

**Date:** 6th December 2023

**To,**

Sh. Anurag Thakur,  
Union Minister of Information and Broadcasting,  
Government of India

Dr. L. Murugan,  
Minister of State,  
Ministry of Information and Broadcasting,  
Government of India

Sh. Apurva Chandra,  
Secretary,  
Ministry of Information and Broadcasting,  
Government of India

Sh. Subhash Kumar,  
Deputy Secretary,  
Ministry of Information and Broadcasting,  
Government of India

**Subject: Extension of deadline and more inclusive public consultation on the Draft Broadcasting Services (Regulation) Bill, 2023**

We, the undersigned civil society organisations and individuals, write to you to share key concerns and demands regarding the ongoing consultation process on the Draft Broadcasting Services Bill, 2023.

A text of the Bill was placed in public domain on 10th November on the Ministry's website and comments have been invited till 09th December 2023. The text of the Bill is accompanied by an explanation. Both the text of the Bill and the explanation are in English. This bill has far reaching consequences for all citizens and their right to access information and news. It completely overhauls the media regulatory framework. It brings OTT platforms under its ambit. Any reform of the media regulatory framework must further public interest and be grounded in the principles of the constitution to further freedom of speech and expression.

At this stage we would like to draw your attention to the Pre-Legislative Consultation Policy, 2014, which every Ministry is required to follow before legislative proposals are submitted to the

Cabinet for approval.<sup>1</sup> The specific mandates of the Policy are summarised below for your reference:

- Ministry shall proactively publish the proposed legislations both on the internet as also through other means;
- The text of the legislation should include brief justification for such legislation, essential elements of the proposed legislation, its broad financial implications;
- An estimated assessment of the impact of such legislation on environment, fundamental rights, lives and livelihoods of the concerned/affected people, etc. should also be made available along with the text of the proposed legislation;
- Such details may be kept in the public domain for a minimum period of thirty days;
- Where such legislation affects specific group of people, it may be documented and disclosed through print or electronic media or in such other manner, as may be considered necessary to give wider publicity to reach the affected people;
- The Ministry concerned might, in addition to placing the proposal in public domain, also hold consultations with all stakeholders.

**We urge the Ministry to comply with all the above mandates of the PLCP to ensure an inclusive, multi-stakeholder and informed consultation on the legislative proposal.** This is particularly crucial given the wide scope and far reaching ramifications of the Bill on free speech and access to information. Therefore, it is important that the Bill be provided wide publicity on different media platforms and along with it the Ministry must undertake open houses and in person public consultations on the Bill with affected stakeholders.

**We also demand that the text of the Bill and the accompanying explanation be published and made available to the public in all Scheduled languages of the Constitution.** We would like to point out that in the past also, the Government of India has facilitated consultations on policy proposals in multiple languages. For instance, the draft of the New Education Policy was translated in 22 languages and uploaded on the Ministry's website,<sup>2</sup> and similarly, the Draft Environment Impact Assessment Notification was also made available in multiple languages after a Delhi High Court order.<sup>3</sup> Therefore it is neither without precedent, nor practically impossible to make policy proposals available in public domain in multiple languages for the purpose of undertaking consultation. Furthermore, as the Ministry itself has claimed that it has used a simple language to draft the Bill, it would be even easier to translate the same.

Finally, given the length of the Bill and the complexity of the regulatory provisions proposed in the Bill, more time must be provided for affected stakeholders to study and analyse the Bill for its potential impact. The PLCP also mandates for a minimum of 30 day period, which must be

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<sup>1</sup> Available here - <https://ddashboard.legislative.gov.in/documents/pre-legislative-consultation-policy>

<sup>2</sup> See the consultation process here - <https://www.education.gov.in/nep/about-consultation>

<sup>3</sup> Available here - [https://environmentclearance.nic.in/report/Translated\\_draftEIA\\_2020.aspx](https://environmentclearance.nic.in/report/Translated_draftEIA_2020.aspx)

extended where needed to fulfill the desired objective of undertaking the consultation process, which is to enable multi-stakeholder deliberation on the Bill. **Therefore, we urge you to extend the deadline at least by another 30 days.**

We have made the above demands to enable the Ministry to undertake meaningful, sustained and inclusive multi-stakeholder consultations, with opportunities for people across India to participate in the same.

We hope these demands will be taken in the right spirit and positively addressed.

