Responses to
Consultation Paper on Issues related to Community Radio Stations (dated July 21, 2022)

August 30, 2022

The undersigned, including operational radio stations, community radio advocates, and researchers, met recently to consider the issues raised by TRAI in its consultation paper on community radio, dated July 21, 2022. The following is our joint submission. Where there was no consensus, we have also noted the minority opinions, with the option of such individuals/organisations making a more detailed submission on the issue separately to TRAI.

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.

The existing policy guidelines for community radio already mention "registered societies and autonomous bodies and public trusts registered under Societies Act *or any other such act* relevant for the purpose." That provision seems to provide a window for Section 8 companies established as not-for-profit entities to be permitted to establish CR stations. There are a range of not-for-profit organisations that operate legally in the country and there may not be much of a difference between NGOs and Section 8 companies in operational terms.

However, we suggest that the screening process currently followed must be a more democratic, transparent, representative, multi-stakeholder process. The Screening Committee must include (as it used to a few years ago) representatives of the community radio associations, representatives of organisations building capacity in the sector, those who have been working on CR Policy in the country, and individuals and organisations who have been conducting research on the CR sector. Section 8 companies that apply for permission to establish CR stations must be subjected to a rigorous scrutiny against all the current provisions of the policy guidelines. The same must be followed at the time of renewal.

However, at least a third of the participants in our meeting expressed their apprehensions about widening the provision to allow Section 8 companies to enter the community radio sector. It was felt that the original intent of opening the airwaves for community radio to provide access to media dark areas and to allow poor and deprived communities a voice in the public sphere may be further diluted with this move. As these companies get some special privileges under the Act and may have deeper pockets, non-negotiable principles of community radio, such as local community participation, voluntarism, and local content may all be sidelined in favour of a more professionally driven management. If a number of these companies start garnering frequencies, there may be nothing left for community-based organisations and NGOs who were originally thought of as the legitimate players in this field.

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.

The current provision for a 5-year license period for community radio stations may be continued. As the MIB is aware, a number of licensees either end up never getting off the ground or discontinue operations in a year or two because of various unanticipated problems they encounter. The process of renewal at the end of five years allows the Ministry the opportunity to weed out such non-functional entities and also review the functioning of the stations as per the provisions of the Policy Guidelines.

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 becomes a more justifiable action as stations considered for this kind of renewal would have passed the test of sustaining their operation for five years and in line with the principles of CR and the Policy Guidelines.

We recommend that stations coming up for renewal may be asked to go through a peer review process, something on the lines of what MoIB did in 2014 across the country (see attached report by MIB Consultant). There are self-assessment tools that are available, developed by agencies such as the UNESCO Chair on Community Media and Ideosync Media Combine and supported by CEMCA and UNICEF, respectively (see attached toolkits). A report from the peer review process followed by a validation exercise to be undertaken by a five-member independent expert panel that could include a couple of 'senior' CR stations (with at least 10 years of experience); an academic specialist in community radio and/or an individual with extensive capacity building experience in the sector; and a consultant with expertise in the development and social sector. These processes will assess the station's broadcasting record, adherence to policy guidelines, and the non-negotiable principles of CR.

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.

Raising the upper limit on advertising on community radio to 12 minutes per one hour of on-air time is welcome. Removal of any restrictions on the potential for community radio stations to become more financially sustainable, while retaining their not-for-profit, non-commercial character, is a desirable initiative. As some of the recent steps being taken by MoIB are likely to help expansion of the community radio sector, it is possible that more and more stations will likely be able to harness the potential for selling airtime more effectively.

However, some of the participants in our meeting were skeptical about raising the limit on advertising. The data shared by MIB in the Consultation Paper as well as other studies (e.g. study by One World in 2014, attached) show that not more than 10-15% of the stations have been able to even reach the earlier limit of 5 minutes of advertising per hour, leave alone the revised limit of 7 minutes per hour. While the new proposal may give MIB the satisfaction of providing more opportunities to CR stations for revenue generation, it fails to acknowledge some basic facts about the sphere of operation of community radios. If most of the community radio stations cater to deprived sections of the society in relatively marginalised geographies, they hardly constitute an attractive audience for advertisers. Community/listener support, parent NGO funding, and deepening state support are the more reliable ways of enabling stations to become more financially sustainable. In this sense, if increasing advertising minutes per hour is intended to make community radio more financially sustainable, there are other international examples we can follow: Establishing an ethnic broadcasting fund that offers grants for content on specific ethnic contexts and communities, for example (like Australia); or establishing content grants for the creation of innovative content formats by CR stations; or even the appointment of a sustainability officer at each CR station (like the UK).

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?

The participants at the meeting overwhelmingly opposed allowing not-for-profit organisations to set up multiple CR stations just because they operate in multiple districts. Creation of media chains and promotion of conglomerates run counter to the spirit of community radio. In any country, the community radio ecology must reflect the diversity of its population, varied interests and issues, languages, and contribute to bringing about a pluralistic media landscape. A single 'owner' establishing multiple stations across different districts or states would promote homogeneous content and stifle local production that could reflect the local context. If there is a need felt by the community for a community radio station in their area, a not-for-profit entity that operates in that region should be able to apply for a license, not someone who already owns a station elsewhere. Without any consultation with relevant stakeholders, a provision has already been made for multiple ownership for educational institutions with multiple campuses. This would further compound that travesty of the principles of community radio.

However, there was a minority opinion expressed by one of the participants who was of the opinion that multiple licenses for such NGOs should be permitted as they bring in the needed expertise and experience to establish a community radio service for another deprived community at a different geographical area that feels the need for community radio to bridge the information gaps.

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?

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. UK's OfCom administers annual grants to all community radio stations (about 300 plus) for a whole range of purposes. There must be a transparent, representative, multi-stakeholder approach to disbursal 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 DAVP for CR stations that broadcast government advertising.

We have suggested elsewhere that the Government should consider utilising a minuscule proportion of the Universal Service Obligation Fund (USoF) for strengthening the community radio sector and its sustainability.

We also recommend a return to the sectoral consultation processes that MoIB used to follow till a few years ago. The original 2001 policy for CR; the subsequent revision of the policy guidelines; the commencement of the CR Sammelans; and the establishment of the CR Support Fund all emerged from extensive discussions with sectoral participants (CR stations, associations, and individuals and organizations with extensive engagement and comprehension of the sector).

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

In 2017, the UNESCO Chair on Community Media, with the support of UNESCO's International Programme for Development of Communication, organised a two-day consultation in New Delhi where about 100 representatives and domain experts from the Government of India, the CR sector, civil society organisations, development agencies, the media, and the academia were brought together to review the existing CR policy and formulate a more enabling framework for positive growth of CR. The focus was on six key issues: Community radio policy; Sustainability; Inclusivity, equity and diversity; Capacity Building; Research, documentation and evaluation;

and, Technology & community radio. The consultation came up with a set of recommendations under each of these six themes. The report and recommendations of this consultation is attached for your perusal. It can be seen from a review of this report that many of the issues raised by these recommendations are still valid for the community radio movement in India today. Several of these issues - were also endorsed in an online meeting of over 50 CR stations conducted by Ideosync Media Combine in 2021.

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.

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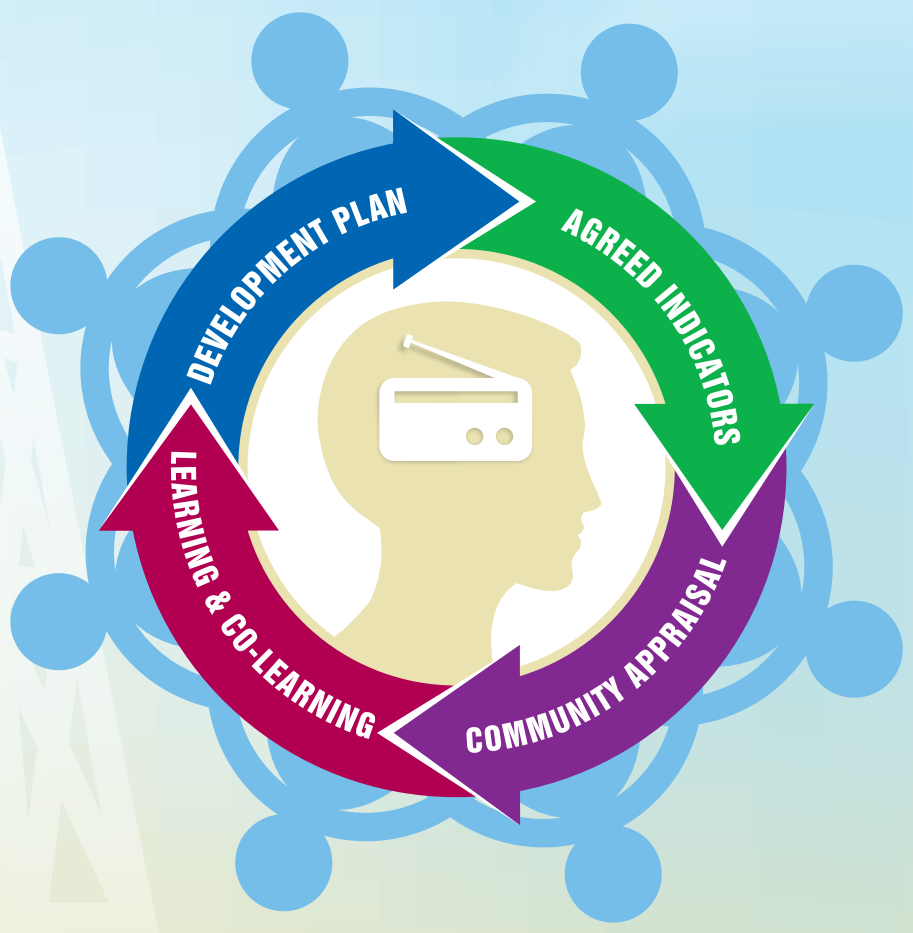
Community Radio
Continuous Improvement Toolkit

DEVELOPMENT PLAN

AGREED INDICATORS

COMMUNITY APPRAISAL

LEARNING & CO-LEARNING

Community Radio
Continuous Improvement Toolkit

Version 2.0
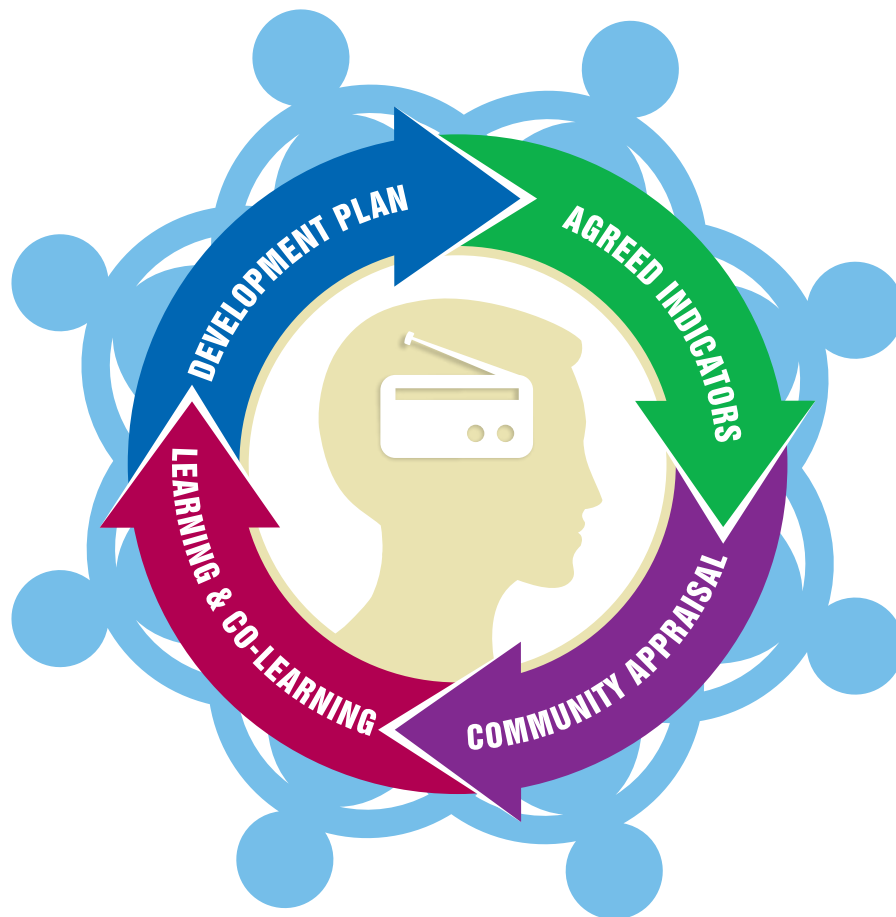
The Commonwealth Educational Media Centre for Asia (CEMCA) is an international organization established by the *Commonwealth of Learning (COL)*, Vancouver, Canada to promote the meaningful, relevant and appropriate use of ICTs to serve the educational and training needs of Commonwealth member states of Asia. CEMCA receives diplomatic privileges and immunities in India under section 3 of the United Nations (privileges and immunities) Act, 1947.
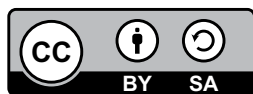
Community Radio Continuous Improvement Toolkit, *Version 2.0*

Authors: Vinod Pavarala, Kanchan K. Malik, Vasuki Belavadi, Aditya Deshbandhu, Preeti Raghunath (Email: cmchair[dot]uoh[at]gmail[dot]com)

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Contents

Foreword to Version 2.0 of CR-CIT

Community Radio has emerged as an effective medium to give voice to the voiceless at the grassroots level in India. Currently, there are about 170 Community Radio Stations (CRS) on the air and it is estimated that more than 500 CRS are at various stages of processing. Considering the experiences of a decade of Community Radio in India, it is felt that a self-review mechanism should be instituted for better governance of this effective medium of communication. CEMCA with its intense engagement with the Community Radio sector in varied aspects ranging from policy interventions to practice is eminently suited to address this felt need. Towards this, CEMCA aims to assist the CRS in their pursuit of continuous improvement through a research based *Toolkit*.

In Phase I of the 'Development of Community Radio Continuous Improvement Toolkit', a project commissioned to the UNESCO Chair on Community Media by CEMCA, the Community Radio Continuous Improvement Toolkit (CR-CIT) Version 1.0 was released. The CR-CIT provides an easy-to-use framework that allows CR stations to periodically assess themselves on their performance. The toolkit has been drafted keeping in view: (a) the national community radio policy guidelines (in India) which have several mandatory provisions; and (b) certain non-negotiable principles of community media globally, such as community participation and ownership, access and inclusion to marginalized groups, gender equity, community-generated content, emphasis on local cultures and identities, and transparency and accountability in practice. Continuing the work related to further refinement of this *Toolkit* developed during 2012-13 and to get feedback on both the process as well as the contents of the *Toolkit*, we organized field testing workshops at *Radio Active* in Bangalore, *Gurgaon Ki Awaaz* (GKA), Gurgaon, *Rudi no Radio*, Ahmedabad, and *Bol Hyderabad*, Hyderabad. We also conducted field testing in Bangladesh with the support of Bangladesh NGOs Network for Radio and Communication (BNNRC).

The Commonwealth Educational Media Centre for Asia (CEMCA) has been working to promote CR in the Commonwealth Asia, in general, and in India and Bangladesh in particular, to support *learning for development*, and create enabling environment for the marginalized communities and groups. Realizing that creating a structural framework for quality and standard for communities that are diverse in terms of their needs, affordances and goals, as a non-viable option, we at the CEMCA embarked upon exploring ways to "improve" CR practices through self-assessment and peer-review. With 'continuous improvement' and 'co-learning' as the foundations of 'quality' that is acceptable to the communities served, the UNESCO Chair on Community Media at the University of Hyderabad prepared the Version 2.0 of the *Community Radio Continuous Improvement Toolkit* (CR-CIT) based on extensive feedback received during the field-testing of the earlier version in four CR stations across the country, with additional inputs from eight other stations whose representatives participated in the process as peers. Further, this version also takes into consideration feedback received during the validation and field testing processes in Bangladesh.

Version 2.0 of CR-CIT also includes a substantial new section on the suggested Peer Review process. In the spirit of continuous improvement, this *Toolkit* is a work in progress, and we also needs preparation of Peer Reviewers to use the CR-CIT. CEMCA will be engaged in supporting CR stations to voluntarily adopt the CR-CIT and define their path of continuous improvement. The overall aim is to create an environment that can be used for self-improvement and then peer-review at a later stage by building capacities of the stakeholders to assist peer CR stations. The CR-CIT is the outcome of the rigorous work done by professionals led by Prof. Vinod Pavarala, the UNESCO Chair at University of Hyderabad. While I want to thank him and his team, the CR-CIT has also been validated through expert interventions and field testing and I would like to thank all who contributed to the development of this improved version.

Our humble initiative will be successful if this is found to be useful for improving the quality of CR operations and governance in all its dimensions. We are eager to receive your feedback to further improve this *Toolkit*.

Sanjaya Mishra
Director
Commonwealth Educational Media Centre for Asia
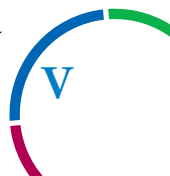
Acknowledgements

With the availability of the first version of CR-CIT in the public domain since August 2013, many community radio stations have voluntarily (outside of the field testing process) adopted the toolkit for their self-assessment. The proof of its worth ultimately lies in its adoption by more and more community radio stations that are interested in continuously improving their services to their respective communities.

We are hoping to sustain our efforts to achieve that end by creating a 'Community of Practice', an online platform, through which practitioners can share experiences and learn from each other.

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Hyderabad
May, 2014   **UNESCO Chair on Community Media Team**

Abbreviations

AIR	All India Radio
AMARC	World Association of Community Radio Broadcasters
BECIL	Broadcast Engineering Consultants India Limited
CoP	Community of Practice
CR	Community Radio
CR-CIT	Community Radio Continuous Improvement Toolkit
CRMC	Community Radio Management Committee
CRS	Community Radio Station
LOI	Letters of Intent
MGNREGA	Mahatma Gandhi National Rural Employment Gurantee Act
MIB	Ministry of Information and Broadcasting, Government of India
NGO	Non-Governmental Organisation
UNESCO	United Nations Educational Scientific and Cultural Organization
UNICEF	United Nations Children Education Fund

1

Introduction and Background
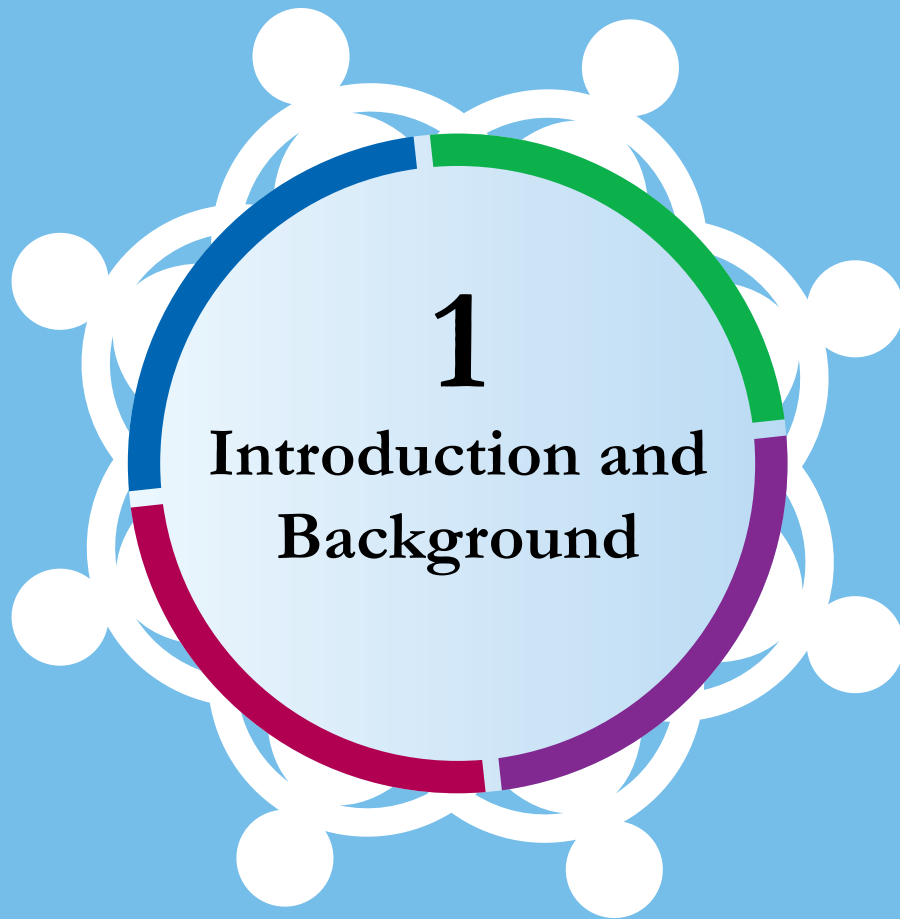
1.1 The Context

Community Radio in India became a legitimate reality after the historic Supreme Court judgment in 1995 which ruled that "airwaves are public property". However, it was only in 2006 that the Government of India modified its initial guidelines (2003) that had allowed only educational institutions, to also permit civil society groups to set up Community Radio Stations (CRSs).[1]
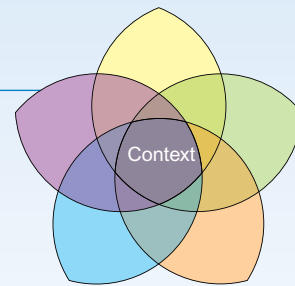
As per the MIB website, India has around 160 operational CRSs (including educational institutions, KVKs, and those set up by civil society groups), with less than a third of those managed by civil society organisations. A total of 436 Letters of Intent (LOIs) have been issued as against the total of 1238 applications received.[2] However, ever since CRSs have come into existence there have been debates about programming, community ownership and management, content sourcing, sustainability, and other such related issues. There is a great deal of variety in the organisations that run these stations, and a broad range of content and management practices can also be seen. It is time India's community radio stations started a systematic process of self-reflection about their experiences and see how they can compare themselves against the philosophy of community radio as promoted by international agencies such as AMARC and UNESCO, but also against the best practices of their peers nationally and internationally. In fact, in February 2014 the Ministry of Information and Broadcasting initiated a process of peer review for CR stations.

This toolkit is for continuous improvement of community radio stations. The quality of performance of a community radio station, for the purpose of this exercise, is being seen as something embedded in the core principles of community radio. According to various documents of AMARC (the World Association of Community Radio Broadcasters) and UNESCO, community radio stations are characterised by the following features.[3] They:

- serve a recognisable community;
- promote access to media facilities and to training, production and distribution facilities as a primary step towards full democratisation of the communication system;
- offer the opportunity to any member of the community to initiate communication and participate in programme making and evaluation, encouraging local creative talent and foster local traditions;
- use technology appropriate to the economic capability of the people, not that which leads to dependence on external sources;
- are motivated by community well-being, not commercial considerations;
- facilitate full interaction between the producers and receivers of messages;
- are managed and owned by the community members. Community or their representatives have a voice in the financing of radio programmes;
- promote the right to communicate, assist the free flow of information and opinions, encourage creative expression and contribute to the democratic process and a pluralist society;
- are editorially independent of government, commercial and religious institutions and political parties in determining their programme policy;
- provide a right of access to minority and marginalised groups and promote and protect cultural and linguistic diversity; and
- follow management, programming and employment practices which oppose discrimination and which are open and accountable to supporters, staff and volunteers.

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[1] For a detailed account of the civil society campaign for community radio in India, see Pavarala, Vinod and Malik, Kanchan K. (2007). *Other Voices: the struggle for community radio in India*, New Delhi: Sage Publications.

[2] Figures as of August 01, 2013. Source: Ministry of Information & Broadcasting, Facts and Figures. http://mib.nic.in/ShowDocs.aspx, Last Accessed on April 12, 2014.

[3] Pavarala and Malik, p.18.

1.2 Conceptual Framework
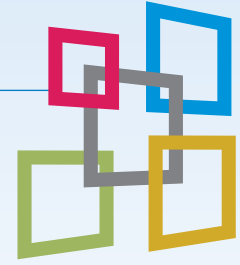
1.2.1 Continuous Improvement

The broad goal of this project is to develop a toolkit through a participatory process, adopting the 'Continuous Improvement' framework that has been used in various other sectors, including higher education. Continuous improvement, in this context, is being conceptualised as ongoing efforts to improve broadcast content as well as processes of production and management of the community radio station. As has been pointed out elsewhere, "It is important to emphasise that continuous improvement isn't one particular system or specific way of doing something, it's a mindset, based on the knowledge that there is always a better way of doing things and therefore a journey that never ends".[4]

Why 'continuous improvement'? The idea of adopting this framework was to move away from externally imposed performance indicators, sometimes suggested by donor agencies who want to know if their money is being well-spent, with outsiders using an evaluation framework.[5] Many scholars and practitioners of participatory development are today suggesting that community-based initiatives should be able to set their own benchmarks or goals against which they could review their performance periodically. This is a process that is participatory, flexible, and realistic. It is an approach that foregrounds unequal power relations, gender inequity, and elite monopoly over media production. It emphasises principles such as 'inclusion, open communication, trust, sharing of knowledge and skills, and continuous learning'.[6]

The Continuous Improvement model has been used in fields such as management and education. If we adopt this framework in the context of community radio, the fundamental questions we need to ask ourselves are:[7]

1. What are we trying to achieve through our radio station?
2. How will we know that a change is an improvement?
3. What changes can we make that will result in improvement of our community radio service?

1.2.2 Co-Learning and Communities of Practice

The entire process of developing this continuous improvement toolkit for community radio is being conceptualised within a co-learning paradigm, incorporating key principles such as: peer learning, reciprocal value of knowledge-sharers, mutual trust, and collective and individual meaning-making.[8] While the workshops and other such events we have organised as part of this process could help, in the short term, in the formulation of certain self-defined guideposts in the journey of community radio practitioners, the medium to long-term goal is to facilitate the forging of a community of practice. The "community of practice," as we understand, is a group of people who share a concern or a passion for something they do and learn how to do it better as they interact with each other regularly.

Wenger, McDermott and Snyder describe how a community of practice develops and works to the benefit of all those participating in it:

They [members of a community of practice] help each other solve problems. They discuss their situations, their aspirations, and their needs. They ponder common issues, explore ideas, and act as sounding boards. They may create tools, standards, generic designs, manuals and other documents – or they may simply develop a tacit understanding that they share. However they accumulate knowledge, they

4 Manchester Metropolitan University, *Continuous Improvement Toolkit to Support Improvement and Innovation in Higher Education*, p.3. Retrieved 12 June 2013 from http://www.mmu.ac.uk/humanresources/changeacademy/improvement_toolkit.pdf
5 For an excellent critique of methods of evaluation used in communication for development, see Lennie, June and Tacchi, Jo (2013). *Evaluating Communication for Development: a framework for social change*, Oxon, UK: Routledge.
6 Lennie and Tacchi, pp. 1 and 5.
7 Adapted from Langley, G., Nolan, K., Norman ,C., & Provost, L. (1996). *The Improvement Guide: a practical approach to enhancing organizational performance*, San Francisco: Jossy Bass Publishers.
8 Edward Brantmeier, "Empowerment Pedagogy: Co-Learning and Teaching." Retrieved 12 June, 2013 from http://www.indiana.edu/~leeehman/Brantmeier.pdf

become informally bound by the value that they find in learning together. This value is not merely instrumental for their work. It also accrues in the personal satisfaction of knowing colleagues who understand each other's perspectives and of belonging to an interesting group of people. Over time, they develop a unique perspective on their topic as well as a body of common knowledge, practices, and approaches. They also develop personal relationships and established ways of interacting. They may even develop a common sense of identity. They become a community of practice.[9]

1.2.3 Components of the CR-CIT

A detailed review of literature[10] was undertaken in the beginning to identify the critical components of community radio that the stakeholders believe as having a bearing on the operations of community radio from the perspective of the community. Further discussion in the co-learning workshop and expert peer validation resulted in the delineation of nine distinct areas, as follows:

Section I		Content Generation and Programming
Section II		Policies and Guidelines
Section III		Volunteers
Section IV		Technology: Access and Management
Section V		On-Air Standards of Broadcasting
Section VI		Governance
Section VII		Feedback and Grievances
Section VIII		Content Sharing and Networking
Section IX		Revenue Generation and Financial Accountability

A detailed User Guide for the parameters and indicators is given in Section 3.

