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SUKUMAR MURALIDHARAN

Media, Advertising and the Elections: Credibility Falls Victim to Globalisation

Paid news, or media for hire to the highest bidder, was till not far back, believed to be the main challenge posed for oversight bodies in the Indian democratic system. Though an age-old practice, "paid news" was first recorded as a regular practice in elections to a number of state legislative assemblies in 2008. It became a sufficiently grave concern for the Press Council of India to carry out an extensive inquiry, though with the power of the media industry lobby, the report was effectively suppressed.[1]

Priorities change very rapidly in these times. In notifying the 2019 polling schedule across the country, the Election Commission of India (ECI) made a special mention of the twin menaces of fake news and hate speech. Responding to an urgent call by the ECI, social media platforms and internet services instituted what they claimed would be a stringent audit of content.[2] Facebook according to its head for public affairs in South Asia, has appointed seven fact-checkers specifically tasked with monitoring election related content in India.[3]

Among the operative parts of a three-page code drafted by social media platforms and internet services in just over a week, are a commitment to communicate all matters of priority to the ECI, submit political advertising to certification by an empowered body, and ensure the transparency of promotional material using relevant "disclosure technology".[4]

These commitments are prefaced with what seems an advance alibi in the event of a transgression. Participants to the code have pleaded for recognition of their special status as neither "authors nor publishers". Though running on user generated content – defined very broadly – their services and products are different and their "business models", quite distinctive. This diversity would shape each participant's compliance with the voluntary code.

Expert commentary meanwhile has spoken of the 2019 Lok Sabha polls as a "WhatsApp" election, acknowledging the immense influence that the messaging application could have.[5] Activists of the Bharatiya Janata Party (BJP) in particular, are known to have deployed a variety of means of joining WhatsApp groups to influence the tone of the messages exchanged within these theoretically closed spaces. The linkage between each mobile phone number and Aadhaar, the biometric national identity cards programme, allows for a profiling of phone users who could be targeted with specifically tailored advertisements.

The publisher of a popular news website, among the few providing critical coverage in a time of conformism, meanwhile was sounding the alarm about "a staggering amount of morphed images, doctored videos and text messaging … spreading largely through messaging services and influencing what India's voters watch and read on their smart-phones". A recent study by Microsoft found that "over 64 per cent Indians encountered fake news online, the highest reported among the 22 countries surveyed".

Fake news, the author concluded "was not a technological or scientific problem with a quick fix". Rather, it should be "treated as a new kind of public health crisis in all its social and human complexity".[6]

In November 2018, a survey by the BBC World Service, involving voluntary access to the messaging services of a number of active social media participants, revealed that "nationalism" – as they called it – was a major driver of fake news. Among participants in the survey, “facts were less important to some than the emotional desire to bolster national identity”. And a social media analysis “suggested that right-wing networks (were) much more organised than on the left, pushing nationalistic fake stories further”.[7] The sense of nationalism was typically consolidated through opposition to particular social groups deemed “anti-national”, affirmed in violent performative acts, such as mob violence and lynching.

The magnitude of the problem is evident from the volume of fake news in circulation and the violent verbal encounters it sparks over social media. Yet, the impact on voting behaviour remains difficult to quantify. During the 2014 election, widely believed to have been one decisively influenced by social media campaigns, a survey by the National Election Studies (NES) team found, after a survey between July 2013 and May 2014, little to corroborate this belief. It found that “more than 80 per cent of the respondents did not use the internet for obtaining news, and only 5 per cent used it daily”. Where social media impact was concerned, fewer than a tenth of voters had a Facebook account and only 3 per cent were on Twitter.

