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Community Radio in India as a Hyperlocal Medium: Proposing a Principled Approach to Policy Design

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Abstract

Community radio in India is structurally a hyperlocal medium. Whilst the rules governing community radio stations (CRSs) contain provisions that are hyperlocal in nature, the lack of an explicit 'hyperlocal' assertion has implications not only for policy discussions and recommendations but also for how CRSs conceptualise and articulate their role, locality, and informational functions. One important policy consequence is reflected in the recommendations of the Telecom Regulatory Authority of India (TRAI), permitting Section 8 not-for-profit companies to operate CRSs. Owing to their legal form and narrowly defined primary objects (a term of art in Indian company law), such entities risk privileging thematic content and focusing on homogeneous communities over the informational needs of geographically situated local populations. Similarly, this tension is also reflected in how CRSs perceive themselves. Drawing upon concordance and collocation analyses of CRS profiles, the study demonstrates the predominance of development-oriented thematic framing and the comparatively limited articulation of hyperlocal informational functions within CRS discourse. The paper argues that, in both policy and CRS discourse, the absence of a hyperlocal framing shifts attention away from the hyperlocal information needs of local populations. In response, the study proposes the inclusion of the "hyperlocal principle" within CRS policy design and discussions to bring greater clarity, inclusivity, and flexibility to the sector.

Keywords: hyperlocal media; policy design; community radio; India; hyperlocal information needs; TRAI

1. Introduction

Community radio is seldom framed as a hyperlocal medium, despite operating through hyperlocal logics. In India, discussions about community radio being a hyperlocal medium are almost non-existent, with research studies using the term only in passing but never to describe the medium (Backhaus, 2019; Bose & Koshy, 2015; Pandit & Chattopadhyay, 2018). This is an outcome of discourse that is based on associating community radio with development only. This itself is a result of the postcolonial mindset that has dictated the development agenda (Pavarala, 2015) instead of its potential as a hyperlocal medium and its ability to serve the hyperlocal information needs of the community.

A normative shift from community to hyperlocal is required for many reasons, which we will explore in this paper, but there are three chief reasons among them. First, this shift liberates community radio from the monopoly of the development agenda and discourse that predominates, changes the mental model of community radio, and places focus on

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hyperlocal information needs. Second, it shifts the focus from community alone to a place-based approach, which is more inclusive and appropriate. Third, it represents a long-overdue acknowledgement of the hyperlocal nature of the policy guidelines that regulate community radio in India.

This paper argues that CRSs in India should be understood as hyperlocal media and that hyperlocality should function as a guiding principle within CRS policy discussions and regulatory design. This paper first situates our study within the broader context of community radio in India and reviews scholarship on hyperlocal media. It then conceptualises CRS in India as a hyperlocal medium. Thereafter, drawing upon concordance and collocation analyses of CRS profiles, this study examines how the keywords locality and news and thematic orientation are articulated within CRS discourse. This paper further discusses the implications of these findings in relation to contemporary CRS policy debates, particularly the recommendations permitting not-for-profit companies incorporated under Section 8 of the Companies Act, 2013 (hereafter referred to as Section 8 companies) to operate CRS, and it ultimately proposes the inclusion of the "hyperlocal principle" within CRS policy design and discussions. Therefore, in this paper, we attempt to answer the following research questions:

RQ1—Can community radio in India be considered hyperlocal media?
RQ2—Are Section 8 not-for-profit companies suitable to operate CRSs?
RQ3—What are the implications of introducing a hyperlocal principle into the policy guidelines governing community radio in India?

2. Literature Review

According to the Oxford English Dictionary, the earliest known usage of the term hyperlocal in the context of media can be traced back to as early as 1989 in a news article, where it was used for cable news that targeted "tiny markets" (Oxford English Dictionary, n.d.; Trueheart, 1989). However, academic research related to hyperlocal media is still in its nascent stage. A systematic literature review conducted by Negreira-Rey and López-García (2021) shows that the first research was published in the year 2010. Moreover, the literature is predominantly Western and preoccupied with the democratic, economic, and technological aspects of hyperlocal media (Hess & Waller, 2016a).

Scholarship has studied the growth of hyperlocal media and attributed it to changes in local media ecosystems, the decline of local news, and news deserts that have emerged as a consequence (Harte et al., 2019; Nygren et al., 2018, p. 33; Rodríguez-Urra et al., 2024). The democratic aspect of hyperlocal media scholarship mainly deals with its potential to fulfil a democratic role as a fourth estate (Barnett & Townend, 2015; Hujanen et al., 2021; Jangdal, 2019; Williams et al., 2015), while the economic side of scholarship deals with the sustainability of hyperlocal media outlets, its revenue models, and the motivations of producers (Cook & Bakker, 2019; Kurpius et al., 2010; Pal et al., 2024).

