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Analysis: Policy Discourse and Critical Policy Research**

**‘Deliberating Community Radio: Narratives of Policies and
Praxis from South Asia’**

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Abstract

A region unified by rich oral cultures and histories, South Asia is home to divergent experiences with community radio, which are localised oral-media run by and for communities. This paper adopts a critical policy studies approach to explore the policy trajectories that the process of advocating for community radio has taken, in four South Asian countries, namely, Sri Lanka, Nepal, India, and Bangladesh. In doing so, the paper seeks to lay out the various actors (across the global-local spectrum) involved in the policy process for community radio in said countries, their rationalities and the complementary rhetoric deployed, norms and values espoused by them in making a case for community radio, and the contestation inherent to the policy process. Finally, using Grounded Theory, this empirical study seeks to add to existing theoretical knowledge on deliberative policy studies and analyses, making headway towards understanding community radios themselves as discursive venues, towards qualitative deliberative democracy in the countries under study.

Keywords: Orality, Community Radio, Critical Media Policy, South Asia, Deliberative Democracy

Critical 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. Research carried out in the area has often been devoted to the study of policy documents and legislations, especially demarcating them on the basis of particular media, technology used, carriage, and content. This narrow approach to studying media policy undermines the diverse processes, actors, settings and social underpinnings that determine the formulation of a policy and its inscription in law, eventually, through legislative practices. Stemming from this understanding, there has been growing interest in the field, with recent works over the last decade challenging the narrow conceptualisation of media policy. Research on media policy now attempts to include the many levels of processes, the varied kinds of actors, the diversity of settings and the normative elements that collectively construct media policy (Iosifidis, 2011; Raboy & Padovani, 2010; Freedman, 2008; Chakravartty & Sarikakis, 2006; van Cuilenburg & McQuail, 2003). This renewed interest in the study of media policy has researchers adopting various theoretical frameworks, from constructivism to critical political economy and post-structuralism to post-colonialism, to engage with the field (Carpentier, 2011; Raboy & Padovani, 2010; Freedman, 2008; Chakravartty & Sarikakis, 2006), besides charting out histories of the field (Chakravartty & Sarikakis, 2006; van Cuilenburg & McQuail, 2003). Studying media policy attains importance in communication as well as public policy studies since it defines the communicative space within which public deliberations and discourses take place. Media policy,

therefore, impacts the extent of information availability to aid such discourses, aids decision-making institutions and procedures, and offers tools to implement other policies (Braman, 2004).

Theorising Media Policy

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 a 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 21st 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 operationalizable, 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'¹. 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

¹ 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.

the 'moral superiority' of the bureaucratic policy-making process, Lasswell suggests that the process is free of political influences and is non-partisan by nature. However, Samarajiva (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 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 is 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 & Sarikakis, 2006).

The coming of the 'Information Society' and the accompanying international governance structures only ensure 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 depoliticized or technologically determined. He, instead, sees it as an arena where competing political leanings, ideological standpoints, and power plays operate. Policy-making 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 & Sarikakis, 2006). McQuail (1992) notes that media policy is grounded in the political and cultural dimensions of communication processes. Media policy-making, 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 policy-making. This style of studying medium-specific policies in silos is now redundant, with the coming of digital technology and Web 2.0 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 & Soethe, 1997). In addition to this, technology is itself transformed, depending on *who* uses it. Jesus Martin-Barbero (1997) 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.

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 policy-making. 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. Braman (2004), as she highlights the definitional problem in studying media policy, 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 policy-making, 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, 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

policy-making must to be incorporated into the study of media policy.

Freedman, while comparing the neo-liberal 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 boardrooms, 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 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 professionalization of policy-making (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 & 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 & 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.

Global Media Policy

In seeking to define 'policy', Raboy and Padovani (2010) 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 & 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 in the process.

Therefore, **Global Media Policy** is conceptualised as:

The multiplicity of configurations of interdependent but operationally autonomous actors that are involved, with different degrees of autonomy and power, in processes of formal or informal character, at different and sometimes overlapping levels - from the local to the supra-national and global - in policy-oriented processes in the domain of media and communication, including infrastructural, content, usage, normative and governing aspects. Through their interactions, actors may (re)define their interests and pursue different goals; contribute in framing policy-relevant issues and produce relevant knowledge and cultural practices; promote the recognition of principles and the evolution of norms that inform state-based policy-making, as well as non-state based standard setting and self-governing arrangements. Ultimately, they engage in political negotiation while trying to influence or determine the outcome of decision-making (Raboy & Padovani, 2010: 16).