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9   Wenger, E., McDermott, R., & Snyder, William M. (2002). *Cultivating Communities of Practice*, Boston: Harvard Business School Press, pp. 4-5.

10 Review undertaken as part of this project is available in the project report submitted to CEMCA. Available at http://www.cemca.org.in/ckfinder/userfiles/files/CR_CIT%201_0%20June%2013,%202013.pdf

1.3 Methodology Adopted

The Community Radio Continuous Improvement Toolkit (CR-CIT) is designed to be participatory in nature, involving consultations with various stakeholders. This approach 'respects, legitimises, contextualises and draws on the knowledge and experience of local participants as well as relevant experts and outsiders'.[11] These deliberations were conducted in order to both develop the CR-CIT (Version 1.0) and also to validate it with experts.

Further, the CR-CIT was field-tested in select CR stations across the country and in Bangladesh.[12] The idea was to make this toolkit inclusive and consensual, as an aid to community radio stations for their continuous improvement. The underlying focus is on social justice and a method that Donna Martens calls 'the transformative lens', which incorporates the knowledge and experiences of the historically excluded and marginalised people.[13]

This version, 2.0 of the CR-CIT is the outcome of the engagements undertaken by the team at the UNESCO Chair on Community Media over a period of two years.

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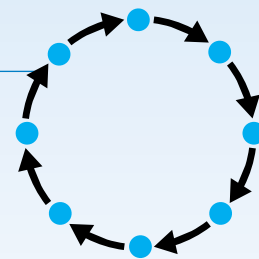
[11] Lennie and Tacchi, p. 22.

[12] Over 30 CR stations in India and 16 in Bangladesh, besides 20 CR experts and advocates were involved in the creation, validation and field testing of of this toolkit.

[13] Mertens, Donna M. (2009). *Transformative Research and Evaluation,* New York: Guilford Press.

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Self-Assessment and Peer Review Processs
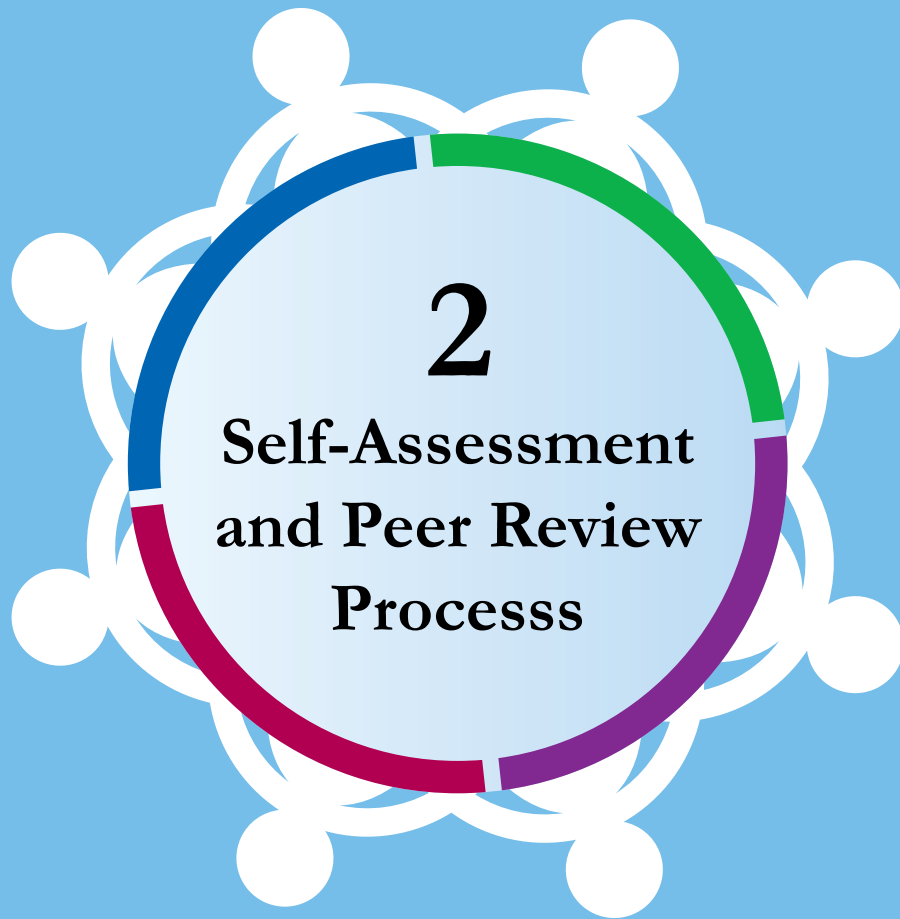
2.1 Know your toolkit

2.1.1 What is CR-CIT?

- CR-CIT (the Community Radio Continuous Improvement Toolkit) is a toolkit that allows community radio stations to periodically assess themselves on their performance.

- CR-CIT has been drafted keeping in view: (a) the national community radio policy guidelines (in India) which have several mandatory provisions; and (b) certain non-negotiable principles of community media globally, such as community participation and ownership, access to and inclusion of marginalised groups, gender equity, community-generated content, emphasis on local cultures and identities, and transparency and accountability in practice.

- CR-CIT provides for indicators of performance along nine broad parameters: content generation and programming; policies and guidelines; volunteers; technology – access and management; on-air standards of broadcast; governance; feedback and grievances; content-sharing and networking; revenue generation and financial accountability.

- Themes such as participation, inclusion, gender, capacity building, etc. have been treated as core principles that cut across all the nine parameters.

- In many cases, the indicators (or questions) for each parameter are framed in such a way that the options move towards the ideal; in other cases, the questions provide an exhaustive list of all the possibilities that the CR station may explore. The indicators also permit individual stations to include any practices and processes that are unique to the local context and not mentioned by the toolkit (under the option, "Any others, please specify").

- CR-CIT focuses on principles, practices, and processes. Impact of the community radio station on the community is outside the purview of this toolkit. This is primarily to help stations reflect on the extent to which their everyday practices and policies are in tune with the larger philosophy and best practices of community radio.

- CR-CIT could also be seen as a way for CR stations to assess the quality of their overall performance. 'Quality' here is not limited to the technical finesse of programmes, but includes active adoption of the core principles of CR by the stations across all the parameters.

- CR-CIT is NOT for comparison between different community radio stations. This is NOT meant to be an evaluation held by an external agency, with a pass/fail grade.

2.1.2 Who can use CR-CIT?

- Community radio stations which are at least two years old may like to use this toolkit. We think this is the time it takes for a community radio station to establish itself and put in place various processes to streamline its functioning. In fact, it could take even longer, say something like 5 years, given that most CR stations operate under various resource constraints. But, two years is long enough for a CR station to start looking at itself to decide how and where it can improve itself.

- CR-CIT may also serve relatively new CR initiatives to understand what goes into the functioning of an ideal CR station.

2.1.3 Why use CR-CIT?

- CR-CIT allows community radio stations to inject a dose of positive reinforcement into its staff and volunteers about the good work they have been doing.

- CR-CIT provides an opportunity to the CR station staff to pause from their hectic day-to-day schedules and reflect on their vision and mission along certain specific parameters.

- At the end of the Self-Assessment and Peer Review process (*described below*) using CR-CIT, individual CR stations would be able to set their own goal posts for the future, with the objective of continuously improving their performance.

- CR-CIT would help CR stations identify gaps and constraints in their functioning and enable them to plan ways to bridge the gaps and overcome constraints.

- The Self-Assessment and Peer Review process (SA&PR) using CR-CIT would provide pointers to managing CR stations efficiently and serving their listening community more effectively.

- Although CR-CIT is not meant to be used as a tool for external evaluation, the SA&PR process using the nine broad parameters would assist CR stations to better prepare for any external evaluations commissioned by funding agencies.

- Overall, the aim is that community radio stations strive continuously to match best practices followed globally.

2.1.4 When to use CR-CIT?

- Community radio stations can use this toolkit after a period of two years of their existence.

- CR-CIT is designed to be self-administered periodically by the CR stations. If the toolkit were to be used in its entirety, the review could typically be done on an annual basis.

- However, the modular design of CR-CIT permits CR stations to review their performance along any one or more of the parameters at any given time of their choice.

2.2 SA&PR Process: Step by Step

It is advised that CR stations use CR-CIT in a Self-Assessment and Peer Review (SA&PR) process. The SA&PR process would help stations recognise their strengths and identify gaps in their practices through a co-learning approach, leading to continuous improvement. The idea is to gradually build peoples' capacities to not only act as peer-reviewers but also take on the role of facilitators.

The main advantage of CR-CIT is that it is not prescriptive and allows for its application in a manner where peer reviewers could facilitate and supplement the process of self-assessment. The station, with inputs from the peer reviewers, could then work on strategies/goalposts for its future.

CR-CIT is modular in design and can be self-administered in parts. If the CR station desires to review its own performance along all the parameters at one go, it may be advisable to set aside adequate time to allow all key stakeholders to participate and express themselves.

Based on the experience of field-testing the CR-CIT, we recommend that two to three days be set aside for Step II, after Step I is completed at the convenience of the station. All people involved in the SA&PR process must have a common understanding of the period under review (e.g. from April 1, 2013 to March 31, 2014).

Step I – Pre-meeting among the following: (a) the station manager and staff; (b) CR Management Committee (CRMC) members and members of the Advisory body, if any; and (c) at least one representative of the parent organisation (if not already on the CRMC) to go through the CR-CIT and collect information that may be required to address the various parameters in the main meeting involving peer reviewers [See Step II].

The toolkit comes with a detailed **User Guide**, [*See Section III of the Toolkit*] which explains in detail the rationale for various parameters and describes the indicators. The CR station would benefit from reviewing this guide before embarking on the SA&PR process. This may help in compiling the data necessary to respond appropriately to some of the questions.

Step II – This step consists of the meeting that is at the heart of the SA&PR Process. The meeting must include as participants (a) the station manager and staff; (b) CR Management Committee (CRMC) members and members of the Advisory body, if any; and (c) one representative of the parent organisation (if not already on the CRMC) and (d) one representative each from two CR stations to serve as peer reviewer. While station personnel are critical to give operational inputs, the presence of CRMC members and that of the parent organisation are important because the toolkit has implications for larger policies and resources. We suggest the following specific guidelines for how this meeting could be conducted:

1. CR-CIT must be administered one parameter at a time. Within each parameter, the group takes up one question at a time and decides its response. One person from the group would read the question within the parameter. A second participant would read the corresponding explanation given in the user guide. This is followed by discussions and deliberations among members of the self-assessing station, and the appropriate options are ticked.

2. The peers observe and wait, while the station team goes through all the questions within one parameter. They may then be invited to express their views and share their own experiences on that particular parameter. [*See Role of Peer Reviewers, below*]

3. The station team may consider the views expressed by the peers and its own responses in order to set goalposts for the station. Goalposts must always include a realistic timeline so that the station may go back and review what it has been able to achieve. Use the **Notes/Goalposts** pages at the end of each section of the toolkit for this purpose.

4. This process is repeated for all nine parameters.

5. Finally, there may be an open discussion leading to an assessment of the outcomes of this SA&PR process for the station. This could lead to a compilation of an outcome document and a to-do list for the stations derived from the goalposts.

2.2.1 Role of the Peer Reviewers

- Peer Reviewers from two stations (one each) – *preferably* from the same linguistic region and those from stations that are similar to the station carrying out the self-assessment [broad categories may include, rural, urban, NGO, campus, KVKs, Agriculture Universities etc.] – would participate along with the station team in the SA&PR process. It may be an added advantage if the invited peers have prior orientation to CR-CIT and the SA&PR process.

- The peer reviewers could initiate the SA&PR process by going through the procedures (*described in Step II above*) with the station team so that there is a common understanding of what is involved.

- After the station team has gone through all the questions in one parameter and noted down the responses, the peers respond to the same set of questions and express their views on each aspect of the parameter.

- The idea would be to share their experiences with the self-assessing station and add new perspectives, where relevant, about the parameter.

- The peers' role is that of a 'friend' and co-learner, who are assisting the station in the process of a productive self-assessment. At the same time, they bring to the process, their own views and suggestions.

- The peers refrain from acting as external evaluators. They are welcome to share ideas that would help in deciding the goalposts.

- Peers may also not get into a self-evaluation mode. Giving examples from their own stations may be useful, however, if it is to suggest solutions or to contribute novel ideas.

- Peer Reviewers facilitate the open discussion at the end of the process, leading to an outcome document. The outcome document could include the perceived strengths and weaknesses of the self-assessing station, experiences and learning of the peer stations, and a compilation of the goalposts.

2.2.2 Getting Started

- Hold pre-meeting and compile relevant data necessary to address the various parameters in the main meeting. [Step I – *Also see the Checklist below*]

- Decide on appropriate peers and set a mutually convenient time and an appropriate date for holding the main meeting [*Step II*]

- Invite all stakeholders [*Step II*]

- Ensure that the place for the main meeting allows for close interaction and discussion among all the participants.

- Use the CR-CIT to review the performance of the CR stations following the SA&PR process explained above and set goalposts for continuous improvement.

2.3 Checklist for CRS adopting CR-CIT

It might be useful for the participating CR stations to keep the following information ready before actually reviewing their performance based on the nine parameters listed out in the CR-CIT. The unit for calculation is one year (unless the station itself decides on another time period).

Content Generation and Programming

- Total number of people involved in Programme Planning, Production, as Talent, Post-production (including staff, volunteers and people from the community)

- Total number of people from the community including volunteers (excluding paid staff)

- Total number of people from marginalised communities including volunteers (excluding paid staff)

- Total number of women including paid members of staff

- Total number of local talent/artistes in entertainment programmes

- Total number of community members as experts in information-based programmes (excluding people from the community who may be officials and in positions of power)

Policies and Guidelines

- CR station's own vision and mission statement

- Inclusive practices in written form, if any, for staffing purposes

- Fair and just workplace policy in written form, if any

- Inclusive practices in written form, if any, for historically marginalised groups and women

- Content policy in written form, if any

- Policy on capacity building, in written form, if any

Volunteers

- Total number of volunteers participating in the CR station

- Policy on attracting volunteers, if any

- Policy on capacity building of volunteers, if any

Technology: Access and Management

- Training policy, if any
- Support documents for maintenance of equipment, in the local language, if any
- Insurance policy of the CR station

On-Air Standards of Broadcasting

- CR station's own programming code (besides the country's broadcasting code)

Governance

- Composition of the Radio Management Committee/Radio Advisory Council

Feedback and Grievances

- Modes/processes in place to receive and analyse feedback
- Modes/processes in place to analyse and redress grievances
- Modifications in the functioning of the CR if any, based on feedback
- Redressals if any, based on grievances received

Content Sharing and Networking

- Content sharing policy of the CR station, if any
- Third-party sources for programming (UNICEF, UNESCO, Deutsche-Welle etc.)
- Percentage of third-party sourced programmes
- Policies for protecting rights of local artistes, particularly when sharing programmes with other CR stations
- Capacity sharing policy of the CR, if any, on technology, management practices, inclusiveness etc
- Networking policy of CR station, if any, with other CR stations, national and international networks
- Networking policy of CR station, if any, with social movements on rights and entitlements

Revenue Generation and Financial Accountability

- All sources of revenue
- Membership fees, if any
- Community contributions, if any, in cash or kind
- Station merchandise, if any
- Number of hours of broadcasting per day
- Total number of hours of commercial time aired in the last one year
- Practices, if any, on sharing income and expenditure on CR station with the community

3

User Guide

In this chapter, we explain the meaning of the nine parameters identified, and their various sub-components. Questions here refer to the questionnaire, which is the tool to measure and understand the present situation of the CRS. Explanations for each of the questions and how to interpret the responses are also given here to help you use the toolkit in a systematic manner. As indicated previously, the CR team should discuss this section carefully to have a common understanding of the questions, before the exercise starts.

3.1 Content Generation and Programming
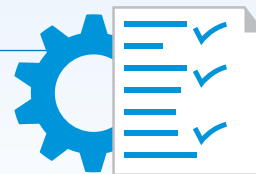
The first section of the toolkit looks at the programme production and content generation aspects of a CR station. In this section the toolkit helps one to know how successful is the station in involving members of the community in the various phases of developing a radio programme, such as programme planning, programme production, programme participation and programme post-production. It also helps the station know the amount of participation from within the community and their contributions to programme development. The need for a community radio station to offer a diversity of programmes (in various formats) as well as for constantly formulating fresh ones cannot be overstated. When a station manages to involve members of the community in the various phases of programme production, they develop a stronger sense of identification with the station. Listening to one's voices over the radio can be an important step towards a sense of 'community ownership'. This section also attempts to assess to what extent the CR station includes historically excluded voices, such as women, dalits, tribals, etc.

Guidelines for Questions 1.1-1.3

The various activities that come under the four mentioned functions are:

1. *Programme Planning:* Includes all pre-production activities such as ideation, research, scriptwriting, and identifying talent.
2. *Programme Production:* This stage includes actual recording, whether in the studio or in the field.
3. *Programme Participation:* Participation here means members from the community appearing on any of the shows.
4. *Programme Post-Production:* This includes editing and packaging a programme for final broadcast.

Percentage of Participation	Level of Participation
75% and above	Substantial
50–74%	Good
30–49%	Moderate
10–29%	Little
0–9%	No Participation

1.1: This question asks the station the percentage of people from the community involved in the four areas of programme development at the CR station. This question *does not include staff* of the CR station as members of the community. The entire pool of people, including staff, involved under each activity for all programmes must be taken as the base number for this calculation. The percentage of members from the community (*excluding staff*) must be calculated and then marked in the appropriate cell in the matrix.

For example, a certain CR station has a total number of 10 people involved in Programme Planning out of which two people are staff of the CR station and the other eight are members from the community, then the percentage of members from the community would be:

$$8/10 \times 100 = 80\%$$
And since 80% is above 75%, the amount of participation would be **"Substantial"**

Keeping in mind the philosophy of participation on which the CR sector has been built, the CR station is encouraged to achieve substantial participation in the long run with continuous improvement.

1.2: This question focuses on the extent of participation of people from marginalised communities in the four areas of programme development at the CR station. The base number for this question *includes station staff* that are also a part of such groups.

'Marginalised groups' here include dalits, tribals, minority groups (religious, linguistic, ethnic, sexual), and persons with disability, etc. The percentage of members from the various marginalised groups (*including staff*) must be calculated and then marked in the appropriate cell in the matrix.

For example, a CR station has a total number of 10 people involved in Programme Post-Production out of which three people are from marginalised groups then the percentage would be:

$$3/10 \times 100 = 30\%$$
The amount of participation would then be **"Moderate"**

1.3: This question looks at the number of women involved in the four areas of programme development at the CR station. This question also *includes members of the staff* of the CR station who are women. The entire pool of people involved under each activity for all programmes must be treated as the base number. The percentage of women (including staff) must be calculated and then marked in the appropriate cell in the matrix.

For example, a certain CR station has a total number of 10 people involved in Programme Production out of which five of the members are women then the percentage would be:

$$5/10 \times 100 = 50\%$$
And since 50% is in the 50–74% bracket, the amount of participation would be **"Good"**

1.4: It is important that CR stations try to encourage participation of community members in all age groups. All the people involved in content generation and programming, including staff, would be the base number for this question. When you add up percentage of members from all the age groups it should approximate to 100%.

1.5: This question seeks to find out the percentage of the entertainment-based programmes on the CR station that promote *local talent/artistes*. The station concerned may arrive at the definition of entertainment through consensus. Community radio ideally showcases and encourages local talent and indigenous art forms. For this question, the percentage of entertainment programmes promoting local talent must be calculated against a CR station's total number of entertainment programmes. The goal is to move towards a higher percentage of entertainment programmes, which encourage local talent and art forms.

1.6: This question tries to ascertain the percentage of information-based programmes that have *community members* as *experts*. "Experts" need not be limited to those who draw their knowledge only from formal, institutional sources; one could also include those with experiential learning. For this question, the percentage must be calculated against the CR station's total number of information-based programmes. The goal is to move towards a greater percentage of information-based programmes, which bring in inputs from within the community, thereby promoting local knowledge.

1.7: CR stations air programmes in a variety of formats that appeal to diverse audiences.

- 'Talk' refers to a format that involves one person speaking to the audience.
- 'Interview' typically involves a host and a guest in a question and answer mode.
- 'Discussion' involves interaction between two or more people in a radio show.
- *'Vox Pop'* refers to a format that involves interviews with people chosen randomly on the street. The objective is to obtain a range of responses and opinions on a given subject.
- 'Magazine' refers to a format that is a mix of different types of programmes presented as a package.
- 'Talent Shows' refers to programmes that seek to identify new talent, for example in music, from among the participants in the show.

Please tick all options applicable.

The more the number of programme formats that a CR station uses in its programming, the greater is the diversity in content, appealing to different audience interests. Community radio should be able to showcase the range of possibilities in radio production that are often missing in commercial radio. A station could work towards a desired programme mix and make an assessment of the extent to which its current programme mix matches that.

1.8: This question seeks to review the CR station's archiving practices. The options move from a minimum of three months (as stipulated by the CR guidelines of MIB) to continuous archiving since inception of the station. Archiving, generally, is a standard radio practice, and for community radio, in particular, archiving enables preservation and transmission of a community's oral histories and cultures.

1.9: This question emphasises the need for regular capacity-building for the station's staff in *programme development*. While this is dependent on availability of resources, it is suggested that at least two such workshops in a year may be necessary to keep alive the enthusiasm of the staff and to enhance their expertise.

3.2 Policies and Guidelines

This section of the toolkit focuses attention on the need for the station to be aware of and comply with the CR guidelines issued by the government. Going beyond the state policy, world over, community radio stations formulate their own guidelines and policies that uphold principles of inclusivity, representation, social justice, and ethical codes of conduct for station personnel. This section allows the CR stations to reflect on and adopt these principles.

2.1: This question seeks to know if the CR station orients all relevant stakeholders, such as its core staff, volunteers, listeners and members of the Management Committee, to the government's CR policy guidelines. This is to ensure that the station does not commit any violations that would attract legal action. *Please tick all options applicable.*

2.2: While the CR policy lays out broad guidelines for running a station, one would expect a CR station to clearly articulate its own vision/mission statement reflecting its overall philosophy and approach.

2.3: This question seeks to encourage CR stations to make a public commitment in writing of their intention to follow inclusive practices in terms of personnel involved. It is ideal that this commitment is made in the local languages for the understanding of the staff and community. *Please tick all options applicable.*

2.4: It is desirable that the CR station have a written policy to create a fair, safe and just workplace environment for all its staff and volunteers. *Please tick all options applicable.*

2.5: Inclusion of excluded voices is the means by which community radio stations promote social change. This question, therefore, seeks to gauge whether the CR station has a policy to adequately represent the issues of groups that are historically marginalised. *Please tick all options applicable.*

2.6: This question aims to assess whether the CR station has a content policy that caters to all sections of its community. This is to ensure that the station does not alienate any particular group within the listening area. *Please tick all options applicable.*

2.7: Community radio stations are required to follow the AIR Commercial Code on advertising, option (a), and CR Policy Guidelines that restrict advertising on CR stations to local products and services, option (b). Stations, however, may choose to go beyond it to formulate its advertising policy that may limit the kind of advertising they will accept. Option (c) is indicative of the additional limitation that the station may impose upon itself, based on its own ideology and principles.

2.8: This question seeks to examine if the CR station has any specific codes of conduct for various groups involved in the functioning of the station. This ensures that everyone behaves in a manner that makes it possible to have a comfortable and amicable work environment. *Please tick all options applicable.*

2.9: This question reflects one of the principles of community radio that a station must constantly strive to widen its circle of expertise beyond its staff in all areas of CR such as policy, production, marketing, etc. Building capacities of more and more community members ensures that the running of the radio station does not become the domain of only the trained staff.

2.10: It is important that the CR station not only formulates policies, but also makes various stakeholders aware of them. Awareness among all relevant actors, besides ensuring compliance, could also help avoid unreasonable expectations being placed on the station, resulting in potential conflicts. *Please tick all options applicable.*

2.11: This question reviews the methods used by the CR station to make various stakeholders aware of its policies. The more methods used to reach out, the better. *Please tick all options applicable.*

3.3 Volunteers

Volunteers have always been an indispensable part of the community radio sector worldwide. In line with the participatory nature of the medium and the modest financial means of most stations, recruiting volunteers from the community seems to be the best option.

For this parameter, we define the term 'volunteers' as people who contribute to the CR station, but are *not* on the station's payrolls.

This section of the toolkit allows CR stations to review their approach to volunteers – recruitment, orientation, incentives provided, and responsibilities assigned. The idea is to have a cadre of volunteers working for the station on a regular basis, keep them motivated through material and non-material incentives, and build a sustained relationship between the station and the community.

3.1: The first question is about the percentage of volunteers against the total number of people working at the CR station. The entire pool of people involved for the various activities must be taken into consideration.

For example, a certain CR station has a total number of 20 people involved in the various activities of the CR station out of which five are volunteers, then the percentage of volunteers would be:

$$5/20 \times 100 = 25\%$$
Option (b) is the appropriate answer

The ideal long-term goal for this question is to increase the percentage of volunteers.

3.2: A CR station needs to think of a variety of ways in which it can attract volunteers. The list given is indicative and the station can add any other method to the last option. The goal for the CR station would be to maximise the number of ways to attract volunteers, as this would attract a larger number of people willing to contribute to the station's working.

An 'open house' is when a station opens its premises on a scheduled day and time to the general public to observe its work and interact with staff. *Please tick all options applicable.*

3.3: This question seeks to find out if the CR station has a policy to pro-actively attract volunteers, especially from disadvantaged sections of the community.

'Marginalised groups' here include dalits and tribals; 'minority groups' here include religious, linguistic, ethnic, and sexual minorities

Please tick all options applicable.

3.4: Considering the constant turnover of volunteers at any CR station, it is essential that every new batch of volunteers is oriented to the station's policies and programming through systematic workshops, among other things.

'Peer-to-peer learning' or mentoring refers to the freshers learning from senior station staff or more experienced volunteers.

Where literacy is not an obstacle, an 'orientation package' could involve a simple set of written guidelines on station policies, programming, and station set-up and technology.

Please tick all options applicable.

