

Consolidated Replies on Consultation Paper No.: 4/2014 by Community Radio Operators, India

Pinky Chandran

Community Radio Association

Consolidated Replies Consultation Paper No.: 4/2014

Summary

The Consolidated replies received have been compiled on the Consultation Paper, circulated by TRAI on Issues related to Community Radio Stations (21st May 2014)

Part 1: The responses received have been listed below:

1	Radio Mattoli, Dwaraka	Fr. Thomas
2	DeshBhagat Community Radio, Chandigarh	RituGhai 09988894304 deshbhagatradio@gmail.com
3	SarathiJhalak 90.4MHz, Bangalore, Karnataka	Shamantha
4	CRS AlwarkiAwaz 90.8MHz	Ashok Singh Sunhal
5	Radio Active CR 90.4MHz & Radio Mewat	Pinky Chandran & Archana Kapoor

Part 2: In addition, a meeting of Community Radio Stations in Karnataka was held on the 9th June 2014, to discuss the paper by the Regional Office of TRAI. The discussion summary has been added to this paper

Stations present (Listed in order of operation)

1	Krishi Community Radio , Dharwad	Mr. Devendrappa
2	Radio Active CR 90.4 MHz	Ms. Pinky Chandran & Ms. Ramya
3	RamanaDhwani	Mr. Mohan
4	Manipal Radio Station	Mr. Shyam Bhatt
5	Radio Siddartha	Mr. Ganesan
6	Neladani	
7	SarathiJalak	Ms. Shamantha

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Part 1: Responses received from Community Radio Operators

1. Radio Mattoli, Dwaraka; Mananthavady Kerala

Mob. +919446030066 (Station Director)

Sl.no	Questions	Responses
Q 1.	What should be the period of permission for CRS to be prescribed in the CRS Guidelines? Is the present 5 year period adequate?	Yes
Q 2.	What should be the period of extension on the expiry of the initial period of permission for CRS?	10 years
Q 3.	Should there be any additional terms and conditions of extension/renewal of the permission for CRS?	No
Q 4	Should CRS permission holders be permitted to carry the news bulletins of All India Radio (AIR) in unaltered format and community based nonnews and current affairs programs for the categories permitted to FM radio stations?	All India Radio (AIR) news and Local news bulletin should be permitted
Q 5	In view of the availability of alternative revenue/funding options, is there any reason to increase the duration of advertisement beyond the 5 minutes per hour limitation? If yes, please explain with full justification.	Sufficient
Q 6.	Do you agree with the above proposal for utilisation of CRS during natural calamities/emergency situations?	Agree
Q 7.	What, in your opinion, are the measures required to ensure a faster growth in the number and spread of CRS in rural India?	District wise orientation may be given to all government departments/organizations to render their services and expertise free of cost to Community Radio stations. Government may direct agriculture research institutes, educational institutions, government health departments/organizations etc, to render their expertise/services free of cost to Community Radio

		stations towards making informative radio programmes for the public good.
Q 8.	Stakeholders may also provide their comments on any other issue relevant to the present consultation.	The transmission power of Community Radio stations in remote, indigenous areas may be increased to 100 watts and the height of the tower may be increased to 45 meters as these would help overcome geographical/terrain barriers in hilly regions.

2. RituGhai, DeshBhagat Community Radio, Chandigarh

Sl.no	Questions	Responses
Q 1.	What should be the period of permission for CRS to be prescribed in the CRS Guidelines? Is the present 5 year period adequate?	We are in sync and agreement with the existing policies. A single window redressal and renewal system would be welcomed.
Q 2.	What should be the period of extension on the expiry of the initial period of permission for CRS?	We are in agreement with the existing policies. Only if we could have a single window redressal and renewal system.
Q 3.	Should there be any additional terms and conditions of extension/renewal of the permission for CRS?	We are in agreement with the existing policies and system. A single window redressal and renewal system would be appreciated.
Q 4	Should CRS permission holders be permitted to carry the news bulletins of All India Radio (AIR) in unaltered format and community based	Definitely. News should be sourced from the AIR and live traffic and weather updates can be done by CRS themselves

