



## **TRAI Consultation on Community Radio**

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Survey on Advertising and other Community Radio related issues

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**Submitted by**  
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## 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 21<sup>st</sup> May 2014 inviting comments from the stakeholders. Following this, TRAI organized an Open House Discussion on 3<sup>rd</sup> 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.

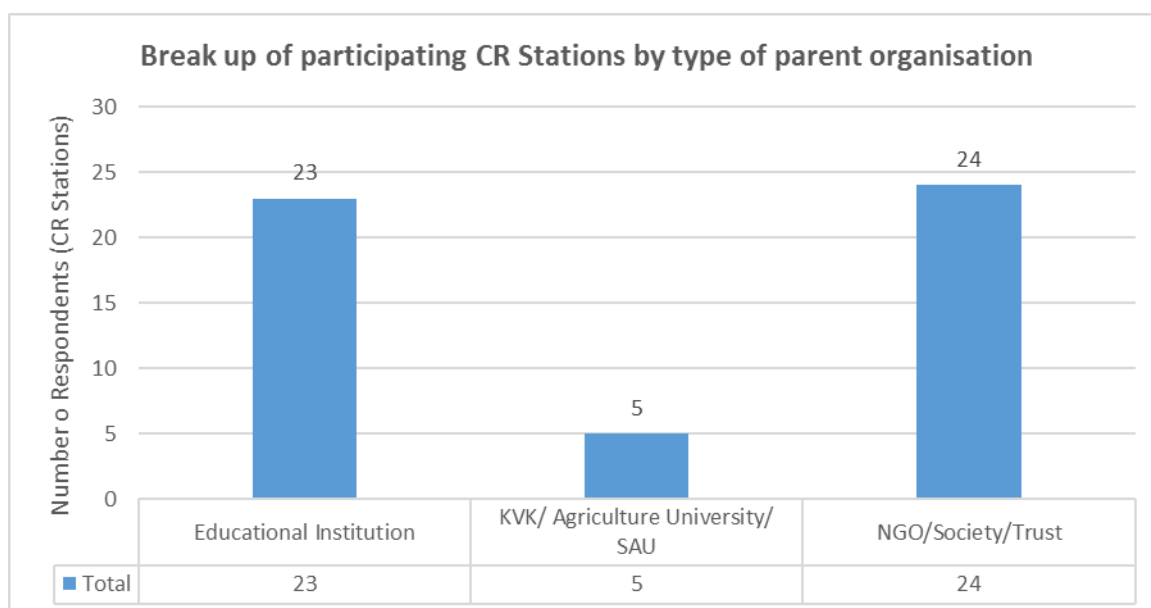
Besides TRAI officials, senior officials from the Ministry of Information & Broadcasting, representatives of Operational CR Stations, Community Radio Association, Community Radio Forum, practitioners and stakeholders including Ford Foundation, CEMCA, OneWorld Foundation India, Ideosync Media Combine 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

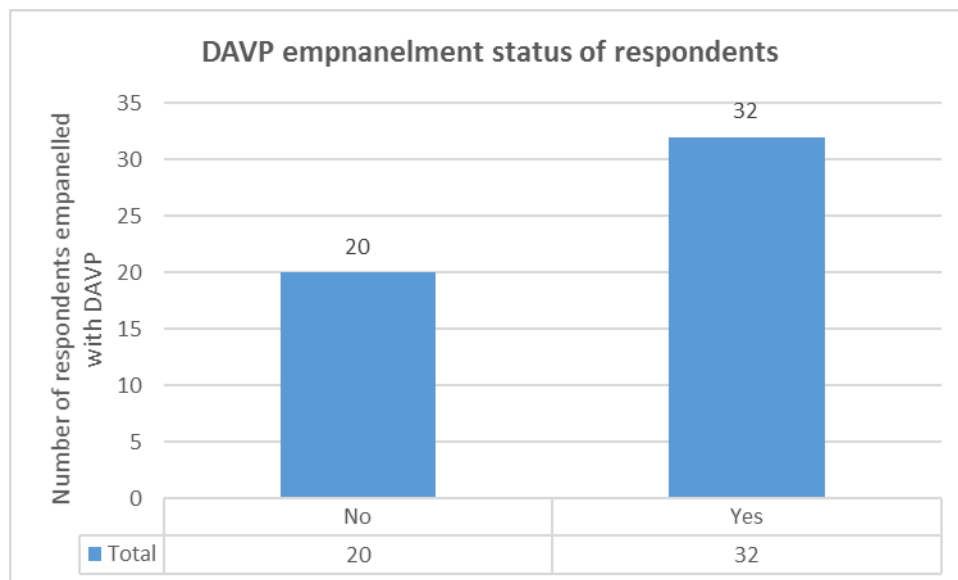
Currently, there are 170 operational Community Radio stations in India. A total of 52 Community Radio Stations (of 170 Community Radio Stations operational in the country) participated in the online survey within a short window span of less than 48 hours. While the information that came out of the



survey 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.