3.5: This question examines the various ways in which a CR station compensates its volunteers. Although, in principle, an ideal community radio station may be one where volunteers are willing to work for it with no expectation of compensation, it may not be realistic under certain conditions. The options listed are in a gradation from no compensation to payment of a fixed honorarium for services rendered. *Please tick all options applicable.*

3.6: This question suggests that the station should have a way of recognising special contributions of volunteers and offer incentives for them to strengthen their association with the radio station. *Please tick all options applicable.*

3.7: This question seeks to ascertain the range of tasks assigned to volunteers by a CR station. The goal for the CR station would be to make judicious use of volunteers who perform the full range of tasks at a CR station. This could also help reduce the station's dependence on the number of employees on its payroll. *Please tick all options applicable.*

3.8: The purpose of this question is to look at how a CR station manages its volunteers. While recruiting and orienting a cadre of volunteers is important, it is critical that the station optimises their contributions to the station.

Option (e) suggests that volunteers could be assigned to particular teams at the station, such as a programming group or a narrowcasting group.

Option (f) assumes that each of the teams at the station have specific duty charts, including for volunteers.

Please tick all options applicable.

3.4 Technology: Access and Management
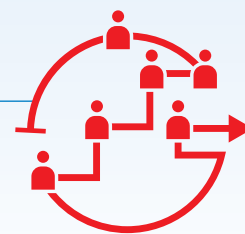
Demystifying technology and providing access to the poor and marginalised are key factors in running a truly participatory community radio station. Giving space to voices of the marginalised should also involve their using the technology actively. Over-dependence on external experts located at a distance can hamper the day-to-day functioning of the radio station and undermine its efficiency. It is important, therefore, that the station becomes as self-reliant as possible by building technical capacities of its own staff and volunteers.

4.1: This question seeks to find out who is allowed to handle the equipment at the CR station. The goal for the CR station would be to move towards a position where women and members from marginalised groups are also provided opportunities to deal with equipment. *Please tick all options applicable.*

4.2: Periodic training is necessary if the staff of a CR station must become confident of managing technology on their own. The goal for the CR station would be to move towards peer-to-peer learning as it would be a more holistic and cost-effective approach.

- 'Peer-to-peer learning' here indicates staff members training each other or learning from personnel at another CR station.
- 'Off-site training' could be in the form of training sessions conducted by an external agency outside the station (e.g. CEMCA, UNICEF, UNESCO, MIB).
- 'On-site training' involves professionals (e.g. BECIL, Nomad, Maraa, Ideosync) coming to the station to train staff.

  Please tick all options applicable.

4.3: This question seeks to examine the frequency of technical training workshops for staff and community members. While this is dependent on availability of resources, it is suggested that at least two such workshops in a year may be necessary to keep alive the enthusiasm of the staff and to enhance their expertise.

4.4: A community radio station that has invested in building technical capacities of its staff and volunteers should be able to move towards a position where they also choose the technology to be used, rather than use the technology that is always chosen for them. While professional opinions on the available technology options may be necessary, the station may want to reflect on whether the actual users are involved in the decision-making.

The goal for the CR station would be to give importance to inputs from its staff and volunteers while making the choices. Their experiences may enable the CR station to acquire equipment, which is not only better suited, but also more user-friendly.

4.5: This question refers to routine maintenance of equipment at the CR station. The ideal for the station is to have internal staff and community members who can completely take care of the maintenance requirements. However, they may call upon professional services whenever more complex problems arise.

4.6: This question seeks to find out the degree of self-sufficiency of a CR station in dealing with any repairs to equipment after the warranty period has ended. While managing locally for all possible repairs is ideal, it is acknowledged that professional support may become necessary from time to time.

4.7: This question examines the kind of support documents that are in place at a CR station to help users handle technical equipment. The goal for the CR station would be to develop user guides, preferably in local languages, which are simpler to use than the user manuals/guides provided by manufacturers. The station staff could document their experiences with the equipment and provide situation-based scenarios to guide other users.

4.8: Natural disasters and other accidents at the CR station may cause serious damage and result in financial liabilities. This could, in turn, lead to disruption of services at the station. Therefore, insuring all essential equipment is recommended. *Please tick all options applicable.*

4.9: In areas that are affected by frequent power cuts or load-shedding, it is advisable that the station has some alternative source of power.

4.10: As the internet enhances connectivity with the external world, CR stations may want to consider having an internet connection.

4.11: This question lists the various ways in which listeners connect and participate in programmes.

3.5 On-Air Standards of Broadcasting

The national CR policy guidelines issued by the Ministry of Information & Broadcasting mandates a CR station to follow AIR's general Broadcast Code as well as the AIR Commercial Code. This parameter calls on CR stations to not only review their compliance to these stipulated codes, but also examines whether they have in place anything beyond, based on the broader community radio philosophy or on the vision of the parent NGO/CR station.

It would be ideal if a CR station moves towards evolving a set of on-air standards that incorporate key principles of community radio and local sensitivities. This may be over and above the national CR policy.

5.1: This question seeks to know if the CR station's programmes follow the minimal required standards as stipulated in the government's policy guidelines or has a document in place that incorporates the official policy and goes beyond. *Please tick all options applicable.*

5.2: This question aims to find out how a CR station ensures that its staff and volunteers are familiar with all the relevant codes for programming. The goal of the station is to not only make the staff aware of these codes, but also to maximise the ways in which it can be done so as to enable the staff internalise these codes. *Please tick all options applicable.*

5.3: While orientations and training sessions may help the staff to internalise the various codes, it is imperative that compliance of all concerned to codes is ensured. Non-compliance may even leave the station vulnerable to legal action. It is important that a CR station takes all possible measures to ensure that the codes are not violated. *Please tick all options applicable.*

5.4: This question tries to examine what actions a CR station takes when violations occur in spite of taking all precautions. Punitive measures must always be proportionate to the scale and frequency of the violation committed. Stations must have in place a range of responses, including apologising to any offended sections on air. They must move towards instituting preventive steps such as holding periodic sensitisation workshops. *Please tick all options applicable.*

3.6 Governance

Governance refers to the decision-making structures and processes at a CR station. It is expected that these be of a participatory character and incorporate principles of transparency and accountability. Representation of different sections of the community, especially the marginalised,

in management structures is a precursor to striving for representation in programming. Involvement in decision-making processes would be empowering for those historically excluded.

An advisory body is one that provides direction in terms of programming and making the CR station relevant to the community. It normally consists of opinion leaders from within the community.

The Management Committee on the other hand decides on administrative and functional matters such as human and technology resources, budgets and day-to-day programming quality. It normally has members from among the staff, volunteers, parent organisation etc.

This section of the toolkit allows CR stations to review their performance on the parameter of participatory governance.

6.1: This question explores the various ways in which a CR station makes policy decisions. The ideal situation is for the station to have a formal decision-making body, which is fairly representative of the community it seeks to serve. While consultations with listener groups and staff members and public hearings are desirable, they may not substitute a formal structure of governance. *Please tick all options applicable.*

6.2: This question seeks to find out if a CR station has an Advisory body, which advises the station on policy and programming.

6.3: This question seeks to ascertain the frequency with which the Advisory body meets. As community radio stations have to respond to a variety of challenges that are dynamic and fluid, it may be necessary for the Advisory body to meet as frequently as possible.

6.4: The Advisory board makes recommendations on all content-related matters and networking. Therefore, it sits in on decisions pertaining to the station's broadcast policy and recommends ways to making it relevant to the community. *Please tick all options applicable.*

6.5: This question seeks to find out if a CR station has a Community Radio Management Committee, which can be defined as a representative decision-making body to advise the station and formulate various policies.

6.6: This question seeks to ascertain the frequency with which the CR Management Committee meets. As community radio stations have to respond to a variety of challenges that are dynamic and fluid, it may be necessary for the Management Committee to meet as frequently as possible. Ideally, the CR Management Committee that meets at least once in three months may be better suited to respond to emerging challenges.

6.7: Since the CR Management Committee performs an advisory role, it sits in decision on a wide range of tasks that affect the functioning of the CR station. In addition to this, liaisoning with local authorities and getting involved with advocacy can help build the image of the CR station. *Please tick all options applicable.*

6.8: It is important that the CR Management Committee is constituted in a representative manner to include historically excluded sections of the community. The diversity of the community ensures that the perspectives and interests of various groups are considered in the decision-making process. *Please tick all options applicable.*

6.9: This question suggests that a robust policy to select its employees is in the interest of the CR station. This process should ideally not be something that is imposed by the parent organisation. The goal for the CR station would be to make the selection process as transparent and participatory as possible. Whatever the means, the idea is to choose the right person for the right task. *Please tick all options applicable.*

6.10: This question is premised on the idea that frequent interactions with listeners will enable the station and the Management Committee to make decisions in tune with ground realities.

6.11: Successful CR stations always tend to keep their doors open for members of the community to visit as and when they desire. If a CR station is open to community visits and permits the station to develop into a hub of community activity, people are likely to build a bond with the station. Often, matching a face with a voice helps people identify with the station. This can be done in a variety of creative ways. *Please tick all options applicable.*

6.12: It is important that the CR station informs the community about its participatory governance structure. Community members need to know that they are welcome to participate in the governance of the station and that their inputs are valued by the station. The ideal for the CR station would be to use all possible ways to ensure that the information reaches the widest possible audience from the community. *Please tick all options applicable.*

3.7 Feedback and Grievances

A CR station is typically driven by audience interests and concerns. It is essential, therefore, that CR stations have a system in place for documenting, processing, and responding to listener feedback and grievances.
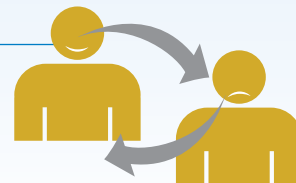
For the purpose of this toolkit, 'grievances' are being defined as negative feedback or complaints from the listening community of a CR station. 'Feedback' is seen, more generally, as audience responses to programming, including suggestions for changes, improvements, or new initiatives.

7.1: This question asks the CR station to list all the methods through which its listeners can provide feedback to the station.

- 'Listenership Surveys' are formal procedures adopted by the station to collect feedback with the aid of tools such as questionnaires.
- 'Face to face meetings' could include feedback given during personal visits, narrowcasting sessions, field/ studio recording sessions, etc.
- 'Social networking sites' means the use of platforms such as Facebook, Twitter, Google+, YouTube etc.

The goal for the CR station would be to maximise the channels through which feedback is received, making the listening experience more interactive and building a more active listenership. *Please tick all options applicable.*

7.2: It is important for a CR station to have evolved a system for processing and analysing feedback received from its listeners. The goal for the CR station would be to not only collect the feedback and analyse it, but also to act (when deemed necessary) upon the suggestions made.

'Collate and analyse' could involve counting the number, categorising them by type of feedback, socio-economic profile, geographical location, etc.

Some kinds of feedback may have to be discussed with the parent organisation option (d) because of their link to additional resources or the possibility of a changed strategy.

It is standard practice in radio stations worldwide to broadcast some representative feedback from the audience option (e). It lets listeners know that their feedback is valued.

Please tick all options applicable.

7.3: This question asks the CR station to list all the methods through which its listeners can register their grievances with the station.

'Face to face meetings' could include grievances conveyed during personal visits, narrowcasting sessions, field/ studio recording sessions, etc.

The grievances could be related to content, quality of transmission, representation of issues, appropriateness of time-slots, conduct of radio station staff, etc.

The goal for the CR station would be to maximise the channels through which listeners can convey their grievances to the station, thereby making the station open to multiple perspectives.

Please tick all options applicable.

7.4: As with the general feedback, it is important for the CR station to have evolved a system for processing and responding to grievances of the listening community.

'Collate and analyse' could involve counting the number, categorising them by type of feedback, socio-economic profile, geographical location, etc.

A dissatisfied or unhappy listener can have a potentially detrimental effect on a community radio station's relationship with its community. The goal for the CR station would be to not only record the grievances, but also to act (when deemed necessary) upon those grievances. While some may require immediate action by the station manager, others may call for greater deliberation at various levels.

Please tick all options applicable.

7.5: The last question in this section calls upon the CR station to recall specific instances of any changes made to content, transmission or scheduling because of audience feedback and grievances. Please mention the specific instances when such changes have been made within the last six months. This can serve as an indicator of how pro-active the station has been in responding to listener inputs.

3.8 Content Sharing and Networking

The concept of content-sharing for community radio stations could be viewed primarily as a strategy for building solidarities among the stations. From another perspective, it could be termed a strategy for networking. Practically, a CR station can use this method to obtain additional content, keeping in mind the difficulty of having to generate 100% original content for broadcast. Sharing programmes also allows listeners the opportunity to connect with information related to similarly-placed communities in another geographical location or to enjoy cultural outputs of another community. At a broader level, a community radio station committed to giving space to people's voices in order to bring about desirable social change in their community, may benefit from establishing linkages with wider social movements that are engaged in securing people's rights.

8.1: This question looks at what kind of content a CR station shares with other CR stations. A station can share not only finished programmes, but also programme ideas and scripts. Stations could work together on issues of common concern (e.g. food security, MGNREGA) by sharing ideas and scripts on the subject, allowing individual stations to make locally relevant adaptations. *Please tick all options applicable.*

8.2: This question aims to find out what percentage of a CR station's broadcast content is from third party sources, such as UNICEF, UNESCO, Deutche Welle, Sesame Street, etc. This *excludes* content sourced from other community radio stations. While stations may use content from third party sources to maximise air time, the ideal is for stations not to depend excessively on them. In any case, the CR policy guidelines of MIB mandates that at least 50% of content must be locally produced.

For this question, calculate the percentage of content from third party sources against the total number of hours broadcast during the period under review (say, last one year).

For example, if a CR station broadcasts for eight hours a day, 365 days in a year, of which about one hour a day is content sourced from third parties.

> **Step 1:** Total no. of broadcast hours: $365 \times 8 = 2920$ hours
> **Step 2:** Hours of third-party content: $365 \times 1 = 365$ hours
> **Step 3:** Percentage of third-party content $= 365/2920 \times 100 = 12.5\%$
> *Tick option (d)*

8.3: This question tries to ascertain the various ways in which a CR station protects the rights of local artistes when content is shared with other CR stations. It is the responsibility of the station to ensure that stations with which they are sharing local cultural content is not benefiting from its re-broadcast commercially, without a share being passed on to the original talent. Even without a commercial angle, it is advisable for a CR station to obtain the informed consent of the artistes concerned, that the content is being shared with other stations. *Please tick all options applicable.*

8.4: CR stations could share a full range of things, apart from content, with other CR stations as it would enable the creation of a peer-to-peer network of interdependence. In the long term, this kind of sharing could also enable newly set up CR stations to learn from the more established ones and build their own capacities.

Sharing 'commercial air time' here refers to any arrangements stations in a particular region could make among themselves to offer a combined package of listeners to potential advertisers.

Sharing 'capacities' would mean imparting training in different aspects of radio production and management, including technical skills and management practices.

Please tick all options applicable.

8.5: It is desirable that CR stations facilitate exchange visits to other stations where possible.

8.6: This question seeks to find out if the CR station is part of any national and international networks. While being a part of some of these networks enables the station to have a voice in policy advocacy, other associations may make it possible for the station to access training opportunities and share content and experiences with others. The ideal is for the CR station to be a part of as many networks as possible. *Please tick all options applicable.*

8.7: CR stations and/or their parent organisations may ally themselves with larger social movements that strive to secure people's rights and entitlements. The question offers a list that is only indicative, not exhaustive. It is extremely valuable for community radio stations working, especially with deprived communities, to make these linkages so that they can offer programming that is directly relevant to their listeners and promote equity and social justice. *Please tick all options applicable.*

3.9 Revenue Generation and Financial Accountability

Community radio stations are expected to be 'not-for-profit' entities. The idea here is that community radio is a non-commercial venture, not that it needs to be a loss-making enterprise. Parent organisations and external funding agencies gradually start expecting the station to explore opportunities for generating revenues that would at least meet the operational costs. Where there is external funding involved, the key principle is to ensure that there is diversity in funding sources and that the station is not over-dependent on a single source. It is important that the station makes the community a 'shareholder' and holds itself accountable to it. The station's policies and procedures must, therefore, incorporate principles of transparency and accountability.

9.1: This question asks the CR station to enumerate all its sources of revenue and mention what percentage of the total support comes from each of these sources. The question expects one to give percentages for every revenue stream that a station taps into against the entire revenue generated.

- 'Programme-based grants' include funds received from various agencies for broadcast of specific programmes (e.g. UNICEF's *Meena ki Duniya* or Sesame Street's *Gali Gali Sim Sim*).
- 'Income from special projects' would be when a station receives income from production and broadcast of particular programmes (e.g. Tourism department funding for a heritage series).

- 'Membership fee' includes a fixed amount charged periodically by the station for individuals who wish to be associated with the station as its supporters.
- 'Community contributions' are more sporadic and voluntary, either in cash or kind.
- 'Station merchandise' typically includes such things as caps, T-Shirts, coffee mugs, pens, keychains, badges, calendars, etc. However, stations could also think of other products that are locally produced and better reflect local artisanship.

    When you add up percentage of all sources it should approximate to 100%.

9.2: The CR policy guidelines restrict advertising on a community radio station to a maximum of five minutes per hour of broadcast. The average advertising time per hour of broadcast can be calculated as follows:

> **Step 1:** Use the log sheets/GRINS software to obtain the total number of minutes of advertising in the given review period (say, one year).
> **Step 2:** Calculate the total number of hours of on-air time for the CR station in the review period.
> **Step 3:** Calculate the average.

For example, a certain CR station broadcasts for five hours a day 365 days in a year and has advertised for a total of 6388 minutes in the same year, then:

> **Step 1:** Total number of advertising minutes: 6388 minutes (from log sheet/GRINS)
> **Step 2:** Total on-air time (in hours): 365×5 (no. of days x no. of hours)= 1825 hours
> **Step 3:** Advertising minutes/total number of hours
>   i.e. 6388 min/1825 hrs = 3.5 min/hrs.
>
> ***Please tick option (e) (3-3.59 minutes)***

9.3: While it is desirable that the station's revenue generation is tied to its core activity, a CR station could explore supplementary sources of revenue by offering certain services that are of use to the community.

'Training' here refers to offering crash courses in things such as basics of computer use, internet browsing, photography, etc.

The station should, however, ensure that the search for these additional sources do not distract it from its primary function of delivering a good quality community radio service to its listeners. *Please tick all options applicable.*

9.4: The ideal way for a CR station to sustain itself is to have a financial model that is based largely on community contributions. This will ensure that the community develops a sense of ownership over the station. *Please tick all options applicable.*

9.5: This question relates to transparency and accountability to the community. While it is customary to prepare annual audited accounts, it is suggested that the CR station could even share a simple statement of accounts twice a year with the community.

9.6: This question seeks to find out the methods used by the CR station to share its financial reports with the community. The goal for the CR station would be to maximise the possible ways and give the community access to financial accounts on a regular basis. *Please tick all options applicable.*

9.7: Revenue generation does not depend only on the station's marketing abilities and mobilisation of advertising. It could be related to many other factors such as transmission and programming quality, and community participation. External networking activities would throw open opportunities to tap newer funding sources. This question asks the CR station to reflect on what possible options it would like to explore to improve revenues.

- 'Maximise current sources of revenue' means the extent to which existing sources of revenue can be optimally used. For example, if a station is able to raise two minutes of advertising, efforts could be made to reach the maximum limit of five minutes.

- 'Diversifying sources of revenue' means adding newer sources of revenue.

  Please tick all options applicable.

4

The Toolkit
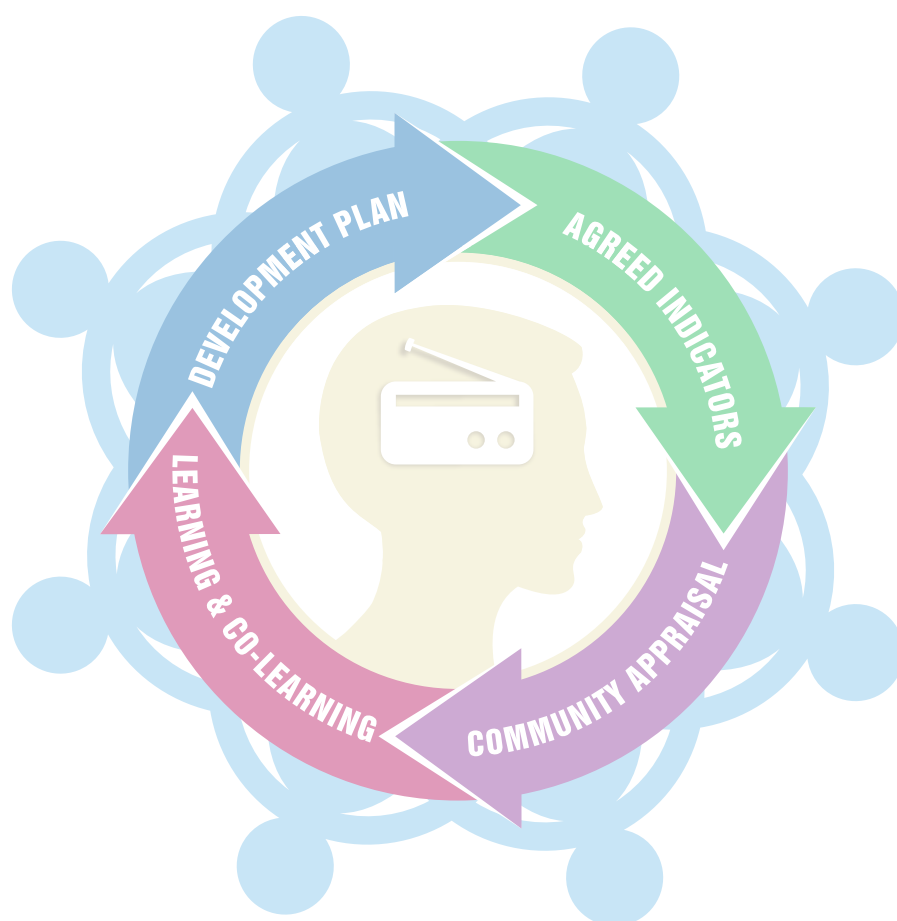
1. Content Generation and Programming

1.1 What percentage of people involved in programming at the CR station are from the community (other than staff)?

Function	Percentage of Participation				
	75% and above (Substantial)	50–74% (Good)	30–49% (Moderate)	10–29% (Little)	0–9% (No Participation)
Programme Planning					
Programme Production					
Programme Participation					
Programme Post-production					

1.2 What percentage of people involved in programming at the CR station are from marginalised groups (e.g. SC/ST/minorities)?

Function	Percentage of Participation				
	75% and above (Substantial)	50–74% (Good)	30–49% (Moderate)	10–29% (Little)	0–9% (No Participation)
Programme Planning					
Programme Production					
Programme Participation					
Programme Post-production					

1.3 What percentage of people involved in programming at the CR station are women?
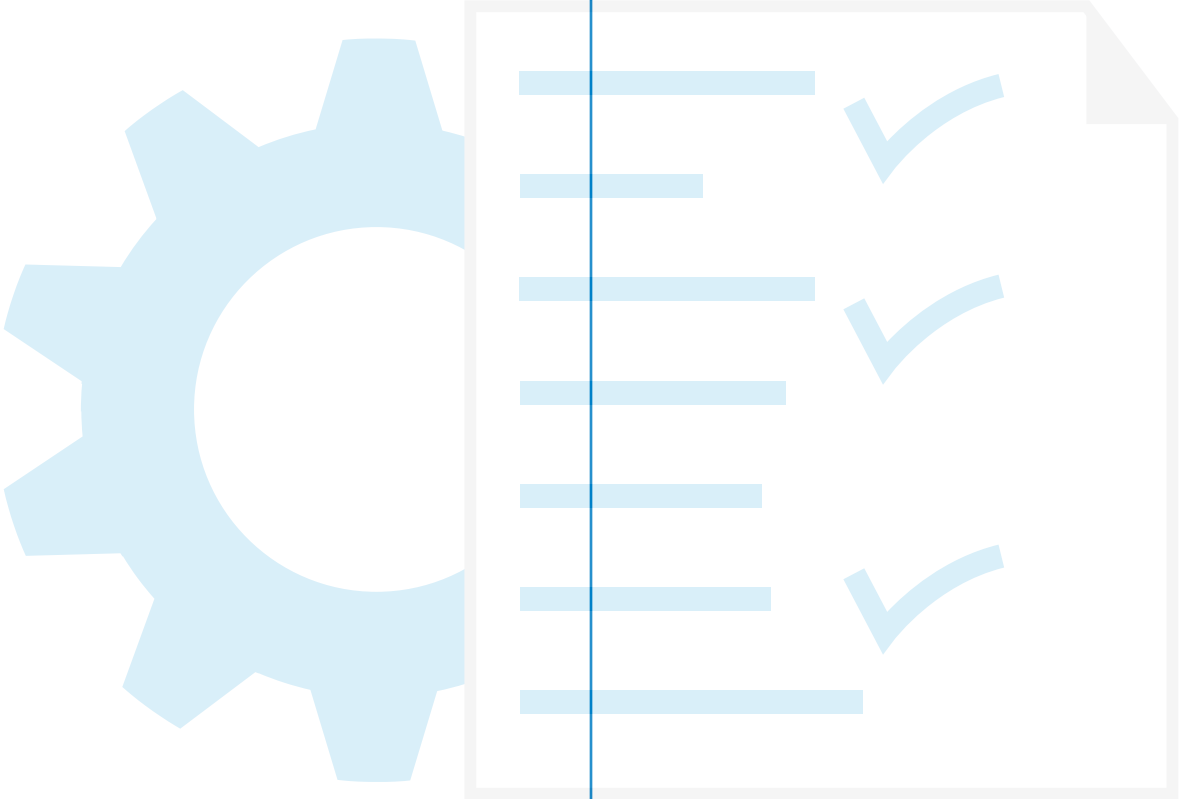
Function	Percentage of Participation				
	75% and above (Substantial)	50–74% (Good)	30–49% (Moderate)	10–29% (Little)	0–9% (No Participation)
Programme Planning					
Programme Production					
Programme Participation					
Programme Post-production					

1.4 What percentage of people in various age groups are involved in content generation and programming at the CR station? (When you add up percentage of members from all the age groups it should approximate to 100%).