Even within this narrow sample, daily use of social media was as low as one among three respondents in the case of Facebook and one among five in the case of Twitter. In terms of keeping in touch with political news through social media, “only about one-third said they use them often and more than half said they never use them for obtaining news”.[8]

With all that, conventional media and the particular slant it imparted to political coverage, was seen to have benefited the BJP in 2014. NES studies indicate that the number of voters who follow the news on TV went up from 19 per cent to 46 per cent between 1996 and 2014. Voters who follow the news through the print media went up from 12 per cent to 26 per cent between 1996 and 2009, staying flat through the 2014 electoral cycle. The reach of radio news increased from 12 per cent of voters to 16 per cent between 1996 and 2004, before declining to 9 per cent in 2014.[9]

There is no denying though, that the 2014 election witnessed a "media blitzkrieg" like never before, with the BJP allocating an estimated Rs 5,000 crore, perhaps more, for campaign publicity. The BJP is believed to have "booked 15,000 hoardings across India for up to three months; bought the most prominent ad slots across national, regional and vernacular newspapers for 40 days, and bought about 2,000 spots a day across Hindi, English, and regional news, general entertainment, and sports channels".[10]

Indeed, so "ubiquitous" was the Modi presence in the media and so "persistent and effective" his campaign, that "many who thought TV news channels biased" were still prepared to vote BJP. Despite doubts about underlying facts, the Gujarat development experience was relentlessly portrayed in the media as a model that the rest of the country could emulate. Voters with high media exposure were "four times more likely to say Gujarat as a state was doing best" among all states, compared to those with low media exposure or none at all.[11]

As the campaign wore on, the BJP's lead over the Congress increased rapidly among voters with high media exposure. Among regular viewers of TV news, the lead increased from 3 to 20 points between July 2013 and May 2014. Among regular consumers of print media news, the BJP lead increased from 7 to 20 points, and among internet news consumers, from 13 to 26 points.[12]

Much has changed in the media landscape since that election, allowing perhaps significantly more influence for fake news and outright propaganda. The number of mobile phones believed to be in operation then was about 900 million, of which 143 million were "smart-phones" capable of accessing the internet. By 2017, the number of mobile phones had increased to 1.2 billion, or 87 per cent of the population. Though the following year did not show any change in total number of phones, there was a significant shift towards smart-phones: from 420 million to 560 million. The volume of data transacted through each smart-phone also increased, from 4.3 GB (gigabytes) per month in early 2017, to 5.4 later that year, to 6.8 in 2018.[13]

The increase in data transactions through the mobile network is in part due to free offerings from Reliance Jio, a division of India's largest industrial group, which arrived in the telecommunications sector through a stealth operation, using a small and obscure firm as cover.[14] This has considerably aggravated the tendency towards concentration and monopoly power in the media space, enabling potential manipulation of news content to influence voter decisions.

Conventional media today is failing in effectively checking the spread of fake news. There is some measure of ideologically driven complicity in this. Despite the failures of the Modi regime over five years, media owners retain a slavish sense of loyalty. Bluntly put, the Modi regime is seen as serving the ends of big business lobbies. And the media industry is more than ever now, integrated into the circuits of global capital, a hapless slave to its demands.

Aside from this very obvious explanation, there is an underlying current of change that creates an incentive for the propagation and large-scale consumption of fake news. Older media (often called "legacy media") continues to be challenged by technology and attendant changes in financial parameters, and has not yet evolved a survival strategy. India is among the few countries where advertising spending in print media continues to increase, though growth in 2018 was weak, a mere 4.4 per cent. Despite the expected windfall from campaign advertising, the forecast for 2019 is a modest 5 per cent.

Advertisement expenditure in television grew 19.2 per cent in 2018 and the current year is expected to bring in a lesser, but nonetheless buoyant increase of 18 per cent. The most rapid growth, an estimated 25.8 per cent, has been registered by digital media, with an even higher forecast of 33.4 per cent for 2019. The share of digital advertising in the total is expected to touch 22 per cent, still behind TV and print, though rapidly catching up with the latter.[15]

This shift in advertising budgets will have an influence over older news media content. Print and TV news have adopted various strategies to staunch the haemorrhage of advertising to digital platforms, among them: the active promotion of certain hash-tags on social media to drive audience traffic.

Audience interest though, has to be coupled with advertisers' assessment of how much purchasing power that particular segment of the audience deploys. To make audience interest profitable, the media outlet has to prove it has cultivated a demographic strata that could actually buy the stuff the advertiser struts.

