

Community Radio Forum Of India

c/o Ideosync Media Combine
1381, Sector 37, Faridabad
Haryana – 121003 - INDIA



Compiled comments received from CRF members in response to TRAI's consultation paper on issues related to community radio stations (issued 21/05/2014)

1. Comments received from Mr.K.Stalin, President, CRF

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?

5 years

Q 3. Should there be any additional terms and conditions of extension/renewal of the permission for CRS?

1. CRS should be required to reapply and argue their case for grant of renewal.
2. If a CRS does not apply for renewal, that particular license should be considered revoked. (This will help weed stations who sit on airwaves and non existent monitoring system is not able to act against them)
3. The renewal of license should be without any additional fee or spectrum usage charges. Meaning, the fee given the first time should be the only fee that needs to be paid

Q 4. Should CRS permission holders be permitted to carry the news bulletins of All India Radio (AIR) in unaltered format and community based non-news and current affairs programs for the categories permitted to FM radio stations?

Yes. CRS should be allowed to carry AIR news if they want to.

And, CRS SHOULD BE ALLOWED TO PRODUCE AND BROADCAST ITS OWN NEWS PROGRAMS AND UPDATES. And this should be NOT be limited to 'community news'. We need the CRS to be able to talk about national and international events that affect their lives and/or are of interest to them.

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.

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5 minutes per hour seem to be enough (I am not aware of a single CRS that has sold all 300 seconds!) However, I am okay if this was raised to 8 minutes or so to accommodate some future smart social entrepreneurial ideas.

What needs to change perhaps is the cap on 'sponsored programs'.

Q 6. Do you agree with the above proposal [*relocation of CRS during emergencies etc*] for utilisation of CRS during natural calamities/ emergency situations?

There should be special provisions to respond to natural calamities and disasters. Nevertheless, i am not sure how 'relocation of CRS' will work. The guidelines should allow for mobile transmitters and transmission from multiple locations on single temporary/special licenses in disaster areas

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?

1. Simplify procedures
2. Applications to be cleared within a specified time frame not exceeding 100 days
3. CR Cell within MIB should be authorized to operate single window clearance for applicants.
4. Clear distinction between Community Radio and Campus Radio
5. Spectrum reservation for CRS and it's allocation to be done by MIB
6. WPC to make it's procedure clear and transparent
7. Lift ban on news
8. Enable production and distribution of low cost transmitters and other radio equipment
9. Open up Citizen Band and delicense it

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

All procedures and formalities required to be followed to set up CRS to be brought under RTI with the only exception where matters may contravene the Official Secrets Act

CRS themselves to be brought under the purview of RTI

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2. Comments received from Mr.Ram Bhat, Vice President, CRF

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

- a. Would be really excellent if TRAI could hold a Open House discussion (OHD) - to discuss all the responses that were received on or by 11th June. This could be done in end-June or early July, depending TRAI and I&B's convenience. TRAI could organize the OHD and I&B could financially support some stakeholders to come and participate in this discussion. This would be a good way to follow up on the work that the policy revision committee had started, but which has now stopped for various reasons.
- b. We believe DoT also tasked TRAI with examining the issue of Spectrum Usage Charge (SUC), with special emphasis on spectrum usage for not-for-profit motives such as community radio, which cannot be decided through an auction route. We strongly recommend that TRAI should proactively respond to this after due consultation with all stakeholders on this important subject, which has not been included directly within this consultation paper.

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3. Comments received from Mr.N.Ramakrishnan, General Secretary, CRF

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?

5 years

Q 3. Should there be any additional terms and conditions of extension/renewal of the permission for CRS?

1. CRS should be required to reapply and argue their case for grant of renewal. They should be required to provide evidence of a community consultation/social audit within a four month period before the date of renewal, where the community should clearly endorse the need for the continued existence of the station.
2. If a CRS does not apply for renewal, its license should lapse.
3. The renewal of license should be without any additional fee or spectrum usage charges. Meaning, the fee given the first time should be the only fee that needs to be paid.

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Q 4. Should CRS permission holders be permitted to carry the news bulletins of All India Radio (AIR) in unaltered format and community based non-news and current affairs programs for the categories permitted to FM radio stations?

Yes. CRS should be allowed to carry AIR news but this should not be mandatory in any way. They should produce and broadcast their own news content, and not be asked to rebroadcast any news feed from AIR, Prasar Bharti, or any news aggregation or wire service. The news should also not be limited to community news – CRs should be able to broadcast news on any topic or event whatsoever.

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.

Currently, 5 mins per hours seems adequate for advertising.

