry or any other government body to implement this capacity building. However, we recommend that funding from Community Radio Support Scheme be utilized to financially support these training workshops.
- All applicants in possession of a FCRA clearance/certificate cannot be allowed to broadcast news since it will amount to violation of FCRA Act 2010. Other such conditions will have to be studied more extensively before news licenses can be operationalized
- In order to receive and act upon complaints from listeners or government, it is necessary to set up an appropriate regulatory mechanism. In order to prevent censorship, it is necessary that this regulatory mechanism be independent from the licensing authority, i.e. Ministry of I&B. Other options for a regulatory mechanism are: a) TRAI can be empowered with additional responsibilities b) A separate regulator can be created for radio broadcasting, and/or broadcasting including TV and radio. c) A self-regulatory body can be formed through support of two representative associations – Community Radio Forum and

⁷ This arrangement is similar to the system followed by television channels. News channels have additional compliances as per the guidelines issued by News Broadcasters Association – the self-regulatory body for television. Details available at http://www.nbanewdelhi.com/pdf/2_REGULATIONS%20FINAL.pdf



Community Radio Association (and any other associations that may form in the future). d) An appellate body that can be created to resolve disputes concerning broadcasting – similar to TDSAT.

Apart from regulatory issues, it is likely that the third phase of bidding for commercial FM licenses will take place and it is most likely that these commercial FM stations will also broadcast news – including in B, C and D towns. This would mean that both community and commercial FM stations will broadcast news programming for the same audiences – thereby causing two separate sectors to compete in the same genre of programming. Until now, the competition between these two sectors was avoided because of the distinction between programme genres. This kind of inter-sectoral competition in a small market can cause a threat to the sustainability of both commercial and community radio stations. Again, this would mean that licensing systems will need to recognize different kinds of markets (urban Vs rural, different population densities, etc.) and different competition levels in each market – and accordingly tailor licenses for community and commercial radio stations.

In order to pre-empt the Supreme Court judgment, we recommend that a private meeting be hosted by TRAI in consultation with Ministry of I&B to work out (at least) three primary issues:

- Standards and ethics of political programming – including news on radio
- Licensing issues for news on radio – regulatory mechanisms, monitoring, compliance etc.
- Sustainability issues

Needless to say these three overlap in various ways, and it will need to be explored in more detail. We recommend that both TRAI as well as I&B Ministry invite all stakeholders concerned for a one or two day meeting to work out all of these issues to mutual satisfaction.

Q5. 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.

There is a need to conduct further research on the issue. A community radio station operating in a rural or a hilly area is significantly different from a community radio station broadcasting in an urban area – in terms of its programming as well as its advertisement patterns and income-expenditure ratio. Community radio's engagement with the advertisement driven market needs to be studied across rural, semi-urban and urban areas.

After the FM Phase III has been completed there will be about 1000 commercial FM stations existing alongside about 200/250 CRS. In several areas, especially semi-urban areas, we foresee both commercial and community radio stations competing for the same ad market (for example – if both commercial and community radio stations have news programmes). In these situations, special licensing conditions will need to be worked out so that both community and commercial radio remain financially feasible operations in their respective contexts.

The current one-size-fits-all approach to licensing and advertising regulations will not work in future scenarios. We recommend that licensing conditions recognize different market segments based on urban/rural divide or in terms of population density or some other appropriate mechanism. There is a need to work out the details through wider consultative mechanisms.

Q6. Do you agree with the above proposal for utilisation of CRS during natural calamities/emergency situations?

CRS can be a highly effective medium during natural calamities and emergency situations. However, if a CRS is installed only at the time of calamity and emergency situation, then there is no guarantee that affected communities will listen to the radio – since it will be new in the community and there will be a trust deficit. Also there may be no radio listening habits within the community. The steps recommended by TRAI are good but insufficient in the long term. In light of this situation, we recommend the following steps:

- A list of disaster prone areas be drawn up across the country in consultation with subject matter experts such as National Disaster Management Authority (NDMA), other civil society agencies etc.