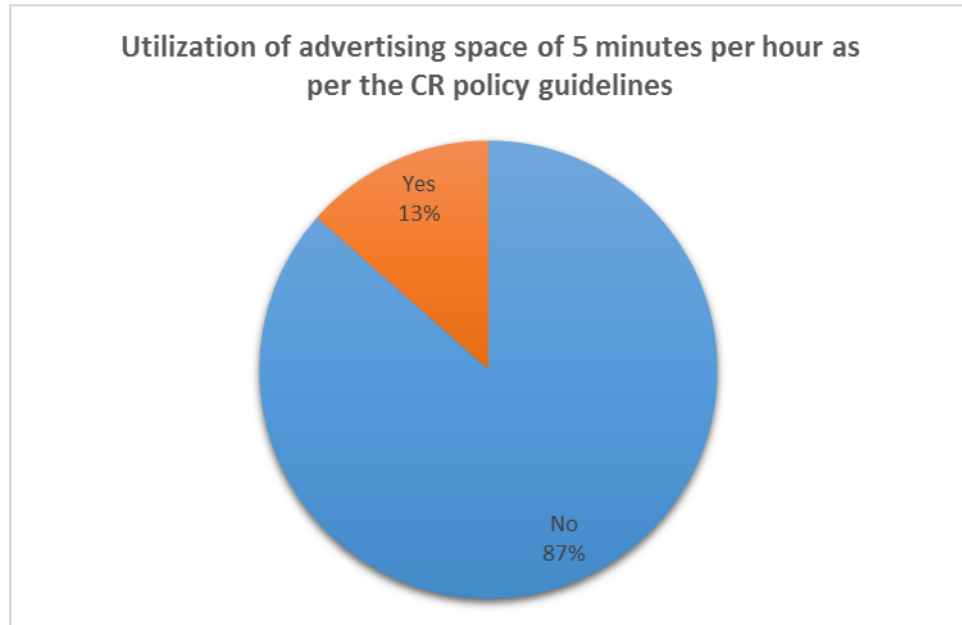
Of these 52 respondents (Community Radio stations), 32 are empanelled with the DAVP while 20 are not. In order to conduct the survey, OneWorld first got in touch in with the stations empanelled with DAVP. This was done to come to an understanding if Community Radio Stations empanelled with DAVP are able 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, 41 are empanelled with DAVP and that these 32 Community Radio Stations participating in the survey represent an overwhelming opinion of those empanelled with the DAVP.)*



### Utilization of Advertising Time

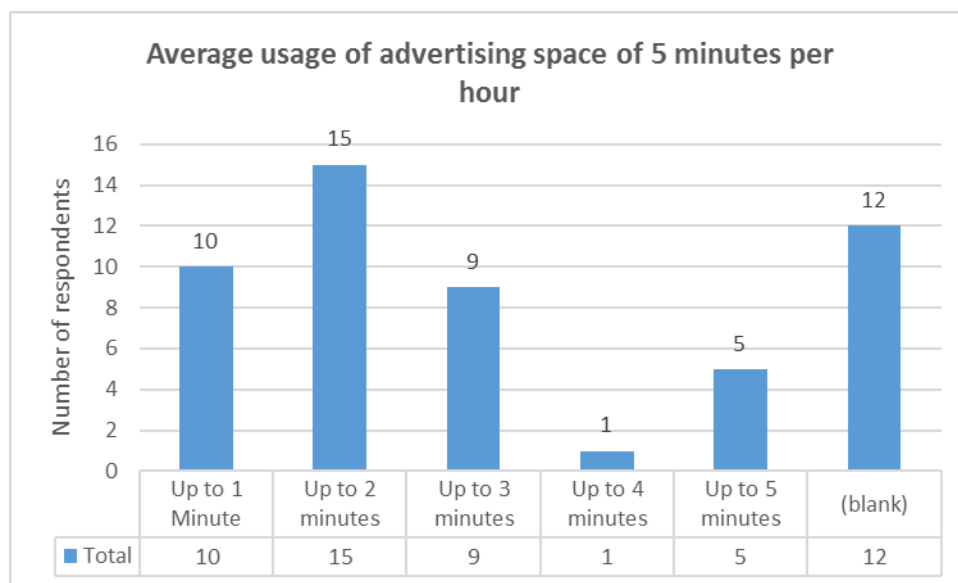
As per the Community Radio policy guidelines, Community Radio Stations can broadcast advertisements for up to 5 minutes for every hour of broadcast. Currently 41 stations are empanelled with the DAVP. However, the survey among Community Radio stations reveals that only 7 stations, i.e. 13 per cent are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