These commercial strategies add up to an inducement for the older media to emulate the "echo chamber" effects of the new. When traffic on the new media is being driven by the hyper-nationalist irrationality that Modi and the BJP are serving up, the older media could hope to get a slice of the advertisement by mimicking the tone of the digital domain. The dominance of the hyper-nationalist narrative is assisted by the growth of media monopolies and a very lax system of regulation over how the broadcast spectrum, a public resource, has been hijacked for private profit and the promotion of political cults.

GROWING MONOPOLIES, LAX REGULATION

Soon after India's election schedule was announced, cable TV and DTH operators began telecasting with no prior announcement, a channel bearing the name NaMo TV, an obvious acronym involving Modi's name. Early in April, news websites reported that the channel had been on air for well over a week with no broadcast licence or statutory security clearances. What the channel offered, as the news portal Scroll reported, was "an unending stream of Narendra Modi's speeches and other pro-BJP material". This was, it ironically commented, "not unlike some other news channels". The significant difference was that, the subscriber to cable or DTH services could not "get rid of it". After inquiries from several opposition parties, India's Ministry of Information and Broadcasting checked the status of the channel and found that it was not one at all. Rather, it was a "special platform" like the information channel that cable and DTH operators routinely operate.[16]

With typical pusillanimity, the ECI under Sunil Arora refused to take into account widespread concerns expressed over this hijack of a public resource to create a personality cult.

Over a year when regulatory matters were addressed by a policy of wilful neglect, ownership issues and in particular, the crucial priorities of checking concentration and ensuring plurality, remained another area of default. After partially disclosed investments that allowed it an influential, perhaps even decisive, voice in various media content firms, Reliance extended its influence by securing controlling interests in two major carriage-ways for satellite-cable TV transmission: Hathaway and Digital Entertainment Network.

Operating through one of many investment arms, Reliance in November 2018 also acquired a controlling interest in a start-up called the New Emerging World of Journalism, which will create news content in multiple formats for distribution over the cell-phone.[17]

The Reuters Institute for the Study of Journalism (RISJ) carried out a survey in India, with the support of two major legacy media companies, on news consumption habits. Though limited in scope to consumers of the English-language news media, the RISJ study offers critical insights into the directions of change in the vast, continental economy of India. Released in March, the report speaks of India as a "platform-dominated market", where an "overwhelming majority of respondents identify various forms of distributed discovery as their main way of accessing news online". The number that seeks direct access to traditional news outlets is a small and diminishing minority. Most news consumers use search and various kinds of social media to access their news for the day.

More than most other markets, including developing countries, the cellphone is king in India. No fewer than 68 per cent of respondents in the RISJ study identified "smart" phones as their main source for accessing news; and no fewer than 31 per cent had no source other than the mobile phone.

FICCI AND THE EFFORT TO CORPORATISE THE MEDIA

The Federation of Indian Chambers of Commerce and Industry (FICCI) has for long years been seeking to organise the media and entertainment industry in the country into a semblance of corporate respectability. In a world where jealously guarded family proprietorship and opaque forms of financing are the norm, FICCI's effort is focused on an annual event called the FRAMES conference, where the big players in the media and entertainment sector gather to plead their case for special considerations.

The event is also occasion for the release of a report which sums up all available data on the industry and offers forecasts about possible future trajectories. It is normally not an occasion for serious or challenging thought, only for reaffirming a collective sense that all is well, except for certain irksome labour laws and government regulations which require to be dismantled.

A rare breach in the pact of silence occurred in March 2013, when Uday Shankar, chief executive of the Rupert Murdoch owned Star TV network in India, chose to look at a different part of the canvas. India's media industry, he said in words that deserve to be carefully parsed, faced a massive deficit of reliable data. For a business leader, finding a pathway out of troubles involved a degree of reliance on data. And Uday Shankar in this respect, faced a deeply disturbing scenario: "Numbers are supposed to be the foundations of rational business decisions but how can we make decisions when professionals in the business of numbers can't get their numbers straight? .. As a TV executive, I am surprised sometimes how I am even able to function. I do not know enough about my viewers – in fact I don't even know how many of them are there. There are 140 million cable and satellite homes but the measured universe is 62 million households. The country's premier media agencies can't even seem to agree on a fact as basic as the size of the advertising market".[18]

