



Date: August 31, 2022

To,
Shri. Manoj Kumar Verma
Technical Officer (B&CS)
Telecom Regulatory Authority of India TRAI

Sub:-Responses to Consultation Paper on Issues related to Community Radio Stations (Dated July 21, 2022)

The Community Radio Association (CRA) is a platform of 300 plus functional Community Radio Stations and other upcoming Community Radio Stations in India. Formed in the Year 2011, it is a body recognized by Ministry of Information & Broadcasting, Government of India. A Not-for-profit organization, CRA strengthens community broadcasting by building the capability of Community Radios and by creating a healthy environment for these sectors to thrive and succeed. CRA provides leadership, advocacy and guidance to its member Stations. Community Radio Association is working with various recognised bodies like Ministry of Information and Broadcasting, Ministry of Rural Development & Panchayati Raj, Department of Science & Technology UNICEF, UNDP, UNESCO, BBC Media and various NGOs in making and Broadcasting radio programmes on various Social, Health and Educational issues etc. ,

The CRA shared the list of eight questions highlighted by TRAI and asked for their comments. Placed below are the points which emerged from the responses of the CRA members for your consideration and necessary action.

Q 1. 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.

Ans.:- - The provision of inclusion of the not-for-profit companies established under Section 8 is already available in the existing policy guidelines for establishing community radios. It is clearly mentioned that "registered societies and autonomous bodies and public trusts registered under Societies Act or any other such act relevant for the purpose." The above mentioned provision provides a window for Section 8 companies established as not-for-profit entities to be permitted to establish CR stations. There seems to be not be much of a difference between NGOs/Trusts and Section 8 companies in operational terms. However, it is suggested that the screening committee must include the representatives of all stakeholders. The process of screening should be representative, transparent and democratic so that all the issues are



discussed in a free and fair manner. All the applicants including Section 8 companies that apply must be subjected to a rigorous scrutiny against all the current provisions of the policy guidelines in the screening committee as well as at the time of renewal.

Many CRs supported the idea of inclusion of Section 8 companies to start Community Radio Stations (CRS). They felt that this step will:

- a) Aid faster growth of community radios in the country by allowing capable organizations having the capacity to operate and sustain a CR, which currently do not fall in the policy's ambit.
- b) give an opportunity for CRS to be set up in remote districts which are "media dark " leading to unheard voices being brought to light, and
- c) Provide more professional broadcasting services with fund and content sustainability.

Some CRS felt that "No. They should not be permitted. Because only the welfare NGOs and institutions registered under SRA or Trust act should be permitted to establish CRS. Companies' main motto is to earn money or profit. So they should not be treated equally as CRS."

Q 2. What should be the prescribed license period for CRS in the Guidelines?

Q 3. What should be the period of extension/renewal on the expiry of the initial permission?

Q 4. 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.

Ans. - At present, there is a provision of getting the license renewal after 5-years. The same may be continued for the initial five years. Upon satisfactory review at the end of the initial five-year period, stations may be given an extension/renewal for a further period of 10 years. This provision may find place in the Policy Guidelines. We should work out a mechanism of review of the operation and performance of CRs after the completion of five years. It may be in the form of "Peer Review" or in any other form. Independent agencies/ organizations/professionals may be identified to conduct the review.

Royalty fee of Rs/ 22500.00 per year should be waived or some relaxation for the operational CRS as they are functioning with much financial pressure.

Q 5. Should the existing limit of 7 minutes per hour on the duration of advertisement on CRS need to be revised? If yes, please suggest the limit on duration of advertisement on CRS with justification.

Ans. - Yes, the existing limit of 7 minutes per hour duration of advertisement on CRs needs to be revised. We welcome and recommend the step of increasing the upper limit on advertising on community radio to 12 minutes per one hour. This will motivate the CRs to explore the possibility of mobilizing advertisement from their communities and earning revenue from other sources. This will make them sustainable. It is suggested that the present condition of BOC that



the CRs cannot book advertisement lower than the rates prescribed by BOC should be removed. The CRs should be allowed to book advertisement as per rate which suits them.

Q 6. 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?

Ans. - There is already a provision of establishing one additional Community Radio for the educational institutions on the campuses of government institutions in the present policy guideline. The same provision may be extended/allowed to all other CR stations. One additional CR station may be allowed to all desirous existing CR stations. However, the need and utility of the same should be thoroughly ascertained before granting the permission.

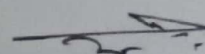
We would like to humbly request the concerned authorities to consider the possibility of permitting an organization to operate 2 CRS ~~in the same district~~, as long as both CRS satisfy certain proximity criteria (such as being at least 25km apart).

Q 7. 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?

Ans. - There are many factors responsible for the slow growth of community radio in India. The unduly long process of obtaining a license, including clearances from multiple ministries, has been clearly a deterrent. While financial sustainability is a universal problem for community radios everywhere, it is the social and community sustainability that contributes to the continued relevance and survival of community radio. The community radio movement in India has for a long time advocated the setting up of an autonomous Community Radio Support Fund (Working Paper, 2011), which has subsequently been transformed into a CR Support Scheme under the MIB. But grants to stations have been minimal and mostly confined to purchase of equipment. It is only recently that the Ministry is thinking of widening its ambit to include even costs of content production. There must be a transparent, representative, multi-stakeholder approach to disbursement of grants from an autonomous Support Fund. Various ministries could contribute to this fund and it may also be possible to encourage private companies, through their CSR, to donate to this corpus. Under the current process, it is essential to streamline long overdue payments from BOC for CR stations that broadcast government advertisements.