**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.



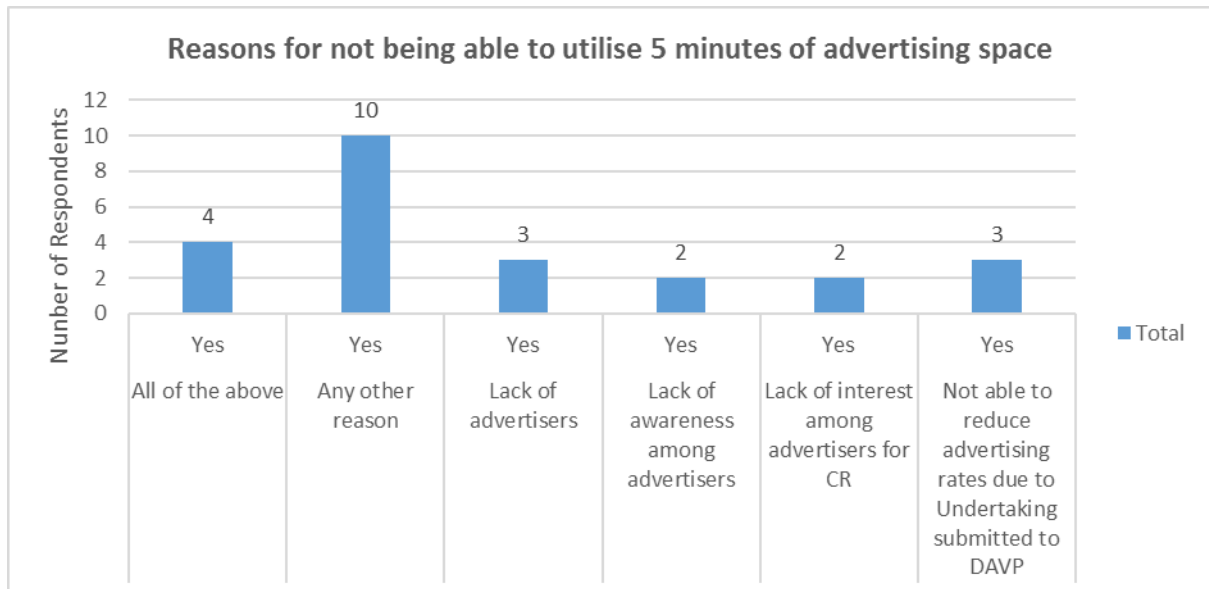
**Reasons for not utilising advertising time**

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.