	nonnews and current affairs programs for the categories permitted to FM radio stations?	
Q 5	In view of the availability of alternative revenue/ funding options, is there any reason to increase the duration of advertisement beyond the 5 minutes per hour limitation? If yes, please explain with full justification.	No, five minutes is enough for sustenance. All that is needed is support from the local authorities.
Q 6.	Do you agree with the above proposal for utilisation of CRS during natural calamities/ emergency situations?	Definitely, it will help serve the community.
Q 7.	What, in your opinion, are the measures required to ensure a faster growth in the number and spread of CRS in rural India?	Easier norms and relaxed waiting period.
Q 8.	Stakeholders may also provide their comments on any other issue relevant to the present consultation.	<ul style="list-style-type: none"> • Increased/mandatory/voluntary participation of local authorities/government • Instructions on advertising/budget releasing by govt offices • Relaxation in reach areas, somewhat similar to private radio operators

3. Shamatha – Sarathijhalak 90.4MHz, Bangalore, Karnataka

Sl.no	Questions	Responses
Q 1.	What should be the period of permission for CRS to be prescribed in the CRS Guidelines? Is the present 5 year period adequate?	10 years
Q 2.	What should be the period of extension on the expiry of the initial period of permission for CRS?	10 years
Q 3.	Should there be any additional terms and conditions of extension/renewal of the permission for CRS?	There should be separate parameter for NGO and Campus based Cr.
Q 4	Should CRS permission holders be permitted to carry the news bulletins of All India Radio (AIR) in unaltered format and community based	Yes, news should be permitted. We feel, community based news is

	nonnewsand current affairs programs for the categories permitted to FM radio stations?	most important along with AIR. It is my general opinion.
Q 5	In view of the availability of alternative revenue/ funding options, is there any reason to increase the duration of advertisement beyond the 5 minutes per hour limitation? If yes, please explain with full justification.	It is a good suggestion but many CRs are still struggling toget 5 mts advertisement.
Q 6.	Do you agree with the above proposal for utilisation of CRS during natural calamities/ emergency situations?	No, a separate provision should be there for such situations.
Q 7.	What, in your opinion, are the measures required to ensure a faster growth in the number and spread of CRS in rural India?	Spreading Cr movement is appreciable but also sustainability is primary
Q 8.	Stakeholders may also provide their comments on any other issue relevant to the present consultation.	We feel, above mentioned are primery issues to be addressed

4. CRS AlwarkiAwaz 90.8MHz

Sl.no	Questions	Responses
Q 1.	What should be the period of permission for CRS to be prescribed in the CRS Guidelines? Is the present 5 year period adequate?	Perpetual permission,till revoked by Government or voluntarily relinquished by the licensee. One time permission fees should be taken at the beginning. It may not be out of context to state that earlier even Radios had licence and ware to renewed every year.
Q 2.	What should be the period of extension on the expiry of the initialperiod of permission for CRS?	Perpetual permission,till revoked by Government or voluntarily relinquished by the licensee. One time permission fees should be taken at the beginning.
Q 3.	Should there be any additional terms and conditions of extension/renewal of the permission for CRS?	New revision to terms and condition should be informed as when revised by Government to the licensee. These new terms and conditions and the old terms and conditions should be consolidated and reissued annually as "Terms and Conditions for operation of Community Radio Station for the

		year ____".
Q 4	Should CRS permission holders be permitted to carry the news bulletins of All India Radio (AIR) in unaltered format and community based nonnews and current affairs programs for the categories permitted to FM radio stations?	Yes
Q 5	In view of the availability of alternative revenue/ funding options, is there any reason to increase the duration of advertisement beyond the 5 minutes per hour limitation? If yes, please explain with full justification.	Only few Stations get alternative revenue/ funding options and this revenue/ funding is also irregular. Therefore advertisement beyond 5 minutes per hour should be permissible.
Q 6.	Do you agree with the above proposal for utilisation of CRS during natural calamities/ emergency situations?	Yes
Q 7.	What, in your opinion, are the measures required to ensure a faster growth in the number and spread of CRS in rural India?	The community should be able to choose what it wants to listen on its Community Radio Station and allow the Community Radio Stations to compete with Commercial Station,s if operating in the area. With limited broadcast range, the Community Radio Stations will supplement the tastes of the local community and fill the gaps left by Commercial Radio Stations broadcasting, the community will be engaged in a better manner. More Community Radio Stations will come up even in areas covered by the broadcasting of Commercial Radio Stations.
Q 8.	Stakeholders may also provide their comments on any other issue relevant to the present consultation.	The Community Radio Station should be in principle "<i>Of the Community, For the community and By the community</i>".

