Role of Media in Building Political Image of Narendra Modi: A Psyphological Study

SK WaseemAkram

Andhra University, India.

Abstract

The present paper is a psyphological study to analyse the role played by the various mediain building the political identity of the NarendraModiandBharatiyaJanata Party getting into power in Centre and many States, by making people believe, that NarandraModi led BJP was the one and only alternative to the India. As media content has strong influence on the viewers the propaganda of BJP helped a lot and succeeded in winning the LokSabhaand many Assembly elections, by making the masses pro-BJP and against the anti-BJP and their allies, Using content analysis as a method, the paper has attempted to analyse the media strategy in 2002, 2007 and 2012 Gujarat Assembly elections, 2014 and 2019 LokSabha elections, 2017 Uttar Pradesh Legislative Assembly elections and 2020 Delhi Legislative Assembly elections.Then media tactics used by the Modi Government to avoid anti-incumbency were discussed with the help of agenda setting theory, which are mainly media supressing steps followed by its consequences.

Key Words: BJP,NarendraModi,Nationalism,Political identity,Psyphology.

Date of Submission: 20-09-2020 Date of Acceptance: 04-10-2020

I. INTRODUCTION

Prime Minister of India NarendraModi is a Indian Politician who was trained in RastriyaSwayamSevakSangh (RSS) for his early childhood, is the personification of the major change in the Indian politics by becoming a Non-Congress Prime Minister twice in the history of India, by decreasing the vote share of 9.03% of the then ruling Congress (total voting share 19.52%) and increasing the BJP voting share to 12.5% (total voting share 31.34%) in 2014 LokSabha elections,¹ the same swing continued even in 2019 LokSabha elections without any anti-incumbency effect, in 2019 BJP's voting share further increased by 6.02% (total voting share 37.36%) meanwhile its Opposition losses its voting share by 1.03% further (total voting share 19.01%) this huge victory was considered as the biggest ever victory in the history of the political sphere of Indian subcontinent, as a result the majority of the psyphologists assume that the era of coalitions central governments with a moderately weak national party with the local political parties in power determining the balance of power at Delhi has decisively come to an end. This coalition government pattern which began in 1977 after the end of Emergencycontinued till 2014 with a single exception of the Rajiv Gandhi's Prime Ministers regime between 1984 and 1989², as the mercy factor of his mother Indira Gandhi's assassination plays a vital role.³ One of the main reason behind this all grand successes was that majority of media houses were heavily backing the Modi's policies and his Hindutya agenda. All the admirers of the Modi call him NaMo lovingly in his honour.

II. RESEARCH QUESTIONS

2.1 Research Objectives:

a. To examine how the fourth pillar of democracy has turned its cause from educating the public to favouring a particular political party or person.

b. To know how the media freedom has effected while media is carrying its watchdog function.

c. To analyse how media is functioning to tarnish the image of its opponents.

2.2 Research Hypothesis:

a. The watchdog of the democracy, which aims at protecting the rights of marginalised and downtrodden classes of the society, changed its cause to support and build a particular political party and its ideology.

b. Previously Media house ownership has prominent role to play in its editorial, which gets changed due to various press repressive steps taken by the Government.

2.3 Research Methodology:

The present research is qualitative research and content analysis and the Agenda Setting theory were used as research tools to examine how the BJP supporting media has portrayed NarendraModi, by setting an Agenda

which helps in creation of paersonality based on the content which the media spreads in a way that public considers it as need of the hour as said in Agenda Setting Theory, it helps to influence the viewers and create a desired public opinion. There after content analysis method is used to critically analyse, to relate such words and concepts which will help to make inference from the content of the media.

2.4 Limitations:

Due to scarcity of time and space, the researcher analyses the content of only those news channels which are pro BJP. Similarly, the researcher could only focus on the few instances from 2001 when NarendraModi became Chief Minister of Gujarat to the latest Corona Pandemic. Multi-method analysis could not be carried out. No responses from the experts were included as their responses are either completely supporting or opposing in nature as Hindutva a religious sentiment was involved.

III. HISTORY OF MEDIA USAGE BY NARENDRAMODI:

Since the NarendraModi entered into full time politics, he productively used the all forms of media in a creative manner, such that no other political party or figure has ever used, which includes both the legal usage and illegal and illegal means.

3.1 Media driven Gujarat election victories of NarendraModi:

Modi initially entered into BJP in 1985, with in short span Modi was elected secretary of the BJP's Gujarat unit in 1987 but he entered into electoral politics in 1994, and supported and advised in many elections and rallies of BJP in Indian subcontinent, on October 07, 2001 Modibecame Chief Minister of Gujarat succeeding Keshubai Patel, with the responsibility of winning the BJP for the December 2002 Legislative Assembly elections, and entered the Gujarat state legislature on February 24, 2002 by winning the by-election of Rajkot-II constituency, by defeating Ashwin Mehta of the INC by 14,728 votes. Soon he became the Chief Minister of Gujarat communal disturbances were started, on February 27, 2002, a train which was returning from Ayodhya after religious ceremony at the disputed site of the demolished Babri Masjid was burnt by Muslims resulting in death of 60 people, Modi informed the media that it was a pre-planned terror attack, on February 28, 2002, the Hindu Organizations call for shutdown, then the way the State Government move the bodies to Ahmadabad with State honours further escalated the tensions among both Hindus and Muslims, when it was telecasted in television as a result communal riots were happened resulted in death of 790 Muslims and 254 Hindus as per Government records, but factual figures may be more than 2000, including mass rapes and mutilations of the body parts of especially women, Lacks of victims especially Muslims were forced to live in refugee camps, after the riots finished the State Government announced compensation for Muslim victims would be half of that offered to Hindus, which was reversed by the court, Modi's personal involvement in the riots were always controversial. During the riots, Modi said that "What is happening is a chain of action and reaction." After severe criticism Modi dissolved the assembly and insisted on organizing elections quickly in spite of a denial of election commissioner who said that the situation unfavourable for polling as at least for the tens of thousands of Muslim refugees who had left or lost their homes are living in refugee shelters, but polling occurs in instance of Modi, as Modi's pre planning of the religious polarization of Hindus was already done as the State has more than 80% of population are Hindus.⁴ In one of the television commercial of BJP during elections shows a Train in a station and mob's raid on train followed by screams of women and children then after few movements Modi picture appears and try to assure that Modi was the only person who can save Gujarat from such riots, all these religious polarisations in the television by Modi succeeded as a result Modi led BJP won December 2002 Assembly elections in a manner ever before.⁵