Thank you,  
Yours sincerely,

**List of signatories:**

<b>Name of Signatories (individuals and organisations)</b>	<b>Place</b>
Alternative Law Forum	Bangalore
Article 21 Trust	Delhi
Campaign Against Hate Speech	Bangalore
Maadhyam	Delhi
Internet Freedom Foundation	New Delhi
Free Speech Collective	
S.Q.Masood, ASEEM	Hyderabad (TS)
Shilpa Prasad	Banglore
Geeta Seshu	Maharashtra/ Mumbai
Sachi Hegde	Karnataka
Sudha N	Bangalore
Aratrika	Kolkata
Adithi Holla	Bengaluru, Karnataka
Prathik Desai	Bengaluru
Jahnvi Pai	Karnataka/ Bangalore
Dhanya Rajendran, The News Minute	Bengaluru
Diya Elizabeth Prakash	Kerala
Sudipto Mondal, The News Minute	Bengaluru

Revathi Siva Kumar	Bengaluru
Cynthia Stephen	Bangalore
Rahul George	Karnataka
Dr.Mohan Rao	Bangalore
Poonam Sharma	Bangalore
Veena Simon	Bangalore, Karnataka
Binita Parikh	Ahmedabad
Ammu Joseph	Bangalore, Karnataka
Arindam Roy	Bangalore
Network of Women in Media, India	
Dhruva Sen	Bangalore
Fr Sandeep Menezes	Bengaluru, Karnataka
Harikrishnan R	Bangalore
Priyanka	karnataka
Usha Raman, University of Hyderabad	Hyderabad
Dr. Vidhulata	Madhya Pradesh (MP) Bhopal
Leo	Bangalore
Sandra	Bangalore
Vaishna Roy	Chennai
Mario Paul	Hyderabad
Laxmi Murthy	BANGALORE
Aakar Patel	Karnataka
Dr Preeti ER	Bangalore
Neeta Kolhatkar, Independent Journalist	Mumbai
Sourav Kumar	Lucknow
Shalom Gauri	New Delhi, NCR
Independent journalist	Mumbai
Jyoti punwani	Mumbai
Dev Baul	Kolkata
Bhagyashree khanolkar	Maharashtra
Sanika Sunil, The National University of Advanced Legal Studies, Kochi, Kerala.	Karnataka
Sumana	
Common Cause	Delhi

Mohd Aasif	Delhi
Rajashri Dasgupta, independent journalist	Kolkata, West Bengal
Anshi Beohar, Common Cause India	New Delhi
Divyanshoo Singh	Delhi
Brihanmumbai Union of Journalists	Mumbai
Pearl D'souza	Karnataka
Avani Chokshi	Bangalore
Suraj Samrat	Maharashtra/ Mumbai
Vivek Sundara	Mumbai
Cyril Sam	New Delhi
Yashas Chandra	Delhi
Siddarth	Bangalore
Stella vyas ( vyas yoga)	Mumbai Maharashtra
Rachel Sudhir	Bengaluru
Cavery Bopaiah	Karnataka/ Bengaluru
Hira Janardan	Mumbai, Maharashtra.
Debangshu সেন	Kolkata
Suraj S	Mumbai, MH
Ardra Narayanan	Karnataka
Anjelin	Bangalore
Ila Dalwai	Maharashtra, Pune
Manogna	Bangalore, karnataka
Hrudaya	Karnataka
Maitreyee Bhujbal	Maharashtra/ Mumbai
KHALEELULLAH R	BENGALURU
Mini Mathew	Mumbai
Dwizotman K	Kadapa, AP
St.aloysius degree college	Karnataka
Adv Purnima Upadhyay	Maharashtra
Rose mary	Karnataka / Bangalore
Sharmila Kaushik	Mumbai
RN Bhaskar, AsiaConverge.com	
Bina Kumari	Bihar