5. Radio Active CR 90.4 MHz & Radio Mewat

<u>Sl.no</u>	<u>Questions</u>	<u>Responses</u>
Q 1.	What should be the period of permission for CRS to be prescribed in the CRS Guidelines? Is the present 5 year period adequate?	Yes
Q 2.	What should be the period of extension on the	10 years

	expiry of the initial period of permission for CRS?	
Q 3.	Should there be any additional terms and conditions of extension/renewal of the permission for CRS?	<p>Renewal of GOPA and Term: The renewed GOPA must be granted for a period of ten years, subject to peer review prior to renewal and subject to social audit at the end of the five years. However, a discussion on social audit, the process etc should be held.</p> <p>Broadcast hours: A minimum of eight hours of broadcast must be stipulated, at the end of the GOPA Term Period, prior to renewal. If at the end of the interim period too, station has not made progress, sanction must be given to other applicant for frequency share, within the same area.</p> <p>Fresh Broadcast: A minimum of 40% original broadcast a day, must be made mandatory at the end of the renewal of the interim period, with a need for stations to send in reports annually of progress made, only then should the GOPA be renewed.</p> <p>Cap on Bollywood Music or any other film music: Community Radio stations should play a maximum of 30% (of their broadcast time) of film music, even if the stations have acquired</p>

		<p>the necessary permissions to do so, as then there is little difference in commercial entertainment channels and CRs. It should be mandatory to build an archive of local folk music.</p> <p>Signal Strength Mapping: MIB must keep a record of signal strength mapping of all Community radio stations and this must be done annually</p>
Q 4	Should CRS permission holders be permitted to carry the news bulletins of All India Radio (AIR) in unaltered format and community based nonnews and current affairs programs for the categories permitted to FM radio stations?	Keeping in mind the Article 19(1a) of the Constitution, Community radio stations must be allowed to broadcast local news and events, keeping in mind reasonable restrictions under Article 19(2). There needs to be a separate consultation on this to define the same
Q 5	In view of the availability of alternative revenue/ funding options, is there any reason to increase the duration of advertisement beyond the 5 minutes per hour limitation? If yes, please explain with full justification.	Stations must be DAVP empanelled to receive advertisements. The current duration may be increased to 6 minutes of advertisements per hour. While AIR Advertisement Code is followed, it is recommended that CR stations develop a "Community Radio Advertisement Code", to be practiced
Q 6.	Do you agree with the above proposal for utilisation of CRS during natural calamities/ emergency situations?	Yes

Q 7.	What, in your opinion, are the measures required to ensure a faster growth in the number and spread of CRS in rural India?	More awareness, capacity building and single window mechanism
Q 8.	Stakeholders may also provide their comments on any other issue relevant to the present consultation.	<p>In cases where community radio stations are located in hilly or disaster prone areas, an increase in ERP of upto 250W may be considered. Such stations can be determined in consultation with the NDMA.</p> <p>Programme Code for Community RadioCR stations, through a process of Consultation must draft a Program Code for Self-Regulation and use that as a guiding principles. Further individual stations must develop station specific programme code.</p> <p>Rented Building and the Problem of Relocation: In case the radio station is operating from a rented building and there is no possibility of renewal of lease, the station should be allowed to shift location within the area without change in frequency. However there should be no frequency clash with any other operational community radio station.</p> <p>Educational Institutions & Transmitter Location: In line with the discretion awarded to the NGOs, educational institutions must be permitted to locate</p>