The technological aspect is most relevant to this study, as this forms part of the definition of hyperlocal media and is much debated. Most scholars make use of the characteristic or criteria-based definition that defines hyperlocal media operations as "geographically-based, community-oriented, original-news reporting organizations indigenous to the web and intended to fill perceived gaps in coverage of an issue or region and to promote civic engagement" (Metzgar et al., 2011).

Hyperlocal Media Beyond the Web

The characteristic definition can be contested at the level of medium. This popular academic definition confines hyperlocal media to the web and excludes other media, even though it is possible for hyperlocal operations to exist within legacy media. According

to its authors, as hyperlocal media never had a kind of "previous incarnation in a more traditional media format" (Metzgar et al., 2011, p. 10), it was only logical to conclude that they were indigenous to the web. This conclusion might be true for the United States, where the study was conducted, and the West in general; however, it is improper to draw the same conclusion for India. For instance, hyperlocal newspapers exist in India and predate the Internet (Kohli, 2003; Rajasekar & Venkatraman, 2025).

Leckner et al. (2019) critiqued the criteria-based definition and moved beyond the web, as not doing so involved risking not having a full picture of the media landscape. Therefore, their definition includes print and electronic media like weekly newspapers, community radio, and television, as exclusion of these media marginalised users and producers who favour them over the web. Hess and Waller (2016a) use a subcultural lens to study hyperlocal media and suggest inclusion of the "full spectrum of media from online, to print, radio, television and social media" (Hess & Waller, 2016a, p. 4).

Regardless of differences and disagreements over the definition at the level of medium, there is broad consensus on the other defining characteristics of hyperlocal media, namely, local geography, orientation towards and focus on community, and news. There are only variations in degree. These defining characteristics are being shared and are compatible with community radio. Therefore, it is safe to state that hyperlocal media formats are being practised beyond the web and include other media like community radio.

Community radio itself has been well researched in South Asia and across the globe. In South Asia, there has been a push for a liberal and democratic approach as the sector suffers from excessive regulations, sustainability issues, and perception of listeners as passive recipients (Malik & Pavarala, 2020). In Australia, growing importance is being given to 'place' and acknowledgement of the hyperlocal nature of the medium (Backhaus, 2024; Backhaus et al., 2025). In Ireland, there is a focus on the role of community radio in providing localised information (Gaynor & O'Brien, 2017). Low-power radio stations in New Zealand and the United States are of relevance to the extent that their technical parameters qualify them to target very small areas. New Zealand is notable for its lightly regulated 'open-spectrum commons' and allows for a range of operators, from individuals to organisations (Simpson, 2012). In the United States, low-power FM radio has been associated with localism (Dunbar-Hester, 2013), although this did not necessarily translate into a strong relationship with the local community (Conti, 2011).

3. CRS Regulation in India

Community radio in India operates within a highly centralised and restrictive regulatory environment. Broadcasting falls under the legislative competence of the Union government, and CRSs are regulated by the Ministry of Information and Broadcasting (MIB). It governs the licensing, content regulation, eligibility conditions, and operational requirements through its Policy Guidelines and is centrally administered through the Community Radio Station Section within the Broadcasting Wing of the Ministry.

What is important to note in the context of this study is the difference between the Telecom Regulatory Authority of India (TRAI) and the MIB. The former was envisioned as an independent telecommunications regulator whose role "has been steadily reduced to that of an expert body limited to making recommendations on key policy issues" (Kapur & Khosla, 2019), whilst the latter is the executive entity that has a monopoly over making rules related to CRSs as well as enforcing them. Before making any major policy changes, the MIB sends a request to TRAI to provide its recommendations. TRAI subsequently starts the consultation process with stakeholders and invites comments. After the completion of the process, it sends its recommendations to MIB. The recommendations are not binding in

nature, and therefore the government may choose to accept the recommendations entirely, partly, or discard them altogether.

TRAI's Recommendation for Inclusion of Section 8 Companies

In the year 2022, TRAI released a consultation paper concerning CRSs and invited comments and counter-comments from stakeholders (Telecom Regulatory Authority of India, 2022b). One major discussion question was the inclusion of not-for-profit Section 8 companies registered under the Companies Act 2013 in the eligibility requirements of CRSs. Most of the stakeholders were against the inclusion for various reasons. Subsequently, after analysing all the opinions and views, the authority released its recommendations permitting not-for-profit companies to set up CRSs. The regulator reasoned that not-for-profit companies "are already covered in the extant eligibility criteria for CRSs" (Telecom Regulatory Authority of India, 2023b).

4. CRSs in India as Hyperlocal Media

There were only 408 operational CRSs in India (Telecom Regulatory Authority of India, 2023b, Annexure III), with only 0.26 stations per million population as compared to 22 in Brazil, 18 in Australia, 5 in the USA, 4 in the UK, and 4 in South Africa (Telecom Regulatory Authority of India, 2022a, p. 21). The CRS landscape is regulated to the extent that it cannot be compared with community radio in other countries. As already stated, some scholars consider community radio in India a hyperlocal medium but do so without providing any justifications. Therefore, it is essential to justify that community radio in India is indeed a hyperlocal medium by ensuring that the defining characteristics of hyperlocal media are compatible with it.

