

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.

No, not-for-profit COMPANIES should not be permitted to establish CRS.

- i. The Community Radio should not be a means for Section 8 companies for Income Tax exception.
- ii. There is also a chance that section 8 company can have profit subsidiary. (There is no specific restriction for section 8 companies to invest in 'for profit' companies. Therefore, Section 8 Company can have for profit subsidiary.)
- iii. A Section 8 Company can be converted into any other company including OPC (One person company) as prescribed under Section 8(4)(ii) read with Rules 21 and 22 of Companies (Incorporation) Rules, 2014. This is further subject to restrictions and compliances as per other applicable laws including Income tax Act, 1961.
- iv. And most important we feel that This is not the right time to add a new entity in this field, instead Ministry should make more focus on current CRS sustainability and its regular operation.

To know the current condition please ask all CRS how many hours they broadcast, and compare them with their permitted license hours by D/T of Telecommunication. You can also ask how many of them broadcast regularly, or even they broadcast.

Ref: <https://www.icsi.edu/Webmodules/Publications/FAQs on Section 8 Companies.pdf>

2. What should be the prescribed license period for CRS in the Guidelines?
3. What should be the period of extension/renewal on the expiry of the initial permission?

Years of Operations	License Period
0	05 Years It is renewable on condition that the licensee have complied with the conditions set out by the licensing authority.
If renewed, after 05 years	05 Years It is renewable on condition that the licensee have complied with the conditions set out by the licensing authority.
If renewed, after 10 years	10 Years It is renewable on condition that the licensee have complied with the conditions set out by the licensing authority.

** After 10 years license can be granted for 10 years or more.*

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.**
- i. For now, Ministry asks for recordings, Schedules, and IB officers' visits to the organization, which is not an ideal way to know whether CRS was/is actively working or not.
 - ii. Instead, Ministry should restart its platform (Ek Duniya Anek Awaaz – <https://edda.in> , which they took over from One world Foundation and closed), and ask all CRS to upload their content. There should be a checkpoint to upload a minimum of “X” [This can be 1800-15000] hours of content in 5 years. Ministry can work with other entities to commercialize this platform instead of taking the burden of platform cost. However, the CRS should be the content owner. Similar to podcast platforms.
 - iii. **FRESH SECURITY CLEARANCE, twice a year (not once in 5 years):** The DM (District Magistrate) or SDM of respective subdivision or IB officers where CRS is situated should report MIB whether the CRS is operational or not (Twice in A year), also they are following the GOPA license T&C or not should be considered while checking.
 - iv. DM or SDM of IB should make sure that they report on their understanding, not of CRS Station/NGO/EDU/KVKs understanding. This should be given 2nd priority while renewing the license.
 - v. Non-compliance with terms and conditions should be made aware to the station's organization, and a report can be asked by the organization on failure. Considering the report Ministry should take action as per the GOPA clause.

#This platform(edaa.in) idea will also benefit the Community Radio National Award criteria. Many CRS has the opinion that non-broadcasted programs are sent to MIB and MIB has selected them as the winner in past based on Jury opinion. If the program is not uploaded on the platform, then it cannot be considered for the Award should be criteria. CRS can complain about the access to the internet, but in current India, the Internet is available everywhere. If not, carry the program in a pen drive and upload from internet zone.

#MIB should think of a better idea to check whether CRS is operational or not.

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

Yes, this should be revised. If possible, please remove the limit similar to commercial FMs.

If removing the limit is not possible then 15-20 minutes in an hour should be given to CRS.

Reason: CRS located in rural and semi-urban areas do not give emphasis on the duration of ad spots as commercial FM radios. They make 60-90 seconds single ad, sometimes 02 minutes of single ad. Rural advertisers do not understand the duration importance, they do not like less second ads. So, even not wanting to produce such ads CRS is compelled to do for sustaining. At least 15 minutes should be given to CRS.

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?

- i. As of now, more than one CRS at different locations can be operated by KVKs, their branches by applying as a new CRS. This question is not applicable to KVKs. They are already enjoying this in a different way.
- ii. For Educational institutes- No. Many (Not all) educational institutes are asking for permission to look good in just a Brochure, and getting more and more admission. Many (Not All) CRS educational institutes are non-functional right now/ broadcasting very less hour. However, MIB can consider giving CRS/Campus Radio to their branches at different place similar to KVKs.

Yes, some best operational CRS (Only NGOs) should be given this opportunity.

What should be the criteria-

- Its parent organization should be working in that area minimum of 03 years.
- The old CRS must be operational for a minimum of 10-13 years. (Preference to the older one).
- The old CRS must receive a 1st Prize (only first prize) CR NATIONAL AWARD in past in any category from the Ministry of Information & Broadcasting.
- The old CRS must get a written letter from their current District Magistrate appreciating CRS's work in the current district. Also, a letter from another DM of other district, writing need of CRS in their district. MIB should take the responsibility that they will inform DM about this clause.
- The organization must be aware of language & culture of that new area.