These utterances carry layers of meaning and also offer a retrospect on two decades when the Indian media seemed intent on expansion beyond inherent economic limits. Through the decade of the 1990s, when rising middle class aspirations drove advertising growth and fuelled an expansion of the media, the revenue model of the industry was seen – despite layers of opacity – to be shifting towards an increasingly audience unfriendly mould, all too willing to not just accommodate, but actively pander to the advertiser. Viewer subscriptions had a large share – roughly 67.5 per cent – of total revenue of the C&S television industry.[19] But the bulk of this money was retained by cable operators performing the last-mile function of delivering the signal to subscriber premises.[20]

For the print media, advertising contributed in overall terms, 65 per cent of total revenue. For the larger groups like the Times of India, Hindustan Times and The Hindu, the share of advertising in total revenue was 85 per cent and more. As the share of subscriptions declined in both TV and print media news, the audience tended to become devalued and priorities shifted towards providing the best deal for the advertiser.

Beginning in the 1980s and accelerating rapidly through the following decade, the global advertising industry witnessed a wave of consolidation that continues to this day. By the early years of this century, four conglomerates – WPP from the UK, Interpublic and Omnicom from the US, and Publicis from France – were believed to control half the advertising agencies in the world, and perhaps an even larger share of the business.[21] Adding on the Dentsu group of Japan, five giant conglomerates, dominate the global advertising business. According to the WPP group's presentation to its shareholders for the year 2017, its share of the advertising market in India was estimated at 50 per cent.

The big conglomerates consolidated their power over the media through strategic acquisitions across a spectrum of related businesses: notably market research and audience measurement. The media industry, which is quick to react to any possible threat to its autonomy – real and imagined – had surprisingly little to say about the implications of growing concentration in advertising, a business which holds the ultimate key to its own commercial viability.

Travelling back, for a longer perspective, to the early years of the century, the media was after a phase of fairly rapid growth, then gearing up for another. It was also a time when the industry took what would turn out to be its last stand on the ramparts of nationalism. In January 2001, the Standing Committee of Parliament on Information Technology began hearings on the longstanding policy of proscribing foreign direct investment (FDI) in the print media.[22] Beginning in January 2001, the committee held thirteen sittings at which it heard senior editors and journalists, media professionals and jurists.

A KEY DECISION ON FOREIGN EQUITY

From around December 2001, with deliberations entering their final phase, the committee began to witness an insistent campaign, associated in particular with BJP MP, Narendra Mohan, principal owner of widely circulated Hindi newspaper Dainik Jagran to permit FDI in the print media to a limit of 26 per cent. Mohan succeeded to the extent that, when the committee met in February, it had two competing drafts before it. While one draft report reflected Mohan's position, the other firmly upheld the 1955 Union Cabinet resolution reserving the print media exclusively for Indian ownership.

The revisionist position failed to gain great traction. A few procedural manoeuvres by Mohan at a committee meeting in February 2002, proved futile, with the Left parties and the Congress firmly backing the 1955 position. The findings of the parliamentary committee though, made little difference to the subsequent course of policy, partly since the ranks of the Indian media industry were by then deeply divided. The Jagran group had for long had allies in the campaign for relaxing FDI norms in the Indian Express (IE), India Today (IT) and Ananda Bazar Patrika (ABP) groups. But this campaign, underway since the early part of the 1990s, did not make much headway since it was met by an even more formidable lobby espousing the high nationalist stand: an informal coalition of the country's three most influential English language publishers, the *Times of India* (ToI), the *Hindustan Times* (HT) and *The Hindu*.