4.1. Community Orientation

Community orientation is one of the defining characteristics of hyperlocal media, and this orientation is institutionally embedded within the CRS framework in India. The policy guidelines explicitly foreground community service through both content and participation requirements. Content regulations require CRS programming to reflect the "needs of the local community" (Ministry of Information and Broadcasting, 2024, p. 4), thereby emphasising programming that is relevant to the population residing within the coverage area. This contrasts with what is envisaged in the newly recommended 'Low-Power Small-Range FM Radio Broadcasting' category. This new category (which is yet to be translated into a regulation) is similar in terms of technical parameters to LPFM (Low-Power FM) in New Zealand. At first blush, this new category might seem truly hyperlocal. However, serving the community is at best an epiphenomenon within it, with use cases like drive-in theatres, "hospital radio services, amusement parks, business premises, closed communities such as residential complexes, small habitations, [and] commentary for local events" (Telecom Regulatory Authority of India, 2023c, p. 4). In contrast, the guidelines for CRSs state that the "basic objective of the Community Radio broadcasting would be to serve the cause of the community in the service area [and for] this purpose community shall mean people living in the zone of the coverage of the broadcasting service" (Ministry of Information and Broadcasting, 2024, p. 8). The regulatory framework also incorporates participatory expectations by requiring that at least 50% of broadcast content be generated with community participation.

Existing scholarship has debated the meaning and boundaries of the term "community" within community media (Bailur, 2012; Hess & Waller, 2016b); nevertheless, CRSs in India remain structurally oriented toward identifiable communities situated within geographically bounded coverage areas. This emphasis on community participation and

content aligns CRS with one of the core characteristics commonly associated with hyperlocal media.

4.2. News

Present regulations in India ban news and current affairs on CRSs. However, there are two exceptions to this ban:

(1). CRSs are allowed to source news exclusively from Akashwani. This is a strict rule, and the content can be broadcast verbatim or translated into the local language or dialect (Ministry of Information and Broadcasting, 2024, p. 5).

(2). Content that is essentially news but is treated as non-news can therefore be broadcast, like information about 'sporting events (excluding live coverage), traffic, weather, local cultural events, festivals, examinations, results, admissions, career counselling, availability of employment opportunities, public announcements (as provided by the local administration) pertaining to civic amenities like electricity, water supply, natural calamities, health alerts' (Ministry of Information and Broadcasting, 2024, p. 5).

Moreover, CRSs in India continue to broadcast news in one way or the other, as even in the presence of such a restrictive environment, "community radio news and journalism is alive and well. Though it may not necessarily take the form of a slick three-minute bulletin" (Backhaus, 2019, p. 101). Therefore, the exceptions and the practices incidentally fulfil the defining characteristic of news in hyperlocal media.

4.3. Local Geography

On close examination of policy guidelines issued by the government, it becomes clear that the intent is more to target geographically based local community rather than just any one special-interest community. One of the basic principles states that a CRS should "be designed to serve the local community in its coverage area" (Ministry of Information and Broadcasting, 2024, p. 1). The requirement in previous guidelines to be specific and well defined has been eliminated. The full emphasis on the 'local' requirement makes CRSs in India appear in their hyperlocal form. CRSs should intend to serve not just any community but a geographically based local community.

4.4. Other Provisions of CRS Policy Guidelines

Apart from the 'local community' principle, Policy Guidelines further regulate the technological aspect of CRSs, which incidentally places emphasis on local geography. For instance, a given CRS is "expected to cover a range of 5–10 km" (Ministry of Information and Broadcasting, 2024, p. 7). This small range reinforces the hyperlocal orientation and idea of community radio. Unlike FM radio stations, which can cover an entire city, CRSs cannot transmit beyond a small range. They can only cover a small area, and they must serve the local community within this area.

Furthermore, the guidelines mention that an applicant "will have to specify the geographical community or the community of interest it wants to cover" (Ministry of Information and Broadcasting, 2024, p. 8). The latter part, 'community of interest', does give the impression of turning away from the hyperlocal nature. However, it instantly becomes diluted when read with the basic principles and other relevant provisions and requirements already mentioned and explained above. Therefore, by virtue of basic principles, technological constraints, and the relevant sections of policy guidelines, CRSs also fulfil the final defining characteristic of hyperlocal media in India.

Whilst CRSs in India satisfy the hyperlocal media criteria, we synthesise the definition, placing emphasis on 'place' first and foremost, and go beyond news towards information.

Therefore, for the purposes of this paper, we operationalise community radio in India as follows:

Community radio is a hyperlocal, place-based, community-oriented medium that cooperates with the community to serve its hyperlocal information needs.