The same strategy of media building of person's identity was followed in a further advanced way in 2007 Gujarat Assembly elections, Modiinstrumentalised television in a subtler manner in 2007 election campaign, in which he used the developmental model of Gujarat instead of religious polarisation, Modi launched a channel Vande Gujarat which means Hail Gujarat, which he first used to telecast the programmes which are associated with Gujarat's identity. The professional manner in which this channel telecasts the campaign amazed everyone across the Globe, as the Party campaign public relations were given to a Washington-based PR and lobbying firm, APCO Worldwide, which was the then, "the second largest independent PR firm in America," and charged about US\$25,000 a month to manage Modi's account, a price more than the costs to conduct biennial industrial summit, "Vibrant Gujarat" (Vishnu 2011). The APCO had already worked for the Nigerian dictator SaniAbacha; the president for life of Kazakhstan, NursultanNazarbayev; and the former Russian oligarch, Mikhail Khodorkovsky. Modi also identified the innovative modes of communication using the latest technology in 2007. By using internet he used to read about 200–250 e-mails he received daily from citizens of Gujarat and responded to 10 percent of them and ordered the bureaucrats to take action in this regard, and the fourteen out of fifty-two million Gujaratis who had a cell phone at the time enabled Modi to send thousands of SMS and MMS to potential voters as well as party cadres.⁶

During 2012 Assembly elections the Modi's use of media was so new and affective, Modi launched a new TV channel calledNaMo, then held a series of virtual public meetings which was new at those times this enables appearance ofModi's hologram on stage in 3D simultaneously in different locations across, along with new modes of communication he also addressed 125 rallies in the first fifteen days of December 2012, or ten meetings a day in a conventional manner, Yet his use of 3D technology reveals his attention to the exceptional power of images in politics (and in Indian civilization or culture). He held 132 holographic shows during the 2012 election campaign to communicate directly with a huge number of citizens, at the cost of Rs. 150 crore.⁷All these electronic communication strategy bring back BJP in the third time also without any anti-incumbency effect.

One thing here to noteworthy was that Modi always tagged himself first followed by the party and its prominent leaders, this clearly shows that Modi always wants to build his own personality by use of innovative new modes of communication as a result many new changes happened which was linked with his name like Modikurta, wearing a Modi mask in campaigning and showing in media results that the persons who were campaigning and their supporters presume as the lackhs of Modis are working for the victory of the Modi. This helped him in footing the national politics directly as a Prime Ministerial candidate in 2014 LokSabha elections.

3.20Modi's Media Strategy to Pluck out the Congress in Centre in 2014 LokSabha Elections:

Modi's media strategy for the 2014 LokSabha elections revolve mainly around four agendas, clean-up the tarnished past to the idle model, Make a National brand from State brand, Focus on development agenda, directly connect with urban youth voters and industrialists.

3.2.1 Clean-up the tarnished past to the idle model: The biggest hurdles for the Brand Modi in national level was that as the Gujarat is a Hindu dominant State and Muslims are minorities, Modi'sHindutva agenda worked despite of communal clashes and death of 2000, because of this the image of Modi gets tarnished across the Globe especially in Indian subcontinent, to tackle this the agenda of media shifted public attention away from the 2002 communal riots of Gujarat. Initially, Modi's supporters attempted in public debate and try to prove him as innocent, which later changed from proving Modi's innocence in Gujarat riots to the recent developmental achievements in Gujarat.As the Party come to know, that people need betterment of life with Hindutva in right direction. They focused on building Modi's image as self-made, strong, efficient, inspiring, and incorruptible.⁸

Marketing experts compare this Modi led BJP strategy with the Cadbury, PepsiCo and Coca-Cola as they struggled to save their brand-taint. Cadbury brand accused forhaving worms in its chocolates, while the two beverages were infamous for having high dose of pesticides in their drinks. The way these multi companies tackled the situation was not indulging in talking too much, but to acknowledge it happened, and then move on, as the more one talks about, the more the memory for that event gets activated among the target market, and they remember it more. Hence the Modiled BJP alsodid not talk about it,or if they did, they kept it to a minimum, which worked well for both Multinational companies and Modi led BJP and they not even take responsibility for the incident or seek public apology, while most companies do so.⁹

3.2.2 Make a National brand from State brand: During 2014 election campaign Modi led BJP team faced three main challenges, when Modi selected as country's next NDA prime minister. The first one was that Modi always has a strong regional command with huge criticism in nation for alleged involvement in 2002 riots, the second one was, a 63-year-old was seeking to connect with the youth considering that this year's election had almost 150 million first-time voters. Modi, who rarely chooses to speak in English, was trying also to connect with the urban, middle-class audience that is becoming more politically conscious, despite of all these as BJP's agenda was developmental based on Gujarat the then recent incident which helped him in national scene was the shifting of Tata Motors factory in 2008 for the Nano minicar from West Bengal to Gujarat.¹⁰

Sridhar Samu, Assistant Professor of Marketing at Hyderabad's Indian School of Business (ISB), opened that, it's not easy for most product brands to go from regional to national, unless the dilution of the other national brand i.e. Congress, along with the regional brandassurance to fulfil the demand of the national. According to Y.L.R Moorthi, Professor of Marketing at the Indian Institute of Management, Bangalore, there is a difference between a regional brand going national and a politician going national. He says Modi was known outside Gujarat even before he decided to move beyond the state, just as Nitish Kumar and J. Jayalalithaa, chief ministers of Bihar and Tamil Nadu, respectively, are known. But these regional leaders didn't venture out of their home states in the recent elections as Modi did. And he did it at a massive scale, by attending more than 5,000 events and 470 political rallies across the length and breadth of the country.¹¹

Making a national brand from State brand can be compared with the Haldiram a Nagpur based snacks company with regional food stuffs and SaravanaBhavana Tamil Nadu based outlets which produce South Indian sweets and savouries (especially Tamil foods) have managed to enter into the national market from their

regional markets, underlying the need for tasty snacks of Maharashtra foods and south Indian to the national and international market.¹²

3.2.3 Focus on development agenda: Even before the Modi selected as Prime Ministerial candidate, on February 6, 2013, he was already clear about his agenda during elections, as Modi addresses the students in Delhi's ShriRam College of Commerce, He talked about Gujarat's model of development, the need for speed in government decision-making and about the need to improve skills of the youth to accelerate economic growth. Which results in clarifying his agenda thus results in enormous influence in the minds of electorates. He also highlighted the various issues like slowing economic growth, high inflation and lack of new job, issues which immediately resonate with young and urban voters, blaming the Congress-led United Progressive Alliance government for the problems.¹³

