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# Community Radio Policies in South Asia

A Deliberative Policy Ecology Approach

Preeti Raghunath

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Preeti Raghunath  
Symbiosis Institute of Media and Communication (SIMC)  
Symbiosis International University (SIU)  
Pune, India

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*To Daddy and Ma, for giving it their all, and for being my first Teachers*

## PREFACE

The study of media policymaking is both extremely gratifying and equally challenging. The growing number of research centres with a focus on media policies makes one believe that the venture is feasible. Surprisingly, there is a lack of a more sustained focus on one of the more important areas of communication research, in that it is a study of how an important non-state actor as the media is governed internationally and within national borders, as also the *processes* of policymaking for such an actor. More concerning is the lack of reflexive scholarship on media policies and policymaking from the Global South at large, and South Asia in particular. A region with tremendous potential for growth and an equally volatile journey, makes South Asia important for any study of the media.

The history of communication and media research is teeming with studies on agriculture and extension, development, film and culture studies, based in the region. I felt that it was about time for the region to reclaim some space in the area of global media policy studies, especially given the history of participation ranging from the NWICO debates to the WSIS processes. Community radio becomes a site that registers these markers of heterogeneity, the thickness of culture, claims and contestations over power and resources, and the interfacing of the region with the rest of the world and its politics.

The normative element that is focused on questions of sustainable development, reclamation of space for the truly voiceless, communication rights for the most marginalised, and a policy process that reflects these realities made the intent behind the study very compelling and

uncompromising. Equally importantly, critical studies, as an assortment of theoretical strands and strains that work with these realities, only offered itself as a natural go-to, for this study. The resultant, combined with a love for a heterogeneous, chaotic, diverse yet unified region in its search for ‘the ultimate destiny’, egged me to take on this study of community radio policymaking in South Asia.

Numerous individuals and experiences have shaped my thinking and praxis over the years. My experiences in journalism and corporate communication practice, in a city that became the face of information technology in a globalising India, acquainted me with its underside—with the aspirational average BPO worker; a news organisation that relied heavily on political funding in one instance, marketing in the second, and one caught in the throes of delivering ‘breaking news’ every other hour in the third. These experiences helped me grasp the vagaries of the field of media and communication in its practicalities. Academic endeavours such as this are a luxury in the face of such everyday realities, a constant reminder to take the hard path of praxis seriously and with utmost commitment. This work is the product of such a commitment, love, and labour. I hope it engages you as much as it enthralled me.

Pune, India

Preeti Raghunath

## ACKNOWLEDGEMENT

This book is dedicated to my Daddy, K. Raghunath, to whom I owe everything, for initiating me into education as a child, for being the first person to have faith in my abilities, and for believing in me. My education has been made possible only because of his vision and hard work in sending me to the best of institutions, at the cost of many other things. One among the many teachable moments was him returning after singing with his music troupe, ‘Ehsaan mere dil pe tumhara hai doston...’, a song of friendship, peace, and brotherhood, in Hyderabad’s Old City. If I’m able to comprehend the incredibly difficult physical, mental, and emotional journey he undertook, I’d retire a grateful person. This book is dedicated to my mother, Malathi, for teaching me the golden principle that what we know is just a handful in comparison to what is out there. I’m deeply indebted to her for single-handedly handling everything and never once discouraging me. I’m eternally grateful to my parents for instilling in me the quest for knowledge, values of humanism, and the freedom to pursue them. This book is the testimony to their will and is the culmination of the goodwill, tenacity, and support of many incredible individuals.

This book would have never taken the shape that it has, if not for the cooperation and kindness of close to a 100 policy actors from Sri Lanka, Nepal, India, and Bangladesh, who agreed to be interviewed and talked to. I’m deeply indebted to each of them for sharing so freely and eloquently their individual and collective journeys of many years in making and shaping policies for community radio in these countries. I have only deep gratitude that many of them chose to take time out of their busy schedules and

meet a rank stranger from another country with little introduction many a time, and at the short notice that my fieldtrips could afford. Their reflective narrations on the many facets of their policymaking experiences certainly shaped my thinking and comprehension of the cultures of governance in the part of the world that I reside in, the praxis of which I have had the strong desire to learn about and understand, for years.