5. Methodology

Part of the study deals with critiquing Section 8 companies and shines light on the common practice of incorporating not-for-profit companies with specific objects within the identity of the organisation itself whilst they are associated with a defined geographic area. To demonstrate the same, an analysis of a list of not-for-profit companies registered under Section 25 of the Companies Act 1956 (now Section 8 of the Companies Act 2013), available from the Registrar of Companies, was carried out. This was the only available data made public by the Registrar of Companies and contained a list of 5528 companies registered with it up to 31 August 2014. The names and addresses of the companies were iterated over a list of states, districts, sub-districts, towns, and villages made available by census data from 2011. Only those companies in which both the name and address of the company contained the name of the location from the census list were filtered.

The other set of analyses were conducted to identify recurring thematic patterns and examine how keywords such as *locality* and *news* are contextually articulated within CRS institutional discourse. This empirical analysis is based on the Community Radio Compendium 2023 published by Commonwealth Educational Media Centre for Asia in partnership with the Government of India. The compendium provides institutionally standardised profiles of 236 licensed community radio stations (CRSs) across India and represents one of the most comprehensive publicly available compilations of the CRS sector currently available.

The compendium was selected because the present study is not concerned with programme reception or broadcast content but with how CRS publicly articulate their identity, purpose, community orientation, and programming priorities. The profiles included in the compendium function as official self-descriptions through which stations describe their thematic focus, target communities, flagship programmes, and broader objectives. As such, they provide a useful corpus for examining the discursive construction of locality, community, and informational roles within the CRS sector. The use of a single consolidated source also ensures consistency in formatting and presentation, making the corpus suitable for concordance and collocation analysis.

The compendium was originally available in PDF format. To enable systematic textual analysis, the relevant textual content was extracted and converted into a structured dataset using Python (version 3.13) programming scripts. Each CRS profile was transformed into row-based CSV format, with individual textual components assigned to distinct columns. Key columns extracted for analysis included thematic focus, and primetime programmes.

Prior to analysis, the corpus was preprocessed with Orange Data Mining software. Preprocessing steps like tokenisation at the word level, conversion to lowercase, removal of stopwords (refer to Appendix A for full list of stopwords) and lemmatisation using WordNet were applied. Different subsets of textual fields were used for subsequent collocation and concordance analyses, reflecting the distinct questions each analysis was intended to address.

5.1. Collocation Analysis

For collocation analysis, only the thematic focus field was used. This field represents the most condensed and institutionally curated articulation of a station's orientation and is therefore well suited to identifying dominant thematic clusters and development-oriented

vocabularies. Thereafter, bigram collocation analysis was performed using Pointwise Mutual Information (PMI), with a minimum frequency threshold of 20 used to minimise the influence of infrequent or isolated co-occurrences. The threshold helped to prioritise recurring thematic patterns across the corpus. This analysis was used to identify statistically salient thematic pairings within the thematic focus corpus. The aim was to examine whether CRS orientations clustered around place-based informational concerns or around sectoral development themes.

5.2. Concordance Analysis

For concordance analysis, a combined corpus was constructed using thematic focus and primetime programmes fields. These fields together capture both how stations describe themselves and what they highlight as their most significant programming. This combination allowed for the examination of how key terms (local and news) were used across both identity claims and programming practices.

The terms local and news were selected for concordance analysis because both are central to the conceptual and regulatory questions examined in this study. The term *local* was chosen due to the centrality of locality within definitions of hyperlocal media and because CRS policy guidelines repeatedly emphasise service to the "local community" and geographically bounded coverage areas. Examining the contextual usage of local allowed the study to assess how CRS themselves conceptualise locality within institutional discourse. The term news was selected because of the unique regulatory environment governing CRS in India, where independent news broadcasting is prohibited while certain forms of informational content remain permitted. Analysing the usage of news enabled the study to examine how CRS articulate informational functions and whether these are framed in relation to place-specific and everyday hyperlocal informational needs.

The analysis was conducted to examine terms usage in context. Rather than focusing on frequency alone, concordance allowed for close inspection of how these terms functioned within discourse. This was particularly important for assessing whether local operated as an operational place category or primarily as a rhetorical modifier, and whether *news* was framed as place-specific information or as generic and thematic content.

5.3. Data Limitations

The present study is based primarily on institutional self-descriptions contained within the Community Radio Compendium 2023. As a result, the analysis reflects how CRSs publicly represent and articulate their objectives, priorities, and community orientation, rather than providing direct evidence of actual broadcast practices or audience reception. The profiles included in the compendium may therefore contain aspirational, strategic, or idealised representations of institutional identity and programming priorities.

Furthermore, the stations in the compendium are not representative of all the CRS in India. For instance, no stations from the states of Madhya Pradesh, Odisha, Bihar, Chhattisgarh and Jharkhand are profiled in the compendium (Table 1).

The study is also limited by the linguistic structure of the source material. While CRSs across India operate in diverse linguistic and regional contexts, the compendium profiles are standardised and primarily presented in English. Consequently, the analysis does not capture regional linguistic variation, multilingual programming practices, or vernacular conceptualisations of locality that may emerge within actual broadcasts.