3.2.4 Connect with urban youth voters and industrialists: Modi's efforts to connect with the youth and urban voters were helped a lot as youth in 2014 election had almost 150 million first-time voters as in no small measure by his pro-business persona. Business leaders from industry doyen Ratan Tata to billionaire brothers Mukesh and Anil Ambani have praised Modi and his administration in Gujarat. This has allowed Modi to build his brand as a progressive leader who has the ability to deliver economic results - the single biggest leitmotif of this campaign that has allowed it to cut through caste bias among other things.¹⁴

The fact was also not deniable that the there is no doubt that the Congress stand and agenda remains confused in election campaign, led by an uninspiring leader, Rahul Gandhi, the corruption scandals which faced by most of the UPA Ministers also lays a seedling in the minds of voters, which creates huge anti-incumbency against the UPA regime and the government's inability to control inflation and tackle the economic slowdown, contributed in a large measure in discrediting the Congress. In addition to these factors, Prime Minister Manmohan Singh's also portrayed as aweak and uncommunicative leader, who works as a puppet in the hands of the UPA Chairperson Sonia Gandhi was also instrumental in destroying Congress credibility. The BJP succeeded in exploiting these issues effectively by projecting Modi as a capable administrator and a decisive leader.¹⁵

3.2.5 Effective Media strategy:

After the elections were announced, Modi's marketing team started influencing voters with print, television and radio advertisements with the same themes. It reached voters through text messages and Modi's recorded voice seeking votes for him. They also entered into social media platforms such as Facebook, YouTube and Twitter, Modi has about four million Twitter followers, to assess the impact of the advertising and branding campaign.¹⁶

Senior BJP leaders PiyushGoyal and Ajay Singh handled the overall media strategy, and a special task force was constituted to handle Modi's campaign in Varanasi. Advertising experts like Ogilvy & Mather's PiyushPandey, McCann Worldgroup'sPrasoon Joshi and Sam Balsara of Madison World were used. Advertising agency Soho Square, part of the WPP Group, handled television, radio and print campaigns with catchy slogans such as "AbkiBaarModiSarkar". These PR firms were involved in writing books and comics of Modi'stales of childhood, were he portrayed as a child hero(BalNarendra) by writing a story about a child swimming across a crocodile-infested lake to plant a flag on a memorial, then when he grows up he gets away from the family for the public and national cause.¹⁷

All these were happening along with the destroying the Congress image by repeated media coverage on its scams and inefficiency of the both incumbent Prime Minister and the party stalwart Rahul Gandhi, in all forms of media from conventional print media to new age social media, with special focus on the television.

3.3 Media Strategy in 2019 LokSabha Elections:

After five years Modi Government rule in Centre results in slowing down of economy, high rate of unemployment, liquidity crisis and consumption slowdown. Hence BJP leaders avoided talking about the economy, unemployment etc.and they start about marketing about uniting India, and he talked about encounter in terrorist camps in Pakistan. This made people feel that there is a strong leader who is standing up for them.¹⁸

Modi, led BJP started a series of slogans like 'Phir el Br ModiSarkar', 'Main BhiChowkidar' campaign, with hours, millions added the prefix 'Chowkidar' to their Twitter handles. As BJPhas been in preparation since they won 2014 election, responded to theModi slogan Opposition spread 'ChowkidarChorHai' slogan within hours and they talked about 'Nyay', (justice), The Congress did talk about creating jobs and about agriculture, as usual in 2019 elections also Congress had not even decided on its advertising agency even a month before the election.¹⁹

Modi led BJP used the media to the threshold level they used each and every media including print, radio, TV, along with the all platforms of the social media, they don't even spared the school and college alumni groups on WhatsApp, along with the Facebook and Twitter and enormous BJP ads in the internet, Modialso usedNamo TV and his biopic on Eros Now, which deviated the Election Commission norms, interview with actor Akshay Kumar, where he talked him as a non-political person. Though the Election Commission had

ordered the withdrawal of Namo TV and his biopic, but the enormous impact on the public has already done by thesehence it was known as 360-degree marketing approach by the marketing experts.²⁰ As a result the Modi Government comes back to the Government with thumping majority ever before in the Indian history.

3.4 Media Strategy in Uttar Pradesh 2017 Assembly Elections:

Each state election is important for a Political Party but Uttar Pradesh is especially significant because the state accounts for 80 seats in the LokSabha, 31 seats in the RajyaSabha and has a crucial stake in determining the outcome of presidential elections, and hence it is believed by most of the psyphologists that the Delhi throne via Uttar Pradesh, that means whoever wins Uttar Pradesh Assembly will rule the Centre and proves in 2019 LokSabha elections.²¹

The Assembly won by BJP by 325 seats with an 81% strike rate and 41.5% vote share, is not just historic but also signifies absolute trust and faith in Prime Minister NarendraModiin State also as no Chief Minister Candidate was announced till the announcement of BJP's victory, responding to this victory even the Congress allies like Omar Abdullah former Jammu and Kashmir Chief Minister tweeted that at juncture the opposition should forget 2019 LokSabha elections and prepare for 2024.²²

The reason for this thumping victory was also the Modi's media strategy by posing Modi's developmental model, egalitarianism, nationalism etc. in various media platforms especially in television and social media platforms, in his election campaign Modi also said that the upcoming elections will be fought in mobile phone, which clearly demonstrates his strategy of media usage. Modi's electoral campaign took place on the streets of rural India as much as it took place on social media platforms.²³

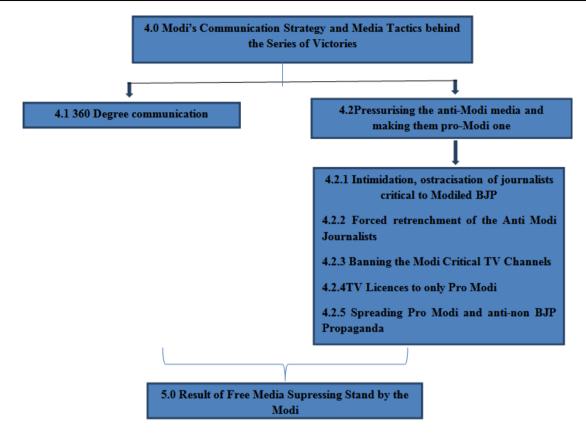
3.5 Media Strategy in 2020, Delhi Assembly Elections:

Media plays the major role in Modi led BJP's 2020 Delhi Assembly Election failure, as the Modi run media houses always targeted Rahul Gandhi as an incapable person with dynastic background, also victimised by consistent social media propaganda and mockery, including those carried out by the mainstream media, by questioning him nonsensical questions to lift up Modi's image and create a fake aura around him which worked to tarnish his reputation. But Modi and his media were unable to target the AravindKejariwal led AamAadmi Party (AAP) or we can also say that they do not pay much attention to the Kejariwal,²⁴ along with the BJP strategy of Citizenship Amendment Act, 2019, (CAA) and National Population Register (NPR) as pro nationalism were also failed, meanwhile the Congress who opposed the CAA and NPR and supported the Muslim community also failed, the AAP MLA RaghavChaddha rightly said the BJP who tries to polarise the Hindu votes failed and AAP who does good governance with zero tolerance to corruption wins.²⁵

In this case there is no alternative (TINA) factor played as the opposition Chief Ministerial candidate Manoj Tiwari has no similarity with the Kejariwal. As a result the Modi led BJP media failed to create any antiincumbency in the minds of the Delhi voters. Here Kejariwalpayed the same game which was played by Modi in 2014 and 2019 LokSabha elections by crating TINA factor in his favour.²⁶

IV. MODI'S COMMUNICATION STRATEGY AND MEDIA TACTICS BEHIND THE SERIES OF VICTORIES:

There are two media strategies used by BJP led Modi one was 360 degree communication and pressurising the anti-Modi media and making them pro-Modi one.



4.1 360 Degree communication Strategy:

Modi as an extraordinary orator, his oratory skills along with the extensive use of media inn complete 360 angle worked for BJP to retain in power, but before the arrival of Moid's in Central the national Media Houses were divided between the Leftist and Rightist ideologies as these media houses were owned by the either politicians or the persons who have either direct or indirect relationship with the political parties, hence the media has its own freedom in news and editorial policy. The BJP supporting Medias include the Zee Group as its Chief Subhash Chandra was a former RajyaSabha Member who wins with the support of BJP, the Republic Group Chiefs i.e. ArnabGoswami and Rajeev Chandrasekharan who is BJP RajyaSabha Member etc. in broadcast media, DanikJagron, Indian Express, DNA, Punjab Kesari etc. in print media support BJP. The Congress Party is not an exception it has its own media supporters like ABP news, NDTV group etc. in broadcast media and Hindustan, Amrit Bazar Patrika etc. in print media.

After Modibecame Prime Minister in 2014, he effectively cut off all communication with the media, expect messaging through tweets, radio programmes like Man Ki Baat (word of Heart) and pre scripted interviews with pro Modi media houses, which was considered as delivering a one-way series of monologues. By exponential rise in the use of social media in India, the government exploited to the hilt to target critics, mobilise public opinion, and use tags like "anti-national," to discredit anyone showing a hint anti BJP ruling. It is estimated that between 2016 and 2018 alone, the number of Indians using social networks grew from 168 million to 326 million, making it a handy tool for the ruling party to spread half-truths and fake news through a cobweb of unofficial accounts.²⁷The most horrifying aspect is the second one i.e. Media Tactics as discussed below.

4.2Pressurising the anti-Modi media and making them pro-Modi one:

The government officiallyhas also done its worstby Raiding news channels, boycotting prime-time debates, stopping government advertising significant source of revenue for the industry, pressuring the media house to retrench the journalists who raise any anti-incumbency voices against the BJP led Governments, banning the TV channels which raise voices against the BJP etc. have been among the horrifying tactics used by the Modi led BJP Government.

4.2.1 Intimidation, ostracisation of journalists critical to Modiled BJP:

According to the Reuters the journalists critical to Modi or BJP have been threatened with physical harm, abused on social media and ostracised by Modi's administration. According to Reporters without Borders, "with Hindu nationalists trying to purge all manifestations of 'anti-national' thought from the national debate,

self-censorship is growing in the mainstream media and journalists are increasingly the targets of online smear campaigns by the most radical nationalists, who vilify them and even threaten physical reprisals" andIndian journalists being killed because of what they write, like GauriLankesh, a vocal advocate of secularism and critic of right-wing political ideology, sometimes anti BJP journalists gets trolled in social media, along with intimidation to murder or rape of their family and friends. The main reason for leaning of the journalists in favour of Modi was pressure from the media owners themselves, because the media proprietors, who often have multiple kinds of businesses were pressurised by the Government in various ways as a result all most all media houses started favouring Modi led BJP Government.²⁸

4.2.2 Forced retrenchment of the Anti ModiJournalists:

The trend the Modi led BJP started in 2016 by retrenchment of the employment of Bobby Ghosh, editor of the Hindustan Times after he meets the Chief of Hindustan Group ShobhanaBharatiya, Ghosh forced to resigned from the newspaper for his leadership to chronicle hate crimes in India which portrays government's role in spreading hate and instigating mob lynching, after the exit of Ghosh the Hate Crimes also stopped,²⁹ this trend was continuing even today. In the same year Outlook magazine retrenched its editor-in-chief, Krishna Prasad, for publication of an article exposing the involvement of people linked to the RSS in the trafficking of young girls in Assam. Harish Khare, editor-in-chief of the Tribune, had to leave on October 2017, a few months before tenure's end after the paper published an expose on the easy availability of Aadhar data, for sale atRs 500 through private operators.Nikhil Wagle quit TV9 in 2017 after the channel's management suddenly cancelled his show Sadetod which had taken a critical stance against the BJP led Maharashtra government on issues like farmers distress. The programme was highly popular but was dropped under pressure from the government. ABP News editor in chief MilindKhandekar anchor PunyaPrasunBajpaialong with the couple of other journalists were forced to leave the channel in August 2018, despite the anti BJP news group the Government imposed such pressure on the Media House to retrench these capable journalists as they repeatedly telecasting by attacking the Modi's in different situations.³⁰

This situation of forced removal of journalists is not limited to criticism to Modi led BJP alone it also spreads to their supporters, as we see in July 2017, Economic & Political Weekly's trusteesforced its editor ParanjoyGuhaThakurta to resign because of the criminal defamation filed by industrialist GautamAdani against an article published in the journalrelating to Special Economic Zones, which allegedly led to the business group earning a refund on tax worth Rs. 500 crore.³¹ In 2016NitinSethi had to resign from Scroll as he wrote about the environmental damage issues of Adani'sMundhra port dealings, as a result fine of Rs 200-crore imposed on the company, which later cancelled in 2018, officials find company did no wrong.³²