A good portion of the empirical data in this book is based on my doctoral research thesis, completed at the University of Hyderabad, India. I'm grateful to the faculty at the Department of Communication at UoH, for constantly pushing the envelope and for imbuing the department with richness and rigour. I'd like to thank the team at the UNESCO Chair on Community Media, where I was a Research Assistant in the initial years of my PhD. I'm grateful to the non-teaching staff at the Department for easing our work on a lot of fronts. I'm also grateful to the researchers at the department for bringing vibrancy to its research climate.

My heartfelt gratitude and respect goes to the teachers who taught me during my Masters at the School of International Studies (SIS), Jawaharlal Nehru University (JNU), for imparting education that went beyond the walls of the classrooms, instilling the spirit of inquiry and a sense of public-oriented reasoning, and for introducing me to theoretical entry-points, an understanding of which provoked me to meander for the years that followed and find my own bent.

I owe a lot of my understanding of politics, society, economy, and everything else in between, to the innumerable conversations had over cups of *chai* at both my alma maters. In particular, the movement for justice for Rohit Vemula has had an indelible impact on my own intellectual and emotional bearings.

I cherish my association with the Symbiosis Institute of Media and Communication (SIMC), where I teach and research. The warmth of my colleagues and congenial atmosphere have been conducive to research, and the bright students bring joy to my teaching endeavour.

I'm grateful to the University Grants Commission, India, for their Junior and Senior Research Fellowships, without which I would not have attempted a PhD, and this book. I'm grateful to the Annenberg-Oxford Media Policy Summer Institute, for the funding that allowed me to participate and learn media policy, and also for enabling me to present the initial portions of my work. I'm very thankful to the International Association for Media and Communication Research (IAMCR), especially

the Global Media Policy Working Group, for their research funding and opportunity to grow. I'm grateful to the Indian Council for Social Sciences Research (ICSSR) for funding my Data Collection Abroad, in the three countries barring India. I'm also thankful to the International Public Policy Association (IPPA) for their Asian Scholar Grant, for facilitating my participation in their annual conference that allowed me to meet and converse with the very proponents of deliberative policy studies and analysis. I would like to place on record my gratitude to Prof. Monroe Price of the Annenberg School of Communication, University of Pennsylvania, for conversations early on into my PhD. I'm thankful to Paula Chakravartty, Vipul Mudgal and Arne Hintz for their early reviews of the book.

I'm very grateful to Sandeep Kaur and her team at Palgrave Macmillan/Springer Nature, for being so stress-free and gently taking the publication process along, in a professional manner. Thanks to Sandeep for believing in my work. I'm happy that this book features as part of the prestigious Palgrave Studies in Communication for Social Change series, edited by Pradip Thomas and Elske van de Fliert.

I'm thankful for the many friendships that I have garnered during the past three decades. I'm grateful to my family for cheering me on; Arun, for deciding to turn into a responsible adult from being a troublesome brat—thank you for being there when it really mattered, and Chan, for the love and liberation. Again, this thesis is for my parents, who never failed to encourage me and gave it their all.

## Praise for *Community Radio Policies in South Asia*

“Drawing from field-based research in Bangladesh, India, Nepal and Sri Lanka, Preeti Raghunath has written an original and nuanced analysis of the multifaceted “bottom-up” process of media policy-making and contestation that will resonate across many postcolonial societies. Theoretically, the “Deliberative Policy Ecology Approach” taken by the author, moves our analyses of media policy and comparative media politics forward, beyond the Eurocentric normative underpinnings that often confine discussions about the media, democracy and civil society.”

—Paula Chakravartty, *New York University*

“In this timely, informative and deeply engaging book, Preeti Raghunath unravels the romance of radio for social change. Her repertoire covers everything from history to prevailing practices and from policies to possibilities. This critically acclaimed work follows a down-to-earth approach and reveals an intimate understanding of community radio in South Asia. Well-grounded in media research, the author seems committed to the cause of community access of airwaves for a better tomorrow.”

—Vipul Mudgal, Director, *Common Cause*, and Head,  
*Inclusive Media for Change*

“*Community Radio Policies in South Asia* offers a fascinating account of the processes and dynamics that have shaped the policy environment of community media in the region. Through its deliberative policy ecology approach, and based on a wealth of ethnographic insights, it explores the roles of actors, venues, norms, narratives and interests, as well as the intersections of the local, national and global. The book manages to unpack the complex layers of policy development in competent and lively fashion and provides a holistic understanding of governance.”

