

Haryana Technical Association

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To,

Shri Anil Kumar Bhardwaj,

Advisor (B & CS),

Telecom Regulatory Authority of India,

e-mail: advbcs2@traigov.in, jtadvbcs-1@traigov.in

Sub:- Counter comments on Consultation Paper No.: 8/2022 on Issues related to Community Radio Stations

Dear Sir,

We are pleased to introduce Haryana Technical Association – A volunteer organisation made up of committed and caring citizens was established and registered under the Societies Act, 1860, on August 21, 2008, with the goal of raising awareness about health, sanitization, environmental, and consumer problems as well as working toward national integration through the organization of public gatherings, declamation contests, paper reading contests, poster painting competitions, and the distribution of literature.

The Haryana Technical Association is developing a "Social Engineering" approach that clarifies how to make the most of the resources at hand. As is well known, Haryana is India's richest state. There is no more ground level development and a significant gap that needs to be repaired after that.

We are recognized as Consumer Advocacy group by Telecom regulatory Authority of India (TRAI) New Delhi w.e.f. 08 August 2012.

We acknowledge with thanks the help extended to us by senior officers of Haryana Administration to achieve its objectives. The role of media during the awareness programmes was greatly appreciated. The group worked in close co-operation with various local N.G.Os throughout Haryana.

As this consultation paper is related to Community Radio Stations and we HTA Haryana working with most of CRS operating in Haryana and even attended Community Radio Awareness Workshop organized by Ministry of Information and Broadcasting, Govt. of India in partnership with Community Radio Association at Mussoorie, Uttakhand from 19 - 21 November, 2014.

We understand in depth pain of community radio stations operating in our region and understand basics of CRS, through this counter comments we are responding as :-

- 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.**

Response: - No, there is no need at all to expand the scope of eligibility to section 8 companies as most of these companies belongs to big giants. It will change the basics the moto of CRS.

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

Response: We believe that the current initial license period 5 years is adequate but renewal/extension of license may be increased as CRSs are not professionally run commercial enterprises.

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

Response: We believe that renewal/extension of license may be increased to increased to 10 years as CRSs are not professionally run commercial enterprises. Yearly compliance may be increased to watch the activity and utilization of natural resources that are being used.

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.

Response: We believe after successful operation of 5 years CRS should be renewal/extension for 10 years as CRSs are not professionally run commercial enterprises.

List of compliances for renewal :- Daily program details Report., Audit Balance Sheet, Involvement of Local Community &/or other NGOs. Utilization of Advertisement Time i.e. Government Advts or Private Advts.

Further require yearly independent audit agency consist of State NGO's as member of audit committee to ensure utilization of CRS & Local Administration involvement should be increased i.e. DC, ADC or SDM should be member of program committee it will increase transparency and automatic regular audit by Distt. Administration.

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.

Response. Yes, it should be increased to 12 minutes per hours. This will increase the financial strength and the quality of program. CRS should not be allowed to book advertisements as per rate which suits them as per local requirement prices and unnecessary restrictions should not be imposed.

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?

Response: No, it will conflict the motto of CRS

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?

Response:- complications procedure to get CRS license

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

Response:-

- Local Administration involvement should be increased.
- CRS allowed to run any program after approval from **District Magistrate/ Deputy Commissioner** through **Sub-Divisional Magistrate**. even allowed to run Local News or State News or any other specific program after approval.
- Yearly Audit Report may be received for audit with comments of **District Magistrate/ Deputy Commissioner** through **Sub-Divisional Magistrate**.
- **Participations of other NGOs should be appreciated or should have remarks in audit.**

Thanks & Regards

Hitesh Dhanda

President

Dr. Alok Saran

Member

Member CAG of TRAI