Age Groups	Percentage of Participation				
	75% and above (Substantial)	50–74% (Good)	30–49% (Moderate)	10–29% (Little)	0–9% (No Participation)
5-12 years					
13-19 years					
20-30 years					
31-50 years					
50 years and above					

1.5 What percentage of the entertainment-based programmes on the CR station promotes local talent/artistes?

    a. 0–25%
    b. 26–50%
    c. 51–75%
    d. 76–100%

1.6 What percentage of the information-based programmes on the CR station includes people from the community as experts?

    a. 0–25%
    b. 26–50%
    c. 51–75%
    d. 76–100%

1.7 What are the different programme formats in which the CR station broadcasts? *(Please tick all that are applicable)*

    a. Information updates/news
    b. Film music
    c. Folk music/performance
    d. Talk
    e. Interview
    f. *Vox Pop*
    g. Discussion
    h. Story telling
    i. Drama
    j. Documentary
    k. Live shows
    l. Talent shows
    m. Magazine
    n. Any others, please specify_____

1.8 For how long has the CR maintained an archive of all its programmes?

    a. For the last 3 months (as stipulated by the national CR policy)
    b. For the last 6 months
    c. For the last year
    d. For the last 2 years
    e. Any others, please specify_____
    f. Right since inception

1.9 How often does the CR station conduct capacity building in programme development?

    a. Does not conduct
    b. Infrequently
    c. Once a year
    d. Once in six months
    e. More frequently, when necessary

Notes	Goalposts

Notes	Goalposts

2. Policies and Guidelines

2.1 The CR station provides orientation on national CR policy to: *(Please tick all that are applicable)*

   a. No orientation
   b. Staff
   c. Volunteers
   d. Members of CR Management Committee
   e. Listeners
   f. Any others, please specify_____

2.2 Does the CR station have a vision/mission statement that guides its activities?

   a. Yes
   b. No

2.3 Does the CR station have a written policy in the local language that addresses inclusion of: *(Please tick all that are applicable)*

   a. No written policy
   b. Gender
   c. Minorities
   d. Marginalised groups
   e. Any others, please specify_____

2.4 The CR station's policy includes: *(Please tick all that are applicable)*

   a. Code of conduct for staff and volunteers
   b. Provisions for minimum wages
   c. Policy against sexual harassment
   d. Policy for grievance redressal
   e. Policy for safety of station personnel
   f. Any others, please specify_____

2.5 Does the CR station have a *programming* policy to ensure representation of issues related to all sections of the community? *(Please tick all that are applicable)*

   a. No policy in place
   b. A broad policy for adequate representation of all sections
   c. Specific policy on women
   d. Specific policy on marginalised groups
   e. Specific policy on minority groups
   f. Specific policy on youth and children
   g. Specific policy on senior citizens/elderly
   h. Specific policy on physically and mentally challenged
   i. Any others, please specify_____

2.6 Does the CR station have a *programming* policy to ensure a wide variety of content catering to all the sections of the community? *(Please tick all that are applicable)*

   a. No policy in place
   b. A broad policy on programming/content for all sections
   c. Specific policy on programming/content for women
   d. Specific policy on programming/content for marginalised groups

e. Specific policy on programming/content for minorities
f. Specific policy on programming/content for youth and children
g. Specific policy on programming/content for senior citizens/elderly
h. Specific policy on programming/content for physically and mentally challenged
i. Any other, please specify_____

2.7 What kind of policy is in place if any, regarding the kind of advertisements the CR station accepts?

a. Only follows national commercial code
b. Advertising limited to local products and services only
c. No acceptance of advertising that violates the core values of the station
d. Any others, please specify_____

2.8 Does the CR station have a written code of conduct in the local language? *(Please tick all that are applicable)*

a. No code of conduct
b. A general code of conduct for the CR station (e.g. No smoking etc.)
c. Code of conduct for staff
d. Code of conduct for volunteers
e. Code of conduct for community participants
f. Code of conduct for visitors
g. Any others, please specify_____

2.9 Does the CR station have in place a written policy for conducting regular capacity building for the community?
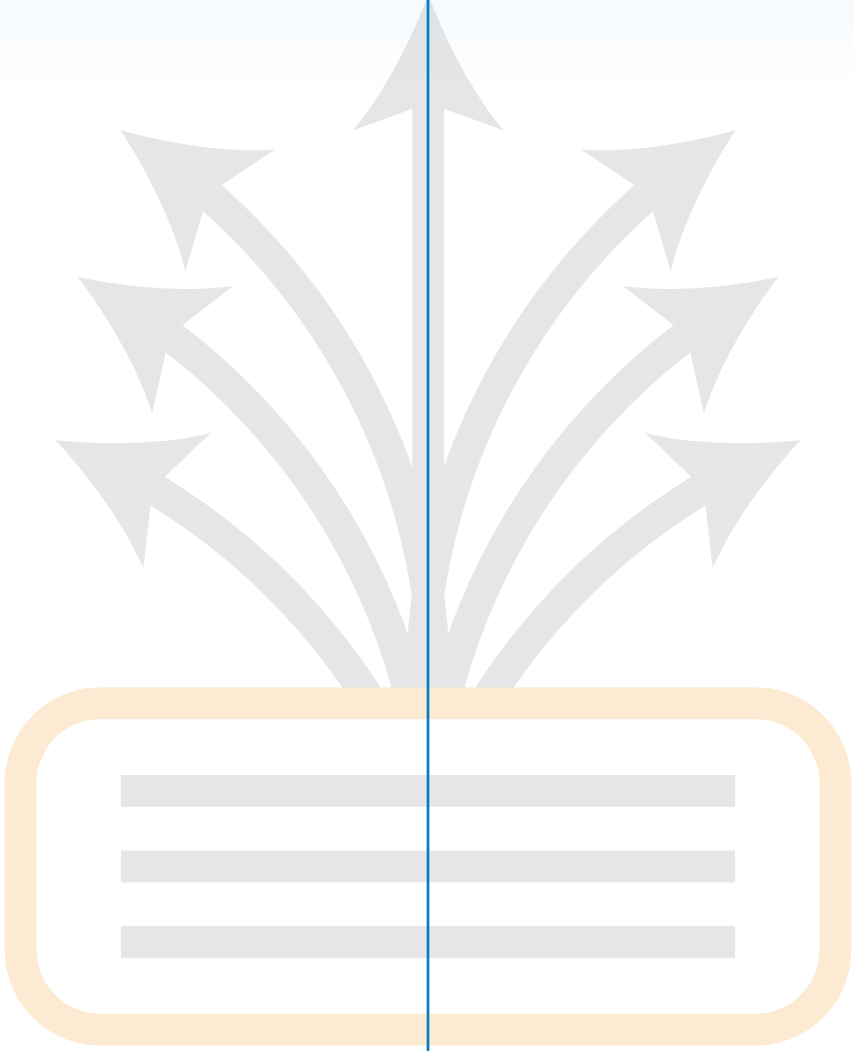
a. Yes
b. No

2.10 The CR station creates awareness about its internal policies among: *(Please tick all that are applicable)*

a. No such initiative
b. Staff
c. Volunteers
d. Members of CR Management Committee
e. Funding Agencies
f. Community
g. Any others, please specify_____

2.11 How does the CR station publicise its policies/code of conduct to its staff and the community? *(Please tick all that are applicable)*

a. Through orientation sessions
b. Through workshops
c. Through charts, displays and leaflets
d. During narrowcasting
e. During open house sessions
f. During social audit meetings
g. Through broadcasts on the station
h. Through its website, social media
i. Any others, please specify_____

Notes	Goalposts

Notes	Goalposts

3. Volunteers

3.1 What percentage of people involved with the CR station are volunteers?

    a.   0–9%
    b.   10–29%
    c.   30–49%
    d.   50–74%
    e.   75% & above

3.2 What does the CR station do to recruit/attract volunteers? *(Please tick all that are applicable)*

    a.   Does nothing
    b.   Broadcasts announcements on the CR station
    c.   Conduct capacity building workshops
    d.   Conduct open houses
    e.   Hold periodic meetings with the community
    f.   Informal interpersonal contacts
    g.   Insert announcements in other local media
    h.   Make announcements on the website
    i.   Any others, please specify _____

3.3 The CR station has a pro-active policy to attract volunteers from: *(Please tick all that are applicable)*

    a.   Not applicable
    b.   Community in general
    c.   Marginalised groups
    d.   Women
    e.   Minority groups
    f.   Children
    g.   Youth
    h.   Senior citizens/elderly
    i.   People with disabilities
    j.   Any others, please specify _____

3.4 What does the CR station do to orient its volunteers into the programme? *(Please tick all that are applicable)*

    a.   Does nothing
    b.   Peer-to-peer learning (mentoring)
    c.   Organise orientation workshops
    d.   Have in place an orientation toolkit/package
    e.   Any others, please specify _____

3.5 In what way does the CR station compensate the volunteers for their services? *(Please tick all that are applicable)*

    a.   No compensation
    b.   Take care of local travel
    c.   Take care of food/snacks
    d.   Free training in radio production
    e.   Free training in computers
    f.   Payment in kind
    g.   Issue certificate
    h.   Discounts in local shops

    i.   Distribute radio souvenirs
    j.   Payment of fixed honorarium
    k.   Any others, please specify _____

3.6 How do you recognise the special contribution of a volunteer? *(Please tick all that are applicable)*

    a.   Certificates
    b.   Gifts/Crest
    c.   Felicitation
    d.   Support for exchange visits to other stations
    e.   Fellowships for training/course
    f.   Opportunity to become station staff
    g.   Any others, please specify _____

3.7 What are the tasks that the volunteers in the CR station typically carry out? *(Please tick all that are applicable)*

    a.   Not applicable
    b.   Mobilise community in their own neighbourhoods
    c.   Produce content in their own neighbourhoods
    d.   Programme planning
    e.   Programme recording/production/scriptwriting
    f.   Programme post-production
    g.   Transmission of programmes
    h.   Maintenance of equipment/studio
    i.   Collecting local ads
    j.   Help organise outside events for the CR station
    k.   Train other volunteers
    l.   Administrative work for the CR station
    m. Any others, please specify _____

3.8 What procedures does the CR station have in place to manage the volunteers? *(Please tick all that are applicable)*

    a.   No procedures
    b.   On the spot assignment of duties
    c.   Listing of volunteers according to skillsets
    d.   Meetings to decide tasks
    e.   Assignment to specific teams within CR station
    f.   Team specific duty charts
    g.   Any others, please specify _____

Notes	Goalposts

Notes	Goalposts

4. Technology: Access and Management
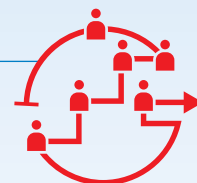
4.1 The CR station provides opportunities for handling equipment to: *(Please tick all that are applicable)*

    a. Professionally trained personnel
    b. Men
    c. Women
    d. Members from marginalised groups
    e. Any others, please specify _____

4.2 What kind of on-going technical training does the CR station provide its staff? *(Please tick all that are applicable)*

    a. Staff learn on the job
    b. Off-site training for staff
    c. On-site training by professionals
    d. Peer-to-peer learning
    e. Any others, please specify _____

4.3 How frequently does the station conduct technical training workshops for members of the staff and the community?

    a. Doesn't conduct
    b. Infrequently
    c. Once a year
    d. Once in six months
    e. More frequently when necessary

4.4 How are the choices for technology upgradation/replacement made at the CR station? *(Please tick all that are applicable)*

    a. Made by the parent organisation/funding agency
    b. By the CR station Management Committee (CRMC)
    c. By station manager in consultation with technical experts
    d. By station staff in consultation with technical experts

4.5 Routine technical maintenance at the CR station is handled by:

    a. Only professionals hired for the purpose
    b. Partly professional, partly staff
    c. Partly staff, partly community members
    d. Handled entirely by members of the community

4.6 How does the CR station manage repairs for equipment beyond the warranty period?

    a. Depend on outside professional services for all possible repairs
    b. Manage with local expertise for minor repairs and professionals for major repairs
    c. Manage locally for all possible repairs

4.7 Does the CR station have manuals/guidelines for the use and maintenance of technical equipment?

    a. No written guidelines for equipment use and maintenance
    b. Depend on user manuals provided by manufacturers
    c. Self-generated guidelines/manuals developed by the CR station in local language

4.8 Which among the following equipment has the CR station insured to prevent it from unforeseen losses? *(Please tick all that are applicable)*

a. No insurance of any equipment
b. Transmitter
c. Tower and antenna
d. Studio equipment
e. Field equipment (recorders, microphones, portable mixers etc.)
f. Any others, please specify _____

4.9 What alternative options does your station have to address power problems?

a. Generator
b. IPS/UPS
c. Renewable sources (e.g. solar, biogas, etc.)

4.10 Does the station have internet connectivity?

a. Yes
b. No

4.11 What technologies does the station have in place to facilitate audience participation in programmes? *(Please tick all that are applicable)*

a. Through mobile phone of station staff
b. Phone-in panel
c. SMS Gateway
d. Internet
e. Any others, please specify _____
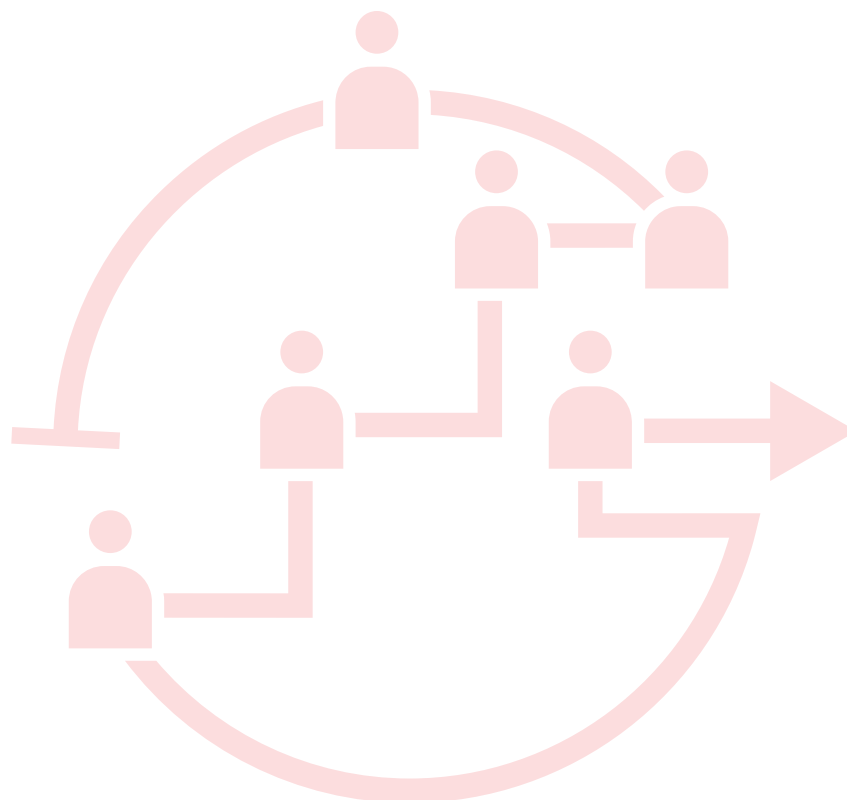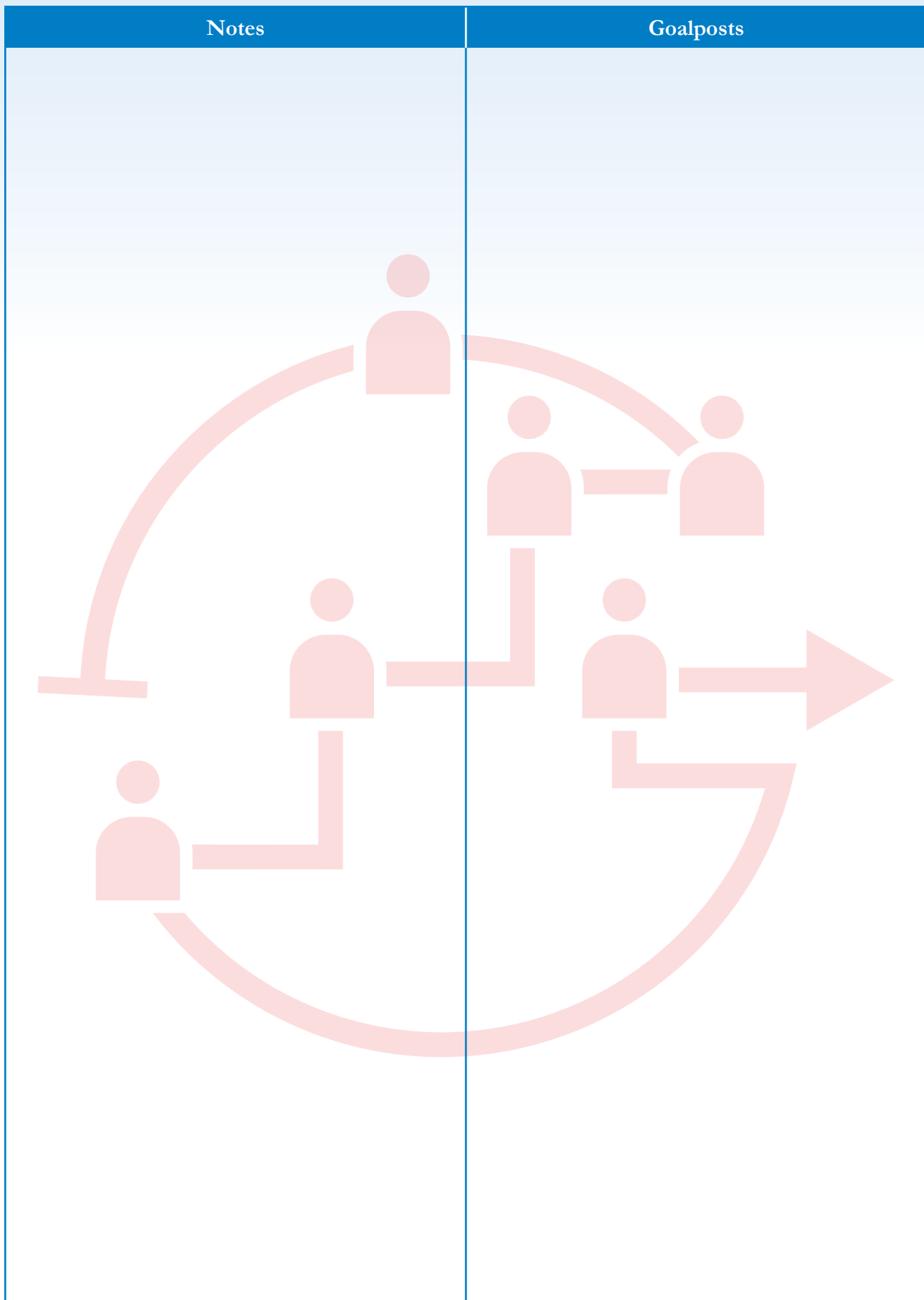
Notes	Goalposts

Notes	Goalposts

5. On-Air Standards of Broadcast

5.1 The programmes broadcast on the CR station follow: *(Please tick all that are applicable)*

    a.   AIR broadcast code

    b.   Guidelines set by parent organisation/NGO

    c.   Policy devised by the CR station (over and above the AIR broadcast code)

5.2 How does the CR station ensure that the station staff and volunteers are familiar with the AIR broadcast code and station programming policies? *(Please tick all that are applicable)*

    a.   Learn on the job

    b.   Through orientation workshops

    c.   Through written guidelines displayed at the station

    d.   Through its website

    e.   Any others, please specify _____

5.3 How does the CR station ensure compliance to the AIR broadcast code and station programming policies? *(Please tick all that are applicable)*

    a.   No fixed compliance method in place

    b.   Random review of programmes periodically

    c.   The station manager/staff member listens to the programmes when aired

    d.   The station manager/staff member listens and pre-screens programmes

    e.   Any others, please specify _____

5.4 What does a CR station do when there are violations of the programming codes/policy? *(Please tick all that are applicable)*

    a.   Broadcasts regrets to any offended sections of the listening community

    b.   Holds staff meetings to discuss ways of ensuring compliance

    c.   Counsel/caution staff members involved

    d.   Holds periodic sensitisation sessions

    e.   Any others, please specify _____

Notes	Goalposts

6. Governance

6.1 How are the policy decisions made for the CR station? *(Please tick all that are applicable)*

- a. Parent organisation/NGO decides
- b. Through discussions among staff members
- c. Through consultations with community members
  (e.g. listener groups, SHGs, other collectives, public hearings)
- d. Through an Advisory Body
- e. Through Management Committee

6.2 Does the CR station have an Advisory body?

- a. Yes
- b. No

6.3 How often does the Advisory body meet?

- a. Not applicable
- b. No particular periodicity
- c. Once a year
- d. Half yearly
- e. Once in 3 months
- f. Once a month

6.4 On what matters does the Advisory body make recommendations? *(Please tick all that are applicable)*

- a. Not applicable
- b. Make/review station policy
- c. Make/review programming policy
- d. Liaise with talent/experts
- e. Foster networking

6.5 Does the CR station have a Management Committee?

- a. Yes
- b. No

6.6 How often does the CR Management Committee meet?

- a. Not applicable
- b. No particular periodicity
- c. Once a year
- d. Half yearly
- e. Once in 3 months
- f. More frequently, please specify _____

6.7 What decisions does the CR Management Committee make? *(Please tick all that are applicable)*

- a. Not applicable
- b. Make/review station policy
- c. Approve financial plans
- d. Advise on HR matters
- e. Advise on programming
- f. Advise and approve technology options

    g.   Liaise with local administration
    h.   Foster networking
    i.   Play advocacy role on national CR Policy
    j.   Any others, please specify _____

6.8 The CR Management Committee has representation from: *(Please tick all that are applicable)*

    a.   Not applicable
    b.   Women
    c.   Minority groups
    d.   Marginalised groups (e.g. SC/ST)
    e.   Children
    f.   Youth
    g.   Senior citizens/Elderly
    h.   Disabled
    i.   Sexual Minorities (gay, lesbian and transgender groups)
    j.   Any others, please specify _____

6.9 How does the CR station recruit its employees?
    (Please tick all that are applicable)

    a.   Appointments made by parent organisation/NGO
    b.   On recommendations from CR Management Committee
    c.   Selected by the station through open call/announcement
    d.   Selected by the station from among volunteers
    e.   Nominations from groups within the community
    f.   Any others, please specify _____

6.10 How often does the CR station CR Management Committee/Advisory Body interact with listeners (listener groups, SHGs, other collectives)?

    a.   No organised interactions
    b.   Once a year
    c.   Once in 6 months
    d.   Once in 3 months
    e.   More frequently, please specify _____

6.11 In what ways does the CR station encourage visits from community members? *(Please tick all that are applicable)*

    a.   It does not have a policy to encourage such visits
    b.   Through random visits
    c.   Through periodic open houses
    d.   Through organised visits by people of different villages or sections of the community
    e.   Through periodic meetings
    f.   Through special events (e.g. Health camp)
    g.   Any others, please specify _____
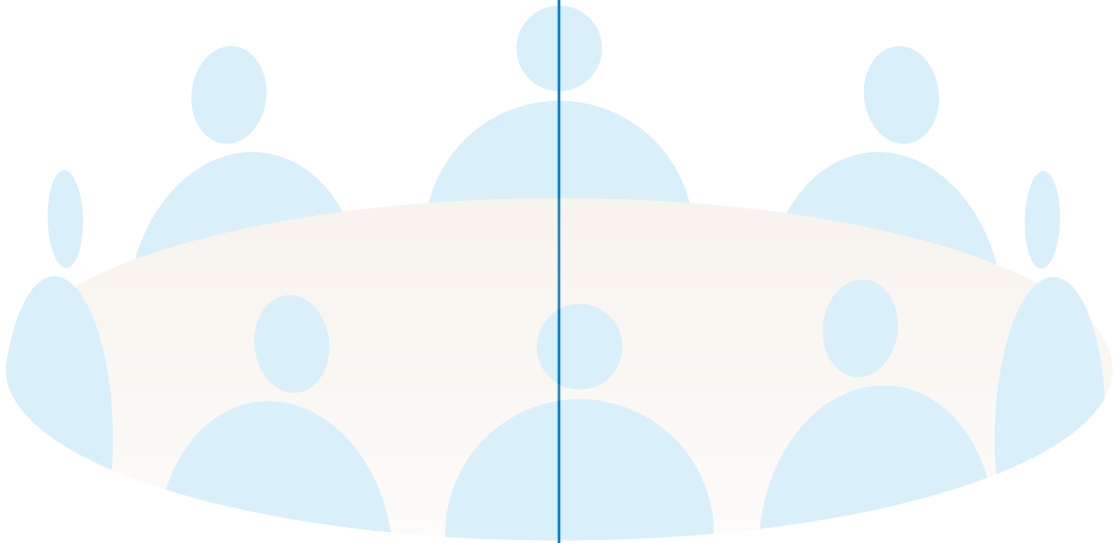
6.11 How does a CR station inform the community about the station's governance processes? *(Please tick all that are applicable)*

    a.   Not applicable
    b.   Through meetings with the community
    c.   Through charts and displays in the CR station

d. During narrowcasting sessions
e. During open house visits
f. During social audits
g. Through announcements on the CR station
h. Through announcements in other local media
i. Through website/social media
j. Any others, please specify _____
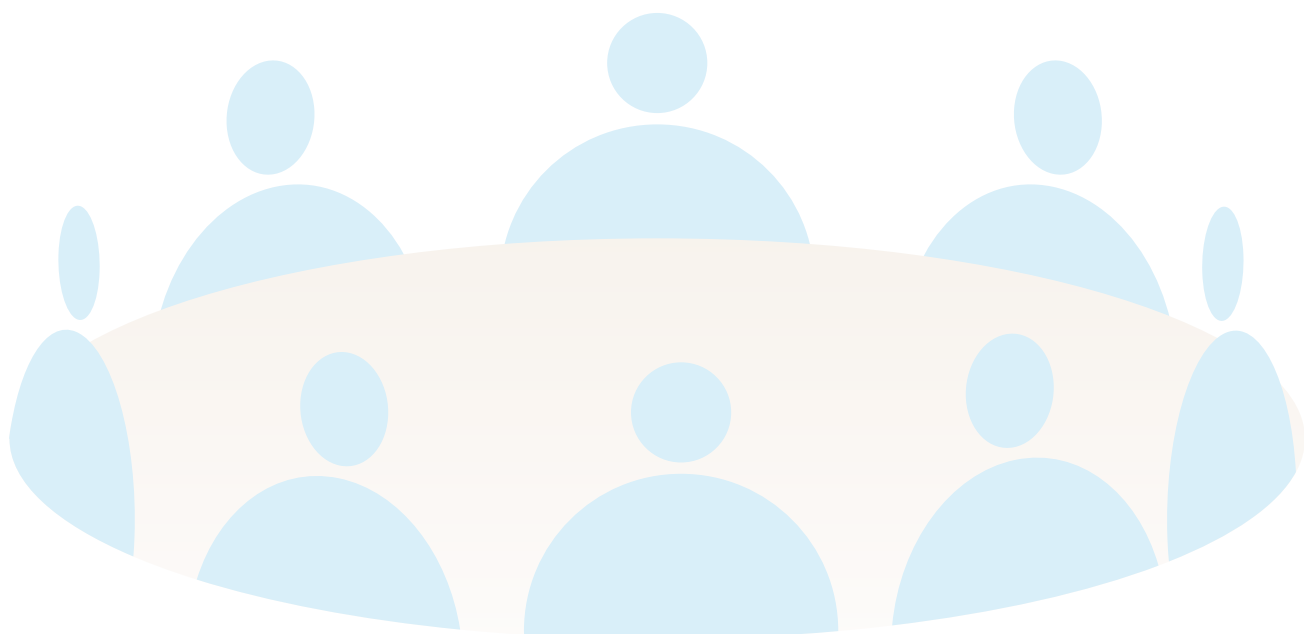
Notes	Goalposts

7. Feedback and Grievances
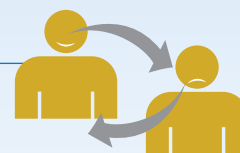
7.1 Through what mechanisms can listeners provide feedback to the CR station?
(Please tick all that are applicable)

    a.   Listenership surveys
    b.   Letters
    c.   Phone calls
    d.   SMSes
    e.   E-mails
    f.   Social networking websites
    g.   Face-to-face meetings
    h.   Suggestion boxes
    i.   Any others, please specify _____

7.2 What procedures does the CR station have in place to process listeners' feedback? *(Please tick all that are applicable)*

    a.   No procedures in place
    b.   Collate and analyse feedback
    c.   Consider the suggestions in periodic staff meetings for action
    d.   Deliberate with parent organisation for action
    e.   Broadcast feedback periodically
    f.   Any others, please specify _____

7.3 Through what mechanisms can listeners register their *grievances* against the CR station? *(Please tick all that are applicable)*

    a.   Listenership survey
    b.   Letters
    c.   Phone calls
    d.   SMSes
    e.   E-mails
    f.   Social networking websites
    g.   Face-to-face meetings
    h.   Complaint boxes
    i.   Any others, please specify _____