—Arne Hintz, *Cardiff University*, and Co-Director, *Data Justice Lab*

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## ABBREVIATIONS

ABGEP	Area-Based Growth and Equity Programme
ACLAB	Alliance for Cooperation and Legal Aid Bangladesh
ACORAB (Nepal)	Association of Community Radio Broadcasters (Nepal)
AID	Alternative for India Development
AIR	All India Radio
AL	Awami League
AM	Amplitude Modulation
AMARC	Association Mondiale des Radiodiffuseurs Communautaires (World Association of Community Radio Broadcasters)
AMIC	Asian Media Information Centre
ASEAN	Association for South East Asian Nations
AT&T	American Telephone and Telegraph Company
BAN	Broadcasters Association of Nepal
BAP	Broadcasting Administration Programmes
BBC	British Broadcasting Corporation
BJP	Bharatiya Janata Party
BNNRC	Bangladesh Network for NGOs in Radio and Communication
BNP	Bangladesh Nationalist Party
BTRC	Bangladesh Telecom Regulatory Commission
CAB	Cricket Association of Bengal
CBO	Community-Based Organisations
CDC (Bangladesh)	Centre for Development Communication (Bangladesh)
CEMCA	Commonwealth Educational Media Centre for Asia

CEO	Chief Executive Officer
CIN (Nepal)	Community Information Network (Nepal)
CPB	Corporation for Public Broadcasting
CPN-UML	Communist Party of Nepal-United Marxist Leninist
CR	Community Radio
CRA (India)	Community Radio Association (India)
CRF	Community Radio Forum
CRFC	Community Radio Facilitation Centre
CRSC	Community Radio Support Centre
CRSS	Community Radio Support Scheme
CSDS	Centre for Study of Developing Societies
DANIDA	Danish International Development Agency
DAVP	Directorate of Advertising and Visual Publicity
DFID	Department for International Development
DRR	Disaster Risk Reduction
DRS	Direct Reception Systems
ECFC	Empowerment of the Coastal Fishing Communities
EDAA	Ek Duniya Anek Awaaz
EMPC	Electronic Media Production Centre
FAO	Food and Agriculture Organisation
FCC	Federal Communications Commission
FCRS	Federation of Community Radio Stations
GDP	Gross Domestic Product
GOPA	Grant of Permission Agreement
IAMCR-GMP	International Association of Media and Community Research-Global Media Policy
ICCPR	International Covenant on Civil and Political Rights
IEC	Information-Education-Communication
IGNOU (India)	Indira Gandhi National Open University (India)
IMC	Inter-Ministerial Committee
INC	Indian National Congress
INGOs	International Non-Governmental Organisations
INTRAC	International NGO Training and Research Centre
IPDC	International Programme for the Development of Communication
IPR	Intellectual Property Rights
IT	Information Technology
ITU	International Telecommunications Union
JICA	Japan International Cooperation Agency
JVP	Janatha Vimukthi Perumuna
KCR	Kothmale Community Radio
KMVS	Kutch Mahila Vikas Sangathan

KPI	Komisi Penyiaran Indonesia (Indonesian Broadcasting Commission)
KW	Kilo Watt
LKR	Lankan Rupee
LPFM	Low-Power Frequency Modulation
LTTE	Liberation Tigers for Tamil Eelam
MCR	Mahaweli Community Radio
MDGs	Millennium Development Goals
MHA (India)	Ministry of Home Affairs (India)
MHz	Mega Hertz
MIB (India)	Ministry of Information and Broadcasting (India)
MIC	Ministry of Information and Communication
MLA	Martial Law Administrator (Bangladesh)
MMC	Mass-Line Media Centre
MoCIT (India)	Ministry of Communication and Information Technology (India)
MoIC (Nepal)	Ministry of Information and Communication (Nepal)
MW	Mega Watt
MYRADA	Mysore Resettlement and Development Agency
NAC	National Advisory Council
NAM	Non-Aligned Movement
NASA	National Aeronautics and Space Administration
NASPRII	National Strategy for Accelerated Poverty Reduction II
NBA (Bangladesh)	National Broadcasting Authority (Bangladesh)
NBC (Bangladesh)	National Broadcasting Corporation (Bangladesh)
NCPRI	National Convention for Peoples' Right to Information
NEFEJ	Nepal Forum of Environmental Journalists
NES	New Education Service
NFI	National Foundation for India
NGO	Non-Governmental Organisation
NIEO	New International Economic Order
NPI (Nepal)	National Press Institute (Nepal)
NWICO	New World Information and Communication Order
OfCom UK	Office of Communication United Kingdom
PRIA	Participatory Research Institute of Asia
PSB	Public Service Broadcasting
RTI	Right to Information
SAARC	South Asian Association for Regional Cooperation
SAC (India)	Space Applications Centre (India)
SACFA	Standing Advisory Committee for Frequency Allocation
SAMAJ	<i>South Asian Multidisciplinary Academic Journal</i>
SDGs	Sustainable Development Goals