- Ministry of I&B can conduct awareness workshops in these disaster areas in collaboration with NDMA and other civil society organizations in order to motivate eligible civil society institutions to apply for a CRS license from these areas.
- Applications coming in from these areas can be processed on a fast track and priority basis. All these CRS stations licensed to address emergency and natural calamity situations, can be collectively trained on basic principles of community participation, using communication to address emergency situations as well as subject specialized issues – rehabilitation, accurate information, linking service providers and relief providers to affected communities and so on.

During times when there is no calamity or emergency, the radio can broadcast like any other community radio – building relationships with local audiences and building a loyal listener base by broadcasting about locally relevant issues, local culture, local news and so on.

Of course, there is no guarantee that this process will necessarily anticipate or even cover all disasters –whether they are natural or human induced. In order to retain some flexibility and responsiveness, we also recommend that a special exemption be made in the case of mobile broadcasting. In the event of a disaster, any group who wishes to set up an emergency and mobile CR set up can contact one of the two representative associations – Community Radio Forum or Community Radio Association of India. These associations in turn should be able to get a temporary license from I&B and WPC in the next one or two days (processed on a fast track basis). Other necessary paper work can be furnished to the government in the coming days without delaying the actual broadcast service.

We also recommend that Wireless Planning and Coordination (WPC) and Standing Advisory Committee on Frequency Allocation (SACFA) of the Department of Telecommunications (DoT), Ministry of Communications and Information Technology (MoCIT) be consulted in this entire process. They can be asked to dedicate one frequency across the country within the Frequency Modulation (FM) band, which can be reserved for providing services related to disaster



management/emergency response. This way, all parties concerned can avoid wasting time to check if any frequencies are available and so on. Further, we also recommend that some money be allotted to these activities under the CR Support Scheme. There is already a category called Disaster/Emergency in the Support Scheme. This category currently supports CR stations to purchase equipment if their existing equipment has been damaged by disaster. We suggest that the terms and conditions for this category be updated in order to support the abovementioned strategies.

Q7. What, in your opinion, are the measures required to ensure a faster growth in the number and spread of rural CRS in India?

I&B ministry follows a First-Come-First-Served licensing policy. It has so happened that more applicants are interested in urban areas than rural areas and therefore there is an imbalance in the spread and growth of CRS.

- I&B needs to identify areas where there is no CRS or lack of CRS and this list needs to factor in various criteria. For e.g. major language belts where there is no CRS.
- Establish rounds of licensing where licenses are offered at specific times of the year (for e.g. every three months) and only from specific areas⁸ (e.g. media dark areas)
- These licensing rounds can be preceded with focused and targeted CRS awareness workshops organized by Ministry of I&B in areas where there is lack of CRS penetration.
- During the in-between periods when the government is not inviting license applications, I&B as well as MoCIT can focus on speedy processing of the licenses pending. This would make the licensing process more efficient.
- The licensing procedures currently requires applicants to approach I&B for LOI, then go to MoCIT for SACFA clearance, then back to I&B for GOPA and then back to MoCIT for WOL. This tedious process discourages many small community-based organizations that do not have the financial resources to visit Delhi so many times, or the psychological resources to deal with this bureaucratic procedure. An eGovernance

⁸ Both Ofcom in the U.K and FCC in the U.S follow this system in order to achieve planned and systematic growth of the sector.

enabled single-window licensing process can be established where I&B Ministry can receive one-time application and subsequently process all documents there onwards.

- The current licensing procedure requires applicants to come to Delhi to attend an interview from a “screening committee”. This committee has no mention in the policy guidelines, and serves no useful purpose that the formal licensing procedure already does not serve. We recommend that the screening committee be disbanded.
- Currently there is a lack of awareness amongst community groups and NGOs about community radio. The only consistent measure pursued by I&B Ministry is the awareness workshop, which reaches limited people at a great cost. We recommend that I&B Ministry places advertisements on both All India Radio as well as Doordarshan apart from mandatory Public Service Announcements (PSAs) on Pvt Channels in order to publicise the concept of community radio. If there is spare or unspent funds available, then ad spots on popular private television channels can also be explored.