Charu Soni	New Delhi
Sujata Madhok	New Delhi
Rakhee Roytalukdar	Jaipur, Rajasthan
K Ashok Rao	Delhi
Rashme sehgal	New Delhi
Rajanayagam	Tamil Nadu
Anil Chaudhry	New Delhi
Anubha Rastogi	Mumbai
Sridhar A	Bengaluru, Karnataka
Pamela Philipose	New Delhi
Lazarus Chettiar	Mumbai
Rita Anand	Gurugram
Abid Shah	Delhi
Dr Sunilam	Madhya Pradesh/ Multapi
Amir Rizvi	Mumbai
Peggy Devaraj	Karnataka/Bangalore
Shalini Dhawan	Mumbai
Tathagat	Assam
Bodhisattva	Assam
Siddheswar Das	Guwahati
Gertrude Fernandes	
Sonali Ghosh	New Delhi
Atul Chaturvedi	Noida, Uttar Pradesh
Leena Reghunath	Bangalore
Anu	Maharashtra/ Mumbai
Swati Goswami	Gujarat
Sultan Ahmad	New Delhi
Harsh Yadav	Jharkhand/Ranchi
Padmasri	Hyderabad
Geeta Mahajan, NFIW	Maharashtra / Thane
Pankaj Joshi	Maharashtra/ Mumbai
Dr Mira Shiva Public Health Physician	
Shruti	Bangalore

Akhileshwari Ramagoud	Telangana/Hyderabad
Sadhana Mahila Sangha	Bengaluru, Karnataka
Ritambhara Shastri , Journalist	Delhi
Gita Bamezai	Gurgaon
Thomas Abraham	Maharashtra / Mumbai
Truth & Justice	
Freny Manecksha	Thane/Maharashtra
Jayesh Desai	Mumbai, Maharashtra
Chandrima Bhattacharya	West Bengal
Pamela Rodrigues	Maharashtra/ Mumbai
Dr Sr Mudita SODDER RSCJ	Mumbai Maharashtra
Alok Tiwari	Nagpur
Ashok jain	Delhi
Vipul Mudgal Common Cause	New Delhi
Kumar B	Bengaluru
Juanita	Maharashtra/ Belgaum
Devika Singh	New Delhi
Rajesh Mehar	Bengaluru
Chirodeep Chaudhuri	Maharashtra/ Thane
Avinash Kumar	Delhi/New Delhi
Organization	City
Rajani G Rao	Karnataka Bangalore
Santosh Madaiah	Karnataka Bangalore
Vijay Kiyawat	Maharashtra, Pune
Adhesh Sagar HKB	Bengaluru
Kripa nand bajpai	Etawah up
Johanna Deeksha	Bengaluru
Pankaj Singh	Madhya Pradesh
Khirod Routray	Odisha
Joe Paul Cyriac	Trivandrum
N Arjun	New Delhi
Rajluxmi Vaish	Karnataka
Akshay Deshmane	Delhi

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Saniya	Bangalore, Karnataka
Runu	Gaziabad /Uttar pradesh
Jayabathuri.J	Chennai
IAWRT	Delhi
C Vanaja, Journalist	Hyderabad
Cris	Kerala
Manu	Bengaluru
Sneha Koshy	Bengaluru
Nicholas George	Haryana / Gurugram
Arjun	
Celine George	Gurgaon
Dr Dilip Kiyawat	Pune
Sanjay Gaddam	Mumbai
Sunil Jain	Mumbai
Vaneet	Punjab / Zirakpur
Faisal Malik	Mumbai
Joshy Joseph	Kolkata
Dr Pramod.Kumar Joshi	NOIDA
Vinata Nanda	Maharashtra
Balakrishnan Koyyal	Kerala
Praveen Elengath	Maharashtra
Revathi Narayanan	Bangalore
Biswaroop Chatterjee	Durgapur, West Bengal
N Manu Chakravarthy	Bangalore
FIROZA KHAN	MUMBAI, MAHARASHTRA
Rasheed Usmani	Karnataka/Bangalore
Rajendran Narayanan	Bangalore
Shahbuddin Khan	Bangalore, Karnataka
Noor	Bangalore
Nasreen syed	Bangalore
Shashank SR	Karnataka
Sarvadaman	Haryana Gurugram



Lalitha Matthew	Krnataka,
James Khangenbam	Manipur
Harini	
Mohammed Akram	Bangalore
Sneha R	Bangalore
Arun Kumar	Karnataka/ Bangalore
Rihana	Bengaluru
Curiosity alliance foundation (NGO)	Karnataka
Shamsul Islam	NCR
Rajshekhar Akki	Karnataka
Neelima Sharma	Gurgaon
Narendra Nayak	Mangalore
Pranav	Bangalore
Sabita Lahkar	Guwahati
Mahendra Mishra	Noida
Aditya Seth	Delhi / NCR
Sweta Singh	New Delhi
Jagrat Biswal	Odisha / Bhubaneswar
Mohan A	Bengaluru
Raymond Saldanha	Karnataka, Bengaluru
R Srinivasan Prof (Retd) IIMB	Bengaluru
Linda Chhakchhuak	Meghalaya
All India Kisan Mazdoor Sabha	New Delhi
Nawaz Aman	Bangalore
Chetana Kumari P	Karnataka
Association For Promotion of Sustainable Development	Hansi. Haryana India
Arvind Narrain, PUCL-K	Karnataka
Shamima Ahasana	Kolkata
Vasanthi Hariprakash	Bangalore
Syed Md Hossain	Kolkata
Jeshmina Begum	Kolkata
Syed Md Ismail	Kolkata
Suraiya Parveen	Kolkata