SEAC	South-East Asian Command
SERP	Society for Elimination of Rural Poverty
SIC	SAARC Information Centre
SIRM	Save Independent Radio Movement
SITE	Satellite Instructional Television Experiment
SLBC	Sri Lanka Broadcasting Corporation
TRAI	Telecommunication Regulatory Authority of India
TRC (Sri Lanka)	Telecom Regulatory Commission (Sri Lanka)
UCR	Uva Community Radio
UN	United Nations
UNDP	United Nations Development Programme
UNESCO	United Nations Educational, Scientific, and Cultural Organisation
UNF	United National Front
UNICEF	United Nations International Children's Emergency Fund
UNP	United National Party
UPC	Uva Provincial Council
USAID	United States Agency for International Development
VDC	Village Development Committee
VOs	Village Organisations
VoT	Voice of Tigers
WACC	World Association for Christian Communication
WOL	Wireless Operating License
WPC	Wireless Planning and Coordination
WSIS	World Summit on Information Society
YAEF	Youth Awareness Environmental Forum

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## CHAPTER 1

---

# Media Policy Studies and Community Media

I took the train from Colombo to Kandy in Sri Lanka, which often features on the list of the most beautiful train rides in the world. Upon alighting in Kandy, I met Sunil Wijesinghe in a tiny stationery shop tucked between small nondescript shops lined up on the road to the Peradeniya University. Wijesinghe, a former employee of the Sri Lanka Broadcasting Corporation (SLBC), is one of the early community radio (CR) broadcasters in South Asia. Now managing the shop, he sat down to relate the story of South Asia's first community radio station<sup>1</sup> (or community-based radio station, as the debate rages on).

Cut to a roadside bench in Kathmandu. The stories being narrated by Raghu Mainali, the Nepalese community radio activist par excellence, were those of the days of the King's takeover of Radio Sagarmatha's station and confiscation of equipment. And of an open truck shaped like a radio, atop which speeches and performances as part of the rally for the Save Independent Radio Movement (SIRM) were carried out. Nepal's vibrant community radio scene amid civil war makes for a story for the history book!

Pan to the waters of Munshiganj in Bangladesh, where the *bedenaari*, the women of the *bede* community, live on boats near the shores of the local water body. They are part of the listeners group that Radio Bikrampur

<sup>1</sup>Find more on this narrative in my long-form journalistic writing for the *Himal Southasian's* special issue on 'Growing Media, Shrinking Spaces', June, Vol. 27 (2).

FM 99.2 counts among its community. The country, often ravaged by floods and cyclones, is home to a planned community radio sector, often drawing on sustainability and phased growth of the CRs, as cornerstones.

Cut back to Colombo, to the International airport outside which I met and chatted with Samanmalee Swarnalatha, the feisty activist who narrated stories of standing tall to pressure from local radio authorities, funders, and the state, on behalf of Saru Praja FM's community. Her stories showcased the state of community-centric radio on the pioneer island, just a little less than three decades hence.