Q8. Stakeholders may also provide their comments on any other issue relevant to the present consultation

There are a number of issues relevant to the present consultation. Some of them are listed below (in no particular order of priority):

- **Pricing Fee of Spectrum:** The lack of clarity on pricing of spectrum for community radio has caused considerable delay for prospective CRS and confusion amongst operational CRS⁹. We recommend that note be taken of the opinion provided by the Supreme Court¹⁰ (special reference No.1 of 2012) in response to the Presidential Reference in the context of the so-called 2G case. The court has clearly held that spectrum allocation design is the mandate of the executive and auction as a mode (of allocation) cannot be conferred the status of a

⁹ Currently operational broadcasters have a new WOL issued to them wherein DoT has mentioned that price may be hiked/ revised at any time, and re-allocation of frequencies may be auctioned. This erodes confidence in broadcasters.

¹⁰ See <http://supremecourtfindia.nic.in/ottoday/op27092012.pdf>

constitutional principle¹¹. TRAI should recommend that spectrum usage charges be waived for community radio stations as a way of advancing public interest. The current nominal charges of Rs. 19,700 per annum is too small and often applicants incur costs in excess of Rs. 20,000 in order to identify the pending fee and visiting the WPC offices to clear their files. This would not only relieve applicants of some financial burden but also speed up the licensing process.

- **Saturation of CRS in Urban Areas:** While there is slow growth and spread of CRS in rural areas, it has also been observed that there is saturation of CRS licenses in urban areas.

Unfortunately, educational institutions were given access to CRS through policy guidelines issued in 2003-04. Due to this, in almost all cities, educational institutions have obtained community radio licenses. Today, if community based groups wish to broadcast in urban areas, they are rejected citing unavailability of frequencies. We recommend that an effective strategy be worked out in order to repeat existing 3 reserved frequencies efficiently (90.4, 90.8 and 91.2 MHz along with 107.8 MHz as stand-by frequency). In order to implement an effective strategy for repeating frequencies, it is necessary to conduct detailed signal strength studies and incentivise applicants who can prove that their prospective operations will not interfere with existing broadcasts. Another option is to ask applicants from urban areas to consider low power community broadcasting. If they apply for 100-watt licenses then there would be a potential for interference. However, if they are asked to re-apply with say 30 or even 50 watts, there is a good chance that they can successfully broadcast without interference.

- **Using AIR Infrastructure strategically:** There are many organizations who could potentially become quality community broadcasters, but who are not in a position to engage with the complex and tedious licensing procedure. Such applicants can be asked to engage with their local All India Radio station. The programmes can be produced in a participatory way, and then submitted to the local AIR station. Unfortunately, AIR stations tend to charge fees for

¹¹ Ibid, Pg 140-143



broadcasting programmes – even if they are developmental and non-profit in nature. We recommend that AIR management be sensitized to the community radio concept and vision, and their cooperation and support in this endeavour must be sought actively. After one year of using air time on All India Radio, applicants will have a much better idea of whether they would like to enter into a five year licensing arrangement with I&B Ministry.

- **Pre-emptive Planning:** Often community radio applicants are not in a position to know whether their licenses will be accepted or rejected – for a variety of reasons. Sometimes their applications are factually incomplete or incorrect. At other times, they might be rejected due to unavailability of frequency and so on. In the case of the latter, we have developed an online tool (available on www.communityradio.technology), which can help prospective applicants efficiently gauge frequency availability and also help them in obtaining accurate latitude and longitude values of the site where CR will be located. We recommend that government promote more such pre-emptive planning measures so that both applicants and government can save precious time.
- **Lack of Disclosure norms:** In the community radio sector, there is lack of credible data, which in turn hampers evidence-based policy making. This problem can be seen across multiple instances. An important area of disclosure is the rejection of licenses. A total of 1348 applications for licenses have been received since the inception of CR policy guidelines. Of these, only 370 have been issued LOI (of which about 170 are operational), and 667 have been rejected¹². I&B Ministry should cite the reason for rejecting these applications – even if they are under broad categories – such as flawed application, security reasons etc. This data would help stakeholders, including TRAI, to analyse the slow growth of CRS. Another example is the question: What should be the correct ad rate for DAVP advertisements on CRS? There is plenty of data generated in the course of the application and licensing process. Only a fraction of it is digitized and even smaller fraction is available in the public domain. Applicants' financial

¹² Taken from data provided by Ministry of I&B, available on www.mib.nic.in/



information (which in any case they have to furnish) can be made available on public domain – either on TRAI website or Ministry of I&B website. This would help a great deal towards analysing sustainability mechanisms as well as ad rates etc.