Additionally, the analysis of Section 8 companies relies on a publicly available list of companies, which is temporally dated. However, it was selected because it remains the only comprehensive publicly available government-published list of such entities.

Table 1. State-wise comparison of number of stations profiled in the compendium and total operational CRSs as on 11 April 2023.

State	Total	Compendium Count
Uttar Pradesh	46	33
Maharashtra	44	27
Tamil Nadu	41	40
Madhya Pradesh	30	*NA*
Odisha	26	*NA*
Rajasthan	23	18
Karnataka	22	18
Haryana	22	13
Kerala	18	19
Gujarat	13	10
Uttarakhand	13	10
Bihar	12	*NA*
Chhattisgarh	12	*NA*
Andhra Pradesh	11	9
West Bengal	11	3
Telangana	9	7
Punjab	7	6
Delhi	5	4
Himachal Pradesh	5	3
Jammu and Kashmir	5	1
Assam	4	3
Manipur	4	3
Chandigarh	4	2
Jharkhand	2	*NA*
Puducherry	2	3
Andaman and Nicobar Islands	1	*NA*
Nagaland	1	1
Sikkim	1	1

6. Findings

The following section presents findings derived from the companies list, concordance and collocation analyses. The analysis focuses on how locality, news, and thematic orientation are articulated within CRS discourse.

6.1. List of Companies with Defined Geographic Area and Associated Primary Object

The number of companies with a defined geographic area and their primary object within their identity was 310. The findings show that all the companies had very narrow and specific primary objects within their names, such as Jharkhand Film Exhibitors Association, Chandigarh Cricket League, Rudrapur City Club, Rajasthan Cricket League, and Patna Golf Club. Only two companies, Gurgaon First Foundation and Maharashtra Foundation India, had no primary object within the identity of their names.

6.2. Development-Oriented Thematic Framing

Collocation analysis of the *thematic focus* corpus revealed strong clustering around development-oriented vocabulary. The most statistically salient bigrams identified through Pointwise Mutual Information (PMI) included "gender equality", "women empowerment", "health hygiene", "education health", and "art culture" (Table 2). These collocations indicate the prevalence of vocabularies centred on social development, awareness generation, welfare, and cultural promotion.

Table 2. Bigrams using the Pointwise Mutual Information (PMI) method with frequency of 20.

Collocation	Score
Gender equality	6.948
Art culture	5.535
Women empowerment	5.213
Health hygiene	4.652
Education health	2.711

The collocation patterns therefore demonstrate that CRS discourse is substantially organised around development-oriented thematic categories. This thematic clustering was observable not only in isolated cases but across the broader corpus of station profiles analysed in the study.

6.3. Construction of Locality in CRS Discourse

Concordance analysis of the term "local" revealed recurring patterns in how CRSs conceptualise locality. Across the corpus, the term most frequently appeared in constructions such as "local culture", "local language", "local art and culture", and "local farmers". Stations commonly framed their role in terms of promoting local traditions, preserving cultural heritage, supporting local artists, or creating awareness among local communities. In these contexts, locality primarily functioned as a marker of cultural authenticity, identity, and social rootedness. The concordance analysis also showed that locality was comparatively less associated with public institutions, infrastructures, or systems that structure everyday life within a geographic area.

The findings therefore indicate that CRS discourse tends to construct locality primarily through cultural and developmental frames. While stations consistently emphasised their connection to local communities, locality was less frequently articulated to the informational needs of everyday place-based life.

6.4. Construction of News and Informational Output

Concordance analysis of the term "news" demonstrated that news-related discourse within CRS profiles was very limited and often framed in generic or formalised terms. Mentions of news frequently referred either to programme categories or to news bulletins sourced from All India Radio, in accordance with existing regulatory requirements. News was more commonly framed as a broadcast category or awareness-oriented content stream.

Taken together, the collocation and concordance analyses suggest convergence between how CRS describe their identity and how they frame their programming priorities. Across the corpus, thematic development-oriented vocabularies were consistently foregrounded in both CRS self-definition and highlighted programme content, while references to place-based informational concerns remained comparatively limited.

7. Discussion

This section first examines the structural tensions surrounding the inclusion of Section 8 companies within the CRS framework that was recommended by TRAI and synthesises the findings from collocation analysis to argue the risk of privileging thematic content being produced by such entities. Thereafter, the requirement of hyperlocal information needs is discussed with the findings from concordance analyses, and ultimately, the hyperlocal is proposed as a guiding principle for CRS policy.

7.1. Limitations of Section 8 Companies in the Context of TRAI's Recommendations

CRSs in India lack a fundamental guiding principle, and this leads to all kinds of anomalies in practices and policies. We argue that one of those anomalies is the recommendation by TRAI to allow Section 8 companies to set up CRS. TRAI refers to only two basic principles within its Policy Guidelines when justifying its recommendation: one, an organisation must be a legal entity, and second, it must be a non-profit organisation. TRAI also states that these not-for-profit companies must satisfy and adhere to the basic principles of the Policy Guidelines. However, this is not possible in practice, given the limitations of not-for-profit companies due to their nature and design, as explained in the following subsections. While it is beyond the scope of this paper to critically study the design and nature of Section 8 companies, a broader discussion of the rules and practices related to such companies is required, as they are prima facie in conflict with the hyperlocal nature of community radio.