For me, the train ride, the truck, the boats, and the airplane symbolised some constitutive moments (Collier and Collier 1991) that flagged off diverse journeys that are integral to the story of media in South Asia. The above narrative sets the tone for numerous realities that community radio encounters in South Asia today—that of some past glories, glimpses of people's activism for their right to free speech, an ever-changing media landscape, and sustainable growth as a concern. This book is a critical study of policies and policymaking for community radio in four countries of South Asia, namely, Sri Lanka, Nepal, India, and Bangladesh. The book delves into the praxis of policy, recounting episodes and narratives from policy actors who bring their own values, stances, *epistemes*, and even ideologies. The interplay of all varied facets of the policy process for community radio in Sri Lanka, Nepal, India, and Bangladesh makes for well-fleshed out narratives and policy stories from South Asia.

South Asia is home to diverse media systems, in congruence with the larger political, economic, social, cultural, and legal contexts. This book explores and explicates the policies and policymaking for community radio in the region. The region emerges as integral to the study, lending its own particularities to it. From localised geographic features to divergences in the degrees of democratic politics between the countries that occupy and make up the region, South Asia emerges as a character in this expansive policy ethnography. Media in South Asia has been studied with various underpinnings—developmentalist, postcolonial, and even orientalist vantage points. This book, as will be demonstrated in the chapters ahead, seeks to engage with the modern phenomenon of community radio in South Asia, piecing together a critical policy ethnography focused on the region. The deliberative policy ecology approach, expounded in Chap. 2 of this book, emerges as the heuristic device that houses and guides such a study.

This chapter presents an overview of the broad fields of inquiry that this book concerns itself with—that of media policy studies and community media. By bringing together relevant literature on these broad fields of study, this chapter sets the stage for the forthcoming chapters that delve into the ethnography of policies and policymaking for community radio in South Asia. The first part of this chapter provides an understanding of the field of Media Policy. It looks into the theorising of media policy, inclusive of the many elements and points of interrogation that goes into the defining of the field. The chapter then presents the critical study of media policies, including the historicising of such a study. This is followed by a section that provides an understanding of how community media has been defined and theorised and how such forms of media have been approached in terms of thematic appreciation. The chapter then moves on to provide an overview of the policy documents such as legislations and regulations, as well as the policy environments for community radio across the world. The chapter then provides the rationale and approach to the present research endeavour and moves on to provide an overview of the many theoretical strands that inform this study, posing questions, objectives, and points of inquiry at the start of the study undertaken. The chapter ends with an overview of the ones to follow.

## MEDIA POLICY STUDIES

To say that media policy as a field of media and communication research has been under-theorised over decades of the discipline's growth is no hyperbole.<sup>2</sup> Media policy research is often conceived of as administrative research, relegated to a corner in the larger machinery and study of government, industry, or international organisations. The rudiments of the field have received very little attention in comparison to the cultural, social, and economic dimensions of studies in media and communication research. From the study of industries, to that of particular cultures, and from dimensions of development studies to health communication, media research has grown and thrived in its multidisciplinary offerings. Such studies have drawn on the humanities and social sciences research traditions, besides other multidisciplinary interfacing with the sciences.

<sup>2</sup>A version of this literature went into a chapter authored by me on the Indian policy scenario titled, 'Deliberating Community Radio in India: A Policy Ethnography', in the edited volume, 'Community Radio in South Asia: Reclaiming the Airwaves' (Raghunath 2020).

However, studies on media policy, with roots in post-Second World War media research, have been seen as *instruments* that accompany such offerings. It is only in the last decade and a half that one can see media policy research gaining ground in Europe and North America. In the non-West, like in South Asia for instance, media policy research came to be identified with the State and its national priorities initially and with the programme of globalisation and the spread of the culture industries, after the 1990s. The term ‘media policy’ came to be connected with the policies adopted by corporations and organisations in their dealings with the media. In other words, an organisation would chart out a ‘media policy’, as part of its public relations activities and interface with the media. Further, research in the field sought to look at how the mass media influenced public policy, becoming another arena that associated itself with the term. It encompassed representation of research in the media to influence various public policies across fields.

As a stand-alone field of research, media policy studies has only been gaining ground in recent times, located as it is at the intersections of global media studies, governance studies, and public policy research. In such a scenario, it is now opportune to ruminate on drawing the broad contours of the field of Media Policy: How does one define Media Policy as a field, and media policy replete with its action-oriented underpinnings? What follows is an immersion into the many facets that go into defining the field of Media Policy, while the action-oriented underpinnings of the term would find explication further ahead in the chapter.