4.2.3 Banning the Modi Critical TV Channels:

Till the Ban imposed by the Mr.Venkiah Naidu, Minister of Information and Broadcasting Minister under Modi as Prime Minister in November 09, 2016, there is no such instance in the entire Indian media History, that the Union bans a TV channel on the ground of the national security under Cable Television Act 1995, on a Indian origin TV channel, despite the previous Governments imposed ban on numerous occasions but they were mainly based on telecasting Adult content or sometimes based on the integrity of the nation, on the foreign channels like ftv, AXN, etc. but this is a first instance when Modi Government imposed a ban on a channel for live telecasting the Pathankot Terror Attack, the main concern was all TV channels telecasted the same thing but as NDTV was critical to Modi led BJP a day ban was imposed which was condemned across the Globe and Editors Guild of India also condemned the step severely.³³The muscle power by the Modi Government was imitated by the Chief Minister Y.S.Jagan Mohan Reddy led Andhra Pradesh Government by banning TV Channels which were critical to him or his YSRC Party,³⁴ restriction to enter into Assembly and a recent Government Order which empowers individual Departments to institute a suit against a media for publishing an false matter.³⁵

In March 06, 2020, after the Delhi riots telecast in two major Malayalam news channels Asianet and Media One against the ruling BJP the both channels gets suspended from air at 7.30 p.m. on Friday i.e. March 06, 2020, following a 48-hour ban by the Union Information and Broadcasting Ministry, Media One TV provocative coverage, which is critical to the Delhi Police and the RSS. Asianetalleges that the channel had earlier given an explanatory notice to the Union for the Ministry's showcase notice, but it was not informed before the channel was pulled off the air. It was done directly through the company which was involved in unlinking the channel's content on air.³⁶

4.2.4TV Licences to only Pro Modi:

TheModi BJP was also selective in issuing TV licences to new applicants, there by controlling who enters media market, hence Republic TV, owned by BJPRajyaSabha Member, Rajeev Chandrasekhar and Chief HostArnabGoswami, a popular, pro-Hindutva anchor known for his anti-minority style, was given permission in

March 01, 2017, along with six other channels.³⁷But Bloomberg Quint, collaboration between Bloomberg LP and media entrepreneur RaghavBahl, known to be critical of the government, has been waiting since 2016,for licence, hence Bahl is now restricted to Bloomberg Quint a digital live-streaming service, at last the collaboration between them ended as Bloomberg blame Bahl for his inability to get TV licence.³⁸

4.2.5 Spreading Pro Modi and anti-non BJP Propaganda:

The Modi led media also spreading propaganda of TINA factor in favour of Modi and against the Opposition Parties and their supporters by portraying them as anti-nationals and those who supports.

In broadcast media especially Republic,Zee Channels were on the first to support Modi and declare anti-nationals who raises any questions against them, ArnabGoswmy the Chief of Republic TV and Republic Bharat never hesitated to telecast the false news which will tarnish the anti BJP parties and ultimately beneficent to the BJP and its allies, for instance The Times Group filed a case for infringement of copyright, then the channel telecasts that the senior Congress leader ShashiTharooor has direct links with the death of his wife SunandaPushkar in which Tharoor has filed a defamation case in Delhi High Court in which court.³⁹ Similarly amidst of COVID-19 pandemic, the Channel continually blamed the Muslim community fort for the protest in ShaheenBagh against CAA and NRC or NPR, then for COVID-19 spread and also said Muslims areconspiring to turn Delhi into Italy,⁴⁰ he also linked the agitation of the migrant workers in Mumbai, adjacent to Bandra Mosque despite in that agitation numerous non-Muslims were also present for which now he is facing a criminal trial and he managed to avoid jailed by filing a writ in Supreme Court of India,⁴¹ along with the defamation suit filed by Sonia Gandhi a Congress Leader.⁴² But in no single instance the channels raised any questions on the incumbent BJP and its allies.

Similarly the Zee news is also favouring the Modi in the same manner as Arnab run Republic TV, the Zee news editor in Chief SudheerChawdary in his primetime show DNA, while supporting Modi and BJP in such a manner that he even compare the AAP with the Indian enemy nation Pakistan's Prime Minster and Delhi public as longing for freebies, with no consideration of nationalism after defeat of BJP in 2020 Assembly elections,⁴³ on March 11, 2020, in the same show and same person tagged each and every Muslim as a terrorist with the help of a flowchart from a Facebook post which opposes Halaal food in response to these various FIR's were filed against him,⁴⁴ these two instances are not an end in every show Zee news used to telecast their propaganda supporting Modi and opposing even other journalists by nicknaming them as Designer Patrakar(journalist), Buddhijeevi(intellectual), Award wapasi(return) Gang etc. in a disrespectful manner almost regularly.

These two channels only along with remaining almost all national channels are spreading the same agenda in their media including India TV, News Nation, News 18, AajTak, ABP News etc. along with most of the print media.

Utter failure of Modi led BJP in recent times: In February 23 to 25, 2020, in Delhi communal riots, the Modi and Amit Shah utterly failed who are directly in charge of law and order in Delhi, leading to death of about 40 officially and thousands of injured and displaced from their homes, most of them were Muslims as the perpetrators were Hindu mobs who were instigated by the BJP Legislator Kapil Mishra,⁴⁵ despite of this no media house dared to blame Modi or Amit Shah for their failure, meanwhile some BJP run media houses blamed Muslim community for riots⁴⁶ and the two TV Channels of Kerala were banned for blaming BJP and Delhi Police.⁴⁷

Similarly in the COVID-19 pandemic lockdown which was imposed by the Modi in an unplanned manner resulting in economic loss, hardships to migrant labour and daily wage earners resulting in death of thousands of labourers either because of starvation or while returning to their native places via. National Highways or Railway lines by walking hundreds to thousands of Kilometres,⁴⁸ in this case the Indian media crossed all horizons by portraying Modi as a COVID-19 warrior, by negating his all atrocities which are direct result of unplanned lockdown and Modi led Media also blaming the non-BJP ruled States for the COVID-19 lockdown situation but the Modi led Central Government invoked Section-2A of The Epidemic Diseases Act, 1897,⁴⁹ which gives power to Union not States, in a fresh incident on May 18, 2020,Former BJP leader YashwantSinha, AAP MP Sanjay Singh detained for protesting, demanding that the armed forces be deployed to help migrant workers reach their homes, all of them gets detained by Delhi police, no media pay any attention to this serious issue except few.⁵⁰ the special package of 20 Lakh Crores as announced by Modi on May 12, 2020, to deal with economic situation but as per Opposition Spokes Person Anand Sharma, government's economic package is only of Rs 3.22 lakh crore and is only 1.6 per cent of India's GDP and is not worth Rs. 20 lakh crore as announced by the Prime Minister, and Sharma said he is ready for any debate in this issue,⁵¹meanwhile FICCI, ASSOCHAM, CII praises the Modi's package, before the clarity from the Finance Minister, ⁵² as these trade associations also habituated in praising Modi along with Media. As in present COVID-19 situation all across the democratic coountries there were numerous debates and discussions were happening with the Government while conducting press conference but in India in press conferences only ANI and PTI news

agencies were allowed to avoid any debate and discussion, from May 12, 2020, onwards no press conference is conducting only a press release was releasing on the evening that means the Government is giving only monotonous information to the public even expert community i.e. epidemiologists were also excluded while briefing.⁵³