- **Digitisation of radio:** Following from the report of the sub-group of the Planning Commission in 2006¹³, it has been recommended that radio digitalization be completed by 2015, and now the deadline has been further extended to 2017¹⁴. Although this recommendation is restricted to public service broadcasting (AIR) it will have implications for other sectors of radio – commercial and community. Current listeners of FM can receive signals through a low cost receiver of say, less than 500 Indian Rupees. In the future, a digital receiver (even if it can receive analogue FM) will cost in excess of 1000 Indian Rupees. The FM Phase III bidding where 800 odd licenses are expected to be auctioned has not even taken place, and those licenses will be valid for 20 years! We recommend that the entire plan digitisation of radio be reviewed in consultation with all stakeholders in the radio sector and subsequently realistic deadlines be set for digitization of radio, or at the very least, simulcasting plans be decided. Further the dividend spectrum resulting from digitization should benefit all stakeholders – including community radio.
- **Inclusive Policy Guidelines:** The objective of the community radio guidelines is to include as many communities as possible in the information society we live in. Thus it is imperative that inclusive access remains a crucial part of the guiding spirit of the policy guidelines. An important but often ignored element of inclusive access is to cater to the community of people with disabilities. In the context of radio (or audio), the visually challenged community assumes special significance. We recommend that the policy guidelines recognize the importance of radio for visually challenged communities by making one frequency available especially for this community. If and when visually challenged community groups apply for a

¹³ Page 12, Report of the Sub-Group on Going Digital under the Chairmanship of Member Secretary Planning Commission. Planning Commission, New Delhi 2006. Available at http://planningcommission.nic.in/reports/genrep/goingdig/drft_gdig.pdf

¹⁴ See last paragraph. Profile of All India Radio, available at <http://allindiaradio.gov.in/Profile/Growth%20and%20Development/Pages/default.aspx>

CRS license, we recommend that Ministry of I&B fast track their license application and exempt them from usual licensing procedures.

- **Universal Service Provisions:** One important aspect of Community Radio is to provide locally relevant information for communities living in remote, rural and hilly areas where mainstream and/or public service media has not reached. In order to fulfil this goal, the subsequent policy guidelines should contain universal service provisions as a key principle of policymaking. In practical terms, licensing can be concentrated for areas where there are no community radio stations. Alternatively the government can set itself goals to provide equitable access. For e.g. every district in India should have at least one operational CRS. This kind of policy making will surely contribute to growth of CRS in rural areas.
- **Licensing Issues:** There have been instances where the flexibility in eligibility criteria has been abused and subsequently public bodies¹⁵ have been able to gain licenses for CRS. This is in contradiction to the objectives of CRS and contains the danger of politically biased programming distorting the free flow of information. One of the important reasons for these slippages is the existence of a screening committee, which has endorsed these applications (sometimes in spite of dissent from few members of this committee). This committee finds no mention in the policy guidelines and sets a bad precedent for policy and licensing – especially, in the context of discretionary licensing system for CRS. We recommend that this screening committee be disbanded at the earliest, and eligibility criteria should be adhered to as faithfully as possible. This can be made possible by increasing transparency through disclosure norms on ownership. We further recommend that no public authorities or public bodies or government agencies be awarded CRS licenses in the future, and existing government bodies who have CRS licenses should not be allowed to renew or extend their licenses after their current license expires. This issue will assume significance if

¹⁵ There have been instances of government schools, state government departments, Border Security Force, government-owned companies etc. getting licenses for CRS. This is not dissimilar to commercial radio and television – which is dominated by political ownership at various levels.

CRS is allowed to broadcast news and/or political programming. Government ownership or political ownership of media along with permission to broadcast news can lead to biased coverage of events or at the very least – a lack of editorial independence.