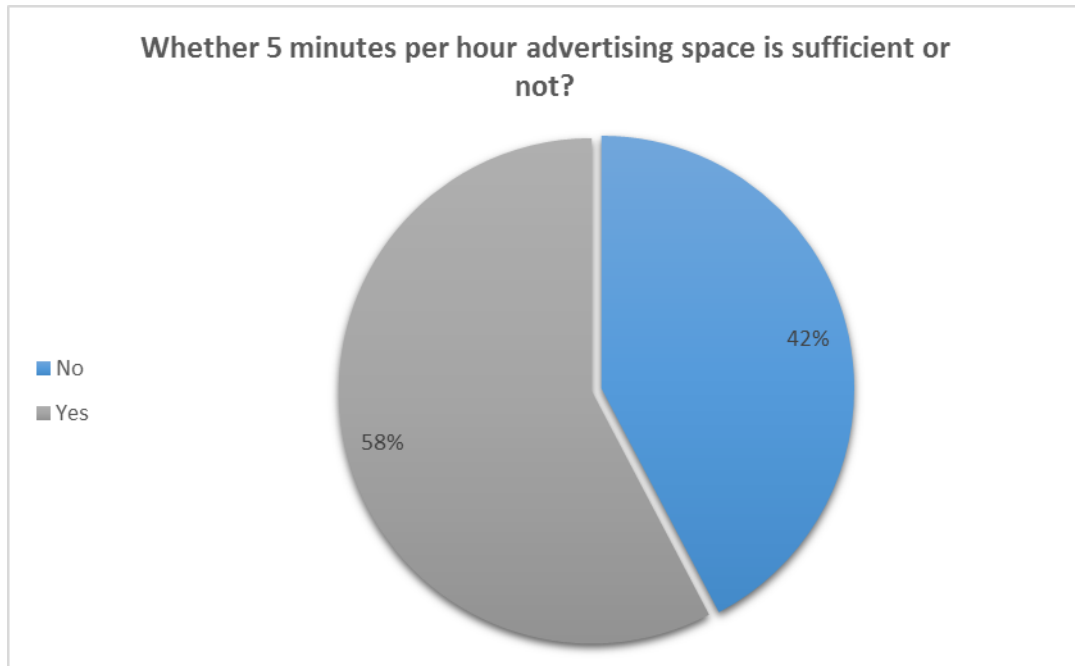
The respondents cited some other reasons for not being able to utilize the existing commercial time of 5 minutes. Following are some of the reasons:

- 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

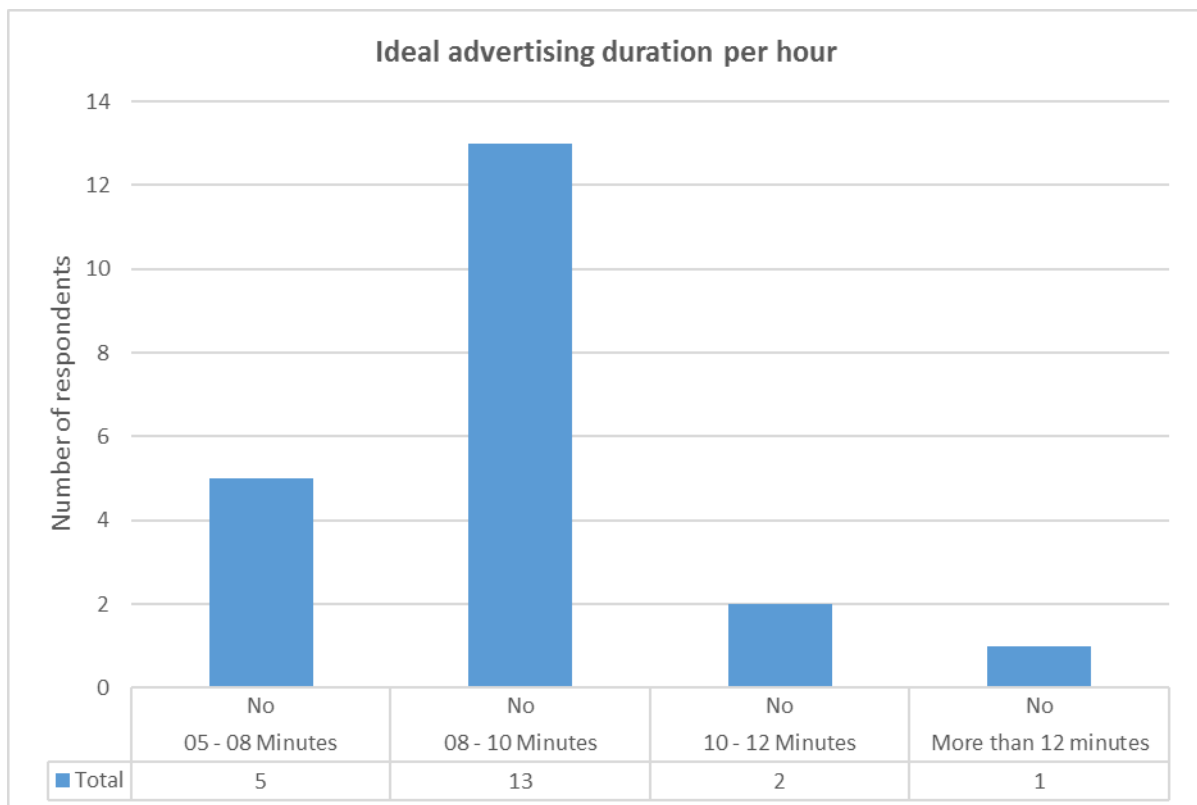
**Views on existing advertising time – 5 minutes/ hour**

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 sufficient.