V. RESULT OF FREE MEDIA SUPRESSING STAND BY THE MODI:

As a result of no freedom of speech to the media, a grim situation prevails so far as media independence and a democratic space for protest and watchdog function is concerned. This was clearly demonstrated by the International agency, Reporters without Borders (RSF) in its World Press Freedom Index in 2020 India's rank was 142 (just three notches above the Pakistan Islamic Republic) out of 180 countries, that means it deteriorated two notches compared to the last year 2019, it was 140, this was not the first instance in 2019 India's rank 140, in 2018 it was 138, in 2017 it was 136, in 2016 it was 133, that means India's performance in the free press index is deteriorating day by day, the reason as explained by the RSF titled "Modi tightens his grip on the media" There were six murders of journalists in 2018, but no murders in 2019, however the security situation for the country's media is yet to be improved, as there have been constant press freedom violations, including police atrocities against journalists, traps by political activists, and retaliations instigated by criminal groups or corrupt local officials. Ever since the general elections in the spring of 2019, won overpoweringly by Prime Minister Modi'sBJP, pressure on the media to support the Hindu nationalist government has increased. Those who advocate Hindutva, the ideology that gave rise to Hindu nationalism, are trying to purge all manifestations of "anti-national" thought from the national debate. The coordinated hate campaigns waged on social networks against journalists who dare to speak or write about subjects that annoy Hindutva followers are alarming and include calls for the journalists concerned to be murdered. The campaigns are particularly virulent when the targets are women, as we see in case of BarkhaDutt's case,⁵⁴ Criminal prosecutions are meanwhile often used to gag journalists critical of the authorities, with some prosecutors invoking Section 124a of the IndianPenal Code, under which "sedition" is punishable by life imprisonment. Along with these, the free media situation in Jammu and Kashmir, after a Constitutional Amendment which converts the State's special status into a Central administered Union Territory, the government shut down all forms of communication completely for several months, making impossible for journalists to cover what was happening.55

Along with criticising the Modi Government's intolerance to the Media the RSF also explained that the press suppressing strategy in India is not a new one as the previous Governments including Congress were also involved in same tactics. This is why the issue needs a deeper, dispassionate analysis to pinpoint the trends reflected in such behaviour by the present government.⁵⁶

But continuous pressure from the senior government officials criticizing editors, cutting off advertising, ordering tax investigations etc. which were focusing on other side of BJP party's promotion to transform India from a tolerant, religiously diverse country into an assertively Hindu one, as media houses also involved in other businesses, resulted in compromise in their stand to save their businesses, as Vineet Jain, managing director of the Times of India Group rightly said in 2014, that their newspaper was in the business of advertising. Media is now seen essentially as a business, then naturally, the profit becomes its prime objective, and no business house would be willing to lose the media business or the other businesses in which they are involved, as a result the media owners also pressuring on journalists as we see in numerous retrenchments including recent PunyaPrasumBajpayee's forced removal from ABP News for anchoring a show which disproves the doubling of farm income as claimed by Modi in Man Ki Baat, even if media owners support the journalists they were threatened to murder or rape them like the threat to BarkhaDutt in 2019, and the government not even hesitate to ban the channels whose tones are against Modi led BJP like MediaOne in Kerala.⁵⁷

All these were proven that these steps against the media were never seen in India even during emergency during Indira Gandhi regime in 1975 to 1977, the Supreme Court protected the media freedom in various instances, but in present situation there is no other alternative to the journalists and people who were supporting the pluralistic views in media, except online journalism which is far to the uneducated people to search and find such media in the vast reach of Modi media even in online journalism.

VI. CONCLUSION:

The researcher through this study concluded that the complete Indian media industry with an exception of very few, maintained very strong pro-BJP stand. This is apparent through the content analysis carried out by the researcher, the reason for this was the various anti-media steps taken by the government. The media was very clear about their pro-Modi agenda, hence while publishing a news or its editorial the media never forget to remind the Modi's Nationalism, development, vision etc. by leaving his mistakes and failures along with portraying the Opposition as the corrupt, incompetent, anti-nationals, dynasty politics etc. The main reason for this polarisation was to save their business from BJP's led government's wrath and to get the other pecuniary

benefits from the ruling government. As a result the India's rank is deteriorating continuously for the past four years in RSF ranking and there is no plurality, no government criticism which results in almost losing the ground of the Opposition party at the Centre and ultimately resulting in ruling monopoly, which is not desirable for a World's largest Democratic Country which is famous for its diversity in culture, religion, language etc.

Declaration of Conflicting Interests:The author declared no potential conflicts of interest with respect to the research, authorship, and publication of this article.

Funding: The author received no financial support, no direct responses from politicians, no second person is involved in this research and this paper is the result of the intellectual efforts of the sole author.

¹ "Performance of National Parties" May 16, 2014, Retrieved from <u>https://eci.gov.in/eci_main/archiveofge2014/20%20-%20Performance%20of%20National%20Parties.pdf</u> (Site last accessed on September 21, 2020).

²SrinivasanRamani "Analysis: Highest-ever national vote share for the BJP" May 23, 2019, Retrieved from <u>https://www.thehindu.com/elections/lok-sabha-2019/analysis-highest-ever-national-vote-share-for-the-bip/article27218550.ece</u> (Site last accessed on September 21, 2020).

 3 Shri Rajiv Gandhi, December 02, 1989, Retrieved from https://www.pmindia.gov.in/en/former_pm/श्री_-

 राजीव -गांधी / (Site last accessed on September 21, 2020).

⁴Pankaj Mishra, "The Gujarat massacre: New India's blood rite" May 14, 2012, Retrieved from <u>https://www.theguardian.com/commentisfree/2012/mar/14/new-india-gujarat-massacre</u> (Site last accessed on September 21, 2020).