## THEORISING MEDIA POLICY

Efforts at theorising media policy take into account the many facets of the process, including the conundrum with defining what media policy is and separating the area of study from other studies on media.

### *The Definitional Problem*

Defining media policy is fraught with difficulty, given the ambiguity of what the constituent elements are and how they come together as ‘policy’. Des Freedman talks about how there is no such thing as a ‘singular’ media policy that can be said to represent all those mechanisms that streamline media structures and systems. Media policies exist in plurality, reflecting the diversity of media systems from print to broadcast and now, the new

media, the multiplicity of settings in which they are produced and the variety of actors that impinge upon the formulation of policies. Media policy is, at best, says Freedman, an umbrella term to refer to a wide range of discourses and methods that impact the functioning of media. It is also not accurately descriptive of a multi-layered heterogeneous setup (Freedman 2008: 2).

Sandra Braman (2004), discussing what she calls the definitional problem, brings to attention the evolving meaning of the phrase ‘media policy’. Braman goes on to highlight the key parameters to define media policy for the twenty-first century. Among them, she writes: (a) the definition should be *valid* and must map on to empirical reality, (b) it must be comprehensive to include all settings, actors, processes, flows of information within its ambit, (c) it must be theoretically broad to permit various frames of reference, must be methodologically operationalisable, thereby drawing on accepted methods scientifically examining policy, and finally, (d) it must be translatable in the sense that new developments should be translatable into the language of ‘legacy law’.<sup>3</sup> Drawing on these parameters that make a good definition of media policy, Braman states that media policy in its broadest sense is co-extant with the field of information policy, which involves issues that arise at every stage of an information production chain that includes information creation, processing, flows, and use (Braman 2004: 179).

### *The Myth of Neutrality*

Scholars like Marc Raboy, Des Freedman, Paula Chakravartty, and Kathryn Sarikakis examine the myth of neutrality that plagues the theorising of media policy. Drawing on Streeter’s observation that it is only the English language that allows for a distinction between the words ‘politics’ and ‘policy’, Chakravartty and Sarikakis critique Harold Lasswell’s conception of policy as an apolitical process. Upholding the ‘moral superiority’ of the bureaucratic policymaking process, Lasswell suggests that the process is free of political influences and is non-partisan by nature. However, Samarajiva and Shields (1990) at a later date highlighted Daniel Lerner’s and Lasswell’s roles in formulating policies for the US government for propaganda in the Middle East during the Cold War, indicating that the

<sup>3</sup>Legacy law refers to already existent legal frameworks, within which new policy formulations are likely to find articulation in order to embed them in terms of the already familiar.

vantage points from which policies are made are never neutral and are laden with intrinsic values and motives. These debates notwithstanding, it is important to note that Chakravartty and Sarikakis assert that a separation of politics from policy is not only artificial, but also ideologically loaded in that it rather inaccurately allows for neutrality. It also does not serve the purpose of critical reflections on the processes and contexts that shape policy (Chakravartty and Sarikakis 2006).

The coming of the ‘Information Society’ and the accompanying international governance structures only ensured that media policy is further embedded in ‘multilateral politics and the debates that surround it’ (Raboy 2007: 346). Des Freedman talks about going beyond seeing media policy as either depoliticised or technologically determined. He, instead, sees it as an arena where competing political leanings, ideological standpoints, and power plays operate. Policymaking becomes political when some viewpoints get preference over others. Critical reflections on policy call for unearthing those marginalised viewpoints (Freedman 2008: 5–6). Similarly, Chakravartty and Sarikakis note that their work on media policy and globalisation seeks to take into account not just voices that pronounce specific media policies, but also those that oppose the dominance of certain viewpoints. Dissenting voices, they say, are very much part of the study of media policy (Chakravartty and Sarikakis 2006). McQuail (1992) notes that media policy is grounded in the political and cultural dimensions of communication processes. Media policymaking, then, is anything but a neutral, apolitical process. It operates in, and emerges out of, specific circumstances that are created due to the interaction of varied actors across levels, with diverse intentions and influences at play.