7.4 What procedures does the CR station have in place to process listeners' *grievances*? *(Please tick all that are applicable)*

    a.   No procedures in place
    b.   Collate and analyse grievances
    c.   Decisions made by station manager to redress grievances
    d.   Consider the grievances in periodic staff meetings for action
    e.   Deliberate with parent organisation for action
    f.   Broadcast grievances periodically
    g.   Any others, please specify _____

7.5 What procedures does the CR station have in place to process listeners' grievances? *(Please tick all that are applicable).*

    a.   No procedures in place

    b.   Collate and analyse grievances

    c.   Decisions made by station manager to redress grievances

    d.   Consider the grievances in periodic staff meetings for action

    e.   Deliberate with parent organisation for action

    f.   Broadcast grievances periodically

    g.   Any others, please specify _____

7.6 What changes (if any) has the CR station made to its programming and/or transmission in the last six months based on listeners' feedback/grievances? *Please recall specific instances.*

_____
_____
_____
_____
_____
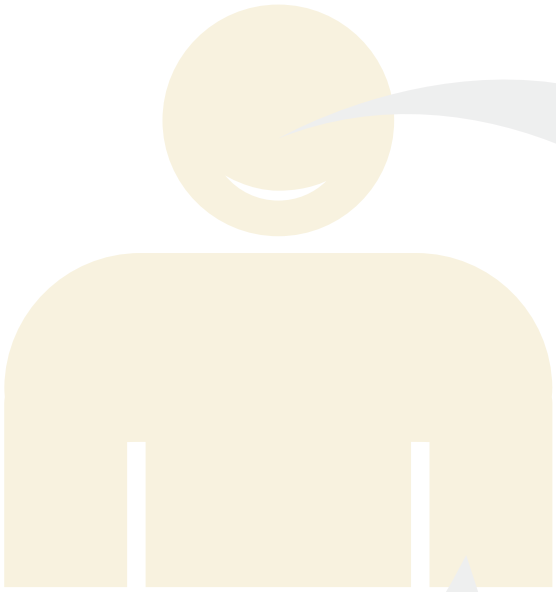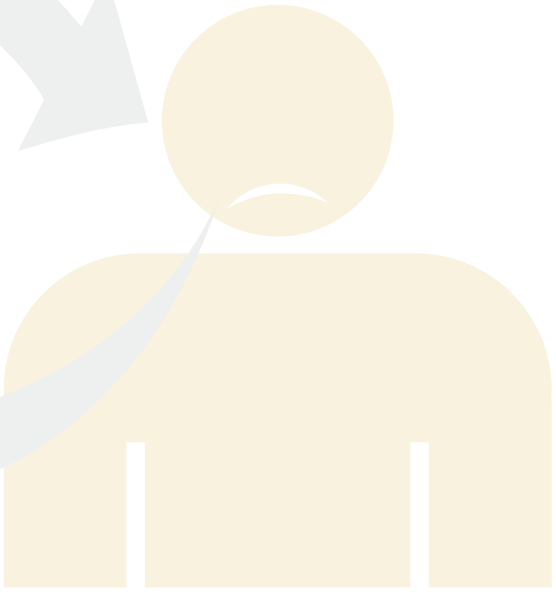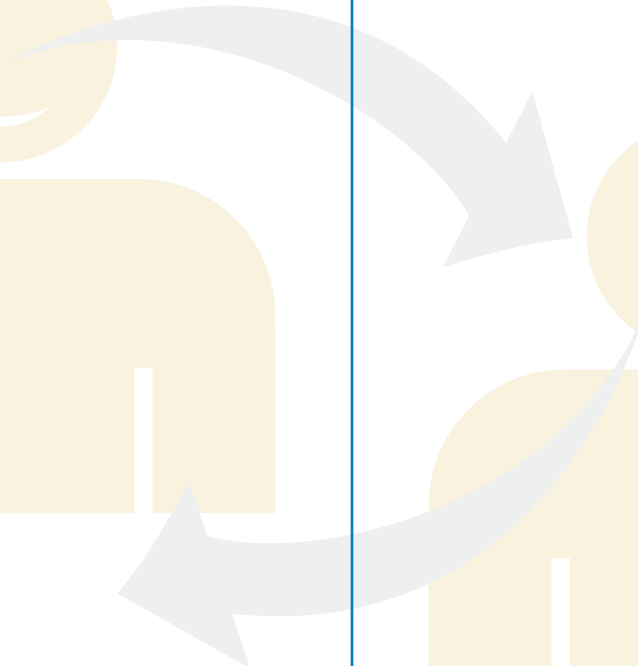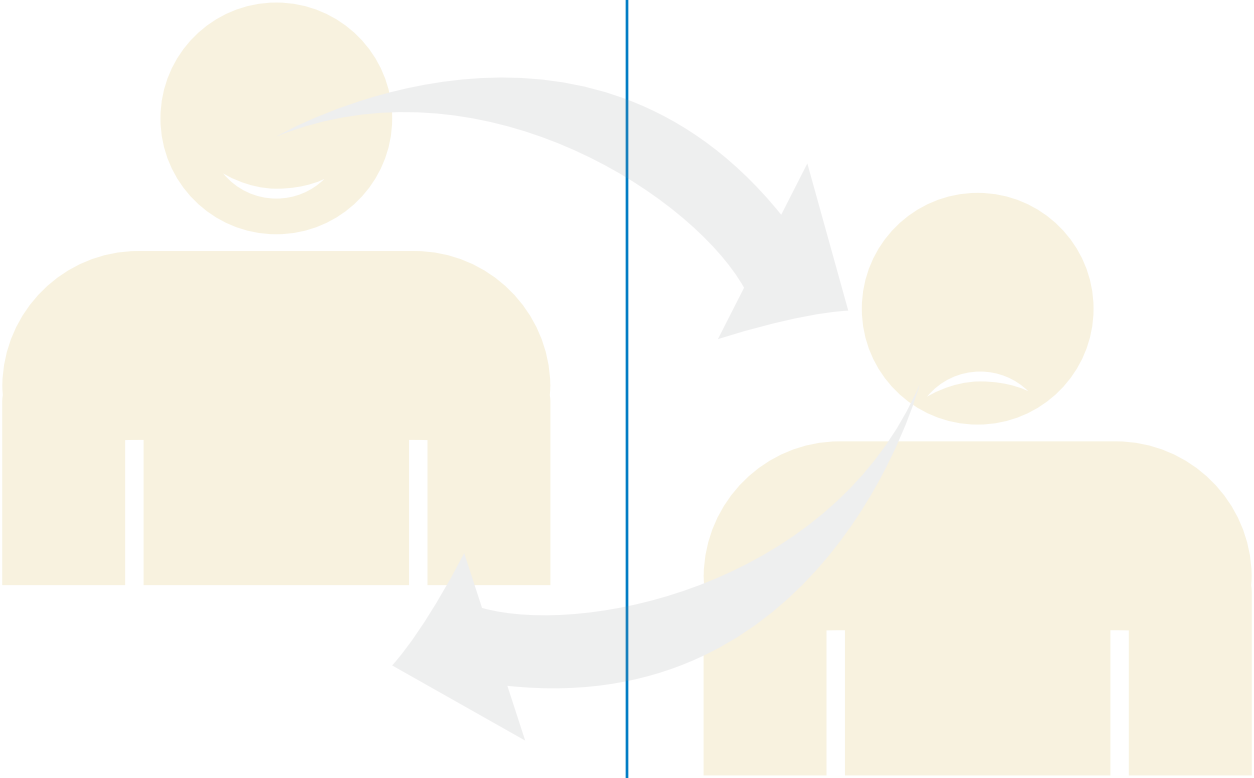
Notes	Goalposts

Notes	Goalposts

8. Content Sharing and Networking

8.1 Which of the following content sharing options does the CR station exercise?
(Please tick all that are applicable)

    a. No content sharing
    b. Sharing of programme ideas
    c. Sharing of scripts
    d. Sharing of programmes
    e. Any others, please specify _____

8.2 What percentage of content broadcast by the CR station is from third party sources? (e.g. UNICEF, UNESCO, BBC World Service Trust, Deutsche Welle, Sesame Street etc.)

    a. About 50%
    b. Between 35–50%
    c. Between 20–35%
    d. Less than 20%
    e. None

8.3 What does the CR station do to protect the rights of local artistes while sharing content with other CR stations? *(Please tick all that are applicable)*

    a. No policy in place
    b. Seek informed consent from the artistes concerned
    c. Ensure on-air credits/acknowledgements
    d. Ensure monetary benefits to artistes if CR station is gaining commercially from its broadcast
    e. Any others, please specify _____

8.4 What does the CR station share with other CR stations? *(Please tick all that are applicable)*

    a. Doesn't share anything
    b. Content
    c. Programme ideas/Scripts
    d. Commercial air time
    e. Capacities
    f. Experiences/Knowledge
    g. Any others, please specify _____

8.5 Does the CR station facilitate exchange visits to other CR stations/groups?

    a. Yes
    b. No

8.6 What national/international associations/networks (online and offline) is the CR station part of? *(Please tick all that are applicable)*

    a. Community Radio Forum of India
    b. Community Radio Association of India
    c. AMARC
    d. Ek Duniya Anek Awaz
    e. Manch
    f. Regional networks (if any, please specify)
    g. Any others, please specify _____

8.7 Does the CR station network with social movements/organisations advocating for people's rights in areas such as: *(Please tick all that are applicable)*

    a.   No linkages

    b.   RTI

    c.   Food security

    d.   Environment

    e.   Forest and Tribal rights

    f.   Women's rights

    g.   Child rights

    h.   Dalit rights

    i.   Right to Education

    j.   Right to Employment

    k.   Any others, please specify _____

Notes	Goalposts

Notes	Goalposts

9. Revenue Generation and Financial Accountability

9.1 What are the CR station's sources of revenue? (When you add up percentage of all sources it should approximate to 100%)

Sources	Percentage of Total Support
Funding by multilateral agencies	
Parent organisation	
Advertising (government)	
Sponsorship (government)	
Advertising (commercial)	
Programme-based grants	
Income from special projects	
Funds from MIB scheme	
Selling station merchandise	
Membership fee	
Community contributions	
Other sources, please specify 1. 2. 3.	

9.2 On an average for the period under review, how many minutes *per hour* of advertising was the CR station able to procure?

  a. No advertising
  b. 0.01–0.59 minutes
  c. 1.00–1.59 minutes
  d. 2.00–2.59 minutes
  e. 3.00–3.59 minutes
  f. 4.00–5.00 minutes

9.3 Which of these *supplementary sources* of revenue has the CR station tapped into: *(Please tick all that are applicable)*

  a. No supplementary sources
  b. Studio rental
  c. Equipment rental
  d. Photocopying
  e. Internet Use
  f. Training
  g. Any others, please specify _____

9.4 In what ways does the CR station raise funds, if any from the community? *(Please tick all that are applicable)*

  a. Does not raise
  b. Membership fee
  c. Donations in cash
  d. Donations in kind
  e. Greetings/announcements
  f. Any others, please specify _____

9.5 How frequently does the CR station present its statement of accounts to the members of the community?

    a. Doesn't present
    b. Once every year
    c. Once every 6 months
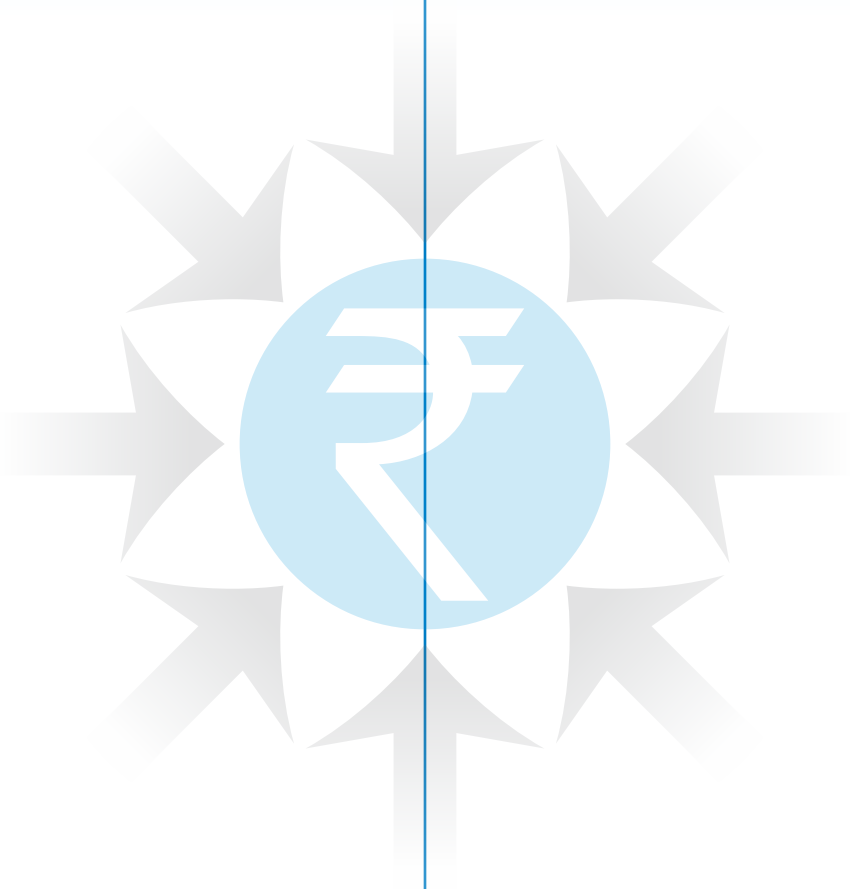
9.6 Through what means does the CR station share its financial reports with the community? *(Please tick all that are applicable)*

    a. Does not share
    b. Display at the CR station
    c. Share them on the website
    d. Make available on demand
    e. Broadcast them periodically
    f. Any others, please specify _____

9.7 What would the CR station do to improve on its existing sources of revenue generation? *(Please tick all that are applicable)*

    a. Maximise current sources of revenue
    b. Diversify sources of revenue
    c. Optimising transmitter reach to increase audiences
    d. Enhance special interest programming
    e. Improve programme quality
    f. Scale up community participation
    g. Intensify external networking activities
    h. Any others, please specify _____

Notes	Goalposts

Further Readings

Buckler, Bill (1996). A learning process model to achieve continuous improvement and innovation, *The Learning Organization*, 3 (3), pp. 31–39.

Buckley, Steve (2008). Community broadcasting: good practice in policy, law and regulation, Paper prepared for UNESCO for World Press Freedom Day 2008 by President, World Association for Community Radio Broadcasters. Retrieved from http://www.unesco.org/new/fileadmin/MULTIMEDIA/HQ/CI/WPFD2009/pdf/wpfd2008_ steve+buckley+community+media+-+maputo+wpfd.pdf

Community MHz II: Assessing Community Radio Performance in Nepal (2012), retrieved from http://www.amarc.org/documents/articles/Nepal_CommunityMHzII.pdf

Fraser, Colin and Estrada, Sonia Restrepo (2001). *The UNESCO Handbook on Community Radio*, Paris: UNESCO.

Howley, Kevin (2000). Radiocracyrulz! Microradio as electronic activism, *International Journal of Cultural Studies,* 3(2), pp. 256–267.

Langley, G., Nolan, K., Norman, C., & Provost, L. (1996). *The Improvement Guide: A Practical Approach to Enhancing Organizational Performance,* San Francisco: Jossy Bass Publishers.

Lennie, June and Tacchi, Jo (2013). *Evaluating Communication for Development: A Framework for Social Change,* Oxon, UK: Routledge.

Mertens, Donna M. (2009). *Transformative Research and Evaluation,* New York: Guilford Press.

Ojebode, A. (2009). *Doing Community Radio, A toolkit for Nigerian Communities,* Lagos: Nigeria Community Radio Coalition.

Pavarala,Vinod and Malik, Kanchan K. (2007). *Other Voices: The Struggle for Community Radio in India*, New Delhi: Sage Publications.

Waldman, Steven (2011). The Information needs of Communities, The changing media landscape in a broadband age, Federal Communications Commission (FCC), July 2011. Retrieved from: http://www.fcc.gov/info-needs-communities.

Wenger, E., McDermott, R. & Snyder, William M. (2002). *Cultivating Communities of Practice*, Boston: Harvard Business School Press.

Notes

TRAI Consultation on Community Radio

Survey on Advertising and other Community Radio related issues

5th July 2014

Submitted by
OneWorld Foundation India
C-1/3, First Floor
Safdarjung Development Area
New Delhi – 110016

Introduction

The Telecom Regulatory Authority of India (TRAI) has undertaken a participatory process for the purpose of preparing its recommendations to the government on issues related various facets connected with the licensing of Community Radio Stations in India.

TRAI released a consultation paper on 'Issues related to Community Radio Stations' on 21st May 2014 inviting comments from the stakeholders. Following this, TRAI organized an Open House Discussion on 3rd July 2014 to deliberate on the issues of renewal of Grant of Permission Agreement (GOPA), broadcast of news, use of Community Radio Stations in emergencies, advertising etc.

Besides TRAI officials, senior officials from the Ministry of Information & Broadcasting, representatives of Operational CR Stations, Community Radio Association, Community Radio Forum, practitioners and stakeholders including Ford Foundation, CEMCA, OneWorld Foundation India, Ideosync Media Combine and the Digital Empowerment Foundation attended the Open House Discussion at TRAI Headquarters. TRAI Chairman Dr Rahul Khullar chaired the meeting.

One of the major issues that came up during the discussions related to the advertising space as provided in the Community Radio Policy, current usage of advertising space and pricing. TRAI intends to understand the views of the operational Community Radio Stations vis-à-vis advertising, DAVP empanelment, pricing and its current usage.

Following from the open house, OneWorld Foundation India conducted a survey among the radio stations to understand the issues of Community Radio Stations on advertising, usage of advertising space and pricing,. A questionnaire was prepared in consultation with the Ministry of Information and Broadcasting before its circulation among the Community Radio Stations for the purpose of eliciting their views. Below are the findings and other details.

Key Findings

Currently, there are 170 operational Community Radio stations in India. A total of 52 Community Radio Stations (of 170 Community Radio Stations operational in the country) participated in the online survey within a short window span of less than 48 hours. While the information that came out of the survey

Break up of participating CR Stations by type of parent organisation

	Educational Institution	KVK/ Agriculture University/ SAU	NGO/Society/Trust
Total	23	5	24
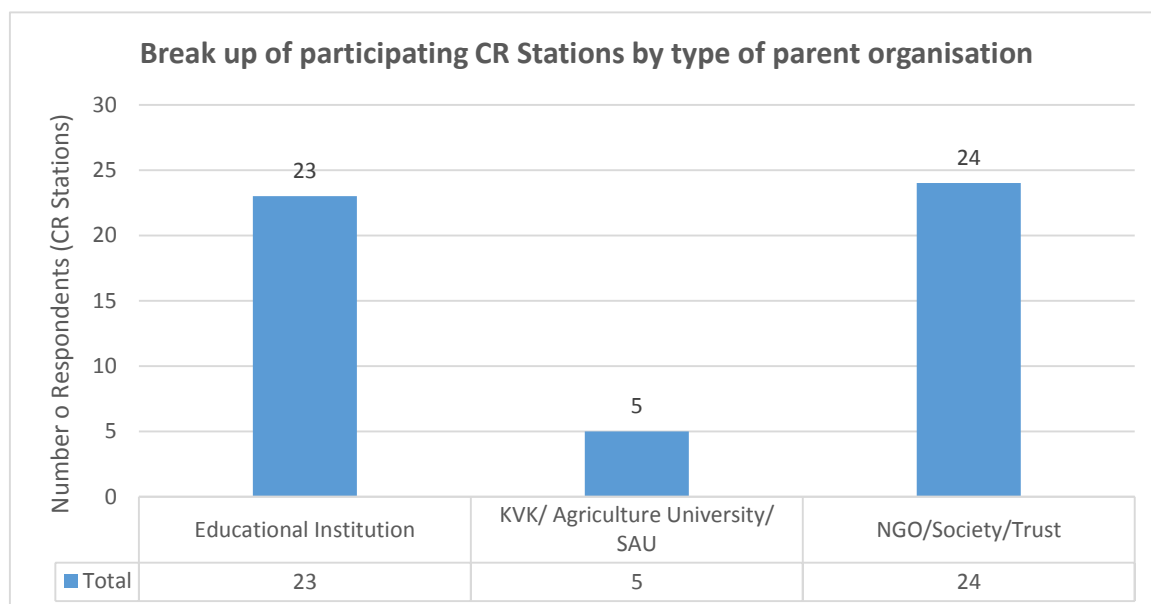
might be basic, the survey threw up a host of issues pertaining to their current usage advertising time,

factors that affect optimal utilization of commercial time, the repercussions of not being able to renew their GOPA documents etc.

The break up of stations by type of their parent organisations suggests that of the 52 participants in the survey, 24 Community Radio Stations are licensed to NGOs, 23 to educational institutions while 5 by KVK-run.

Of these 52 respondents (Community Radio stations), 32 are empanelled with the DAVP while 20 are not. In order to conduct the survey, OneWorld first got in touch in with the stations empanelled with DAVP. This was done to come to an understanding if Community Radio Stations empanelled with DAVP are able to utilize the commercial time of 5 minutes per hour as provided in the Community Radio policy guidelines. This would also help in drawing a comparison between Community Radio stations empanelled with DAVP and not empanelled with DAVP. *(It might be important to note that of the total of 170 Community Radio Stations, 41are empanelled with DAVP and that these 32 Community Radio Stations participating in the survey represent an overwhelming opinion of those empanelled with the DAVP.)*

DAVP empnanelment status of respondents

	No	Yes
■ Total	20	32
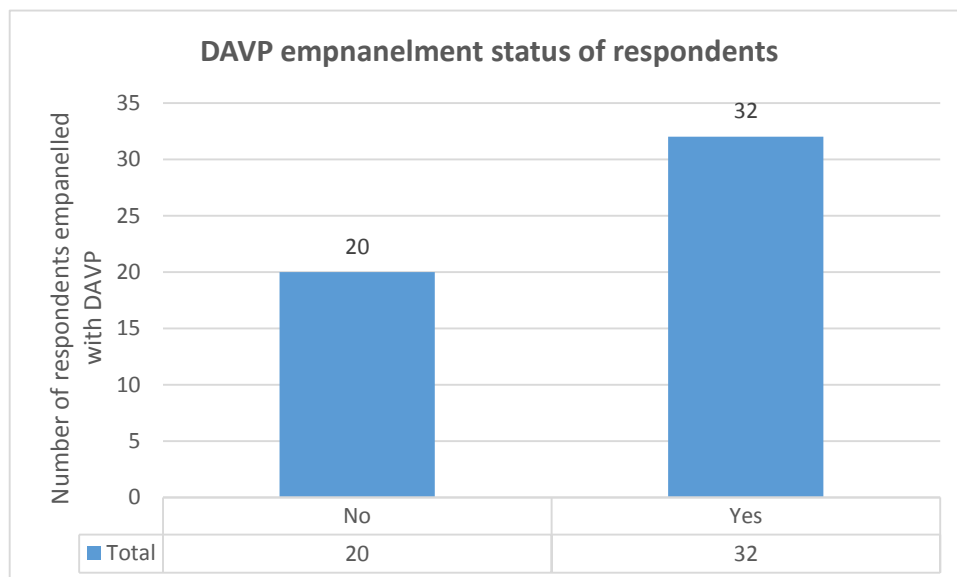
Utilization of Advertising Time

As per the Community Radio policy guidelines, Community Radio Stations can broadcast advertisements for up to 5 minutes for every hour of broadcast. Currently 41 stations are empanelled with the DAVP. However, the survey among Community Radio stations reveals that only 7 stations, i.e. 13 per cent are able to fully utilize the commercial time of 5 minutes.

Community Radio Stations have expressed that the DAVP should release more advertisements for Community Radio Stations, fast-track the payment process and increase the existing rates for DAVP advertisements.

Utilization of advertising space of 5 minutes per hour as per the CR policy guidelines

Yes
13%

No
87%
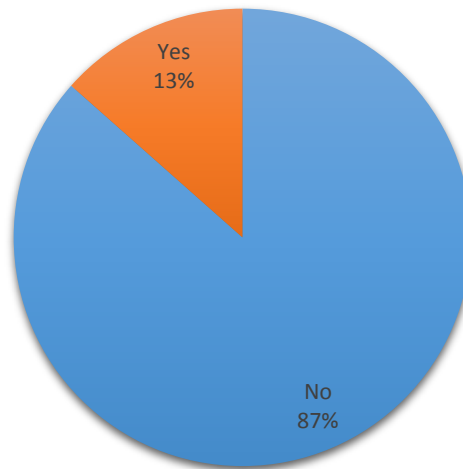
Average usage of advertising time

The second question on advertising dealt with the average usage of advertising time by the Community Radio Stations. Of the 52 participating Community Radio Stations, 40 responded to this question. An analysis of the response shows that the average advertising time being currently utilized by the 40 respondents is around 2.6 minutes per minutes for every hour of broadcast. This indicates that a majority of the stations are not able to utilise about 50 per cent of the commercial time out of 5 minutes as envisaged in the CR policy guidelines.

Average usage of advertising space of 5 minutes per hour

	Up to 1 Minute	Up to 2 minutes	Up to 3 minutes	Up to 4 minutes	Up to 5 minutes	(blank)
Total	10	15	9	1	5	12

Number of respondents
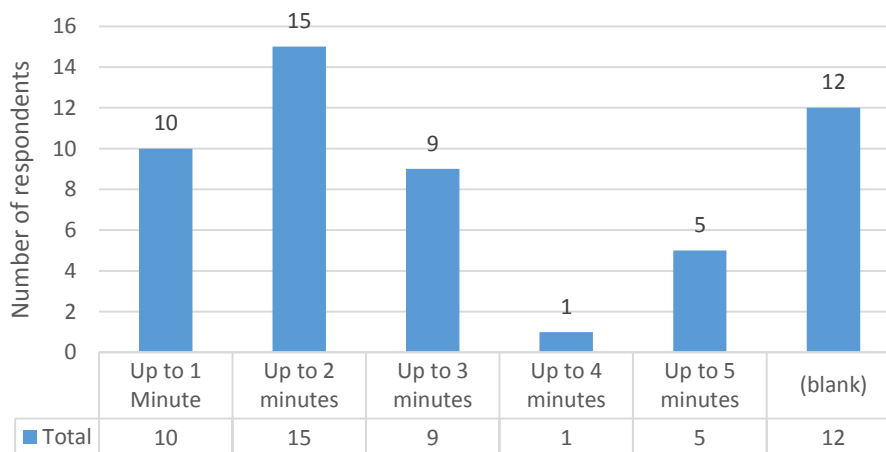
Reasons for not utilising advertising time

The following question tried looking at the reasons due to which Community Radio stations are not able to use the advertising space optimally -- On an average how many minutes of the advertising space you are able to utilize in an hour?

Some of the options included lack of advertisers in the area where Community Radio Station broadcast, lack of awareness among advertisers about Community Radio and its potential, lack of interest among

advertisers for Community Radio Stations and not able to negotiate/reduce advertising tariff below the DAVP rates as they have submitted an undertaking for not accepting advertisements at lesser rates than that stipulated by DAVP.