Q 6. Do you agree with the above proposal [*relocation of CRS during emergencies etc*] for utilisation of CRS during natural calamities/ emergency situations?

There should be a special set of regulations to respond to CRS in disaster situations. This may not be limited to 'relocation' of the CRS (which may conceivably solve the long term problem of a damaged CR site). Provisions for processes to issue rapid permissions for - or allow licensed CRSs to maintain – a mobile transmitter may allow better responses to disaster situations, allow better coordination, and save many lives.

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?

1. Simplify procedures and create provisions for time bound stage clearances
2. CR Cell within MIB should be authorized to operate single window clearance for applicants.
3. Clear distinction between Community Radio and Campus Radio
4. Spectrum reservation for CRS and it's allocation to be done by MIB
5. WPC to make it's procedure clear and transparent
6. Lift ban on news
7. Enable production and distribution of low cost transmitters and other radio equipment by expanding the list of approved transmitter units.
8. Delicense 10W and under radio transmission in the FM band
9. Waive spectrum fee completely for the CR sector and limit procedural formalities to allocation of frequency

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

TRAI must provide recommendations to DoT to provide mechanisms for pricing of non-commercial spectrum by a non auction route. This should be a complete waiver for CR stations.

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4. Comments received from Ms.Venu Arora, Ideosync Media Combine

Q 3. Should there be any additional terms and conditions of extension/renewal of the permission for CRS?

- a. A mechanism should be in place to ensure that at least two reminders are sent to the CRS regarding renewal time. If no renewal request comes through license should be revoked.
- b. The renewal of license should be without any additional fee or spectrum usage charges. Meaning, the fee given the first time should be the only fee that needs to be paid.

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.

I submit that a no-strings-attached autonomous public fund must be established to cover basic minimal operational costs of a CRS to support other strengthening activities like technology upgrades, innovation and capacity building. The current support fund system, while well intended, is a government scheme – and subject to the limitations of a government scheme.

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?

- 1. Clear distinction between Community Radio and Campus Radio, and public and private radio
 - 2. Open up Citizen Band and delicense all FM radio broadcasting under 10 watt transmission
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5. Comments received from Mr.Rajender Negi, Henvallvani CR, Chamba, Uttarakhand

- यह तय कथिा जाय कजिो भी सामुदायकि रेडयिो स्टेशन के नाम से लाईसेंस लेता है वह समुदाय के लएिे दयिे जाने वाली सेवाओं के लएिे सर्क्षत बचनबद्ध हो।
- समुदाय द्वारा संचालति कयिे जाने वाले सामुदायकि रेडयिो को चनिन्ति कर स्पेक्ट्रम शुल्क खत्तम होना चाहयिे।
- कैपस रेडयिो व सामजकि संघठनों अथवा एनजीओ द्वारा संचालति रेडयिो को अलग अलग कथिा जाना चाहयिे जब कैपस को सगिल वडिो क्लीयरेंस दयिा जाता है साथ ही उस रेडयिो को सरकारी य गैर सरकारी संस्थानों के अधिकारी या मालकि अपनी मैनेमेंट के हसिाब से संचालति करते है इसमें समुदायकि सहभागति नरिणय व अधिकार में कही नही होती।
- पहाडो के लएिे ट्रांसमीटर वाटेज क्षमता में पुरनवचिार की आवश्यक्ता है क्योककिही कही यह प्रसारण 4 कलिोमीटर तक भी नही पहुंच पा रहा है।
- गैर सरकारी संस्थाओं द्वारा संचालति कयिे जाने वाले सामुदायकि रेडयिो स्टेशन अधिकितर करियाे के भवनों पर संचालति कयिे जा रहे है कई बार भवन बदलने की परसिथ्तियां पैदा हो जाती है जसिमें कडििसके लएिे संबधति मंत्रालय को इस बदलाव के लएिे आवेदन करना पडता है जो कबिेहद जटलि व लम्बा है इसे 30 दनि के अंदर सूचना प्रसारण मंत्रालय के द्वारा ही जारी कथिा जाना चाहयिे।

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6. Comments received from Mr.Rakesh Pandey, Waqt Ki Awaaz CR, Kanpur, UP

We request TRAI to encourage various ministries to use the services of CRS for publicity / public awareness as a paid services.

We examined the Annual Implementation Plan of Nirmal Bharat Abhiyan in U.P. In 2013-14 there was a budget of Rs. 55 lakhs for radio spots against this expenditure was 0. The same amount is budgeted in 2014-15.

**Compiled by N.Ramakrishnan, General Secretary, CRF
11th June 2014 (Mob: 9810273883)**