It might be noted that while earlier responses show that on an average the Community Radio Stations are able to utilize only 2.6 minutes of the commercial time, yet, 42 per cent (22 respondents) think that 5 minutes is not sufficient.



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 be between 8 – 10 minutes while 2 respondents think that it should be 10 – 12 minutes.



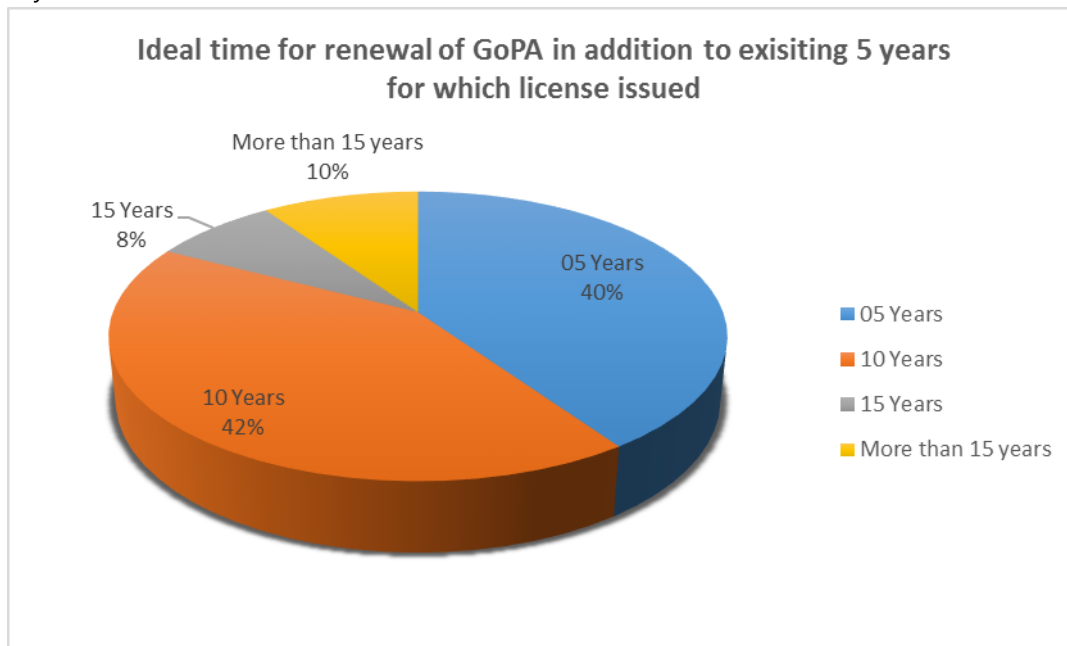
**Views and Suggestions from CR Stations**

S.No.	Name & Location of the Community Radio station	Comments/ suggestions on advertising
01	Radio FTII, Pune, Maharashtra	<ul style="list-style-type: none"> <li>▪ In the city like Pune, competition from other stations.</li> <li>▪ No Marketing team of CRS due to lack of funds or support</li> <li>▪ Reach of signal is also hindrance in attracting advertisers</li> </ul>
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	<p>High charge rates- Local small businessmen are not able to pay advertisement rates given by DAVP.</p> <p>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).</p>
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	<p>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.</p> <p>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.</p>
07	Chanderi Ki Awaaz, Ashok Nagar, Madhya Pradesh	<ul style="list-style-type: none"> <li>▪ No marketing plan</li> <li>▪ No Staff</li> <li>▪ Advertisement Rate high</li> <li>▪ Not proper Communication</li> <li>▪ No publicity</li> <li>▪ Untrained Staff for Advertisement</li> </ul>