7.1.1. Section 8(1)(a) Inflexibility

The law states that not-for-profit companies must specifically deal with the "promotion of commerce, art, science, sports, education, research, social welfare, religion, charity, protection of environment or any such other object" (*Companies act*, 2013). This means that one kind of community, for example an artistic community or research community, can come together to create a company to further its objectives. For such a company and community, there is only one objective.

This is not to say that Section 8 companies cannot have a geographical dimension to them. They can be bound to a specific geography, as demonstrated in the next section. However, inflexibility created by the primary objects of one kind enforces constraints that might limit the diversity of content on CRSs operated by such a company, as it will only be able to explore some aspects of the local community, like its artistic or cultural aspects, but not all of it. Therefore, the company will be unable to serve the different demands of the population residing in the coverage area.

7.1.2. Practice of Associating Geographical Area with the Primary Object

Section 8 permits the incorporation of companies whose name can include a geographically defined area. A common practice is to register companies with the name of the state or district in the name along with the primary object or function of the company.

As demonstrated in the findings, the common practice is to incorporate not-for-profit companies with specific objects within the name itself when associated with a defined geographic area, therefore giving no scope, legally or otherwise, for the company to move beyond those primary objects even when covering a specific area.

7.1.3. 'Undesirable Names' Condition

The rules prohibits incorporation of any company if the name contains "only the name of a continent, country, state, city" (*Companies (Incorporation) rules* (2014)). It also regulates the name at the level of activity by prohibiting the "use of descriptive names, where the name merely consists of commonly used words to describe an activity" (*Companies (Incorporation) rules* (2014)). Therefore, a not-for-profit company cannot be legally incorporated with the name of the defined geographic area with words like 'radio' or 'community radio' to be broad enough to cover all aspects in its content.

7.1.4. Likelihood of Thematic Content

Community radio is generally known for producing thematic content. There is a problem with monopoly of discourse on CRSs because of the development agenda. Pavarala

(2015) notes the "legacy of the postcolonial nation building project" that results in community radio being used solely as a channel to communicate only development-related content. This paradigm perceives people "as passive recipients of information" (Pavarala, 2015), and as a result, the "development agenda overpowers the potential of community radio for journalism, activism, communication rights, and acting as an alternative public sphere" (Backhaus, 2019, p. 100). This view is substantiated by the collocation analysis conducted in this study, wherein terms like gender equality, art culture, women's empowerment, health hygiene, and education health were dominant. These collocations are indicative of a vocabulary organised around normative development domains rather than place-based informational concerns. When this is combined with Section 8 companies' primary objects, the likelihood of content becoming more thematic becomes exponential.

One might contest that the principle demands that emphasis be placed on the design of CRSs only and not to the design or nature of the organisation that is operating the community radio station. That is to say that the station itself, and not the organisation operating it, should be designed to comply with basic principles. Therefore, it can be argued that the limitations that apply to Section 8 companies do not apply to CRSs themselves. This, however, is not always the case. For instance, there is a problem with NGO-isation of CRSs wherein "some organisations are beginning to enter the arena solely to further the organisational objectives... [and] programmatic agendas of NGOs tend to dictate the content" (Pavarala, 2015). This means that the station is not per se independent of the organisation that operates it. Similarly, Section 8 companies are governed by the Memorandum of Association adopted by it during its incorporation and guided by its primary objects and limitations thereof. Therefore, these organisations are legally bound to work towards those objects and therefore might design CRSs and their content that is faithful to those objects only, and they might effectively result in the NFPO-isation (not-for-profit organisation-isation) of CRSs.

This prima facie shows that Section 8 companies are probably ill suited to handling CRSs. For the purposes of this paper, however, what is important to note is that without a fundamental guiding principle, policy debates produce valid suggestions that might be applicable but end up underappreciating or frustrating the potential of the medium. TRAI's recommendations in this regard are valid, but they are fundamentally problematic, as both stakeholders and TRAI were contemplating an issue without a solid and fundamental guiding principle, thereby complicating discussions.