The formidable clout of the big three was buttressed by many of the regional papers, particularly in the southern states, where they were well organised, innovative and financially powerful. To the argument that the print media had no worthwhile reason to resist or stand aside from the wave of liberalisation, this lobby responded with a seemingly powerful counter: the newspaper was a unique cultural product that had a deep influence on the public mood and the political agenda, even more so than the electronic media. To demand that the sector be opened up to foreign investment was to invite alien and potentially corrosive influences into the political process. Maintaining editorial control in Indian hands would be unworkable with the asymmetries of power that would emerge from the entry of a large foreign investor.[23]

By the early-2000s, the alignment of forces within the media industry had begun to shift. The principal switch in the balance was effected by HT, which had come through distinctly the loser in its home territory in Delhi, from an intense price war against ToI. By early-2002, without explicitly acknowledging it, HT shifted discreetly to the pro-FDI corner. In June that year, the BJP-led government, reassured that it had sufficient backing to risk angering a powerful section within the newspaper industry, opened up the print media to FDI, to the limit of 26 per cent of total equity. Editorial control was to remain in Indian hands and at least three-quarters of all senior positions with influence over news agendas were to necessarily be occupied by Indian nationals.[24]

The newspaper industry was split in its response. The apex industry lobby, the Indian Newspaper Society (INS) reacted with some asperity: the decision, it said, would lead to the death of the small and medium newspapers. Individual news industry groups, such as *Business Standard*, IE and IT, cheered it as an overdue measure to bring much needed capital and state-of-the-art practices to the country.[25]

HT's apostasy on FDI was complete by 2005, when it came out with an Initial Public Offering (IPO) of shares. Early conviction having evaporated in the heat of competition with ToI, foreign entities including Citigroup and the Henderson group, were invited to pick up sizeable chunks of the IPO. Other news industry groups to allow significant equity dilution through foreign investments, were Jagran Prakashan, Midday Multimedia and Business Standard. In the satellite TV sector, Asianet Communications, the market leader in Malayalam language broadcasting, attracted a significant equity investment from a Mauritius based enterprise.

TAKEOVER OF THE ADVERTISEMENT SPACE

While the newspaper industry was engaged in this series of skirmishes over FDI, a major manoeuvre was executed on its flanks, leading in effect to its complete encirclement by foreign interests. Being narrowly focused on the issue of ownership in the industry, the newspaper lobby failed to recognise the signals from a policy move initiated in 2001 with little public debate or discussion, when the doors were opened up for 100 per cent foreign investment in the equity of ad agencies and market research firms. At a time of increasing dependence on advertising revenue – when advertisement placement decisions depended crucially on the results that market research firms turned in – these policy decisions of consequence passed without serious opposition, indeed without even a cursory examination in regard to longer-term implications.

In 2002, N Bhaskara Rao, a market research professional and media analyst, wrote that the debate on foreign ownership in the media was superfluous, if not entirely futile. The entire public discussion had "quite overlooked the fact that increasingly, the pace and path of the media are being determined by advertising, and is influenced by market research and media planning strategies in which corporates (sic), Indian and foreign, have invested heavily".[26]

While the media and newspaper barons carried out their phony wars over FDI in their narrow turfs while invoking high principle, the territory all around was rapidly being colonised by corporate interests, both Indian and foreign. The story could be told through the career of the WPP group, which today dominates the Indian advertising world. Despite its increasing dominance in the global scenario through the 1990s, WPP was yet to secure absolute control in India. It did however, exert a substantial influence through its associated advertising companies and through the Indian Market Research Bureau (IMRB).

In 1993, WPP formed the Kantar group within a complex web of holdings across the world, as its market research arm.[27] In 1998, Kantar teamed up with AC Nielsen – the acknowledged pioneer in the field – to set up Television Audience Measurement (TAM), with the promise that it would offer a unique combination of skills, invaluable for the rapidly growing Indian broadcasting industry. The main competitor for this system of television audience measurement was INTAM, set up then by a rival market research firm, ORG-Marg.

In 2000, ORG-Marg was itself acquired by a conglomerate floated by WPP and some partners. TAM and INTAM then merged to offer a single, unified measure for advertisers to bet on various channels. Thus even as it acquired larger market shares in advertising, WPP also effectively controlled the ratings system that determined how ads would be placed across competing TV news channels.

Globalisation brought tumultuous change to the world of newspaper readership surveys. The National Readership Survey (NRS), promoted by the newspaper industry, an association of advertising agencies and the Audit Bureau of Circulation (ABC), remained the industry standard through much of the 1990s.[28] In 1995, a newly constituted coalition of advertising and media companies launched an alternate process which it called the Indian Readership Survey (IRS). Directly challenging the NRS, the IRS promised quarterly surveys, synchronised presumably with the reporting cycle for corporate enterprises.