### *Going Beyond the Technological Imperative*

Much of the academic research on media policy has been technology-centric. By stressing on technology as the force that ‘creates’ media, the study of media policy has historically demarcated policies on the basis of medium-specific policymaking. This style of studying medium-specific policies in silos is now redundant, with the coming of digital technology and Web 2.0 (and now, Web 3.0) that has led to the blurring of boundaries between mediums and producing the producer-consumer. Braman (2004) talks about the blurring of medium, function, industry, and genre, with the coming of digital technologies, not to mention the convergence of communication styles. She also traces the evolution of technology, from

tools to technology to meta-technology. Braman brings to notice the difficulty in ensuring that policy is commensurate with improvements in technology because of the time lag in understanding new technology from a regulatory perspective and implementing policies to address it. Constant innovation only accentuates the problem.

While understanding newer forms of technology is important for conceptualising media policy, there is a need to go beyond that. Marc Raboy (2007) draws our attention to how technologies are not neutral but emerge out of particular political circumstances. The changes that accompany the advancements and spread of technology would not be equally accessible to all and would have varying impacts on diverse groups (Freeman and Soete 1997). In addition to this, technology is itself transformed, depending on *who* uses it. Jesús Martín-Barbero (2001) suggests that technology allows itself to be moulded according to civil society groups' attempts to operationalise value systems in policies, just like it allows states to mould it according to national interests. Michael Litschka (2019) draws on the capabilities approach put forth by Amartya Sen, to study the political economy of media capabilities, under the larger canopy of media policy.

### *Multi-layered Settings and Plurality of Actors*

Media policy today, consistent with all the advances in global governance mechanisms, does not work solely within the ambit of the nation-state. From the 1970s when the 'Third World' came together and spearheaded the call for the New World Information and Communication Order (NWICO) to the coming together of civil society at the World Summit on Information Society (WSIS) at Tunis, in 2005, there has been a huge shift in processes of media policymaking. The levels of analysis are now stacked, with multiple layers of settings and embedded actors playing crucial roles in influencing the making of media policy. The shift from the 'international' to the 'global' is a case in point, with non-state actors, activist groups, academics, and civil society being part of global governance mechanisms in varied capacities. This is seen in the inclusion of civil society in the Internet Governance forum proceedings, for instance. Similarly, the negotiations between India and Pakistan now have track-two dialogues like the Chaophraya Dialogues. Braman (2004) highlights the definitional problem in studying media policy and suggests that it is imperative to go beyond the actions of formal actors. Braman expands the policy landscape

by drawing our attention to invisible and latent policymaking, the former emanating from influential sources like presidential orders and the latter, as the spill-over side-effects of policy decisions in other areas. Braman provides a useful concept when she talks about going beyond the ‘venue-based approach’ to studying media policy. The venue-based approach examines how media policies are being made and implemented from a particular ‘venue’, like a government department. Media policy, Braman says, increasingly is becoming venue-agnostic, with a range of actors and institutions influencing and adding to framing of policies from varied organisational setups—international, national, non-governmental, academic, regional, and more. Even when one studies formal institutional regulatory frameworks, Braman looks at how media policies are mostly spread across ministries in the sense that ministries dealing with Information Technology, Communication, and Security are all implicated in the pronouncement of a policy. Today, policy cannot be said to be formulated and implemented by a particular Ministry. Policy is, instead, a site for competing forces and actors wielding their powers at various settings at different levels. These non-formal mechanisms occurring on the fringes of formal policymaking must be incorporated into the study of media policy.

Freedman, while comparing the neoliberal and liberal pluralist models of media policies, talks about how policy is indeed formulated by the government department in question. However, it is also formulated in board-rooms, passageways where lobbyists congregate, academic conferences, seminars where stakeholders assemble, and think tanks where reforms are suggested (2008: 23). His work is interspersed with interviews of policy-making authorities, one of whom is the former media adviser to Tony Blair. He quotes Lance Price, a former media advisor to Blair, who talks about feeling the presence of Rupert Murdoch all along, even though his voice wasn’t heard. It is difficult to account for influences such as these and that makes defining the field of media policy rather difficult. Petros Iosifidis looks at how policy and regulations have been ‘professionalised’ and quotes Schlesinger (2009) who points out that think tanks, experts’ groupings like policy advisers, and industry players have all contributed to the professionalisation of policymaking (Iosifidis 2011).

Iosifidis focuses on the supranational level, which is where media policymaking ‘is increasingly taking place’, especially due to the process of globalisation, networking, and development of technologies. Given this context, he draws on Castells (2010), who identifies three capacities—technological capacity, institutional capacity, and organisational capacity.