Governing Community Radio in South Asia: A brief overview

Community Radio responds to the needs of the community it serves, contributing to its development within progressive perspectives in favour of social change. Community radio strives to democratize communication through democratic participation in different forms in accordance with each specific social context.

-World Association of Community Radio Broadcasters (AMARC), 1988

Community radio (CR), as distinctly oral forms of localized media, are those media that are democratising, serving the identity efforts of a community in an increasingly globalised world while subverting the effects of transnational corporatisation of communication. Community Media, in general, and CR in particular have been seen

as the alternative space autonomy, identity and cultural heterogeneity find expression. These forms of media that are appropriated by groups to serve as sites for expression, engagement and redressal, have been defined in varying terms. Kevin Howley (2005) locates community media in perspectives of media democratisation, in the phase of cultural globalization and as a site with potential for effective forms of socio-cultural mediation. Drawing from this explication of the rather diverse forms of community media, one could outline some key defining features of such media: (a) not-for-profit (b) serve defined community of people (c) managed and owned by the community (d) editorially independent of government and state influences (e) promote the right to communicate and allow for free flow of communication.

CR in Sri Lanka

Sri Lanka is home to the oldest radio station in Asia. What was first established as Colombo Radio in 1925, later became Radio Ceylon, enjoying high levels of popularity in the 1950s and 1960s. In 1967, Radio Ceylon was transformed into a public corporation and named the Sri Lanka Broadcasting Corporation (SLBC). All radio stations in Sri Lanka operated under the SLBC, until private radio stations became operational since the 1980s.

Sri Lanka is also home to the oldest Community Radio project in South Asia, with the Mahaweli Community Radio project of 1981 often being hailed as the first effort in the direction of community broadcasting in the region. Initiated by the SLBC with support from UNESCO and the Danish International Development Agency (DANIDA), the initiative began as part of the rehabilitation efforts of the Mahaweli Project² (Girard, 1992), to address the socio-economic development needs of the community. Similarly, the Kothmale project began in 1989, reaching a radius of 25 kilometres. The project combined local radio with the internet serving as a ‘gateway’, through a two-hour programme called *Radio Browsing* that provided answers to listeners’ queries by browsing the internet for answers. The project also has a telecentre as a component that allowed the local community to learn and work with ICTs. The Kothmale Community Radio station began its Tamil broadcasts in 1999. Today, the SLBC runs what it calls, the ‘regional radio service’ in locations across the country, including the Tamil-speaking regions. Community multimedia initiatives like the Saru Praja radio, which functions as part of a Community ICT and Multimedia setup caters to the ‘first community in Sri Lanka to ask for an FM radio frequency to air their productions across a footprint of 48 villages in the Pollannaruwa district.’³ As

² The Mahaweli Project was a multipurpose irrigation and power generation project that required the government to resettle lakhs of people, and the CR project was seen as a tool to aid resettlement and rehabilitation.

³ Information on technologies for peace in Sri Lanka is procured from: <http://ict4peace.wordpress.com/2009/07/29/from-community-radio-to-internet-radio-mobiles-and-narrow-casting-new-models-for-enduring-needs/> (Accessed on March 30, 2013)

will be elaborated further ahead, the country's tryst with CR has been checkered, owing to the overt influence of the state.

CR in Nepal

Radio broadcasting made its entry into Nepal in the 1950s, when the national government introduced Radio Nepal under its control. Legislation pertinent to radio broadcasting was enacted in the year 1957, outlining among other things, the rules for the possession of radio sets and licensing procedures. It did not allow citizens to possess a radio set, unless permission was sought for the same. This legislation governed the functioning of the radio broadcasting sector till 1990, when the new Constitution was adopted. The Constitution, while establishing a multiparty parliamentary system, also laid the ground for a plural mediascape, without creating specific provisions for broadcast media. Three years later, the Broadcasting Act of 1993 laid provisions governing broadcast media, from licensing procedures to defining FM Radio. The Act, combined with the National Broadcasting Regulations of 1995, have permitted the setting up and broadcasting of community radio stations in the country (Pringle & Subba, 2007). Legal provisions do not specifically create separate clauses or special provisions for CR, demarcating it from Private FM. The laws governing the two are the same, except for their definition – while Private FMs are understood to be owned and run as private, profit-making ventures, Community Radios are those initiatives that work as non-profits and are concerned with providing media access to the communities they serve.