How many stations can an organization manage:

Maximum 03 (Current working CRS + 02 New). This is for NGO only.

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?

Ministry of Information & Broadcasting, WPC, and the current Govt are responsible for slow growth.

- Big Radio Stations are leaving the field of radio, moving to the Internet stating this field is dead, no one listens to radio now. Creating a negative environment is one of the key reasons for the slow growth of this field.

- Ministry and Govt. have no idea of where CRS is needed. They just want to project numbers in documents. Not thinking of communities, and regions. Giving licenses where not required is one of the key reasons.
- Giving multiple licenses in small towns/small areas without thinking and killing old working CRS.
- Giving license and not worrying about whether operational or not. A non-operational CRS is a really dangerous thing for this sector.
- Meaning of CRS, communities, should need to be learned by office bearers before distributing licenses to entities.

Once I (as a Radio Rimjhim 90.4 CRS member) asked a representative of WPC- Sir, why Ministry of I&B and your department has given license at 90.8 FM to a new CRS 500m far from us in Gopalganj, covering the same community, they have copied all our programs and the most important thing is our rate of the advertisement has now come to less than 01 rupees/second due to our competition. We are collapsing, our local market is in less than 02 KM. This is surrounded by villages only.

He said we have permission to give 05 CRS at the same location. Even on a single tower, more than one CRS can operate.

That day, we realized that Ministry has been given instruction to increase numbers on papers, no matter what is relevant for communities, sustainability of old CRS, where should we license and what is the meaning of community radio.

Whether the current scheme for 'Supporting Community Radio Movement in India' is adequate to promote the CRS in India?

Yes, the current scheme is good but if MIB can release fund before buying of equipment and studio set up, it will be great as financial assistance.

What is the benefit of this scheme if an NGO does not have a fund of 10-15 Lakh starting. how they can start CRS. They will look for a loan, that is the only option.

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I will not deny that many CRS look at funds as their savings and most of the time they are hit by natural disasters and get funds. Ministry should look at this matter more closely.

Also, Ministry should consider looking for and registering vendors as these days all vendors know the CRS will get funds from Ministry and they are increasing rates more than the actual rate for equipment.

What other measures can be undertaken to promote faster growth of CRS in India?

- Strengthening the working CRS should be the top priority as they are the face of this sector.
- **MUST Cancelling license of non-operational CRS, no matter it's NGO, KVKs, or Educational Institutions. This is MUCH NEEDED.** There are people, who talk about

very big things but in actuality they are non-operational. This is the harsh reality of this sector.

- **Less than 01 KMs apart all CRS should be shifted to at least 10-15 KM far from old CRS to reach new communities and for the betterment of both CRS.**
- Each district of India should have one CRS. Minimum distance between two CRS should be 10-15 KM (for new community). This should be the priority of MIB and they should ask for application by releasing a notice.
- An image/hype should be created by MIB with help of CRS & AIR that Radio is there and it is more important than other mediums, they work on facts. No chance of rumours/false news.
- Only giving licenses to organizations that are actually going to run CRS. Regular checks on whether operational or not should be done.
- MIB should release a notice to all working CRS if or whether they want to surrender their license they can. **Otherwise, be operation at least for 08-10 hours a day.**
- District & State govt should be given ORDER to utilize CRS and release govt ads to CRS.

Bihar govt says we don't have funds, ask central govt to send some money with these letters.

- BOC should be requested to release campaigns for CRS. Not campaign of ₹200 (Two hundred rupees) in six months. Good amount of funds similar to what was used released in early 2014 and till 2015, should release.
- Before giving permission, what is a community, community radio, why license we are giving, what you have to do, why it is not for making profits, and how you will work – should be taught through video or in-person training. But give license to those who actually interested in running CRS and understanding the meaning.

CRS can be a most important tool; we are not only on frequency but at the root level- we are in-person radio. We narrowcast to people, we do group meetings, and we are voice. The current govt has never used CRSs to their full potential. We can be the medium for change that each govt wants to have in society in their tenure.

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

i. Digital Media, Decrease in Radio Listeners & Digital Internet Community Radio

With easy access to the internet and smartphones in every hand, we are in the digital age. Social media platforms are in power like no other thing. We can't deny that there is a huge loss of listeners due to the internet. People prefer to watch video content over radio programs.

Radio Sets prices have increased to 800-900 per piece. The cost of three radio batteries is 75 rupees, listeners are decreasing even in villages also, People nearby radio station listen on mobile on FM radio application around 01-02 KMs. On radio sets, we are accessible to 10KM but very few numbers of people are there with radio sets.

So, what's next?

Internet and Community Radio = Internet Community Radio.