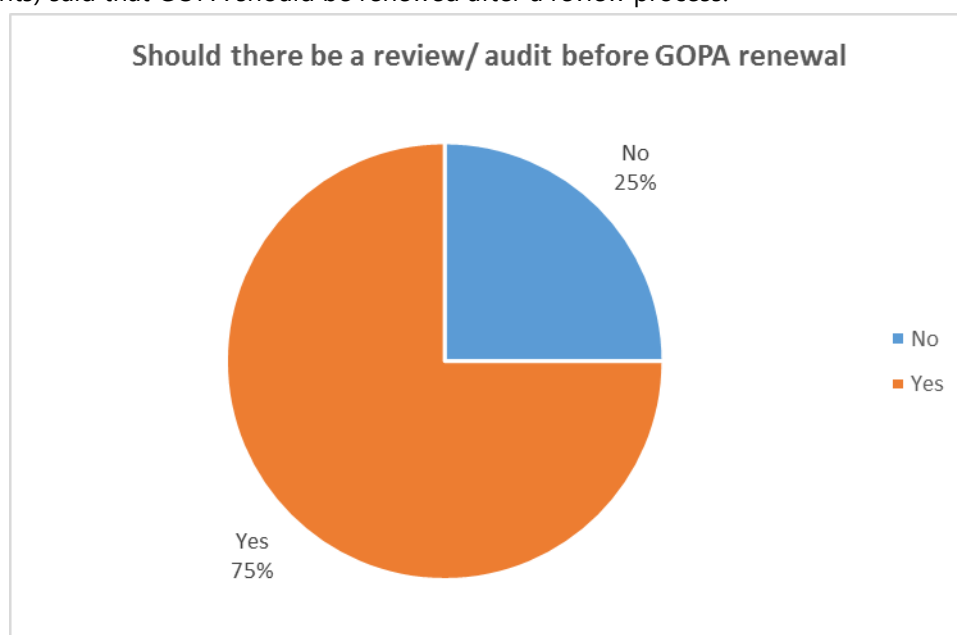
## GOPA Renewal

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.



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.





### 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**

## Views, Observations and inputs from Stakeholders

### **Rukmini Vemraju**

Surprised to not that even those unable to utilise the current 5 minutes would like the slot (commercial time) to be increased

### **Sajan Venniyoor, Community Radio Forum**

The sponsorship on Community Radio must include private sponsored programmes as long as they do not promote corporate or commercial interest

1. Private sponsorship should follow the same guidelines as Central & State government sponsorship; viz., sponsorship is only for the broadcast of public interest information.
2. Private sponsorship should also follow DAVP content guidelines -- that no canned or ready-to-air programmes will be accepted from sponsors. Community Radio Stations will develop their own local and community-centred programmes based on the sponsor's public service requirements.
3. As in the case of DAVP advertisements vs local ads, the sponsorship rates for Community Radio should be relaxed in the case of private sponsorships.

The above observations have also been echoed by **Vinod Pavarala**, UNESCO Chair on Community Media.

### **Dr R Sreedher:**

While agreeing with the observations of Sajan Venniyoor, Dr Sreedher says that "free commercial time (has been) included in sponsors category".

### **Tej Prakash Yadav**

#### **Manager – Community Media, OneWorld Foundation India**

I think enhancing the duration of Fixed Commercial Time from existing 5 minutes to 8 minutes make sense in the case DAVP undertaking clause is made flexible. Once DAVP clause becomes flexible, Community Radio stations will be able to accept advertisements at lower rates than Rupees 4 per second. In this case, they would need to more advertisements and fixed commercial time to generate adequate revenues.

There is also an emerging need for sourcing content from private outside the government in light of the amended Companies Act provisioning for mandatory reporting on CSR expenditures

### **Bijoy Patro**

#### **Head of Programmes and Editorial, OneWorld Foundation India**

We need to take the journey to the next level to arrive at a CR Policy so that it graduates from the present CR Policy Guidelines and factor in the following facts:

- The capacity of CR Stations to produce enough content to demand for advertisement time beyond five minutes. More DAVP support will only help enhance their sustainability.
- The policy should scope for better spectrum usage – by sharing, or however, but enhance the productivity per licensed CR Station.
- It is also time to explore the scope for private sponsorships while adhering to the existing guidelines and giving care to community-centred, culturally relevant programmes.

## 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.
- Explore the scope for private sponsorships while adhering to the guidelines as central and state government sponsorship, DAVP content guidelines and community-centred, culturally relevant programmes.
- Explore the scope for sponsorship of content from sources outside the government in light of the amended Companies Act provisioning for mandatory reporting on CSR expenditures.

## 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 Awaaz	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	Vasundhara Vahini	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	Puducherry	Puducherry
36	KVK Pravara CR	Ahmednagar	Maharashtra
37	Radio Siddhartha	Tumkur	Karnataka

38	Neladani 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 Dhvani	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

**Comments and inputs on this report can be sent to [tejprakash.yadav@oneworld.net](mailto:tejprakash.yadav@oneworld.net)**

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