Nepal has been one of the first countries in South Asia to see the setting up of community radio stations. The Nepal Forum of Environmental Journalists (NEFEJ) applied for the first radio broadcast license in 1992, to set up a CR. Radio Sagarmatha became the first CR station to receive a broadcasting license and go on air in 1996 (UNESCO, 2003).

Community Radio in India

India is the first country in the region to have a dedicated CR policy, emerging in the aftermath of the historic 1995 Supreme Court judgement in the Ministry of Information and Broadcasting (MIB) vs Cricket Association of Bengal case, that ruled, 'The use of airwaves, which is public property, must be regulated for its optimum use for public good for the greatest number.' The next six years saw free speech activists, academics, NGOs and other civil society groups coming together, to lobby for the opening up of airwaves for community broadcasting. The 1996 Bangalore Declaration turned out to be the first such planned advocacy effort, to bring together campaigners for the opening up of airwaves. This was followed by the Pastapur Declaration in 2000, which focused on advocating a three-tier broadcasting framework in India – public service broadcasting, private commercial radio and community radio. As a parallel development, private commercial broadcasting was

given the go-ahead, with Radio City going on air for the first time in Bangalore in 2001⁴.

In 2002, the Ministry of Information and Broadcasting released 'Community Radio Guidelines', which while allowing for community radio broadcasting, restricted licenses to 'well-established educational institutions', omitting civil society groups and NGOs from the eligibility criteria. The following years saw activists strengthening their lobbying and advocacy efforts, calling for a revision in the policy in order to expand the eligibility criterion to such groups as well. The new CR Policy announced in 2006 says, 'civil society and voluntary organisations, State Agriculture Universities (SAUs), ICAR institutions, Krishi Vigyan Kendras' are allowed to apply for a license, also stipulating that the organisation should have been registered for three years to be able to apply for licenses.

CR in Bangladesh

Radio broadcasting in Bangladesh can be traced back to the pre-Independence era, when the first radio station was set up in Dhaka in 1939. The Wireless and Telegraphy Act of 1885, the Wireless Telegraphy Act of 1933 and the Bangladesh Telecommunications Regulatory Commission Act of 2001 govern the functioning of radio and the allocation of frequencies. Post Independence, Bangladesh Betar, the state-owned radio broadcaster was the sole broadcaster for six decades, with 15 stations running across the country. After years of lobbying, activism and engagement undertaken by the civil society, the Bangladesh government announced its Community Radio Policy in 2008 (Suhrawardy, 2010).

The CR Policy of Bangladesh is similar to that of India in many respects. In terms of the eligibility criteria for the awarding of licenses, Bangladesh's policy says the CR should be 'owned by a particular community, usually through a trust, foundation, or association'. The policy stresses the non-profit nature of the enterprise, besides laying down that the organisation should have a proven track-record of community service for at least five years. The policy also goes on to stipulate that a transmitter of 100 watt ERP shall be permitted, and that the antenna should not exceed 32 metres above ground level. The license fee of 20,000 Taka and a sizeable deposit of 1,00,000 Taka are prescribed by the policy. The policy also bans the broadcast of political news, while allowing for local development news to go on air. The policy also says that in the interest of national security, the government has the right to take over a CR station anytime.

While this section presented an overview of CR and the larger policy environment of the four countries of South Asia under study, what follows is an elaboration of the methodology adopted for this research.

⁴ Information drawn from communityradioindia.org, accessed on March 31, 2013

Critical Policy Ethnography as a Methodology: A brief note

Multi-sitedness

The concept of multi-sited ethnography is most famously associated with Marcus (1995), whose work on this form of ethnography sought to go beyond the closed, bound, systemic study that is typically attributed to Malinowskian ethnographic research, to the more open-ended one embracing changes in the wake of globalisation. In advancing a critique of traditional ethnography, he made a case for embracing the more multi-disciplinary offerings that anthropological work could have, something that gains utility for this research. Critics contend that it becomes difficult to define multi-sitedness, and propose ideas like that of a single discontinuous site (Hage, 2005), mostly see it as the reification of a postmodern reaction to ethnography, or suggest that the concept falls prey to oversimplification like the term globalization (Herzfeld, 2004)

This researcher, taking into account these debates, chose to conceive of the conceptualising of spaces for this ethnography as multi-sited, but fluid, unbound and not closed off. To elaborate, the ‘deliberative spaces’ that this researcher embedded herself in, spanned the only seeming dichotomies of virtual and real, formal and informal venues, and government and non-government actors. The principle, process, practise of and performances inherent to *deliberation* underpins the activity in all such spaces, with each rendering its own characteristic features towards defining the discursive nature of such spaces. This dimension attains importance in the current study, since it was deemed imperative for the researcher to be present and peg ethnography to key informal policy venues that are conceived as sites integral to the policy process for CR. Informal sites like regional and national conferences and seminars, track-two dialogues, meetings between international donors agencies and their local development partners serve as deliberative sites for the policy process, among others (Braman, 2004; Raboy and Padovani, 2010). An elaboration on these deliberative sites as conceived for this research follows.