This is the right time when MIB should start framing guidelines for internet community radio stations. Many CRS are broadcasting on Internet also, which is really great thing. But having proper guidelines from MIB will be best for them.

ii. Electric Radio Sets Production & Increase 50W Transmitter power

To increase radio listeners, we've two ways –

First, we must come out of GenZ radios and give more emphasis on Radio that runs on electric power, as per current trend and must be lower/cheaper in cost. The Ministry of Information & Broadcasting should send a proposal to the Ministry of Electronics and Information Technology for such an initiative where individuals and firms are asked to produce new age radios at a lower cost.

Free distribution of radios to backward class communities from state govt/central govt can be another way to increase number of listeners. This type of distribution was once done by Bihar Chief Minister, but being a battery-based radio sets people stopped listening after 5-6 times battery change. But this was a great idea.

Second, increase 50W to 100W or more so that a large audience can listen to us on Mobile Phones/Feature Phones. In GOPA, it is written that Ministry can give permission for 100W in some cases, but has not been given to any CRS to date.

iii. Copyrights Free CRS or Minimal Charges

We all agree at some point that Community Radio Stations are using commercial music/songs without having proper permission or without paying the royalty fees to labels.

The current rate to broadcast commercial music is very high for CRS that only educational institutions and Big NGO-based CRS can only afford. For a small NGO-based CRS it is not possible to pay.

CRS can pay amounts like 10 thousand – 15 thousand per year.

If MIB can talk with labels for not considering CRS for royalty charges or ask for minimal charge that can be very helpful for this sector.

iv. Easy process Longitude and Latitude (Location) change request

Many CRS are on rent based office, sometimes due to some problems with owner or sometimes disaster issue like flood etc, they are required to shift their studio to some other place but they can't.

For now, there is provision that CRS must need to apply as a FRESH radio to do something like that means there is no such provision that CRS can change their place.

We request you to add a provision that CRS can relocate within 05KMs in their coverage area. Through Saral Sanchar they can do so, please add this.

v. Wireless Operating License Fee – No Late Fine

Late fine on WoL (wireless operating license) should be omitted for CRS.

WoL fee for CRS is 23,000- 23,500 per year. If they fail, they are fined 2% per month, and again if they are not able to pay then 2% per month (total amount + earlier fine).

CRS is not a very active sector in terms of financial status. Many state govt does not support them, and BOC has almost stopped supporting them through central govt. campaigns [200-300 rupees campaign was released]. The only source of their finance is local ads and if Ministry opened two CRS 500m apart in 02 KM village town then you can feel the condition.

So, we request to consider this for CRS.

- vi. Minimum distance between two CRS should be between 10-15KM, especially for rural areas and semi-urban areas. If MIB will keep giving the license without thinking of old CRS, old CRS will die for sure.

One District, One CRS should first be followed, then in next phase new CRS in same district licensed, minimum distance b/w two CRS at least 10 KM. (or 7-8 KM) should be followed. This is for reach new people and to make CRS sustainable without govt. support.

For urban cities like Lucknow, Delhi, Dehradun, Indore, Mumbai, Patna etc. multiple CRS can sustain at same place because their coverage area is large, they have huge listener and they can sustain easily. Even in urban cases minimum distance should be considered. Strictly no two CRS should cover same community (***distance between two CRS should never be less than 01-02 KMs, this is not only loss of both CRS but loss/misuse of resource of government of India***).

#CRS should not be classified as Public or Private.

#Request MIB Social Media handles to share our work also.

vi. **Permission to broadcast local news**

A CRS should be given permission to broadcast local news. In this digital age, if a youtuber can upload news and getting so much views, why not CRS.

CRS should not be given permission to produce regional or national news, they can choose AIR news to broadcast (without any change) as per current policy. But they must be given permission to produce and broadcast local their coverage area news through radio in local dialect (or regional dialect). This will increase importance of CRS and fake news; false news of particular area can be countered. CRS asking for this from more than a decade.

vii. **Educational Institutes – Campus Radio**

Educational institutes can be given campus radio instead of proper community radio. Campus radio will have more freedom than CRS (like not necessary to broadcast regularly), similar guidelines as CRS but their transmitter power will be decided on their campus area size. Maximum transmitter power can be as same as CRS.

My name is Abhay Pratap Srivastava, I am 23 years old. I am from the Gopalganj district of Bihar. Currently working at Cognizant as a Software Engineer. I am one of the members of an NGO which runs a CRS - Radio Rimjhim 90.4 MHz in Bihar, since 2013-14- I'm active volunteer for this NGO and community radio. I love community radio because of its engagement and power to connect the root level people on any topics/issues. Central Govt. should think of giving this medium more attention. This CRS sector do not want to be burden on Govt so please make correct guidelines so that they can sustain their own without depending on govt or any third party, and they can work for community and be their voice.

I humbly request to do not give multiple CRS permission in a small town and Those CRS which are less than 01-02KMs apart, they (newly established CRS) should be moved at least 07-08 KM (if not 10-15KM).