		<p>their transmitter and antenna within the geographical area that the institution operates in.</p> <p>Spectrum Allocation Plan & Reservation of frequency for Community Radio Stations: In order to facilitate the growth of Community Radio stations, it is recommended that a comprehensive Spectrum Allocation Plan is prepared. It is important to reserve spectrum for Community Radio stations and the reservation of bandwidth must be increased, both in rural and urban areas.</p> <p>Names for Community Radio Station: It is recommended that no two community radio stations be named the same, in order to maintain clarity.</p> <p>CR station for Government insitutions: It is recommended that no government institutions be awarded community radio licenses under any circumstances.</p> <p>Spectrum Fees & Renewal of Licenses: The spectrum fee of Rs. 19700/- must continue and there should not be any increment in the fees for community radio stations. There must be a system in place for renewed licenses being issued within</p>
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		<p>15 days of payment/application of renewal. In case there has to be a change in policy, it should only be to wave off the current license fee.</p> <p>Single Window Clearance Mechanism: There is a need to simplify and implement a single window clearance mechanism for the CR licensing procedure. The applicant should be able to submit all documents after receiving LoI to one single ministry and all clearances including SACFA, Wol and GOPA should be handled in one go within a stipulated time period. Transparency should be established to help track the status of the application.</p> <p>Screening Committee: The Screening Committee which has been constituted must continue. However the Ministry of I & B must have a seven member committee in rotation, for every six months.</p> <p>No distinction between stations run by educational institutions or NGOs</p>
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Sl.no	Questions	Responses
Q 1.	What should be the period of permission for CRS to be prescribed in the CRS Guidelines? Is the present 5 year period adequate?	It was agreed that the present 5 year period was adequate
Q 2.	What should be the period of extension on the expiry of the initial period of permission for CRS?	10 years
Q 3.	Should there be any additional terms and conditions of extension/renewal of the permission for CRS?	<ul style="list-style-type: none"> • It was agreed that Peer Review should be undertaken prior to the extension, and following the extension Peer Review must be undertaken periodically every two years • Stations that are in operation for just one or two hours must be given a notice and extension must be based on increase in broadcast hours
Q 4	Should CRS permission holders be permitted to carry the news bulletins of All India Radio (AIR) in unaltered format and community based nonnews and current affairs programs for the categories permitted to FM radio stations?	<p>CRs must be permitted to carry local and community based in addition to what has been listed in the consultation paper.</p> <p>Eg: Crisis in a mid-day meal scheme</p> <p>In addition if a particular news carries significance for the local community, that must also be allowed to be carried, as discussions are the basis of a community radio station and hence there needs to be a separate consultation on definition of news in community radio</p>

Q 5	In view of the availability of alternative revenue/ funding options, is there any reason to increase the duration of advertisement beyond the 5 minutes per hour limitation? If yes, please explain with full justification.	<ul style="list-style-type: none"> • 5 minutes can be retained and an increase to six minutes maybe considered. • However it was recommended that State Governments be made aware of CR stations and funding be directed through different departments , with a limit or a ceiling of an upper limit • In addition, MIB must write to Ministry of Corporate Affairs to include Community Radio for Community projects • Need to study the Kerala model of State funding the CR stations for better understanding of achieving financial sustainability
Q 6.	Do you agree with the above proposal for utilisation of CRS during natural calamities/ emergency situations?	Yes
Q 7.	What, in your opinion, are the measures required to ensure a faster growth in the number and spread of CRS in rural India?	<ul style="list-style-type: none"> • WPC, must be made accountable and the renewal of license needs to be processed within a time period of month. • Information Department in the States must actively publish a list of operational CR

		<p>stations in leading dailies and regional newspaper either bi-annually or quarterly</p> <ul style="list-style-type: none"> • More frequencies must be reserved for CRS across the country • In addition, State Information Department must convene periodic sensitization programmes with various officers of different Departments on Operational Community Radio
Q 8.	Stakeholders may also provide their comments on any other issue relevant to the present consultation.	<ul style="list-style-type: none"> • Educational Institutions must be permitted to locate their transmitters outside if they wish and there must be no restriction • Frequency Clash problem must be addressed in a time bound manner- within a period of 3 months • Reserve more frequencies for CR stations especially in the metros, if that is not possible, important to increase EPR of existing CRs in urban areas • No increase in the present fee of 19700/- • Need a Consultation

		<p>on the TRAI paper</p> <ul style="list-style-type: none">• Need for a Spectrum Allocation plan and a single window clearance mechanism
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