Syed Md Mufti	Kolkata
Veena Verma	Delhip
Roop Rekha Vetma	Lucknow, UP
Mahanand Singh	Bihar/Arwal
Adiba	Bengaluru
Mira Bakhru	Karnataka / Bengaluru
Dr Narender Nagarwal, University of Delhi	Delhi
Kirti Sud	Delhi
Sanjib Das	Delhi
Rashmi Doraiswamy	New Delhi
Mangala Dilip	Karnataka/Bangalore
Patrick Edward Pinto	Karnataka
Sunita Kumari	Jharkhand
Shobha Joseph	Karnataka, Bangalore
Anjana Magalagiri	Maharashtra/Thane
Sathya S	Bengaluru
Siddharth K J	Bangalore, Karnataka
John Dayal	Delhi
Chanda Kumari	
Johnson Thomas Aasra NGO	Mumbai. Maharashtra
Kamal Kishore	Faridabad, Haryana
Shepard vas Normandy	Kerala
Sachdev Virdee	En gland Birmingham
Souvik Roy Chowdhury	West Bengal/ Kolkata
Anjali Monteiro	Goa
KP Jayasankar	Goa
Jagdish Jayaswal	Shahada Dist. Nandurbar
Arjun Gourisaria	Kolkata
Padmaja Shaw	Telangana
Meghnath	Ranchi Jharkhand
Meghnath AKHRA	Jharkhand Ranchi
Mariam Dhawale - All India Democratic Women's Association	New Delhi
Suvarna Ramsing Solanki	Maharashtra

AIDWA	Delhi
Maimoona BAM	Delhi
Vasuki umanath	Chennai
Shilpi Gulati	Mumbai
Shalini Gera	Bilaspur, Chhattisgarh
A. Radhika Aidwa General Secretary	Chennai Tamil Nadu
Jagmati Sangwan	Haryana
Saakhi Mishra	Bengaluru, Karanataka
Varishtha singh	delhi
Anam Syed	Gujarat
Ahaan Rudrashish Sarkar	Gurugram, Haryana
Khushi V	Jaipur
Sanat Agrawal	Haryana
S.VALANTINA,AIDWA,STATE PRESIDENT	Tamil Nadu
Salam Khan	Telangana
Karnataka Peace Organisation	Karnataka Bangalore
Sameer Kashyap	
Prasad Chacko	Ahmedabad, Gujarat
Carina	
Madhavi Marasakatla	Andhra Pradesh
Nizamuddin	Hyderabad
Swathi S	
Pritha Paul	Bombay
Meghana Muddurangappa	Bengaluru
Aditya	Chennai TN
Md Shadab Ansari, Advocate JHC	Ranchi
Ajay Bansal	New Delhi
Bhargav Oza	Ahmedabad
Swati Dandekar	
Unni Vijayan	Bengaluru
Akanksha Sharma	
Rohit Prajapati, Environment Activist	Vadodara, Gujarat
Jacob	Bangalore

Gouri Patwardhan	Bengalury
Satej Desale	Maharashtra
Kareena Jindal	New Delhi
N.Umamaheswari	Virudhunagar
Satish Narayanan	Trivandrum
Clifton D' Rozario	Bengaluru
M A SHAKEEL	Telangana
V Mary AIDWA	Tamilnadu
maya rao	Mumbai
Avinash Deshpande	Pune, Maharashtra
Richa Ghera	Delhi
Paul Abraham	Bangalore Karnataka
Saumya Kanyal	Delhi
Anita Dumra	Bangalore
People's Union for Democratic Rights,	Delhi
PRANI SEWA SANGAM	BANKA
Mohinee Sudarsanam	Karnataka/Bangaluru
Obaid Rahman	
Swaroop Sardeshmukh	Bengaluru