‘Deliberative Sites’ for CR policy ethnography

Drawing from the understanding of deliberative spaces as fora integral to deliberative systems and democracy (Elster, 1998; O’Flynn & Curato, 2015), what follows is an unpacking of the definition of ‘deliberative spaces’ (Fischer, 1995; Hajer, 1995) for the policy ethnography in Sri Lanka, Nepal, India and Bangladesh.

The digital archive of cr-india⁵ hosted by The Sarai Programme at the Centre for Study of Developing Societies (CSDS), New Delhi, is one such virtual deliberative space that offered access to discussions around community radio in the region, and beyond. The cr-india archive houses digital archives that go back to January 2002, and are replete with deliberations around clarification of concepts, announcements and updates on community radio, resolution of queries, and discussions on the approaches of governments across the region, among other things. The participants in these discussions have primarily been community radio enthusiasts and activists from diverse spheres of activity, and have played an instrumental part in propelling demands for opening up of the airwaves for community radio in India, and the region. The researcher sifted through this repository in no structured manner, making notes and going back to certain posts every now and then.

Informal venues like the Kathmandu workshop held in 2002 served not just as a site for deliberation and rational exchange of ideas, but also served as a networking space for policy interactions. Such informal venues such as workshops and seminars continue to be an important part of the CR policy process. During the course of the research, the researcher was part of two such regional seminars that offered rich ground not only for the initial exploration of emerging ideas, but also allowed for access to key actors who continue to be part of the epistemic community for policy-making in their respective countries, besides the larger region. Two South Asia-wide seminars conducted in 2013 served as venues that allowed for introductions and initial interactions with policy advocacy groups, international donor agencies, government representatives, and media practitioners. The first seminar was ‘Voices for Change and Peace: Taking Stock of Community Radio in South Asia’, jointly organised by the UNESCO Chair on Community Media and AMARC Asia-Pacific, in New Delhi, in January, 2013. The ‘Seminar on Enhancing the Role of Community Radio and Promoting Positive Social Change’, organised jointly by the SAARC Information Centre and AMARC Asia-Pacific in Kathmandu, in September, 2013 emerged as the second such venue. Both these sites provided opportunities for interactions with varied policy actors in the CR space in South Asia.

Focused, intensive ethnographic study was then conducted in each of the countries under study. The spatial sites for this component of ethnography were the capital cities of Colombo, Kathmandu, New Delhi and Dhaka, which are home to government ministries and bodies, headquarters of international donor agencies and advocacy groups, and the larger media landscape. In addition, the researcher was also able to travel to Kandy in Sri Lanka, areas like Dhulikhel and Badegaon (Godawari area) that are a few hours each from Kathmandu in Nepal, Bangalore and Hyderabad in India, and Munshigunj in Bangladesh. As is typical of focused, intensive ethnographic research, the endeavour yielded large amount of data in proportion to

⁵ The digital repository can be accessed here: http://mail.sarai.net/pipermail/cr-india_mail.sarai.net/

the number of days spent in the field. Audio recording of interviews was done, to supplement field observations and notes (Knoblauch, 2015). From the initial interactions that emerged out of the seminars, the researcher went on to connect with and interview some key policy actors. Through the process of snowball sampling, more such policy actors across groups and affiliations were contacted. In carrying out a policy ethnography, the researcher took care to ensure that diverse historical narratives of CR policy-making, wherever they existed, were brought in. Critical policy histories, in the form of micro-histories (Brewer, 2010) or diverse historical narratives from policy actors, are key to moving away from single-narrative histories that often get fortified as the dominant narrative thereby ensconcing other experiences.