The Slow factors responsible for slow growth of CRS in India is,

- i) India is a developing Country, and the economic conditions of the people are not good.
- ii) There is no adequate fund for operating a CRS and it is hard to sustain the CR over a long period of time.



iii) Proper and regular funding support from the Ministry or other sources are either not available or minimum.

iv) Except in case of Metropolitan Cities and big towns, the availability of local advertisement is less.

v) Regular media campaign through BOC is not available. Even the pending dues have not been paid since years. Not many ministries/departments of the government are coming forward to support the Community Radio Stations.

Yes it is true. Because....

A. The schemes for supporting CRS is inadequate.

B. There is a Gap between State and Central Govt. (conceptual and operational)

C. There is delay in releasing funds.

D. It became mandatory to register the CRS under GST in the state like Odisha. CRS has no separate legal entity; rather they are recognized through NGO or Institutions, and free from GST. Even if DAVP clarified that GST is only levied if the turnover is more than 40 lakhs per Annam.

Measures to be undertaken: ---

1. Support schemes should be adequate and active involvement of all departments in term of Advertisement can help the CRS.

2. The whole process, application to grant of woL should be simple and may be operated through single window process to avoid delay and hectic situations.

3. The suppliers/companies approved by Govt. should be closely monitored whether they are providing best equipment and services. Feedback from CRSs should be mandatory. Extra charges except Servicing charges or spare part should not be imposed to CRS.

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

Ans.- With engaging content, financial support and consistent efforts, a community radio can successfully bridge the information divide and support the development process of the community. Sustenance is important to achieve the intended outcomes of CRS for which strong foundations need to be laid out. Many CR stations were set up in 2012 with seed funding from the Ministry of Agriculture, under its Agricultural Technology Management Agency scheme. Unfortunately, the scheme has been discontinued. We request for the continuation of this scheme, immediately. In fact, more such enabling schemes need to be implemented that provide guidance, content monitoring and financial support to CRS that often struggle with funding and sustaining their operations. Apart from 'Supporting Community Radio Movement



in India' scheme, utilizing CSR funds and monetary support from local authorities should also be allowed to ensure more CRS are established and strengthened. Instead of a blanket approach, criteria for bandwidth, licensing and funding should be specified for each organization type (NGOs/ Educational Institution/ KVK/ Section 8 companies differently. This will ensure availability of resources as per the requirements and capacity of each CRS, leading to their optimal usage.

On behalf of all Community Radios operational in coastal areas, Kadal Osai FM 90.4 would like to submit our suggestions regarding the Issues related to Community Radio Stations as requested by TRAI for consideration.

Our primary issue lies with the range of operation and capacity of the equipment allotted by the government as different terrains provide different outcomes. Being a coastal CRS, we are able to broadcast to a radius of around 5-7km, covering only 2 Panchayati. Due to our low range of transmission, we have been unable to fully reach even our intended target which is the fishermen at sea, and guide and assist the pilgrims at Rameswaram and other locations in the coastal areas. If any of the following issues or suggestions are addressed, we assure that the community service done by our CRS and other CRS will reach and benefit multiple folds of people.

Issues with the range of operation:

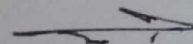
The Government of India permits a range of 20km radius for community radio broadcasts as per the GOPA issued by the Ministry of Information and Broadcast. However, the range of broadcast of most CRS is only within 5-10km.

Despite organizations paying spectrum fees for 20km broadcast according to GOPA, we are only able to broadcast for a range of 5-10km. The intended broadcast range has been effectively halved, causing organizations to suffer by not being able to reach some target communities and populations in areas they originally intended to serve.

In our region, we are the only community media operating under the guidelines of the Ministry of Information and Broadcasting. People don't even have access to All India Radio in this region and hence we take the responsibility of sharing and involving the local community with the government's schemes and campaigns for their welfare.

Hence, to cover more area, the tower exemption (permitting 250W transmitter instead of 100W) can be implemented for CRS, especially like ours in coastal regions that have an issue due to our proximity to the sea and its winds, Hence we would like to kindly request the authorities to look into the tower exemption rule and permit deserving and necessary CRs like ours with the tower exemption during this review of the community radio guidelines.

There is a Doordarshan TV tower in Rameswaram that is rumored to be dismantled as it is not in operation anymore. We would like to request TRAI to consider allowing Coastal CRs like ours to be able to rent such towers for our transmission as done by commercial radios in some cities and towns. Transmitting through this tower will improve the quality of our broadcast from our current transmission. Currently, only about a 5km radius within our transmitter gets uninterrupted and quality reception of our broadcast, areas beyond that receive a poorer



quality transmission, especially in areas densely populated by buildings or trees. Hence, we would like to request TRAI to consider leasing this tower for our transmission, and other government broadcast towers to CRs in Coastal areas with similar difficulties with transmission range in the next CR guidelines amendment Since there is a provision of granting permission to permit 250W transmitter instead of 100W in exceptional areas in the existing policy guidelines, the community radios operational in coastal areas and hill states where the line of sight restricts the reach of the radio, permission should be given for 250 W transmitter.

Other recommendations that came up from participants in our meeting include:

- Allow sharing of community radio towers with other parties, such as local Internet providers and cable operators that may want to use them on rent. This can also contribute to the sustainability of the stations.
- Monitor the performance of all the transmitters that are currently permitted so that their quality can be ensured. If needed, more market options for transmitters may be provided.
- Charge spectrum fee from the date of issuing of the wireless operating license (WoL) as delays in the licensing process results in license-holders having to pay even if they are not using the spectrum.
- Frame clear-cut guidelines for surrender/cancellation of WoL if the applicants or CR stations are found inactive for a certain period of time.

Warm Regards

For Community Radio Association



General Secretary

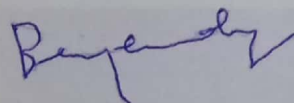
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COMMUNITY RADIO ASSOCIATION

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