(Many communities served by Community Radio Stations work and broadcast in the most backward regions of the country where dispensable incomes, and consequently, purchasing powers of the people are very low.)
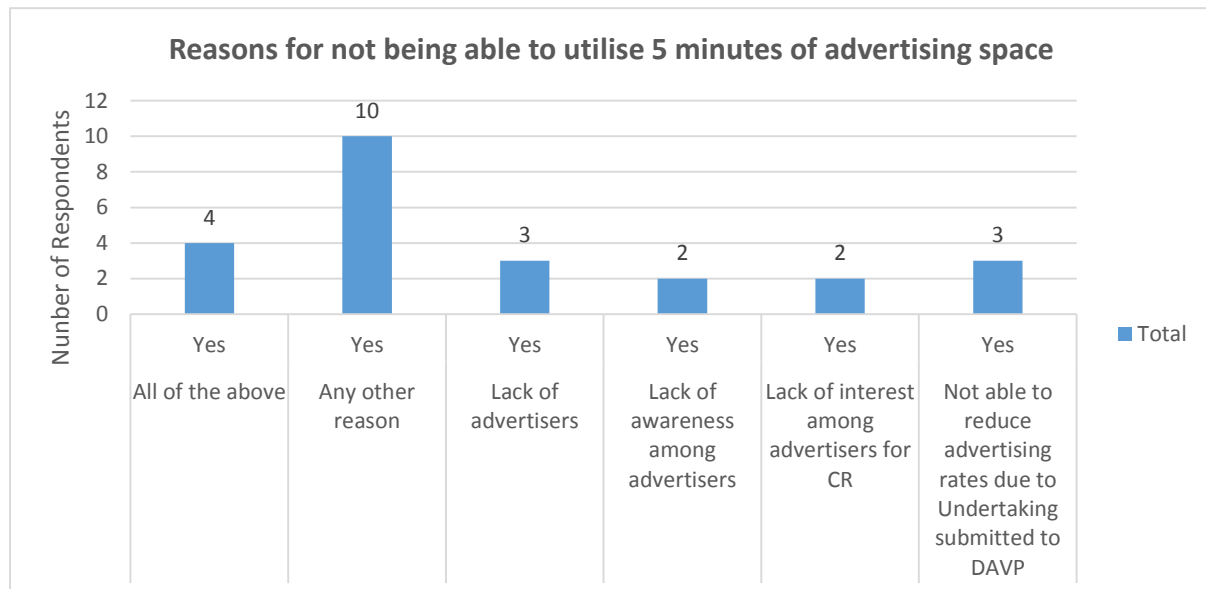
The results indicate that most of the respondents face the problem of lack of advertisers, awareness about Community Radio stations among advertisers and also the lack of interest among advertisers for Community Radio. Many Community Radio Stations indicated that they wanted to reduce their advertising rates in order to attract more advertisers, but were not able to do so in view of the undertaking submitted by them to DAVP stating that they will not offer DAVP rates (or less) to another client.

The respondents cited some other reasons for not being able to utilize the existing commercial time of 5 minutes. Following are some of the reasons:

- Remote location of the Community Radio Station
- Broadcast area of the radio station
- Reception quality and reach of signals
- Competition from FM Stations, especially in metro cities
- Lack of funds and support and no marketing team
- Privately sponsored programmes are not allowed
- DAVP rates are too high for local and small businesses

Views on existing advertising time – 5 minutes/ hour

This question aimed at understanding the views of Community Radio Stations about existing 5 minutes of advertising time as provided by the policy guidelines. When asked whether or not 5 minutes of the advertising time is sufficient, 58 per cent respondents (30 Community Radio stations) were of the view that it is sufficcent.

It might be noted that while earlier responses show that on an average the Community Radio Stations are able to utlize only 2.6 minutes of the commercial time, yet, 42 per cent (22 respondents) think that 5 minutes is not sufficent.
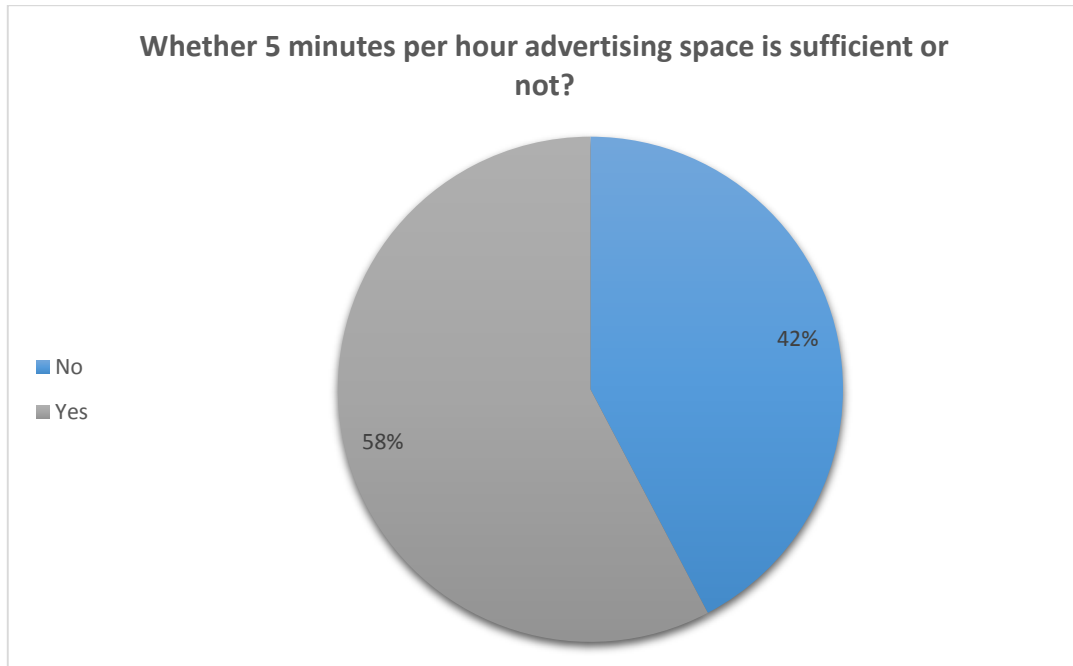
Those who said that the advertising time of 5 minutes per hour is not sufficient for the CR station think that it should be increased. A total 5 respondents said advertising time should be increased and kept up to 8 minutes per hour. At the same time, 13 respondents were of the view that it should between 8 – 10 minutes while 2 respondents think that it should be 10 – 12 minutes.
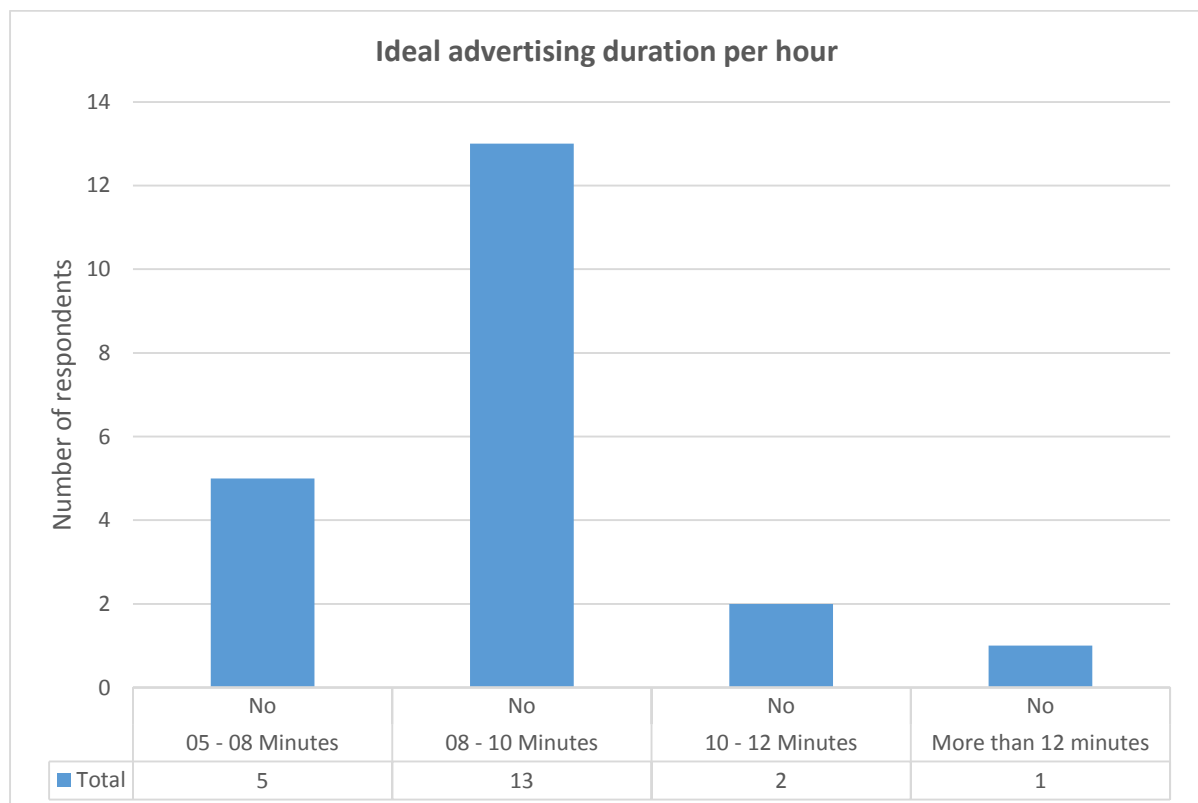
Views and Suggestions from CR Stations

S.No.	Name & Location of the Community Radio station	Comments/ suggestions on advertising
01	Radio FTII, Pune, Maharashtra	▪ In the city like Pune, competition from other stations. ▪ No Marketing team of CRS due to lack of funds or support ▪ Reach of signal is also hindrance in attracting advertisers
02	Kalanjiam Samuga Vanoli, Nagapattanam, Tamil Nadu	Local advertisement contents come for more than 30 seconds and were not affordable for rural enterprise. They were not able to shrink their advertisement content.
03	Radio Bundelkhand, Tikamgarh, Madhya Pradesh	High charge rates- Local small businessmen are not able to pay advertisement rates given by DAVP. With larger companies, charge rate with respect to covered area is again high (reach area is small but charge rates are very high as compared to reach).
04	KVK Pravara, Ahmednagar, Maharashtra	Community Radio situated in rural area so nobody is interested to invest money.
05	Radio Siddhartha, Tumkur, Karnataka	Not getting any private or DAVP advertisements. Advertisers are not interested in giving advertisements to the institute. Also the coverage area is less so not getting advertisements and most people see TV and do not listen to radio.
06	Gurgaon Ki Awaaz Samudayik Radio	DAVP rate too high for local, small businesses, no dedicated person to market ad space, advertisers are keen to sponsor programs which is not allowed. Broadcast footprint is smaller than even 10 kms in some areas because tower height is limited to 30 meters and Gurgaon has many buildings that are taller than that and hence block line of sight signal. Since the main shopping areas (Sadar Bazar Gurgaon) do not receive a clear signal, shopkeepers are reluctant to commit to ads.
07	Chanderi Ki Awaaz, Ashok Nagar, Madhya Pradesh	▪ No marketing plan ▪ No Staff ▪ Advertisement Rate high ▪ Not proper Communication ▪ No publicity ▪ Untrained Staff for Advertisement

GOPA Renewal

As per the Community Radio policy, Grant of Permission Agreement is valid for a period of 5 years. While efforts are being made to institutionalise a GoPA renewal process, most of the operational Community Radio Stations feel that the GoPA renewal should be done for a period of 10 years.

Around 42 per cent (22 respondents) of the respondents who participated in the survey feel that GOPA should be renewed for a period of 10 years in addition to the initial 5 years for which permission is issued. 40 per cent i.e. 21 station felt that this period should be 5 years in addition to the initial 5 years.

Ideal time for renewal of GoPA in addition to exisiting 5 years for which license issued

- More than 15 years 10%
- 15 Years 8%
- 05 Years 40%
- 10 Years 42%

Legend:
- 05 Years
- 10 Years
- 15 Years
- More than 15 years
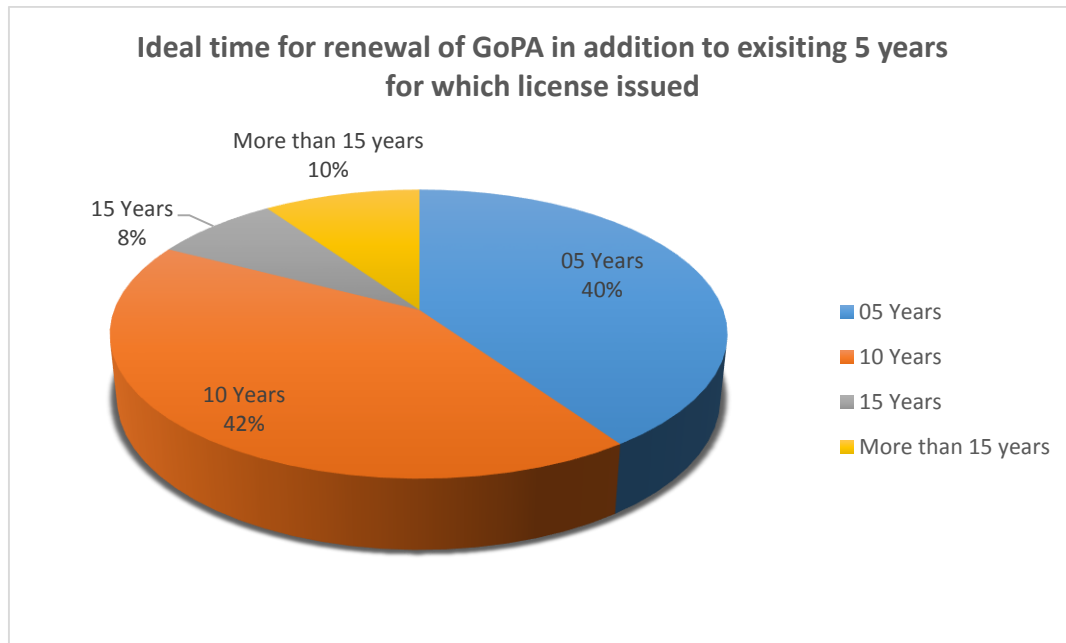
Most Community Radio Stations also agreed (and were open to the idea) that there should be a review or audit of the work before renewing the permission. 39 out of 53 (75 per cent of the total respondents) said that GOPA should be renewed after a review process.

Should there be a review/ audit before GOPA renewal

- No 25%
- Yes 75%

Legend:
- No
- Yes
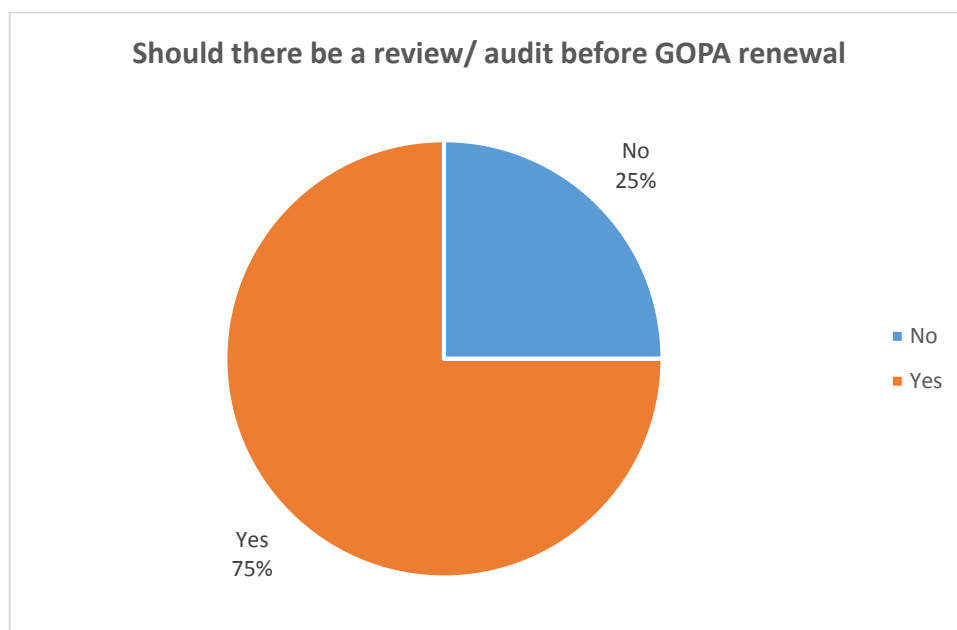
Comments/ Inputs from the CR Stations

The survey/ audit should be optional for CRS to renew GOPA. Advertising rate should be more than Rs. 4 per second

Deshraj
Radio Mewat, Haryana

Licensing process should be fast and less complicated

N A Shah Ansari
Radio Namaskar, Odisha

The establishment of CR itself takes about 5 years so renewal should be for at least 10 years. More government schemes for supporting CR should be introduced

S K Babu
Shyamalavani, Madurai, Tamil Nadu

DAVP Payment process should be fast. State governments should help us

Mohan Karki
Kumaon Vani, Uttarakhand

DAVP Payment process should be fast and on time. Government should treat Community Radio station like any other commercial venture and other ministries and department should give advertisements to Community Radio on regular basis

B S Panwar
Hamara MSPICM CR, Solan, Himachal Pradesh

We want when we renew our GOPA at that point of time we want to change our location so we can sustain

Amol U Deshmukh
Swaranant CR, Washim, Maharashtra

Local bodies should come out for the help of Community Radio. A report should be present by the Community Radio before the GOPA renewal

Nirmal Bhatnagar
JIMS Rohini, Delhi

Annual license or WOL renewal should be for a longer time. Some notice by government to state governments for CR to receive adverts directly for them or approach them

Zahed Farooqui
Deccan CR, Telangana

The process should be made easy for CR stations (GOPA renewal)

Fr Ferdinand Peter
Radio Benziger, Kerala

Every CR cannot be judged and reviewed according on one pattern. Somebody should help CRS to get advertisements as staff and skills not available with everyone for marketing. CR should be used as a tool for public announcements by putting a budget for it.

Anuradha Kunte
Yerala Vani, Sangli, Maharashtra

DAVP rates should be increased, range should be increased, Community Radio can broadcast news, local administration or district authority should help the Community Radio

Jitender Sharma
Kissan Vani, Sironj, Madhya Pradesh

State government does not know what CR is? Lack of awareness so not providing any advertisements, state governments should be informed about CR as a tool. Coverage area of CR should be increased by some provision

Shivaji Ganeshan
Radio Siddhartha, Tumkur, Karnataka

Survey, some sort of recognition should be there from ministry's side for those who working in rural areas. Strong review mechanism should be there

Dr Bhaskar Gaikwad
KVK Pravara CR, Maharashtra

More support from government for advertising. The rate for CR adverts should be Rs. 15 per second. More support and adverts from DAVP is required and timely release of funds from DAVP is required

Paul Bhaskar
Pasumai CR, Tamil Nadu

Reminder for renewal of GOPA should be sent to registered email of CRS. Original bank guarantee should be returned to CRS to enable issue of new bank guarantee.

Arti Jaiman
Gurgaon Ki Awaaz Samudayik Radio, Haryana

The GOPA renewal process should be a one-time process. The process should be simplified as much as possible

Ashok Singh Sunhal
Alwar Ki Awaaz, Rajasthan

Instead of a review a report should be asked for from the CRS. Sponsorship should be allowed for CRS

Seema Bharti Shrivastava
Voice of Azamgarh, Azamgarh, Uttar Pradesh

Recommendations

- Government bodies and agencies like DAVP, WPC etc should recognise the service Community Radio Stations do to the communities they work among and to the larger benefit of the country and come up with an enabling policy regime for Community Radio Stations.

- Create an enabling policy for Community Radio Stations to utilise their allocated advertisement time.

- The DAVP undertaking on minimum pricing should not become a limitation for Community Radio Stations and they should be encouraged to market airtime

- The existing time of 5 minutes per hour should be increased.

- The existing DAVP rates should be increased for the Community Radio Stations.

- Community Radio Stations that have demonstrated their abilities to run and broadcast for five years should have a GOPA renewal for 10 years (considering that some of these Community Radio Stations operate in very remote areas and build their capacities from the scratch).

- Like any other creative agency, DAVP should encourage Community Radio Stations to act as creative agencies to produce advertisements on behalf of DAVP in the languages and dialects of their listenership. This should be accompanied with a remuneration package corresponding to DAVP's policies.

ANNEXURE -1

List of CR Stations – Survey Participants

S.No.	Name of the Community Radio station*	District	State
1	Radio Media Village	Kottayam	Kerala
2	Radio Active	Bangalore	Karnataka
3	Radio Mewat	Mewat	Haryana
4	Hint Radio	Ghaziabad	Uttar Pradesh
5	Rudi No Radio	Ahmedabad	Gujarat
6	Radio Namaskar	Puri	Odisha
7	Shyamalavani CR	Madurai	Tamil Nadu
8	Kumaon Vani	Mukteshwar	Uttarakhand
9	Alfaz e Mewat	Mewat	Haryana
10	Radio Snehi	Siwan	Bihar
11	Hamara MSPICM CR	Solan	Himachal Pradesh
12	Aap Ki Awaz	Agra	Uttar Pradesh
13	Manav Rachna CR	Faridabad	Haryana
14	Swaranant CRS	Washim	Maharashtra
15	JIMS CR Rohini	Delhi	Delhi
16	Radio FTII 90.4 CRS	PUNE	Maharashtra
17	Kalanjiam Samuga Vanoli	Nagapattinam	Tamil Nadu
18	Vallabh Krishak Radio	Saharanpur	Uttar Pradesh
19	SANJHA RADIO	YAMUNA NAGAR	Haryana
20	Vasundharaa Vaahini	Pune	Maharashtra
21	Mugil CR	Erode	Tamil Nadu
22	Pantnagar Janvani	Udham Singh Nagar	Uttarakhand
23	SSM Community Radio	Namakkal	Tamil Nadu
24	Deccan Radio	Hyderabad	Telangana
25	Radio Bundelkhand	Tikamgarh	Madhya Pradesh
26	Radio MGIRI 90.4 FM	Wardha	Maharashtra
27	Radio Benziger	Kollam	Kerala
28	Y CR	Kolkata	West Bengal
29	Neotech CR	Ambikapur	Chhattisgarh
30	Radio Mattoli	Wayanand	Kerala
31	Yerala Vani	Sangli	Maharashtra
32	Radio Luit	Guwahati	Assam
33	Kisan Vani CR	Vidisha	Madhya Pradesh
34	Radio Rimjhim	Gopalganj	Bihar
35	Puduvai Vaani CRS 107.8	Puduchery	Puducherry
36	KVK Pravara CR	Ahmednagar	Maharashtra
37	Radio Siddhartha	Tumkur	Karnataka
38	Neladhani CR	Bengaluru Rural	Karnataka
39	Henval Vani CR	Tehri Garhwal	Uttarakhand

40	Jnan Taranga	Kamrup	Assam
41	Pasumai CR	Dindigul	Tamil Nadu
42	Gurgaon Ki Awaaz	Gurgaon	Haryana
43	CRS Ghazipur	Ghazipur	Uttar Pradesh
44	SRM Muthucharam CR	Kancheepuram	Tamil Nadu
45	Alwar Ki Awaz	Alwar	Haryana
46	Sangham Radio	Medak	Telangana
47	Periyar Community Radio	Thanjavur	Tamil Nadu
48	Voice of Azamgarh	Azamgarh	Uttar Pradesh
49	Jana Dhwani	Mysore	Karnataka
50	Radio Amity	Gautam Buddha Nagar	Uttar Pradesh
51	Chanderi Ki Awaaz	Ashoknagar	Madhya Pradesh
52	AGN SCHOOL CRS	SALEM	Tamil Nadu

Attached

1. Annexure 2 – Survey Questionnaire
2. Annexure 3 – Raw Data in Excel Format

(ENDS)

Working Paper on
Community Radio Support Fund of India (CRSFI)

Vinod Pavarala, Kanchan K. Malik, Ashish Sen, Ramnath Bhat, Sajan Venniyoor,
Arti Jaiman, Hemant Babu, N. Ramakrishnan, Mitu Varma
*(*Submitted on behalf of **Community Radio Forum of India** at the meeting of the Working Group on Community
Radio Support Fund set up by the Ministry of I&B, July 14-15, 2011)*

Background:

Economic viability and sustainability continues to be the major challenge for community radio stations in India especially in rural areas. This working paper proposes the establishment of a Community Radio Support Fund of India, to be referred to as the CRSFI. It urges the government to adopt mechanisms for state support to the community radio sector with a view to expand and improve access of the marginalised to media. This document first describes the structural and operational plan of Community Radio Funds in other countries before making recommendations for the management and administration of CRSFI.

Community Media Support Mechanisms of other countries:

A study carried out in May 2006 by the National Campus and Community Radio Association (NCRA/ANREC), with assistance from the European office of the World Association of Community Radio Broadcasters (AMARC), looked at the community radio support mechanisms in several industrialized countries.

The study, restricted to state-mandated support for community radio, compared seven industrialized countries – Ireland, the United States, Australia, France, the Netherlands, New Zealand, and the United Kingdom – that have reputable national government-mandated community radio support programs. According to the study, support to a CR station may commonly be administered in three forms: "a direct station operational subsidy; targeted support for specific station operations (typically programming production and distribution, staff training and capacity building, and transmission and production equipment); or a combination of the two."

A comparative analysis of CR funding systems of five countries – Australia, Ireland, South Africa., Canada, and the U.S – also finds place in the book *Other Voices – the Struggle for Community Radio in India* by Vinod Pavarala and Kanchan Malik. They observe that community radio stands out as a sector which is distinctive not only in terms of its mandate and programming content, but also in terms of its sources of revenue and funding. In all the five countries, advertising and/or sponsorship is permitted but confined within specified norms and an emphasis is placed on funding from a diversity of sources to ensure that, primarily, the community served determines the programming.

According to the book and the above-mentioned study, Australia has a non-profit, independent, federal funding body i.e. the Community Broadcasting Foundation (CBF), in place to support community broadcasting with over 20 targeted granting programs. The CBF receives an annual grant from the Department of Communications, Information Technology and the Arts plus a smaller grant from the Aboriginal and Torres Strait Islander Commission. The community radio in France is ensured by the federal Fonds de soutien à l'expression radiophonique (FSER), which is funded by a tax on the advertising revenue of commercial broadcast media. FSER funding is available through three programs: new station subsidy; operational subsidy (operations, training of personnel, education and culture, program production and sharing, and social development); and acquisition and replacement of equipment.

The Community Radio Support Scheme in Ireland is funded by the Broadcasting Commission of Ireland (BCI) and the Community Radio Forum of Ireland (CRAOL), is responsible for managing it. The Commission allows coordinated funding for community stations from appropriate statutory sources and endorses that community radio should be included in the support structures being developed for community and voluntary organisations generally. The Community Radio Support Scheme typically funds evaluations, with the larger aim of building capacity within the individual stations as also the community radio sector.

The NCRA/ANREC study clarifies that in The Netherlands a radio license fee is levied to each household, yearly, for having a radio or television set and all local community broadcasters are eligible receive a percentage of this from the Dutch Media Commission based on their listenership.

The Corporation for Public Broadcasting (CPB) helps organizations in obtaining grants or loans for the construction of a low power radio station in the USA and funds non-commercial broadcasting, including both public and community radio.