Multi-Situatedness

Ethics and Considerations

The researcher was aware of the perceived skewed power dynamics and geopolitics of the relations between the countries in the South Asian region, and hence took utmost care to define to the government officials in these countries, her role in the academic inquiry that the current project is. Common ethical protocol of explanation of the research endeavour, procuring interviewee consent, and preference with respect to anonymity was followed diligently. Following from this effort, the researcher deemed it appropriate to cite the policy actor's official title in place of their individual names in most cases, especially when they act as representatives for their organisations, in her work. This allows for maintaining anonymity while understanding their positioning in the policy landscape for community radio in the four countries. However, in the case of individuals who have driven key policy changes by virtue of their individual official position, activism or personality-driven efforts, individual names would be cited. This allows the researcher to account for personality-driven policy manoeuvres and shifts, a characteristic feature of policy processes in the larger South Asian region.

The Researcher in Ethnography: Intersectionality and Reflexivity

This researcher was extremely sensitive to the multiplicity of identities she embodies, and the many locations she operated in, all at once. Location as a standpoint allows to understand spatiality and region as constituting the epistemological entry-points for the researcher. Her many identities, as an urban, city-bred, upper caste, middle class female researcher, born in a world that was to see the fall of the Berlin Wall and the subsequent ushering in of liberalisation in India, provide a multi-faceted experiential understanding of global and national politics, societal functioning, multiculturalism,

alongside the idea of the region, only shaped in a big way by her public university education.

Massey's (1999) perspectives on relationality in determining one's location was useful in understanding the researcher's own location. Locations emerge as concentric and overlapping circles starting from the researcher's academic location, to the larger South Asian region at the other end. This allowed the researcher to conceptualise her approach to the policy ethnography for CR. The researcher's location at the UNESCO Chair on Community Media in the capacity of a Research Assistant allowed access, background understanding and scope for engaging with community media in general, and community radio in particular. Similarly, her location at the Department of Communication, in a public university in the Southern Indian city of Hyderabad, provided for an understanding of working on media policy away from the administrative nerve-centre of New Delhi. The researcher's Indian nationality was an important consideration in conducting fieldwork in Sri Lanka, Nepal, and Bangladesh. She was aware and sensitive to perceptions of being a foreigner along the corridors of power in government offices in Colombo, Kathmandu, and Dhaka. For instance, some interactions with government officials did bring to light perceptions that Indian industries were seen as backed by the Indian government's policies, in capturing local markets including media markets, in Nepal. Similarly, the researcher was watchful of perceptions of her linguistic identity during the course of gaining entry to government offices in Colombo, especially in light of the country's transition over the last decade of post-civil war politics and governance. Further, she was careful to understand the politics of language in Bangladesh, and the country's ties with India in 2014 when the Awami League was in power and was seen as friendly with India. She took care to explain her academic research endeavour to interviewees who may have favoured the Opposition. These negotiations were part of this researcher's everyday engagement during the course of her fieldwork.

The above understanding of the researcher's location as concentric and overlapping circles acknowledges intersecting influences, complex interactions that is reflective of the critical policy endeavour itself, and allows for reflexivity that is multi-vector. Ethnography entails a reflexive interaction with the universe being studied, taking into account the lived experiences of the researcher herself, even as she studies the lived experiences of the subjects of her research. This gains further importance in a critical policy ethnography, since it entails interacting with actors from the domain of policymaking, as well as for the objects and conditions for which said policy is made.

ANALYSIS

Fieldwork: Notes from the Field, and Interview Transcription

The researcher ensured that analytic notes were made throughout the process of observation and data collection, at deliberative sites and during the course of field-trips. These notes were written between interviews and at the end of each day of fieldwork, to make a quick record of analytic conjectures emerging from first impressions in the field. Similarly, the researcher took care to constantly shuttle between policy actors holding divergent viewpoints, and made sure to ask questions of them that enabled them to reflect on issues/points of contestations with the other actors. This exercise was made possible by noting down the epistemic entry-points, rationales behind norms evoked, and helped arrive at each actor's justification for them in accordance with contextual explanations. The data collected from the interviews conducted as part of the policy ethnography described above was transcribed word-by-word by the researcher. Even as she was transcribing, she made paragraph-by-paragraph notes on the side, and indulged in constant comparison (Glaser and Strauss, 1967) at three levels: constant comparison between diverse policy actors within the same country, constant comparison between the contextual realities in each of the four countries, and constant comparison amongst policy actors spread across the four countries that form a part of this study. Upon the completion of transcription of interviews, the fieldnotes and transcripts were read thoroughly and codes were thematically grouped. The Grounded Theory method as put forward by Charmaz (2006) was a useful guide in aiding the coding and analysis of research. Drawing from a constructivist worldview, Charmaz presents a comprehensive guide to interviewing and the generation of codes and sub-themes, taking into account the researcher's own subjectivities and location, lending itself to critical research. What follows is a thematic capsule of the critical policy ethnography conducted by this researcher.