Advancements in technology are complemented by the capacity of institutions, be it national or supranational, who seek to re-regulate, liberalise, or control these technologies to ensure that they retain control over media and communication activities. Organisational capacity refers to the ability of groups and organisations to come together and use digital technologies to network seamlessly.

Mansell and Raboy quote Kingdon (1984) in defining media policy-making as a process of persuasion and argumentation that takes place within a complex system of actors and institutions (Mansell and Raboy 2011: 4). They also draw on the works and experiences of the Euromedia Group, on behalf of whom McQuail and Siune (1986) wrote:

No actor is really completely in control; they all share control over issues affecting their interests, and therefore depend on support in order to fulfill their wishes. Any public policy can be considered as an intermediate moment between two successive states of the field that institutional structure has to regulate. (Quoted in Mansell and Raboy 2011: 4)

Clearly, the ambiguity, pushes, and pulls of who is a ‘legitimate’ actor embedded in the ‘right’ setting make defining the field of media policy a gruelling task. The Mapping Global Media Policy project undertaken by the Global Media Policy Working Group of the International Association for Media and Communication Research (IAMCR) is one such attempt. The project employs mapping as a methodological tool to understand the complexity of actors, processes, settings, influences, and objectives of the process of policymaking in the various components of Global Media Policy.

### *Global Media Policy—The Mapping Project*

The Mapping Project of the Global Media Policy Working Group of the IAMCR attempts to arrive at a comprehensive understanding of the media policymaking processes taking place at varied levels. The project examines various issues pertinent to global media policy, the diversity of actors who operate in different circumstances and settings, the venues where policy-making in all its forms takes place, the processes of policymaking across all levels, and finally, the connections between actors, issues, venues, and processes (Raboy and Padovani 2010). All along, they employ the term ‘multiplicity’, derived from the idea of convergence, to define each of these elements in order to ensure inclusiveness.

Raboy and Padovani contend that ‘time’ and ‘space’ construct how realities are experienced by various actors, alluding to Harvey’s concept of ‘time-space compression’ (1989). They see these realities as constructed by ‘space of place’ and ‘space of flows’, wherein physical manifestations of situations are expanded through technologies, drawing on Castells (1996), and as an interplay between the different ‘scapes’ discussed by Appadurai (1996). Therefore, the ‘global’ in Global Media Policy refers to the *multi-layered, multi-dimensional facets* of media and communication governance. The *processes* involved in this governance could take place in local, regional, national, supra-national, extra-national settings, multilateral fora and beyond. While these require the mediation of the state, these processes could also take place in arenas where individuals, communities, groups, and bodies interact, going beyond the dimension of the nation-state (Raboy and Padovani 2010: 10).

By ‘media’, they refer to all those *spaces* that allow for human communication. In the light of technological advancements, these spaces are converged and diverse, a mix of traditional and modern means, enabling diverse peoples to communicate. Raboy and Padovani include technical infrastructure from spectrum to Internet servers and the *inter-operation of infrastructures* that increasingly allow/control communication today. They also include the *coexistence and use of varied media platforms*, a conception that is larger in its purview in comparison to a media ‘sector’. They also bring in the concept of the *media system*, within the purview of ‘media’, as also *media content, media usage, and normative elements* pertinent to these realms. Thus, they conceptualise a comprehensive, broad schema when they refer to ‘media’ in Global Media Policy.

In seeking to define ‘policy’, Raboy and Padovani draw our attention to the manner in which the term ‘governance’ has evolved over time, to expand horizontally and vertically, thereby also accommodating ‘governance without government’ (Rosenau and Czempiel 1992), wherein governance goes beyond the ambit of the nation-state to other actors. For the purpose of the project, they refer to ‘policy’ as encompassing all processes, formal and informal, invisible, latent, and conspicuous, in which actors are engaged in varied capacities. They also allow room for individual cognition, in comprehending and implementing policy, besides including epistemic communities<sup>4</sup> in the process.

<sup>4</sup>Peter Haas (1992) has defined an epistemic community as ‘a network of professionals with recognised expertise and competence in a particular domain and an authoritative claim to policy relevant knowledge within that domain or issue-area’ (1992: 3).