In New Zealand, the funding for "access radio," is in the form of operational subsidies through a national independent funding agency for public and local content on radio and Television. According to a Centre for International Media Assistance (CIMA), report, dated April *5, 2011* and titled, 'Voices from Villages: Community Radio in the Developing World' , "other examples of aid from government sources to community radio include a tax on cable or telecommunication operators (Colombia); government funds made available to support training, equipment purchases, and/or provide indirect funding such as fee and tax waivers (Venezuela, Bolivia, and Colombia); government funds set aside for training, technical support, and research and development (Bangladesh)."

In South Africa, community broadcasters can access government assistance for, amongst other things, training, capacity building and in-kind assistance through Media Development and Diversity Agency (MDDA) in accordance with the MDDA ACT, excerpts of which are given below. Also stated below are the relevant provisions of the Community Radio Fund for British

community broadcasters, set up by Ofcom in the UK. Following that are some of the extracts from the structural and operation plan of Community Radio Fund of Canada.

MDDA; South Africa (extracts taken directly from MDDA Act)

The Media Development and Diversity Agency (MDDA) of South Africa is "a statutory development agency for promoting and ensuring media development and diversity... to enable historically disadvantaged communities and persons not adequately served by the media to gain access to the media."

Community radio is able to access grant-funding through this agency which, in turn, is funded through a share of profits from some of the bigger commercial news enterprises in South Africa.

Objective of Agency
The objective of the Agency is to promote development and diversity in the South African media throughout the country, consistent with the right to freedom of expression as entrenched in section 16 (1) of the Constitution. In particular-
(i) encourage ownership and control of, and access to, media by historically disadvantaged communities as well as by historically diminished indigenous language and cultural groups;
(ii) encourage the development of human resources and training, and capacity building, within the media industry, especially amongst historically disadvantaged groups;
(iii) encourage the channelling of resources to the community media and small commercial media sectors;
(iv) raise public awareness with regard to media development and diversity issues;
(v) support initiatives which promote literacy and culture of reading;
(vi) encourage research regarding media development and diversity; and
(vii) liaise with other statutory bodies such as the Independent Communications Authority of South Africa and the Universal Service Agency.

Projects [to be funded]
(1) All projects must be aimed at achieving the objectives of the Agency.
(2) The Board must, when selecting projects, take into consideration the communities: (identify historically disadvantaged communities and persons that are not adequately served by the media;
 (3) The Board must, prescribe
(a) detailed criteria for selecting-
(i) community media projects;
(ii) small commercial media projects; and
(iii) research projects
(b) the manner in which an application for support for projects must be made; and

(c) the information that must accompany the application.

(4) The Board must prescribe the percentages of the money referred to in section, to be utilised for-

(a) community *media,*

(b) small commercial media projects; and

(c) research projects.

(5) The information referred to in subsection must include information regarding-

(a) The goals and objectives of the project

(b) business plans containing measures for future sustainability; and

(c) the proposed budget.

Evaluation of projects receiving support

(1) The Board must evaluate all projects receiving support so as to-

(a) assess the progress of such projects; and

(b) ensure that such projects are achieving their agreed goals, the board may-.

(2) If the Board is of the opinion that a project concerned is not achieving its goals, the

(a) instruct the person in control of the project, in writing, to rectify the problem identified by it;

(b) if the instruction contemplated in paragraph *(a)* is not complied with, suspend or terminate the support provided to the project concerned.

OfCom; UK (extracts taken directly from Policy Statement, CRF, Ofcom)

Ofcom believes that a Community Radio Fund will help to deliver tangible benefits to this new radio broadcasting sector. However, we are also anxious to ensure that such support for the sector is well-targeted, used efficiently, and delivered in a cost effective manner.

Management of the fund

In the consultation document, Ofcom suggested the establishment of a small Community Radio Fund Panel, to meet as required to examine applications and make awards from a Community Radio Fund. This Panel would be independent of the Ofcom Radio Licensing Committee (RLC) which awards community radio licences. It would report to the Board and be chaired by a member of Ofcom's Content Board.

Also in the consultation document, Ofcom suggested that one member of the grant-awarding Panel should be appointed from the Community Media Association, which already has experience of awarding grants in this sector. In addition, Ofcom suggested that a second Ofcom representative with relevant expertise be included, such that the Panel consists of three members in total.

Operation of the fund

In the consultation document, Ofcom stated its view that it considers that it would not be appropriate to simply divide available funding equally between all licensed community radio

stations. Instead, it proposed that applications would be judged on a combination of individual need and merit.

Ofcom's consultation document proposed that grants from a Community Radio Fund would be used to support core competencies, such as financial management, fund raising and administrative support, because these are functions which are both essential and often very difficult to fund from other sources.

Given its limited scale, Ofcom also suggested that a 'light-touch' approach to the operation of the fund would be appropriate. It was proposed that the fund should be operated with the minimum of resources needed, commensurate with ensuring relevant targeting, efficiency and appropriate oversight.

Ofcom's response to the issues raised
Given the high level of generally positive comments received as a result of the Community Radio Fund Consultation Document, and specifically taking into account the various answers to the five specific questions posed, Ofcom has concluded that it is appropriate to move forward with plans to implement the operation of such a fund.

Ofcom proposes to establish and operate the fund broadly as proposed in the consultation document. Many of the useful and constructive criticisms levelled at the proposals look towards the future development of the fund and, as such, do not significantly detract from the initial proposals concerning the operation of the relatively small-scale fund that can be established at this stage.

Community Radio Fund of Canada; (extracts taken directly from Structural and Operational plan of the CRFC)

This document sets out the structural and operational plan of the Community Radio Fund of Canada (CRFC) as requested by the Canadian Radio-television and Telecommunications Commission (the Commission) in the 2010 Campus and Community Radio Policy (the Policy).

Section A: Structure of the CRFC
The CRFC's mandate is to provide support to the more than 150 campus and community radio stations in Canada and to foster a well-resourced, dynamic, and accessible sector. It is an organization that distributes funds for the development and sustainability of local community radio broadcasting.
The goal of the CRFC is to provide this support under the following program priority areas:
1. Local Community News and Access: Local reflection in news, public affairs, and arts and culture; community access and outreach programming, including training and production.
• Production of local news and community affairs programs
• Training for community news production staff
• Support for official language minority and third-language news programming

2. Community Music and Expression: Programming and projects that highlight and promote local music and emerging artists.

• Support to stations for outreach, acquisition, and archiving of local music, particularly in under-represented genres

• Assistance to record, digitize, and distribute recordings from local artists

3. Emerging Distribution Technologies: Planning and implementation of systems to support new program delivery technologies.

• Training staff and volunteers in the practical use of new communications technology

• Research of digital distribution techniques appropriate for community radio content

• Support for station computer technology and connectivity

4. Sustainability and Capacity-Building: Skills and knowledge central to the ability of community radio stations to effectively serve their local communities

• Assistance to stations in core competency areas including governance, management, programming, volunteer support, community relations, and development

• Assistance to national community radio associations to provide key support services and resources to local stations

• Support for stations in communities underserved by other media, including rural areas

Section B: Allocation of Funding

The Commission has asked the CRFC to implement an approach to funding with "*clear performance measures;*" specifically, "*measures to evaluate the success of funding. Such measures may include, but would not necessarily be limited to, a description of incremental increases in volunteer programming levels or Canadian content levels that occur as a result of funding.*"

The outcomes-based approach focuses on specific measurable outcomes. The establishment of services or programming by recipients will not alone define the success of the project. Rather, all program recipients will be required to provide specific metrics on which their projects will be evaluated. These metrics will include the changes and future situation that a station and community expect to achieve as a result of the funded activity.

CRFC revenues derived from this funding will contribute to the following three outcomes:

1. High-quality, locally-reflective music and spoken word programming
2. Skilled and sustainable volunteer participation in local content creation and operations
3. Diverse community participation in governance, programming, and content

As outlined in the application guide, applications for funding are judged on their merit and station need, subject to the availability of funds. The selection committee assesses each application by applying scores in the following areas:

• The value and relevance of the application in relation to the CRFC's outcomes and program priorities as well as CCD objectives

• The strength of the various elements of the application (local programming element, volunteer support, training element, etc.)

- How the application benefits the station and those it serves
- The financial need of the station
- The originality and innovative elements of the application
- A realistic budget
- A realistic timeline
- The quality of the presentation

Eligible Expenses

The following are examples of eligible expenses:
- Wages and honoraria
- Specific costs associated with interns/participants
- Travel expenses, if justified
- Studio or equipment rental, only if additional resources are required (not for existing studios, equipment purchases, or maintenance)
- Training fees
- Technical expenses up to $500 (minidisks, USB keys, CDs, editing software, etc.)
- Website costs related directly to the activities (cannot include hosting or domain fees, or regular maintenance/upgrading of existing website)

CRFC Structural and Operational Plan 2010 Page 37

The following are examples of expenses that are not eligible:
- Capital equipment (soundcards, computers, office software, furniture, soundboards, transmitters, etc.)
- Technical briefs submitted as part of any Industry Canada/Commission licensing process
- Advertising and promotion material
- Registrations and travel associated with attending conferences
- Expenses incurred in preparing the application
- Auditing fees, legal fees, or fines
- Recoverable taxes, tuitions, or related fees
- Interest fees on late payments
- Rental fees of the station's own studios

Recommendations for the management and administration of CRSFI:

It is recommended that:

1.   A Community Radio Support Fund of India (CRSFI) be created to provide financial support to holders of Community Radio licences, and, more generally, to promote community radio sector in the country.

2.   The Fund should be set up as an independent and autonomous body. It should provide a strategic cross-subsidy funding mechanism for community broadcasting. While primary sources of funding would emanate from the various Ministries of the Government, additional resource mobilization would also be accessed by the fund from donor agencies, multilateral organizations, corporate social responsibility/private sector sources and others.

3.   The CRSFI's structure and decision making should demonstrate independence, transparency, and accountability in its efforts to facilitate an enabling environment for the community radio sector in the country. This should be reflected in the composition of its board members, grants evaluation panel and other advisory committees. Representatives on these groups should comprise a mix of community radio actors and eminent people with proven credentials in areas like governance, media, fund raising, and the law.

4.   Government of India (or MIB, as the case may be) and community radio associations such as the Community Radio Forum should nominate representatives to serve on the Community Radio Fund of India.

5.   The philosophy of community radio is fundamentally different from the mainstream media. While all applicants must be treated equally, the fund's priority should be to address the legacy of imbalances in access to the media. It must seek to support community radio projects in under-served, needy communities, especially in remote and rural areas that are lacking in core media competencies within the community radio sector. Only not-for-profit community based organizations would be eligible for grants.

6.   There are various concerns surrounding the potential cost implications of running CRSFI. Therefore, while CRSFI should seek to increase funding for the CR sector from multiple sources, administrative overheads for its operation should be kept to a minimum and stations should receive funding promptly after its sanction. Administrative costs should not exceed 15 per cent of the annual disbursement of CRSFI.

7.   A list of the activities/services for which the CRSFI resources would be made available/awarded must be clearly indicated (as also the ineligible categories). However, an assessment of individual applications which takes into account their needs and merits, must be done for determining the quantity and objective of the funding being made to them.

8.   Emergency grants should be available in exceptional circumstances, with preference being given to stations operating in areas which are prone to disasters.

9.   Two rounds of grant awards may be made in each financial year. Though recurrent funding should be available to stations, subsequent applications from groups that have already once received support from the Fund, should be considered on a lower priority. This is also to ensure that stations become less grant-dependent over a period of time. Priority should be given to licensees that have **NOT** been awarded a grant and to newly-licensed stations.

10.   While a mechanism should be in place to monitor that CRSFI funds are used appropriately, it must also be ensured that CR stations do not lose their self-governing, participatory character and their sense of accountability to the communities they serve. Community Radio stations applying for CRFSI need to also reflect management models that demonstrate community ownership.

11.   CRSFI funding may include:
a.   One-off support for newly-launched stations
b.   Fund for capacity building to involve the community in running the station. This could be for initial training, skill-enhancement, and for horizontal learning between communities running radio stations.
c.   Programme Production and Community Outreach: Priority will be given to initiatives which strengthen governance, local arts, culture and information, and marginalised groups. Within these groups, particular attention should be given to women, youth, tribal communities, dalits, and the disabled. These costs do not include the day to day running costs which need to be raised by the community radio stations themselves.
d.   Transmitter or studio equipment. Infrastructure/equipment grants. These would be seed grants and would not exceed 20 per cent of their total costs.
e.   Listenership surveys, fund raising, business development and revenue generation efforts.
f.   Innovative Research and Development initiatives that would deepen the impact and scale of community broadcasting

12.   Exclusions List
a.   Retrospective grants i.e. to cover expenditure already incurred
b.   Funding for the repayment of loans
c.   Vehicle costs; Travel and other expenses
d.   Cost of building repairs, construction or maintenance
e.   Purchase of office equipment and furnishings
f.   Rent due on premises and/or mortgage payments
g.   Day to day running costs of the CRS
h.   Licence fees
i.   Application for the same/similar grants should be avoided
###

STRENGTHENING COMMUNITY RADIO IN INDIA

FINAL REPORT *on*
NATIONAL CONSULTATION

April 11-12, 2017
UNESCO Office, New Delhi

Organised by:

United Nations
Educational, Scientific and
Cultural Organization

uni Twin

UNESCO Chair
on Community Media
(India)

With support from:

United Nations
Educational, Scientific and
Cultural Organization

IPDC THE INTERNATIONAL PROGRAMME
FOR THE DEVELOPMENT OF COMMUNICATIO

CONTENTS

1. Introduction & Background

India opened the airwaves to private, commercial radio operators in the late 1990s, and to community radio (CR) stations in 2002, ending Government monopoly over radio broadcasting.

Today there are over 200 CR stations run by educational institutions and NGOs across India. However, there is a growing perception that the decade-old CR sector in India is nowhere close to realizing its potential both in terms of numbers and its original mandate to truly democratize the media landscape.

A National Consultation of key stakeholders last held in New Delhi in 2010 under the auspices of UNESCO had flagged the following issues as central to the growth of the CR sector in India: sluggish licensing procedures; the ban on news on CR; denial of licenses in geographically marginalized areas; the need for an autonomous Community Radio Support Fund; and community-based reviews of CR stations. Concerted efforts by the Government and various stakeholders have since led to some action on these fronts: the institution of a Community Radio Support Scheme; a facilitation centre at the Ministry of Information and Broadcasting, Government of India; and a system of peer review for CR stations.

However, the CR sector still grapples with a host of problems arising out of restrictive and unclear policy provisions, stopping short of having an empowering policy for a pluralistic, democratic, and free CR in the country.

2. The Consultation

Against this background, a National Consultation was held on April 11 and 12, 2017 to bring together all major stakeholders to review the existing CR policy and formulate a more enabling framework for positive growth of CR. This Consultation was organized by the UNESCO Chair on Community Media, with the support of International Programmes for Development of Communication (IPDC), UNESCO at UNESCO, New Delhi on April 11 and 12, 2017.

The Consultation brought together around 100 representatives and domain experts from the Government of India, the Indian community radio (CR) sector, civil society organizations, development agencies, the media, and the academia. [*see Annexure 1 for list of participants*]

The Consultation was conducted with the objective of revisiting the recommendations made at the National Consultation in 2010 and reviewing the status of the community radio sector in India since the policy guidelines issued in 2006 opened the airwaves for community broadcasting.

The two-day deliberations, focused on six themes:
- Community radio policy
- Sustainability
- Inclusivity, equity and diversity
- Capacity Building
- Research, documentation and evaluation

- Technology & community radio

[*see Annexure 2 for the detailed programme*]

After thorough discussions on the above-mentioned themes [*see Annexure 3 for a session-by-session report*], the participants have put together a set of recommendations for the government as well as for the community radio sector.

3. Recommendations

Participants in the National Consultation endorsed the following set of recommendations, arranged thematically, towards the strengthening of the community radio sector in India. (*Within each theme, the recommendations have been presented separately for the government and the CR sector, with some repeated under both.*)

Inclusivity, Equity, and Diversity

For the CR Sector

- Community radio must build associations with social movements such as Right to Information, Food Security and Sovereignty, Education, and Disability Rights etc. These associations will help amplify diverse issues, perspectives, and voices from the perspectives of a range of movements. These will in turn reaffirm the right to communication, collectivisation of voices, and create active citizenship.

- Community radios need to also look at newer forms of cultural diversity within the community that include lifestyle changes, social equations among peers, and different modes of representations and artistic expressions.

- The term 'community' is a contested concept and its manifestation on ground is very complex. Efforts must be made by the CR stakeholders to develop a more nuanced understanding of 'community' as heterogeneous and dynamic. They must be sensitive to the internal power structures of a community that make it difficult for everyone to participate equally and for all perspectives to be represented.

- AMARC gender guidelines and other documents related to gender-sensitive programming must be included in all capacity sharing efforts to sensitise the radio station staff, volunteers as well as management about the need for democratic communication and diversity. Internal policies of CR stations must adopt codes and practices that ensure gender equity and inclusion.

For the Government

- The CR policy must make provisions for pro-active licensing in conflict prone areas and regions under-served by media. Efforts must be made to encourage spaces and opportunities for democratic deliberations and collective action on issues that affect the lives of the communities who are at the receiving end of development.

- There must be provision in the policy for issuing of emergency and mobile community radio licenses to facilitate disaster mitigation, prevention, management, and relief measures.

- The government should provide support for organising capacity building workshops that sensitise CR stations on the principles, processes and practices to encourage Inclusivity, Equity and Diversity.

Capacity Building

<u>For the CR Sector</u>

- **Stakeholders** that fund initiatives in the sector (e.g. CEMCA, UNICEF, UNESCO) could share their specific interests and thrust areas, along with outlay if possible, with MIB/Consortium to help fine-tune plans.
- Promote a **multi-sectoral** approach to training by engaging cross-media experts on issues such as gender, environment, and health, and those with expertise in theatre, folk arts, and other media to introduce creative and lateral thinking for innovative programming.
- Consolidate all the training material and make them available in the Creative Commons. Training guides to help utilise the materials effectively may also be considered, along with translation rights and support.
- **The different practitioner agencies** could forge partnerships for a common minimum training agenda and help with identifying training needs.
- **Operating CRSs**, without depending exclusively on organised training events by stakeholders and the MIB, should imbibe a training culture and conduct periodic trainings locally and regionally.
- They can help build a cadre of Master Trainers from among themselves from each State/linguistic zone that would be helpful in providing cost effective, quick, short-term and refresher training.
- CRSs must initiate a culture within their stations, whereby, any person who has attended a training programme must share the ideas, learning, materials with a larger group comprising CRS staff and community contributors.
- There ought to be post-training handholding to promote leadership and decision making capabilities.

<u>For the Government</u>

- **The MIB** could create an umbrella body such as a Consortium (not in the brick and mortar sense) of agencies and organizations to better coordinate different capacity building activities for the sector.
- List and update agencies with the capacity to provide training.
- Create a dynamic database of experts/individual consultants with a facility for end users to provide feedback.
- Develop a training calendar for different types of institutions, regions and linguistic zones.
- Promote a **multi-sectoral** approach to training by engaging cross-media experts on issues such as gender, environment, and health, and those with expertise in theatre, folk arts, and other media to introduce creative and lateral thinking for innovative programming.
- Consolidate all the training material and make them available in the Creative Commons. Training guides to help utilise the materials effectively may also be considered, along with translation rights and support.

Sustainability

<u>For the CR Sector</u>

• Going beyond the emphasis on CR as a development tool, and re-imagining CR within the paradigm of Right to Communication, to be read implicitly within Article (19)(1)(a) of the Indian Constitution, guaranteeing citizens the right to freedom of speech and expression.
• Establish core funding for CR stations so that basic operational costs are covered, leaving CRs free to concentrate on content development.
• Facilitate physical and online information and best practice exchanges and further peer visits for learning with specified deliverables and outputs.

<u>For the Government</u>

• Establishing consultations specific to CR sustainability and sharing of best practices (national, regional and global), as well as the documentation and sharing of such innovative practices.
• Revisions in regulatory frameworks to allow identification of the CRS as a functionally independent institution with a distinct identity that is separate from its parent institution.
• Establishment of processes to mandate community ownership of the decision-making and management of the CRS from the start of the licensing period, rather than mandating a handover point much later in the history of the CRS.
• Specifically mandating social audits of community radio stations at regular intervals, and developing capacity building processes for beginning CR stations on establishing such processes for their CRs.
• Relax content restrictions on community radio, and permit free collection and broadcast of local news and information over CRs.
• Expand and institutionalize (as in the form of a Consortium) capacity building processes for the CR sector, with sustainability specific components that encourage innovative solutions to different aspects of sustainability.
• Expand CR technology sustainability capacity building, as well as technology related training as a specific stream of training.
• Streamline payments from DAVP to CR stations, but establish limits for government sourced advertising and sponsorship revenue to CRs and stakeholder organisations/CR sectoral associations, to ensure independence and funding diversity.
• Facilitate physical and online information and best practice exchanges and further peer visits for learning with specified deliverables and outputs.
• Design and notify a community-friendly handover process of the CR license that respects the basic tenets of community ownership and management of the CR.
• Redesign and re-establish the CR Support Fund as an autonomous sectoral fund with government and stakeholder participation, as well as supportive regulatory frameworks for CR technology localization and lowered tariff and excise regimes.
• Advocacy with other line ministries (MHA, MoCIT) to streamline and conform contrary legislation like FCRA 2010 (which has some provisions that are antithetical to

entities involved in media activity), and reduce potential friction points that challenge CR policy.

Technology

<u>For the Government</u>

- Simplification of the application process for both SACFA and Frequency Allocation has been a long pending demand. This needs to be implemented immediately.
- An exclusive and efficient help-desk at WPC is the need of the hour. Several applicants have noted that WPC is unresponsive to queries on SACFA and frequency allocation issues.
- There needs to be a systematic, rational and dynamic mapping of the spectrum both in urban and rural areas. This is important so that we do not lose sight of the principles of equity and social justice in allocation of spectrum.
- Transmission licenses of 20W and below need to be 'light licensed'/ delicensed.
- Establishing a specific capacity building programme for CR technology and technological processes within the larger process of CR capacity building, especially as supported with CR Support Fund.

- Revitalizing the technology innovation support under the CR Support Scheme (MIB called for applications a couple of years ago and did nothing).
- There is an urgent need for eliminating import duties on CR equipment in order to further bring down the costs of setting up a CR station. Both MIB and MoCIT need to work with the relevant ministries to bring this into effect. This includes fully built equipment units; assemblage packages for transmitters, and, components of CR equipment that are not manufactured in India.
- The Ministry of I&B needs to codify under what conditions the increased wattage of up to 250 ERP will be provided. These conditions should be carefully considered, given that spectrum is scarce and urban areas and often underutilised in rural areas.
- On funding of technology, the recommended standards are too stringent and hardly dynamic to take cognizance of the pace at which appropriate and durable technology is evolving.
- Subsidies should also be extended to CR stations wanting to embrace convergence.
- The introduction of convergent technologies raises issues in terms of dealing with the communities. Numbers alone cannot be the parameter for participation of communities. The depth of engagement must also be considered.
- Any attempt to digitalise community radio should take place through a thorough consultative process. While accounting for learnings from other countries, a clear timeline should be laid out before any policy level decisions are announced for the CR sector.

Research, Documentation, Evaluation

For the CR Sector

- There must be processes put in place for exchange visits among CR stations to encourage horizontal learning. Existing platforms for sharing, learning, and collaboration must be sustained and strengthened.
- Capacity-building efforts must be put in place for developing research and documentation skills within CR stations.
- The sector must work towards a CR Consortium which should adopt a code of ethics that would reflect the core non-negotiable principles of the CR sector in India.
- Research, Assessment and Evaluation methodologies for the CR sector must be distinct and different from those adopted by mainstream media and must be in keeping with the core participatory principles and philosophy of community radio.

For the Government

- Capacity-building efforts must be put in place for developing research and documentation skills within CR stations.
- Self-Assessment and Peer Review exercises must be facilitated and encouraged as a tool for co-learning and continuous improvement.
- The government should support research and documentation in the CR sector, and when such studies are commissioned, the findings must be shared with various stakeholders and their implications discussed in a transparent manner.
- Research, Assessment and Evaluation methodologies for the CR sector must be distinct and different from those adopted by mainstream media and must be in keeping with the core participatory principles and philosophy of community radio.
- Systematic processes must be put in place such that documentation, research and evaluation informs policy-making and support for the CR sector.

CR Policy

For the Government

Licensing

- Expansion of ownership to a range of registered, non-governmental bodies that could workers' organizations (not affiliated to political parties) and cooperatives, with a demonstrable commitment to community service.
- Apart from public educational institutions, other government agencies and departments should be disallowed from setting up and running CR. This is in keeping with the true spirit of community radios, which are run and managed by communities.
- Catering to geographical diversity and topography of the region, CRs should be allowed, on a case-to-case basis, to go beyond the prescribed 100-watt ERP, especially in difficult terrain and higher altitudes.

- Integrated and speedy licensing of CR applications, including clearances from MoCIT, should be implemented, to enhance the effectiveness of the single-window mechanism.
- Licensing should prioritise states that do not yet have an operational community radio, and cater to regions that are underserved by the media.
- A separate nation-wide frequency for emergency and disaster situations must be allocated. Additionally, proactive licensing of applications from disaster-prone regions should be made high-priority.
- Constitution of the Screening Committee and its functioning should be made more transparent and genuinely representative, democratic, and inclusive. Reasons for rejection of applications by the Committee should also be made available on a public platform.

Content

- Keeping in line with international norms that permit airing of local news on CRs, broadcast of independently produced news and current affairs should be allowed on community radio in India. If required, FCRA norms may be revisited to enable CR stations to broadcast news and current affairs programming.
- Suitable provisions should be made in the Intellectual Property Rights (IPR) policy to protect communities against commercial exploitation of local cultural resources aired on CRs, and to encourage local cultural programming.

Funding and Monitoring

- An independent regulatory body, with clear checks and balances, should be set up to address violations of programming guidelines by CR stations.
- Provision of public funding of CR, as it exists today, should be reconceptualised to allow the setting up of an autonomous public body for decision-making on fund disbursal.
- Advertising, sponsorship and any other government funding for CRs should be made transparent.
- As part of Digital India, high speed broadband should be provided by Bharat Broadband Network Limited (BBNL) to every CR station. This could also address the government's concern about not being able to monitor FM broadcasts.
- As part of Digital India, telecom companies should exempt CRs engaged in online audio streaming from incurring data charges.

Spectrum and Technology

- The procurement of transmitters and other broadcasting equipment should be made easier, exempting CRs from incurring excise duties and other levies on import.
- Explore 'lighter' licensing (de-licensing) procedures for low-power FM stations, say of around 20 W power.
- Take a more cautious and deliberate move towards digitalization of broadcasting, especially in community radio.
- Undertake a systematic spectrum mapping of the country and place it in the public domain, so that a more rational and realistic view can be taken of availability of frequencies in certain parts of the country.

4. Dissemination Process

Apart from the intense deliberations during the Consultation when a range of presentations were made by different stakeholders, the Chair team also recorded audio testimonies of a few participants (10) about the state of the CR sector in India and the Consultation [*see Annexure 5*]

After the Consultation, the recommendations were translated into Tamil, Malayalam, Marathi, and Hindi, with support, respectively, from DHAN Foundation, Madurai, Radio Mattoli, Mann Deshi Tarang Vahini, and Ideosync Media Combine. These translated versions, along with the original English one, were then shared on the website of the UNESCO Chair on Community Media and its social media platforms, the social media network of Community Radio Association of India (CRA), the cr-India mailing list, the CRF (Community Radio Forum) mailing list, Ideosync Manch platform, and other regional networks (Kerala, Tamil Nadu, and Orissa). The recommendations were in the public domain with an invitation and an online form to send comments and feedback until May 31, 2017. This deadline was further extended up to June 7, 2017. There were only two comments received, neither of which warrants any changes in the recommendations endorsed at the conclusion of the Consultation.