- **CRS and Security:** Community Radio applications have been rejected consistently over the last three years from areas like Chhattisgarh, Jharkhand, Orissa, North-Eastern states, Jammu and Kashmir, and other border, coastal and areas deemed sensitive to internal security. The objection has come primarily from Intelligence Bureau and Ministry of Home Affairs. We assume that their concern is around lack of monitoring mechanisms which cut both ways – it is impossible to provide security to these remote CR stations, and it may not be possible to trust or monitor the content of these radio stations. This is indeed an unfortunate development, and can be considered a major reason for lack of growth of CRS in rural and remote areas. CRS is an excellent tool to promote dialogue within communities. CRS who are trained in conflict management, reconciliation, rehabilitation etc., are capable of in fact drastically improving the prospects of internal security – by ensuring good governance in these areas, as well as providing a legitimate channel for people’s expression. We recommend that government take special initiative to promote CRS in conflict areas, border, coastal and other sensitive areas. A part of the CR Support Scheme funds can be allocated to train these applicants in how to use radio for conflict related broadcasting. These training workshops can be organized by civil society agencies with financial support from government.
- **Copyright Issues:** It is unfortunate that the Copyright Act 2010 has not realized special needs of the community radio sector. In hindsight, the Copyright Act has only considered commercial radio, in terms of the on-going dispute between copyright holders (of music) and commercial broadcasters. We recommend that TRAI as well as Ministry of I&B make a special case to Ministry of HRD to consider some copyright exemptions in the case of community radio. Firstly, if visually challenged communities are to broadcast on FM, we recommend that they be exempt and further allowed to convert copyrighted print material to audio, and further be allowed to broadcast that

material to their listeners (they can include a line in their key commitments form that conversion and broadcast of copyrighted material will be used exclusively for benefit of visually challenged community). Secondly, community radio stations are not for profit operations. However, in order to build and sustain audience and listenership, it is important they be able to play music – including copyrighted music at affordable rates. Therefore we recommend that TRAI as well as Ministry of I&B make a case for CRS wherein CR Stations can broadcast copyrighted music by paying 1 or 2% of aggregated gross revenue on an annual basis.

- **Going beyond FM:** It is unfortunate that non-state or non-govt radio has come to fruit only in the FM band. As far as community radio is concerned, the primary objective is to reach out to communities without a voice, provide locally relevant information to communities who are left out from mainstream media and lastly, provide a platform for community based ownership of media. None of these objectives necessarily require restriction in terms of frequency (i.e. FM band). The word community is mostly defined in terms of geographical proximity. However, there are instances, for e.g. the Gondi speaking community in Central India, of communities who are shaped in terms of language and culture, and spread across a large geographical area. In this case, instead of allotting several hundreds of FM frequencies it would be feasible to consider allotting a frequency in the medium wave band, commonly known as Amplitude Modulation (AM). Currently, the MW band is monopolised by AIR and Prasar Bharti is already under the process of digitalisation of MW band. This would mean that large parts of the MW band are open to use by community broadcasters. We recommend that community radio be re-interpreted to include usage of the medium wave band as and when applicants want to serve communities of common interest spread across large geographical areas¹⁶. This is feasible especially since AIR has already started the process of digitization leading to increased availability of frequencies in the Medium Wave band. One

¹⁶ This model is already in use in the United Kingdom, Australia, USA and South Africa – all countries with relatively mature CRS sectors.



challenge of community radio on medium wave is the high cost of infrastructure in terms of transmission, tower etc. Since large number of people will be covered through one license, there is considerable savings in terms of administrative and licensing cost. We propose that Ministry of I&B reserve a significant part of the public fund, i.e. Community Radio Support Scheme, for those who seek to set up community radio on the Medium Wave band. Needless to say, creating space in this frequency band and incentivising applications in this band, will reduce the burden on the already crowded FM band. Strategic use of National Optical Fibre Network (NOFN) infrastructure and tie up with Universal Service Obligation Fund (USOF) may also be mutually beneficial to Internet service providers, telecom service providers and community radio broadcasters.

Submission by Ram Bhat, Maraa, Bangalore

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Maraa is a media and arts organization with core competency in community media – in areas of capacity building, content development and policy advocacy. More details available at <http://www.maraa.in/>

Ram Bhat is currently serving as the Vice-President of the World Association of Community Radio Broadcasters (AMARC), Asia Pacific Chapter. He has previously served as the Vice-President of the Community Radio Forum of India (2012-14). He has ten years of experience in the community radio sector.