As competition intensified, major players saw little amiss in calling into question the whole exercise of audience measurement when it failed to serve their ends. Facing the bitter recriminations of various newspaper groups, NRS shut shop in 2004, leaving IRS as the sole player in the field. Questions of methodology continued to swirl around the IRS in subsequent years. In 2006, it was compelled to substantially revise its initial readership estimates after a number of publications that had signed on, threatened to withdraw patronage because they were allegedly given a raw deal.

In terms of the global dynamics, this meant that the WPP conglomerate, which dominated the NRS, ceased having a role in newspaper ad allocations. That role passed exclusively to the control of the Omnicom group, whose Indian subsidiary, Hansa Research had bid for and earned the IRS contract in the late-1990s with the patronage of a rival consortium of newspapers. In 2008, the NRS made a feeble effort at resumption, under the technical supervision of IMRB, part of the WPP consortium. Though that effort failed, WPP continues having a strong presence in TV ratings.

This story of growing concentration in media ownership, the advertising industry and market research, runs alongside another one: the increasing influence of the big advertising conglomerates in political advertising. Through the 2014 election cycle, the BJP alternates between choosing firms belonging to Interpublic and WPP, to handle its advertising campaign, before opting for a number of industry specialists in their individual capacities. Opinion polls to help plan strategy and also influence the public mood, were meanwhile being carried out by agencies integrated into the WPP and Omnicom groups.

For the media as an institution serving a public purpose, globalisation has been a deeply corrosive force. The subservience to global advertising agencies has caused a sundering of older bonds of trust between the media and its audience. Several strategic choices made as competition in the globalised Indian environment escalated, lie behind this outcome. Today's media ecosystem is one in which trust has been severely eroded and fake news flourishes.

ENDNOTES

1 The report, which ruffled many feathers in the media industry, particularly among news outlets that had been thriving on the practice of paid news, was severely abridged before publication. After a right-to-information intervention, the full report was posted by the PCI on its website in 2010. It can be accessed by typing in "Paid news sub-committee report" in the search box on the website of the PCI: presscouncil.nic.in.

2 The ECI reported its meeting with mobile phone and internet service companies on its website on March 19, 2019. See the following link, extracted on May 1, 2019: https://eci.gov.in/files/file/9458-eci-convenes-meeting-with-social-media-platforms-iamai-and-social-media-intermediaries-willingly-agree-to-come-up-with-a-code-of-ethics-for-the-industry-laying-down-operational-details/. The industry response was reported by a media news website on March 25, 2019. See the following link, good on May 1, 2019: https://www.medianama.com/2019/03/223-code-of-ethics-elections-social-media-platforms/. The Facebook plan was

3 See "We are taking every step to prevent abuse, spread of misinformation: Shivnath Thukral", *The Hindu*, March 13, 2019, p 13 (Delhi edition).

4 See "Social media platforms and IAMAI enact 'voluntary code of ethics' for Elections 2019: Some challenges", Medianama, March 25, 2019; extracted May 1 at: https://www.medianama.com/2019/03/223-code-of-ethics-elections-social-media-platforms/.

5 Chinmayi Arun, "India may be witnessing the next 'WhatsApp eleciton' – and the stakes couldn't be higher", The Washington Post, April 25, 2019; extracted May 1 at: https://www.washingtonpost.com/opinions/2019/04/25/india-could-see-next-whatsapp-election-stakes-couldnt-be-higher/?utm_term=.39ce2d22b632.

6 Samir Patil, "How to Fight India's Fake---News Epidemic", The New York Times, April 29, 2019, extracted May 1 at: https://www.nytimes.com/2019/04/29/opinion/india-elections-disinformation.html.

7 BBC News, "Nationalism a driving force behind fake news in India, research shows", November 12, 2018; extracted May 1 at: https://www.bbc.com/news/world-46146877.

8 Rahul Verma and Shreyas Saradesai, "Does Media Exposure Affect Voting Behaviour and Political Preferences in India?", *Economic and Political Weekly*, Volume XLIX, No: 39, September 27, 2014; pp 82-88, at page 83.