⁵ Ibid note 4, pp.2,3.

⁶ Ibid note 4, p.3.

⁷ Ibid note 4, pp.3,4.

⁸ "Just the Right Image, (case study) strategy and tactics behind the creation of Brand Modi" June 08, 2014, Retrieved from <u>https://www.businesstoday.in/magazine/case-study/case-study-strategy-tactics-behind-creation-of-brand-narendra-modi/story/206321.html</u> (Site last accessed on September 21, 2020).

⁹ Ibid.

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Anita Katyal, "5 reasons for the Congress's defeat" May 16, 2014, Retrieved from <u>https://www.rediff.com/news/report/ls-election-5-reasons-for-the-congress-defeat/20140516.htm</u> (Site last accessed on September 21, 2020).

¹⁶ Ibid.

¹⁷ Supra note. 10.

¹⁸AjitaShashidhar, "The great branding campaign that made PM Modi the winner" May 28, 2019, Retrieved from <u>https://www.businesstoday.in/buzztop/buzztop-feature/lok-sabha-eelction-results-2019-pm-narendra-modi-bjp-victory-pm-modi-brand-namo/story/351239.html</u> (Site last accessed on September 21, 2020).

¹⁹ Ibid.

²⁰ Ibid.

²¹ "Uttar Pradesh Assembly Elections 2017" January 27, 2017, Retrieved from <u>https://timesofindia.indiatimes.com/elections/assembly-elections/uttar-pradesh/news/uttar-pradesh-assembly-</u>elections-2017/articleshow/5680/4891 cms (Site last accessed on September 21, 2020)

elections-2017/articleshow/56804891.cms (Site last accessed on September 21, 2020). ²²Devendra Kumar "Four-pronged strategy behind BJP's Uttar Pradesh election victory" March 17, 2017, Retrieved from <u>https://www.livemint.com/Opinion/3WvfJ5CwX66NkhkQY0kYrJ/Fourpronged-strategy-behind-BJPs-Uttar-Pradesh-election-vi.html</u> (Site last accessed on September 21, 2020).

²³ Samarth Bansal "How the BJP Used Technology to Secure Modi's Second Win" June 12, 2019, Retrieved from <u>https://www.cigionline.org/articles/how-bjp-used-technology-secure-modis-second-win</u> (Site last accessed on September 21, 2020).

²⁴DhruvRathi "Why Delhi voters chose ArvindKejriwal for CM and NarendraModi for PM" February 11, 2020, Retrieved from <u>https://theprint.in/opinion/why-delhi-voters-chose-arvind-kejriwal-for-cm-and-narendra-modi-for-pm/362881/</u> (Site last accessed on September 21, 2020).
 ²⁵ "CAA and NRC national issues, no resonance in Delhi polls: RaghavChadha" January 23, 2020, Retrieved

²⁵ "CAA and NRC national issues, no resonance in Delhi polls: RaghavChadha" January 23, 2020, Retrieved from <u>https://economictimes.indiatimes.com/news/elections/assembly-elections/delhi/caa-and-nrc-national-issues-no-resonance-in-delhi-polls-raghav-</u>

<u>chadha/articleshow/73544932.cms?utm_source=contentofinterest&utm_medium=text&utm_campaign=cppst</u> (Site last accessed on September 21, 2020).

²⁶ Nikhil Rampal "How Kejriwal used Modi mantra in Delhi to beat him at his own game" February 13, 2020, Retrieved from <u>https://www.dailyo.in/politics/arvind-kejriwal-aam-aadmi-party-delhi-assembly-election-results-delhi-assembly-elections-narendra-modi/story/1/32468.html</u> (Site last accessed on September 21, 2020).

²⁷ Nikhil Inamdar "How NarendraModi has almost killed the Indian media" March 12, 2019, Retrieved from <u>https://qz.com/india/1570899/how-narendra-modi-has-almost-killed-indian-media/</u> (Site last accessed on September 21, 2020).

²⁸RajuGopalakrishnan "Indian journalists say they are intimidated, ostracised if they criticise Modi and the BJP"

April 27, 2018, Retrieved from <u>https://in.reuters.com/article/india-politics-media-analysis/indian-journalists-say-they-are-intimidated-ostracised-if-they-criticise-modi-and-the-bjp-idINKBN1HY0AQ</u> (Site last accessed on September 21, 2020).

²⁹ "After Editor's Exit, Hindustan Times Pulls Down Controversial 'Hate Tracker'" October 25, 2017, Retrieved from <u>https://thewire.in/media/hindustan-times-hate-tracker</u> (Site last accessed on September 21, 2020).

³⁰VagrajBadrayan "Message From ABP News: A Long Battle Ahead for Media Freedom" August 07, 2018, Retrieved from <u>https://www.thecitizen.in/index.php/en/NewsDetail/index/2/14617/Message-From-ABP-News-</u> <u>A-Long-Battle-Ahead-for-Media-Freedom</u> (Site last accessed on September 21, 2020).

³¹ "ParanjoyGuhaThakurta quits as EPW editor" July 2017, Retrieved from <u>https://www.thecitizen.in/index.php/en/NewsDetail/index/2/14617/Message-From-ABP-News-A-Long-Battle-</u>Ahead-for-Media-Freedom (Site last accessed on September 21, 2020).

<u>Ahead-for-Media-Freedom</u> (Site last accessed on September 21, 2020). ³²Shrivastavaand NitinSethi "AdaniMundra project: First, Rs 200-crore fine cancelled. Now, officials find company did no wrong" May 05, 2018, Retrieved from <u>https://scroll.in/article/869582/adani-mundra-project-first-rs-200-crore-fine-cancelled-now-officials-find-company-did-no-wrong</u> (Site last accessed on September 21, 2020).

³³ "Government Bans NDTV India for a Day OverPathankot Reportage" November 03, 2016, Retrieved from <u>https://thewire.in/government/government-orders-ndtv-india-go-off-air-day-pathankot-reportage</u> (Site last accessed on September 21, 2020).

³⁴ "TV5 and ABN Andhra Jyothi channels go off cable networks, YSRCP behind ban?" SEPTEMBER 18, 2019, Retrieved from <u>https://www.thenewsminute.com/article/tv5-and-abn-andhra-jyothi-channels-go-cable-networks-ysrcp-behind-ban-109093</u> (Site last accessed on September 21, 2020).