Critical Policy Ethnography for CR in South Asia

(Presented as part of the Powerpoint presentation, and will be added)

Conclusion: Way Forward

Pathways for future research in Deliberative Policy Analysis

The above illustration of research on the connectedness, comparisons, and contestations inherent to the policymaking for CR in South Asia makes for an interesting exercise in underscoring *deliberation* that reveals itself in the process. By focusing on the practice (Wagenaar & Cook, 2003) inherent to the policy process, the above thematic description provides an overview of the action-oriented underpinnings

of policy, even as they emerge from and lead to the (re)construction of ideas and norms. This allows to trace the mobility of ideas, and how they get (re)institutionalized over time with multiple iterations. It also allows to peg policy to the pragmatics on ground, shifting to a bottom-up process and leading to more sound policy formulations based on *listening* as well as *speaking*, both key aspects of deliberation. The above sample from the field showcases the discursive dimensions (Dryzek, 1995) of the policy process for CR, bringing to the fore the potency in the expansion of ideational, even in the face of the material institutionalization of policy activities.

This allows for an advancement of the enterprise of Deliberative Policy Analysis on three fronts: (a) As a way of making policy, it becomes an exercise in criticality, examining the *deliberative potential* in the media policymaking process, and the entrenched structures of power that determine such a potential; (b) As a methodological process, critical policy ethnography in itself becomes an exercise in deliberation, allowing the researcher to go beyond the confines of traditional technocratic policymaking, to locate the critical policy research endeavor in deliberating among the various stakeholders, especially aimed at a bottom-up process of policy-making instead of studying up; (c) As an analytic tool, Deliberative Policy Analysis allows to study the various principles, processes, practices, and performances of actor-interactions in a policy environment. This multi-leveled understanding allows to build a deliberative-analytic pedagogy towards defining future research endeavours in the realm of Deliberative Policy Analysis.

Theorists of deliberative systems and institutional design point to heuristic devices to conceptualise the ontological proportions of deliberative practices. For instance, ‘policy networks’, ‘advocacy coalitions’, ‘epistemic communities’, ‘communities of practise’ are all policy architectures that one can utilize in studying policy processes. However, they provide for a systemic study, which is often left short-charged owing to the entry and re-entry of newer actors, challenges, technological advances and opportunities. Instead, this researcher proposed an inclusive heuristic of the Deliberative Policy Ecology, as the opening up of closed and bounded systems to externalities like the entry and agency of newer policy actors, or uncertainties brought about by ecosystem-bound shifts and complexities. This helps synthesise policy architectures and subsystemic attributes, while also cutting across political systems of differing natures. It offers better applicability in explaining the *degree* of deliberative practices even in quasi-/semi democracies. This allows to underscore the practice of deliberation as an exercise undertaken by a multitude of policy actors, irrespective of official recognition or formal authority. It also helps account for efforts made in pushing the policy envelope and public discourse towards further democratization, across political settings and not solely in liberal democracies, opening up avenues for DPA manifold.

The brief explication made in this paper, of critical policy research on CR in South Asia, allows for policymaking that is intersectional and reflexive, taking into account

the mediums it seeks to streamline and systematise, acknowledging and catering to the specificities of each medium, while also being reflexive to the overarching umbrella that media policy is. The Rule of Law in a democracy underscores “speaking for oneself”, something that has successfully been translated to action in democratic electoral processes, leading to representative democracy. However, this has not found enough articulation in the study and practise of deliberative democracy, which is more often than not, work in progress. Theoretical advancement for deliberative democracy should, then, incorporate the study of democratizing agents, who push the envelope in its favour, at critical junctures (Collier and Collier, 1991). Such a direction could incorporate the reflexive study of their language, the structures of power impinging on their actions, and the communicative mechanisms they adopt in negotiating with them, in the Habermasian sense. This allows to draw on symbolic interactionism (Mead, 1934; Charon, 2009), to incorporate shared meaning-making as something that is integral to *deliberation*. When this is incorporated into critical media policy research, it helps bridge the agonistic spaces of participation that community radios are (Nico Carpentier, 2015; Mouffe, 2000), allowing to provide ultimately for community radios themselves to emerge as discursive sites for qualitative deliberative democracy in South Asia.

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