9 Ibid.

10 Ibid.

11 Ibid: 84.

12 Ibid: 85.

13 All data are from the bi-annual Ericsson Mobility Report, issued by the Swedish cellphone manufacturer.

14 Jio's entry into the telecom and internet space was an end-run around all regulatory norms, a manoeuvre carried out while regulatory agencies looked elsewhere. In 2010, a little known entity, Infotel Broadband Services Ltd. (ISBL), was awarded a number of licences for data services incorporating "fourth generation" or 4G specifications and technology. Since licences came

bundled up with spectrum, this award earned for the novitiate in the field, the right to colonise a wide swathe of the electromagnetic spectrum across the country. A few days later, Reliance announced that it had acquired a 95 per cent stake in ISBL. Soon afterwards, Reliance announced the launch of a high-speed data service under the brand name Jio. Capitalising on the concept of a universal service licence announced in 2013, it expanded the service to include voice calls.

In 2014, the official watchdog over public finances, the Comptroller and Auditor-General of India (CAG), sent a draft report to the Department of Telecommunications (DoT), urging cancellation of the licence issued IBSL. The CAG found after an audit of the process, that the "DoT failed to recognise the tell-tale sign of rigging of the auction right from (the) beginning". Rather implausibly, a small and obscure company was awarded an all-India licence on the basis of a licence fee bid that was over 5,000 times its net worth.

In January 2016, an advocacy group, the Centre for Public Interest Litigation, filed a petition in the Supreme Court demanding revocation of the 4G services licence granted Jio. In April that year, the Supreme Court dismissed the petition on grounds that it would not intervene in policy matters unless there was evidence of "blatant" malafide.

15 The summary of estimates carried out by the public relations-advertising agency Pitch Madison, can be found at the Indian Television website in a story datelined February 14, 2019; extracted May 6, 2019 at: http://www.indiantelevision.com/mam/media-and-advertising/digital-agencies/pitch-madison-report-shows-adex-grew-146-in-2018-190214.

16 These details were reported by the news website The Scroll, dateline April 6, 2019, extracted May 6, 2019 at: https://scroll.in/article/919120/what-the-emergence-of-namo-tv-says-about-narendra-modis-attitude-to-indias-legal-system.

17 Press Trust of India, dateline November 28, 2018: published under headline "RIL arm acquires substantial stake in media startup NEWJ", Moneycontrol; extracted May 6, 2019 at: https://www.moneycontrol.com/news/business/ril-arm-acquires-substantial-stake-in-media-startup-newj-3229551.html.

18 Indian Television: "M&E industry lacks reliable data: Uday Shankar", March 12, 2013; accessed May 6, 2019 at: http://www.indiantelevision.com/headlines/y2k13/mar/mar96.php.

19 Open Society Foundations (2012): Mapping Digital Media: India, (Lead Reporters: Vibodh Parthasarathi and Alam Srinivas), December 2012, pp 105ff.

20 Ibid: p 108.

21 Robin Andersen and Jonathan Grey (editors), *Battleground: The Media*, Greenwood Press, London, 2008; p 64.

22 *Frontline*: "No to FDI in print", Vol 19, Issue 8, 26 April, 2002, p 132.

23 For an example see the article by N. Ram, a substantial shareholder in *The Hindu* of Chennai and a former editor-in-chief of all the group's publications: "Foreign Media Entry into the Press: Issues and Implications", *Economic and Political Weekly*, Volume 29, Number 43, 22 October, pp 2787-90.

24 *Frontline*: "A Perilous Policy Shift", Vol 19, Issue 14, 19 July, 2002, p 19-21.

25 *Frontline*: "Criticism and Concern", Vol 19, Issue 14, 19 July, 2002, p 22.

26 N Bhaskara Rao, "Foreign Participation in Media", *Economic and Political Weekly*, Volume 37, No: 2, January 12, 2002, p 105.

27 The basic details are available from a variety of sources, including the Wikipedia entry on the Kantar group.

28 Information on these two bodies could be found at their respective websites: http://www.auditbureau.org/about.htm and http://www.aaaindia.org/.