7.2. Toward a Hyperlocal Principle

CRSs in India are structurally a hyperlocal medium but are not genuinely faithful to the hyperlocal principle. The focus tends to be on one specific community, and the differential importance given to a particular community or community of interest is more than that given to the area and its population. Our concordance analysis showed that across the corpus, *local* most frequently appears in constructions such as local culture, local art and culture, local farmers, and local language. For instance, Hello BAOU radio aims to promote "local art and culture", or "create awareness among local people". Moreover, CRSs that are run by educational institutes, for instance, rarely mention their own student community as one of their foci, even when student volunteers operate them, and these students sometimes form much of the population in the coverage area. In these contexts, locality is invoked as a marker of authenticity, identity, or legitimacy, rather than as a determinant of specific informational needs. The term operates rhetorically, reinforcing the moral and cultural grounding of CRSs, while leaving the informational dimensions of locality largely unspecified. For this reason, even when CRSs in India showcase characteristics of hyperlocal media, they are unable to properly function as hyperlocal media, because

the importance is effectively given to one community. Hence, the operations and content revolve around that community rather than the geographical area and its population. Moreover, as is the case with NGO-isation, Section 8 companies are also likely to serve a subset of the community within the identified local community, like an artistic or linguistic community, due to their design and nature; therefore, they are useful only for an extremely small homogeneous community that is residing in an area consisting of a heterogeneous population. This, in turn, makes content for most people "irrelevant, or at least not as valuable as other types of content which might bring. . . more value" (Dhanjani, 2022).

7.2.1. The Need for a Hyperlocal Lens

Community radio is considered a natural part of community media and tends to overlap with hyperlocal media in terms of categorisation. Both community media and hyperlocal media focus on communities. However, unlike community media wherein the community is the foremost element, it is the geography or locality that takes precedence in hyperlocal media, with community as its orientation or focus but not as its centre. While community media can exist without physical geography by serving the community of interest that is based on a shared interest or topic rather than the same geographical location (Harcup, 2014), hyperlocal media is inconceivable without its relationship to the community of place, which "occurs in a geographical location where people actually live, interact, and share a sense of place identity" (McKnight et al., 2017). As community radio is situated in a fixed physical space and is bounded by geography, it gives precedence to place, with its orientation towards the community residing within that place, therefore focusing on a community of place in a hyperlocal area. Importantly, there is no defined area or radius that is associated with the community of place. Hence, the use of the term hyperlocal, rather than the term community of place, is necessary.

Moreover, given the nature of radio and regulations in India, multiple communities residing in the same geographical area cannot operate multiple CRSs to serve their own interests. Unlike print or digital media, community radio uses a spectrum that is a scarce and limited resource. In the context of India, only five frequencies are reserved for CRSs—89.6 MHz, 90.0 MHz, 90.4 MHz, 90.8 MHz, and 91.2 MHz (Telecom Regulatory Authority of India, 2023a, p. 17). Given this limited set of frequencies, 800 kHz of channel spacing (Bhat, 2020), and blocking of allocated frequency for 50 KM and 30 KM in rural and urban areas, respectively (Telecom Regulatory Authority of India, 2023a, p. 17), it is not possible for different communities to start their own CRS within or in the nearby area of an established CRS. Therefore, it is important for CRSs to shift their focus from a specific community to all the communities in the locality. Hyperlocal as a term in that sense provides inclusivity for all communities within the defined area and is more appropriate given the limited resources CRSs utilise and the strict regulatory environment that they operate in.

7.2.2. Hyperlocal Information Needs

People actively seek and demand hyperlocal information related to 'community initiatives, education, emergency information, hyperlocal news, hyperlocal events, local jobs, hobbies, general local knowledge, etc.' (Mukhtar et al., 2021). Similarly, during times of disaster, the "need for real-time and critical information that could save lives is often hyperlocal" (Bose & Koshy, 2015). However, concordance analyses conducted for the term *news* to assess how CRS conceptualise informational output show disregard for the hyperlocal information needs of the population in the coverage area. Mentions of news typically refer to generic bulletins or relayed content from All India Radio, and news is rarely framed as place-specific hyperlocal information. This insight is particularly striking and significant,

as hyperlocal information needs can easily be mapped to the 'non-news' items that are already permitted by the government, allowing CRSs to broadcast such content.

Moreover, CRSs in India need to evolve while considering the rate of internal migration, the country's ambition for urbanisation, and the diversity of the population. It can be safely stated that migration makes it important to have such systems in place that can fulfil hyperlocal information needs. Migrants who are new to the city and in search of a better life and opportunities need access to such information. The same is true for those who undertake rural-to-rural migration. However, only three CRSs mention the migrant community as one of their foci. This paper, however, does not intend to place an exclusive focus on the migrant population but to highlight them as one of the many groups that are not accounted for in CRS discussions in India.

7.2.3. Hyperlocal Principle

Malik (2015) proposes 13 codes of practice for CR in India by synthesising various guidelines, codes, and practices provided by government, multilateral agencies, and academic discourses globally "so that the sector as a whole does not lose its primary and fundamental philosophy, purpose, and essence of inclusivity and diversity" (Malik, 2015). These codes fall short of one important consideration, i.e., that of accounting for all in the immediate locality, even when recommending to 'serve a recognisable community'. A recognisable community is the starting point and lays down the minimum, not the maximum, of what a CRS must consider when accounting for whom to serve. The recommended code of 'protecting and augmenting cultural and linguistic diversity' rather ends up disregarding many groups by stating that "the programmes of CR stations should. . . be in the local language and dialect(s)" (Malik, 2015). This does not factor in migrants or students from other states who cannot understand or communicate effectively in the language of the local community that consists of and is dominated by permanent residents of that area, even though these groups are part of the locality and community for a significant time. It equally applies to groups like tourists and pilgrims who might speak different languages and are stuck in the locality during times of disaster and need access to real-time critical hyperlocal information in a language that they can understand, as it can save their lives.