These recommendations may now be submitted to the Ministry of Information & Broadcasting for their consideration.

ANNEXURE 1: List of Participants

ANNEXURE 2: PROGRAMME

DAY 1: Tuesday, 11 April 2017

Timing Activity
10.00 – 11.10 am Inaugural Session

Welcome address: **Mr Shigeru Aoyagi**, Director and UNESCO Representative to Bhutan, India, Maldives and Sri Lanka

On the National Consultation: **Prof. Vinod Pavarala**, UNESCO Chair on Community Media, University of Hyderabad

Perspective from the field: **Ms Radha Shukla**, Station Manager, Waqt ki Awaz, Kanpur

Guest address: **Ms Anju Nigam**, Joint Secretary (Broadcasting), Ministry of Information and Broadcasting, Government of India

11.00 – 11.30 am Tea and Coffee

11.30 – 1.00 pm Session 1
Inclusivity, Equity and Diversity in Community Radio

Introduction by Session Chair: **Mr Ashish Sen**, Adviser, AMARC Asia-Pacific Regional Board

Presentation of working paper: **Ms Pinky Chandran**, Station Director, Radio Active, Bengaluru

Panelists
o **Ms Arti Jaiman**, Station Director, Gurgaon ki Awaaz, Haryana
o **Ms Aarti Bisht**, Station Director, Henvalvani, Chamba, Uttarakhand
o **Ms Pooja Murada**, Treasurer, Community Radio Association and representative, Alfaaz-e-Mewat, Haryana

Open discussion

1.00 – 2.00 pm Lunch

2.00 – 3.30 pm Session 2
Issues in Capacity-Building

Introduction by Session Chair: **Dr Shahid Rasool**, Director, Commonwealth Educational Media Centre for Asia (CEMCA)

Presentation of working paper: **Ms Rukmini Vemraju**, Community radio expert and independent consultant

Panelists
o **Mr Debarun Dutta**, Executive Director, Drishti

o **Ms Jayalakshmi Chittoor**, Community radio expert and independent consultant
o **Mr P Krishnamurthi**, Programme Leader, Centre for Development Communication, DHAN Foundation, Madurai
o **Ms Preeti Soni**, Director, Kutch Mahila Vikas Sanghatan, Gujarat

Open discussion

3.30 – 4.00 pm Tea and coffee

4.00 – 5.30 pm Session 3
The Sustainability Conundrum

Introduction by Session Chair: **Mr N A Shah Ansari**, Chairperson, Radio Namaskar and President, Community Radio Association of Odisha

Presentation of working paper: **Mr N Ramakrishnan**, Executive Director, Ideosync Media Combine

Panelists
o **Dr Rachna Saini**, Department of Journalism and Mass Communication, Central University of Haryana, Mahendragarh
o **Fr Sebastian Puthen Varghese**, Representative, Radio Mattoli, Kerala
o **Mr Inderjeet Grewal**, Deputy Director (CRS), Ministry of Information and Broadcasting, Government of India

Open discussion

DAY 2: Wednesday, 12 April 2017

10.00 – 11.30 pm Session 4
Technologies for Community Radio: Challenges and Possibilities

Introduction by Session Chair: **Dr Ankuran Dutta**, Head, Department of Communication and Journalism, Gauhati University and representative, Radio Luit

Presentation of working paper: **Mr Hemant Babu**, Managing Director, Nomad Communication Pvt Ltd
Panelists
o **Prof. Vasuki Belavadi**, Fellow, UNESCO Chair on Community Media and representative, Bol Hyderabad, University of Hyderabad
o **Mr Khuswinder Singh Bhatia**, Deputy Manager, BECIL
o **Dr Jayanth Narayan Petkar**, School of Communication Studies, Panjab University and representative, Radio Jyotirgamaya

Open discussion

11.30 – 12.00 noon Tea and Coffee

12.00 – 1.30 pm Session 5
Learning from Community Radio in India: Research, Documentation and

Evaluation

Introduction by Session Chair: **Mr Amitabh Behar**, Executive Director, National Foundation for India

Presentation of working paper: **Ms Venu Arora**, Executive Director, Ideosync Media Combine

Panelists
o **Mr Shivaji Yadav**, Representative, Mann Deshi Tarang Vahini, Mhaswad, Maharashtra
o **Prof. Kanchan K Malik**, Fellow, UNESCO Chair on Community Media
o **Dr Bidu Bhusan Dash**, Department of Media and Communication Studies, Savitribai Phule Pune University
o **Mr Bijoy Patro**, Senior Programme Director (Communication for Development), Development Alternatives

Open discussion

1.30 – 2.30 pm Lunch

2.30 – 4.00 pm Session 6
Towards a More Enabling Policy for Community Radio

Introduction by Session Chair: **Dr Vibodh Parthasarathy**, Centre for Culture, Media and Governance, Jamia Millia Islamia

Presentation of working paper: **Ms Archana Kapoor**, Managing Trustee, International Association of Women in Radio and Television (IAWRT) and Station Director, Radio Mewat

Panelists
o **Prof. Ashok Singh Sunhal**, President, Community Radio Association
and Station Director, Alwar ki Awaaz, Rajasthan
o **Ms Anushi Agrawal**, Programme Executive, Maraa
o **Mr Sajan Venniyoor**, Community radio expert and independent consultant
o **Ms Anju Nigam**, Joint Secretary (Broadcasting), Ministry of Information and Broadcasting, Government of India

Open discussion

4.00 – 4.30 pm Tea and coffee

4.30 – 6.00 pm Recommendations and Valedictory

Presentation of recommendations emerging from the thematic sessions and discussion of the way forward

Facilitators

o **Mr Al-Amin Yusuph**, Adviser (Communication and Information) for South Asia, UNESCO
o **Prof. Vinod Pavarala**, UNESCO Chair on Community Media, University of Hyderabad
o **Ms Rukmini Vemraju**, Community radio expert and independent consultant

Vote of thanks

ANNEXURE 3: SESSION-BY-SESSION REPORT

Inaugural Session

The inaugural session set the agenda for the two days of the National Consultation. UNESCO Director Shigeru Aoyagi said that the expectations from the consultation are to determine how community radio can contribute to the future generation and promote the UN's Sustainable Development Goals (SDGs) as well as national goals like Swacch Bharat and Skill India. He hoped that within a year's time, there would be at least one community radio station in every district in India. He said that a Community Radio Consortium is being facilitated by UNESCO to strengthen the CR sector in India.

Prof. Vinod Pavarala, UNESCO Chair on Community Media, appealed to the government to take up a democratic review of the policy to make it more enabling and progressive. He made a special mention of the continued ban on broadcast of news by community radios and urged the government to follow international norms and lift the prohibition. He felt that the sessions at the Consultation, based on well-researched working papers, would bring in new ideas for strengthening community radio in the country.

Community radio broadcaster Radha Shukla of Waqt ki Awaaz (Kanpur-Rural) said four essential stakeholders have to be effectively involved to make community radio strong – *sarkar* (government), *samudaay* (community), *sahyogi sansthan* (organisations such as UNESCO) and the *swayam-sewa sansthan* (the NGO).

Joint Secretary, Ministry of Information & Broadcasting, Ms.Anju Nigam briefly summarized the support that the government has been providing to the community radio sector in India and assured the sector of all support in the future.

Each of the six sessions that followed focused on one specific theme. Each thematic session had one principal speaker presenting the working paper prepared in advance and shared with all participants. This was followed by responses from panelists and an open discussion.

What follows is a brief report of each of the sessions. The working papers and recommendations have been shared separately.

Session 1:
Inclusivity, Equity and Diversity in CR
Chair: Ashish Sen, Advisor, AMARC Asia-Pacific

Panelists: Pinky Chandran, *Radio Active*, Bangalore **(Working Paper)**
Arti Jaiman, *Gurgaon ki Awaaz*, Haryana
Aarti Bisht, *Henvalvani*, Chamba, Uttarakhand
Pooja Murada, *Alfaaz-e-Mewat*, Haryana/Community Radio Association)

Ashish Sen opened the session by recalling the inaugural session where the UNESCO

Chair reminded the house of the 1995 Supreme Court judgment and of the previous National Consultation in 2010, both of which were signs of hope and excitement for all in the CR sector and set the tone for the movement.

Invoking a verse from Alice in Wonderland, Ashish Sen said it was important to examine "how many people have joined the dance. Who has prevented them from joining the dance. Whose tunes do they follow?"

Pinky Chandran, who presented the Working Paper on the subject, pointed out that community radio is and should be a platform that provides an opportunity for all those discriminated in various forms. It should provide opportunities for all those vulnerable to have a voice as a matter of right. In order to do so, it was important that CR stations (CRS) built solidarities with social movements. It was important for CRSs to note that participation is layered. CRSs must pro-actively examine diversity within the organization -- who is participating and how -- and take measures to make it more inclusive. Taking off on Ashish Sen's introduction, Pinky said "diversity is about being invited to the party and inclusion is about being asked to dance." She also reminded the house that policy guidelines also stress on community inclusion.

Pinky Chandran said while the sector lamented spectrum saturation, one should also introspect if exclusive dalit or transgender radio stations would lead to further marginalization. CRSs should avoid replicating the caste hierarchies in a community, she added.

Aarti Bisht, in response, said her radio station had decided not to append surnames on broadcast to avoid caste and religion as an identifier. Her station had actively sought to train Muslim women in digital literacy to encourage their involvement. Flexibility is the key to ensuring participation of married women, she said.

Arti Jaiman said her station constantly evaluated voices that are excluded and strove to include sounds that are not there on radio -- minorities, dalits, people of alternative sexualities, etc. It was important to have a clear vision of 'who we are not, and who we are not for'. Her station consciously decided not to cater to the English-speaking community in the listening area, but to migrants who come to Gurgaon from the BIMARU states who are not included in the life of the city and its administration and are often left out with no rights.

Arti Jaiman said one of the ways of checking if a station was inclusive was to check who was not involved in decision making.

Pooja Murada underlined that an effective CRS would make its policy to reach out to the excluded communities. The language of broadcast and the choice of content also gains significance, she added.

In the discussion that followed, other important issues such as the class divide in society, the dynamic nature of CRSs, and the problem of delineating a community for researching community radios also came up.

Session II:
Issues in Capacity-Building
Chair: Dr. Shahid Rasool, Director, CEMCA

Panelists:
Rukmini Vemraju, CR Expert & Consultant **(Working Paper)**
Debarun Dutta, Drishti Media, Arts & Human Rights, Ahmedabad
Jayalakshmi Chittoor, Consultant & CR expert, New Delhi
P.Krishnamurthi, DHAN Foundation, Madurai
Preeti Soni, Kutch Mahila Vikas Sanghatan, Gujarat

Shahid Rasool in his opening remarks said a lot more needs to be done both in terms of the number of CR stations—200 was a very small number—and in terms of capacity building. CEMCA, he said, has contributed to capacity building and it was also looking at shifting attention from the listener to the learner.

Rukmini Vemraju, who presented the working paper, said capacity building was a cross-cutting theme. Social justice and inclusion must be the articles of faith for a CRS; and freedom of expression and the right to information must be the ideas around which capacity building needs to be anchored.

It was important that capacity building was seen more as a process, rather than as an operation, she said, emphasizing that a culture of capacity building must emerge from within the CRSs. Although there was a lot of material produced by various agencies, including CEMCA and UNESCO, on capacity building, they had not taken on a life of their own.

The ban on news was limiting, she said, adding that the sector needs to develop a 'sound of its own' that reflected the lived experiences, even while focusing on creative programming. There was a need to set up a Consortium for training that would have a well-defined calendar and met demands from the ground. There was a need to use gender as a lens while building capacities, she added.

In his response, Debarun Dutta wanted an input/output analysis of all the training programmes that have taken place since the CRSs were established. A cascading influence of experienced community radio stations building capacities of others would require a collaborative effort.

Jaya Chittoor pointed out the main difference between capacity building and training. While the former is more of a process, including training-needs assessment etc, a training programme was often a one-off event. Training must also happen for producers to become decision makers. There must be an attitude to let go -- enable community whose capacities you are building to take decisions. Capacity building agendas should focus on developing localized and relevant content. An institutionalized process would perhaps work best, she added.

P.Krishnamurthi said levels of capacity building must be identified and what kinds of

capacity building is required for what contexts must be realized. Capacity building for beginners and more advanced stations should be different. Conceptual capacity building is important, for example, to work with social movements. Although 80 awareness workshops have been conducted by the Ministry, one needs to ask what has been the 'conversion rate' into CR licenses. Capacity building must be a self-propelled movement. Experienced stations should mentor those that have just launched, exchange ideas and strengthen regional networks, he added.

Preeti Soni said one could look at the CR sector in terms of three phases: The first one which was about learning about CR and learning together. The second phase was about getting a policy in place and establishing CRSs. The third phase seems to have seen a slowdown. The learning/ empowerment process seems to have stopped. Rapid changes in technology have thrown up many challenges.

Soni pointed out that deprivation must be understood in depth. Is the deprivation natural or man-made? How does one get access to resources to train oneself? There was a need to focus on decision making and leadership training; legal aspects and examining policy guidelines from various angles. In fact, critical examination of the policy also required capacity building, she added.

In the discussion that followed, Hemant Babu of Nomad India said more than having training institutes, an enabling framework for self-learning was important. Dr. Rasool of CEMCA also cautioned against creating more structures for capacity building. Many participants also felt that CRSs should themselves allocate resources for capacity building instead of waiting for funding.

Session III:
Sustainability Conundrum
Chair: N.A. Shah Ansari, *Radio Namaskar*, Konark, Odisha

Panelists:
N. Ramakrishnan, Ideosync Media Combine, New Delhi **(Working Paper)**
Dr. Rachna Saini, Central University of Haryana, Mahendragarh
Fr. Sebastian Puthen Varghese, *Radio Mattoli*, Kerala
Inderjeet Grewal, Deputy Director, Ministry of I&B

N.Ramakrishnan, in his presentation of the Working Paper, said sustainability for many meant just financial sustainability. However, quoting Alfonso Dragon (2001), he said social and institutional sustainability were equally important. Any one of the three is not possible without the other two.

Institutional sustainability could be achieved by bringing in accountability, transparency, and practicing a set of ethical codes; social sustainability could be achieved by active community engagement, participation and volunteerism. One would have to look at converting issues into programmes, receive feedback in a structured manner and analyse it and prioritize expenses in order to achieve financial sustainability.

It is time the sector examined for itself if the State should be involved in the financial

sustainability of a CR station. One would have to strive to build ownership among communities so that they too invest in keeping the CRS alive.

CRSs must achieve technological sustainability by planning for redundancy, adopting low cost and renewable technologies. It is time the sector lobbied for development of home-grown technological options, he added.

Rachna Saini narrated how she had attempted to measure the sustainability of CR stations in the National Capital Region (NCR). She said she had developed a scale to measure institutional, social, technological and financial sustainability. Her research had led her to conclude that social sustainability is the most important.

Fr. Sebastian Varghese spoke about how his CR station was striving to become a CRS 'by the people, of the people, and for the people'. Serving 49 revenue villages in Wayanad, the entire team of the CRS goes out every Saturday, invites local authorities and villagers to understand the concerns of the people. He said 50% of the station's financial sustainability depends on its rapport with the state government. The parent organization has several projects and the CRS converts them into programmes on air.

Inderjeet Grewal pointed out that in its attempt to promote diversity and community participation, CRSs should be cautious about some regressive practices too. While recounting the funding being provided by the government under the CR Support Scheme, he said the government has now introduced funding also for content creation.

In the discussion that followed, it was noted that although infrastructure is not very good, the involvement of the community is more important. Another participant observed that a collaborative effort was preferred rather than one institution conducting training programmes.

DAY TWO -- APRIL 12, 2017

Session IV
Technologies for CR: Challenges and Possibilities
Chair: Dr. Ankuran Dutta, Gauhati University/Radio Luit

Panelists:
Hemant Babu, Nomad India, Dahanu, Maharashtra **(Working Paper)**
Prof. Vasuki Belavadi, University of Hyderabad/Bol Hyderabad
Khuswinder Singh Bhatia, Manager, BECIL
Dr. Jayanth Narayan Petkar, Radio Jyotirgamaya, Chandigarh/Community Radio Association

Chairing the session, Ankuran Dutta said large populations now make technologies indispensable. However, one needs to adopt a blended approach to technology. There were many innovations in the CR sector across the country. However, they have not been documented well. Why 250W ERP has not been allowed till date has emerged as a very important issue.

Presenting the working paper, Hemant Babu urged the ministry to codify under what

conditions 250W ERP can be granted. While there were suggestions that the government should also look at MW or SW for CR, it would serve better for the government to incentivize lower power FM transmission. Although MW & SW maybe advantageous in difficult terrains like desert areas, the cost of the technologies would make it unaffordable for the communities. He decried the 'expansionist' tendencies shown by some organizations that seem to be seeking a bigger footprint for their broadcast.

He pointed out the urgent need for real-time mapping of frequencies to make their allocation more efficient. A study by Maraa/Nomad in urban areas shows that people who really need a community radio are not able to access a frequency.

MIB should work with other ministries in removing import duties on specific CR equipment, he added.

Vasuki Belavadi said WPC was perhaps the most unresponsive department in the Communications Ministry. A simpler online application process for SACFA and frequency allocation has been a demand for over a decade. The ministry, with all the resources at its command, has not been able to create a separate online application for CR applicants, he said.

CRSs cannot be dependent on external agencies for day-to-day maintenance -- capacity building in this area is essential. While the government is talking about digitalization, it is important that it adopts a consultative process before announcing any policy, he added.

On the issue of SACFA clearance, Khuswinder Singh Bhatia said SACFA clearance is strictly speaking not required for community radio, considering the limitation on a 30m tower height. He suggested that lower or higher power is more to do with one's sense of community and what power is required to reach them. There is likely to be rivalry among CR stations over the issue of higher power. In rural areas, 250 Watt power is likely to work better as they are not densely populated.

Bhatia said a lot of spectrum was available and CR could be allotted more frequencies by WPC.

Jayanth Narayan Petkar, speaking as a representative of the Community Radio Association (CRA), said while the policy insisted on logging of programs for three months, loggers available in the market are not very user-friendly. Many CRSs in rural areas don't even know the process of logging, he said. Since transmission power was limited to 50 W, we should explore innovations in broadcasting to expand the reach of a CRS.

Petkar called for regional/ zonal centres that could provide maintenance services for CRSs. This would reduce financial burden on the CRSs, he said.

In the discussion that followed, it was felt that licenses for emergency broadcasting should find a mention in the policy as well. The sector should push for mobile transmitters for emergency broadcasts. Participants also felt that the sector should use the Skill Development Programme to help build capacities of communities to handle

maintenance and repair issues.

SESSION V
Learning from CR in India: Research, Documentation, and Evaluation
Chair: Mr. Amitabh Behar, Executive Director, National Foundation for India (NFI), New Delhi

Panelists:
Venu Arora, Ideosync Media Combine, New Delhi **(Working Paper)**
Shivaji Yadav, *Mann Deshi Tarang Vahini,* Mhaswad, Maharashtra
Prof. Kanchan K. Malik, University of Hyderabad/UNESCO Chair on Community Media
Dr. Bidu Bhusan Dash, Savitribai Phule Pune University
Bijoy Patro, Development Alternatives, New Delhi

Amitabh Behar, in his opening remarks, appreciated that all the discussions were grounded in social justice and marginalization. A security lens is being used to put in place an oppressive policy regime in India. Extra-terrestrial concerns are being brought up to regulate. One should think beyond incremental changes in policy and look towards fundamental changes. We need a new generation of ideas about what community radio can do. "I am involved in multiple alliances and movements; the CR space doesn't engage enough with these campaigns and networks," he said.

Presenting the working paper, Venu Arora said documentation enables reflection on practice; it creates a body of material that can be shared within and outside and helps create an understanding of the role CR plays in the community; enables the CR to be transparent and accountable to its community; creates a basis for policy advocacy. It also helped in serving as a record and re-engage with ongoing work and to posit new knowledge. Can evaluation be a collaborative project in which CRSs, their communities and academic institutions work together to create a practice for the sector, she asked.

One should be cautious about borrowing methodologies from other sectors and making them our own and also about setting evaluation benchmarks that are in dissonance with the core principles of CR.

Shivaji Yadav, in response, said Mann Deshi Tarang began documenting all its activities in the initial three months itself. The methods included maintaining visitors' lists with their feedback and contacts, photo documentation of visits and community engagement programmes, maintaining daily recording register. Scripting and producing videos of their daily practice through peer learning, trainings and publishing monthly newsletters are some of the activities they take up at the CR station that he manages.

Kanchan K Malik, while focussing on academic research, said one must look beyond linear transmission models where public was seen as passive recipients. One would have to look at researching CR a bit differently. "It's time we abandoned the diffusion model and adopt participatory models -- emphasising the social context of the communities." TRPs, eyeballs, target audiences, etc may not be appropriate for study of CR. Let us try not to measure and prove all the time. Let us try to understand and

improve, she said.

A qualitative, subjective approach, that helps in interpreting how people construct empowerment and change, rather than only objective, rational, cause-effect focus would be more appropriate. It's time even academic research looked beyond best practices and gave an ethnographic and cultural studies turn to it, she added.

Bidu Bhusan Dash said documentation and research provides greater visibility, transparency and maybe even better funding. Some stations that maybe doing good work may not be very visible because of poor documentation practices.

Should CR stations give their programmes for free to researchers? Very few researchers work with the communities for lengthy periods, understand their work, share the reports with the community, etc. There is also need to research CR economics and issues such as transparency and capacity building measures. If Bhutan can measure happiness, why can't we measure empowerment? We need advocacy research, but also evaluation research, he said.

Bijoy Patro said respect for the community and ethics are the key. He mentioned a study conducted by AMS Lucknow, commissioned by the government, and urged the Ministry to make the results public.

In the discussion that followed, there was a suggestion for launching a journal on community media. While some stations were indeed documenting their work, how could it be made valuable for the community? Another observation was that CR enthusiasts had not done enough to conscientize bureaucracy about the potentiality of CR.

SESSION VI
Towards a more Enabling Policy for Community Radio
Chair: Dr. Vibodh Parthasarathy, Centre for Culture, Media and Governance, Jamia Millia, Islamia, New Delhi

Panelists:
Archana Kapoor, *Radio Mewat*, Haryana **(Working Paper)**
Prof. Ashok Singh Sunhal, President, Community Radio Association/*Alwar ki Awaaz*, Rajasthan
Anushi Agrawal, Maraa, New Delhi
Sajan Venniyoor, CR Expert and Consultant, New Delhi
Ms. Anju Nigam, Joint Secretary, Ministry of Information & Broadcasting, GoI

Presenting the working paper, Archana Kapoor said the CR sector was beset with bureaucratic procedures, lack of transparency in the screening committee, and lack of long-term thinking. The high rates of rejection of applications originating from what the government calls conflict zones was a matter of concern. The vanishing spectrum in urban areas was another issue that needs indepth examination, she added.

While there were content guidelines in the policy, there was a lot of ambiguity on what constitutes political content, Ms. Kapoor pointed out. The ban on news was highly

limiting on CRSs, she said.

She stated that while the government claims that it has been supporting CRSs in terms of advertising revenues and even increased the limit from five to seven minutes per hour of broadcasting, the DAVP was caught sleeping with pending payments. Several CRSs that had broadcast commercials released by DAVP were yet to receive payments even after a year or so. Direct financial support to CRSs has been limited to hardware subsidies. This calls for an independent and autonomous funding body, Ms. Kapoor said.

Anushi Agrawal, in response, said there was a danger that the CR ownership is hijacked by vested interests. A recent study conducted by Maraa revealed that while all 'owners' were technically legal in terms of the policy guidelines, some of them had proxy political ownership as the guidelines are silent on such ownership. The types of organisations that can apply for a CRS need to be properly codified. It's time we examined the drastic changes required in the policy and amended them to keep such vested interests out of the sector.

Sajan Venniyoor said with so many gaps, merely tinkering with the policy guidelines wasn't enough. It called for an entire overhaul of the policy. Each set of policy guidelines had a colonial history and the government is not able to come out of it, he said.

While there could be no objection to sectors such defence and the police having their own radios, they cannot be given licenses as community radio. CR is not all radio that is not market and not state radio, he reminded.

Ashok Singh Sunhal, as President of the Community Radio Association (CRA), reiterated that there was a need to speed up the application process. More important for him was arriving at a clear definition of community service. The CR Support Fund should be made statutory through a law created by Parliament. In fact, an autonomous body that would provide financial support and also monitor the sector was preferred, he said.

Anju Nigam said some of the issues raised in the presentations, including the ban on broadcast of news, had to be cleared by the Home Ministry. She clarified that not just development information, but even public-interest information is permitted on CR, subject to the broadcast code.

She clarified that DAVP has pending payments worth only Rs. 2 crore (not Rs.5 crore as was claimed by some activists) and the delays in most cases were a result of inadequate or improper documentation. A total sum of Rs. 27.32 lakh had been sanctioned so far under the CR Support Scheme towards equipment subsidies. As far as permitting news is concerned, it is subjudice in the Supreme Court, she said, adding that re-broadcast of AIR news in its unaltered form is currently being allowed.

In the discussion that followed it was felt that MIB should champion the cause of CR with other ministries--be it Home or Commerce. MIB should help the sector to sort some of these issues with the other ministries. The MoCIT has never been available with a view to sort out issues related to the sector. It was also felt that all stakeholders

should agree on a timeframe for revising the policy.

Valedictory Session & Recommendations

Facilitators:
Al-Amin Yusuph, Information & Communication Advisor, UNESCO New Delhi
Vinod Pavarala, UNESCO Chair on Community Media
Rukmini Vemraju, Consultant & CR Expert

In his opening remarks, Mr. Al-Amin Yusuph congratulated all the stakeholders who came together for the Consultation and the UNESCO Chair on Community Media for organizing such an intensive and focussed consultation. He hoped that the deliberations would lead to the strengthening of the community radio sector in India. He reiterated the idea of the **Consortium** that was mentioned in the inaugural session, and said that UNESCO would be committed to facilitating the functioning of such a group consisting of various networks, groups, and organizations involved in community radio.

The facilitators then invited each of the working paper presenters -- Pinky Chandran, Rukmini Vemraju, N. Ramakrishnan, Hemant Babu, Venu Arora, and Archana Kapoor -- to review the recommendations made by their respective sessions. Audience responses were then sought and key suggestions made were noted.

The Consultation ended with Prof. Vinod Pavarala, the UNESCO Chair on Community Media, expressing his thanks to IPDC and UNESCO New Delhi for their moral, financial and logistical support extended to the National Consultation. He also thanked all the working groups for producing excellent papers for discussion and all the panelists for making the sessions engaging and productive. He said the Chair would do follow-up work on the recommendations of the Consultation and share them widely for comments and suggestions, before submitting them to the Ministry for any policy-related changes. Overall, he hoped that the deliberations would contribute to making the community radio sector in India more resilient and sustainable.

**ANNEXURE 4: TRANSLATED VERSIONS OF RECOMMENDATIONS
(Tamil, Malayalam, Marathi, Hindi)**

ANNEXURE 5: AUDIO TESTIMONIES OF PARTICIPANTS