³⁵SumitBhattacharjee "A.P. Government Order on media triggers debate" November 11, 2019, Retrieved from <u>https://www.thehindu.com/news/national/andhra-pradesh/ap-government-order-on-media-triggers-</u>

debate/article29941529.ece (Site last accessed on September 21, 2020).

³⁶ 'Ban on channels invites criticism', March 06, 2020, Retrieved from <u>https://www.thehindu.com/news/national/kerala/ban-on-channels-invites-criticism/article31004025.ece</u> (Site last accessed on September 21, 2020).
 ³⁷ "Republic TV amongst six channels to receive license by MIB in March" April 25, 2017, Retrieved from

³⁷ "Republic TV amongst six channels to receive license by MIB in March" April 25, 2017, Retrieved from <u>https://www.adgully.com/republic-tv-amongst-six-channels-to-receive-license-by-mib-in-march-72097.html</u> (Site last accessed on September 21, 2020).

³⁸ "Bloomberg's India Venture With RaghavBahl's Quint All Set to Collapse" December 03, 2019, Retrieved from <u>https://www.news18.com/news/business/bloombergs-india-venture-with-raghav-bahls-quint-all-set-to-collapse-report-2410217.html</u> (Site last accessed on September 21, 2020).

³⁹ "Congress leader ShashiTharoor files defamation case against Republic TV's ArnabGoswami" May 27, 2017, Retrieved from <u>https://indianexpress.com/article/india/shashi-tharoor-files-defamation-case-against-arnabgoswami-4675250/</u> (Site last accessed on September 21, 2020).
 ⁴⁰AyushTiwari "Coronavirus and Nizamuddin: TV news returns to bigotry with a bang" April 01, 2020,

 ⁴⁰AyushTiwari "Coronavirus and Nizamuddin: TV news returns to bigotry with a bang" April 01, 2020, Retrieved from <u>https://www.newslaundry.com/2020/04/01/coronavirus-and-nizamuddin-tv-news-returns-to-bigotry-with-a-bang</u> (Site last accessed on September 21, 2020).
 ⁴¹ "Second FIR against ArnabGoswami: SC reserves order on plea to quash it, demand of CBI probe" May 11,

⁴¹ "Second FIR against ArnabGoswami: SC reserves order on plea to quash it, demand of CBI probe" May 11, 2020, Retrieved from <u>https://www.nationalheraldindia.com/india/second-fir-against-arnab-goswami-sc-reserves-order-on-plea-to-quash-it-demand-of-cbi-probe</u> (Site last accessed on September 21, 2020).

⁴² "Mumbai: ArnabGoswami appears before police for questioning in Sonia Gandhi defamation case" April 27, 2020, Retrieved from <u>https://scroll.in/latest/960314/mumbai-arnab-goswami-to-appear-before-police-for-questioning-in-sonia-gandhi-defamation-case-today</u> (Site last accessed on September 21, 2020).
 ⁴³PunitYadav, "Are Newsrooms Run By Political Masters? Why Are Editors Compromising On Truth Telling?"

⁴³PunitYadav, "Are Newsrooms Run By Political Masters? Why Are Editors Compromising On Truth Telling?" March 22, 2020, Retrieved from <u>https://www.outlookindia.com/magazine/story/india-news-are-newsrooms-run-by-political-masters-why-are-editors-compromising-on-truth-telling/302846</u> (Site last accessed on September 21, 2020). ⁴⁴ "Kerala Police books Zee News editor SudhirChaudhary under non-bailable sections" May 10, 2020, Retrieved from <u>https://indianexpress.com/article/india/kerala-police-books-zee-news-editor-sudhir-chaudhary-6401670/</u> (Site last accessed on September 21, 2020).

⁴⁵ Joanna Slater and NihaMasih "What Delhi's worst communal violence in decades means for Modi's India" March 2, 2020, Retrieved from <u>https://www.washingtonpost.com/world/asia_pacific/what-days-of-communal-violence-mean-for-modi-and-for-india/2020/03/01/3d649c18-5a68-11ea-8efd-0f904bdd8057_story.html</u> (Site last accessed on September 21, 2020).

⁴⁶ "Delhi Riots" May 01, 2020, Retrieved from <u>https://zeenews.india.com/tags/delhi-riots.html</u> (Site last accessed on September 21, 2020).

⁴⁷Supra note. 38.

⁴⁸ShorboriPurkayastha "Can PM Modi's Apology to the Poor Undo This Unplanned Lockdown?" March 30, 2020, Retrieved from <u>https://www.thequint.com/podcast/coronavirus-lockdown-migrant-hunger-crisis-can-pm-modis-apology-to-the-poor-undo-this-unplanned-lockdown</u> (Site last accessed on September 21, 2020).
 ⁴⁹ ACT NO. 3 OF 1897

⁵⁰ "Former BJP leader YashwantSinha, AAP MP Sanjay Singh detained for protesting amid lockdown" May 18, 2020, Retrieved from <u>https://www.indiatoday.in/india/story/former-bjp-leader-yashwant-sinha-arrested-for-protesting-amid-lockdown-1679349-2020-05-18</u> (Site last accessed on September 21, 2020).
⁵¹VaibhavTiwari "Walk The Talk": Congress Says PM's Package Only 1.6% Of GDP" May 17, 2020, Retrieved

⁵¹VaibhavTiwari "Walk The Talk": Congress Says PM's Package Only 1.6% Of GDP" May 17, 2020, Retrieved from <u>https://www.ndtv.com/india-news/coronavirus-congress-says-pm-narendra-modis-package-only-1-6-of-gdp-2230302</u> (Site last accessed on September 21, 2020).

⁵² "FICCI, ASSOCHAM and CII welcomes Modi's package" May 13, 2010, Retrieved from <u>https://citytoday.news/ficci-assocham-and-cii-welcome-pm-modis-economic-package/</u> (Site last accessed on September 21, 2020).

⁵³Raveesh Kumar "Prime Time 9 PM" May 19, 2020. (Television Broadcast) NDTV India.

⁵⁴ "BarkhaDutt alleges threat calls, harassment on social media, accuses Twitter of being 'tone deaf" Feb 18, 2019, Retrieved from <u>https://www.moneycontrol.com/news/trends/barkha-dutt-alleges-threat-calls-harassment-on-social-media-accuses-twitter-of-being-tone-deaf-3554411.html</u> (Site last accessed on September 21, 2020).

⁵⁵ "Modi tightens his grip on the media" May 01, 2020, Retrieved from <u>https://rsf.org/en/india</u> (Site last accessed on September 21, 2020).

⁵⁶ Ibid.

⁵⁷ Supra note. 38.