In this context, hyperlocality as a principle becomes useful. As a term, hyperlocal implies geographical space, locality, place, and a small, limited range. Hyperlocal is an inclusive term and demands the flexibility to evolve according to the ever-changing realities and demography of a geographical area. The loyalty of hyperlocal is fluid and is towards its present population consisting of heterogeneous people, rather than to one particular community that may culturally or socially dominate the defined area presently with its primordial loyalties. Hyperlocal embraces diversity, especially in a large, diverse, and developing country like India, wherein citizens have the right to settle anywhere in the country and speak different languages. More importantly, hyperlocal brings under its ambit groups like migrants, tourists, pilgrims, and various other groups. They are also in need of hyperlocal information, along with the permanent residents of the area. The hyperlocal principle ensures that airwaves that are considered public property are not appropriated by a homogeneous community in an area consisting of a heterogeneous population. The hyperlocal principle, therefore, reorients the focus on geography and community of place first and foremost so that the demands of a particular locality and geography are considered. Once looked at from this perspective, this principle allows the demands of, for example, CRSs in coastal areas like Kadal Osai FM to be considered. The radio station wishes to expand its range of transmission to be able to reach the "fishermen at sea [as well as] guide and assist pilgrims at Rameswaram" (Community Radio Association, 2022). CRSs, after all, are meant for the whole of the local population, not one part of it.

Moreover, any organisation or policy related to CRS should be consistent with the hyperlocal principle. As we have argued that CRS guidelines are already hyperlocal in nature, what remains is to introduce the term as a guiding principle. This can be achieved by amending policy guidelines and by adding the operational definition of community radio we have utilised. The other part is the basic principles section of the guidelines, one of which presently states that "CRS. . . should be designed to serve the local community in its coverage area". This could be replaced with "CRS. . . should be designed to serve the hyperlocal information needs of communities residing in its coverage area." In addition to this, content regulations should explicitly state hyperlocal information when referring to non-news categories. For example, "hyperlocal information pertaining to and coverage of cultural events, festivals" is better suited.

Similarly, policies, recommendations, and organisational design become easy to identify once seen through the hyperlocal lens, and any kind of deviation and anomaly can easily be detected. Using the hyperlocal lens, it becomes easy to reason that Section 8 not-for-profit companies are limited by their form and nature and hence cannot be all-encompassing to fulfil the needs and demands of the local population, and they are, therefore, inconsistent with the hyperlocal principle.

The hyperlocal principle in CRS policy brings in much-needed clarity, inclusivity, and flexibility. It is receptive to the hyperlocal information needs of people in the coverage area, and furthermore, it disallows any policy or organisational design whose nature and form do not permit it to cover all aspects of the community of place in a geographical area. Therefore, the inclusion of the hyperlocal principle in policy design and debates will not only be faithful to the medium and the purpose of community radio in India but will also allow the medium to be utilised to its full potential.

8. Conclusions

CRSs in India are essentially a hyperlocal medium as they share the defining characteristics of hyperlocal media and align with the basic principles issued by the government. However, they continue to lack this much-needed assertion, resulting in confusing outcomes in policy discussions and recommendations, as well as programming priorities of CRSs themselves. The question of inclusion of Section 8 companies, disapproval by majority stakeholders, and subsequent approval by TRAI has created an avoidable conundrum. TRAI's recommendations cannot be contested at the level of validity. Similarly, CRS operators' self-perception is largely developmental, and this is partly created because CRSs in India lack the fundamental guiding principle of being hyperlocal.

At the same time, given the hyperlocal information needs of people and the heterogeneous population of a given area, a medium like community radio should be utilised to its full potential to fulfil those needs. Any organisation operating such a CRS should be capable in its design of affording inclusivity of objects and flexibility to evolve with ever-changing informational needs and demography.

This paper's primary focus was on forwarding the hyperlocal principle. Hyperlocal, as a term, is inclusive and flexible. The inclusion of the hyperlocal principle brings much-needed clarity to policy debates and design regarding CRSs in India. Moreover, any policy, organisation, or CRS designed without the hyperlocal principle will create means that are frustrating and ill suited to the real demands of the population and their hyperlocal information needs. Consequently, it moves the focus from the immediate local community, thereby making content either generic or irrelevant and ultimately less valuable. The hyperlocal principle, therefore, aligns the entire ecosystem of CRSs in India to its purpose and incidentally fulfils the medium's true potential.

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Appendix A

List of stopwords:

- radio
- community
- crs
- thematic
- focus
- primary
- area
- areas
- focuses
- programme
- programmes
- also
- cr
- primetime
- broadcast

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