

India: An Internet Shutdown Advocacy Needs Assessment

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About this Report

Internet shutdowns are on the rise around the globe. In 2021, Access Now documented at least 182 internet shutdowns in 34 countries, affecting the ability of millions of people to use the internet to access health, educational, social, political, and economic resources.

Governments shut down the internet for various reasons; to restrict the circulation of alternative information; to assert control during elections, protests, and contentious political moments; and to target marginalized racial or ethnic communities. Governments often claim that these measures are meant to prevent the circulation of hate speech and ensure public safety and security. Human rights advocates have argued that, while these sometimes are real problems, depriving large populations access to the internet is not a necessary or proportionate response and may in fact be counterproductive. The United Nations Human Rights Council condemned such intentional restrictions in a non-binding 2016 resolution.

When most people think about an internet shutdown, they think about full-scale network blackouts or blanket shutdowns -- when the government hits the “kill switch” and orders internet service providers to disconnect a population from all forms of internet connection. However, there are other, more targeted (and harder to verify and measure) forms of internet shutdowns, including the blocking of popular social media platforms and messaging apps, and “throttling” bandwidth to slow internet connectivity so much that users cannot effectively access or share information. As described by Gustaf Björkstén in Access Now’s [Taxonomy of Internet Shutdowns: The Technologies Behind Network Interference](#), as international pressure and scrutiny increases, governments are increasingly using “targeted shutdowns, throttling, app blocking, or other less obvious forms of disruption, to escape accountability.” Governments often mix various technical approaches to block internet access, for example by throttling connectivity and blocking specific social media platforms in the lead up to an election, before eventually shutting down the entire network.

“No two shutdowns are alike. Advocacy needs to be responsive to local threats, challenges, and needs.”

For the past several years, Internews’ OPTIMA project has been working with civil society organizations in countries around the world to better prepare for, prevent, and advocate against internet shutdowns. As part of this process, Internews conducted a global survey of digital rights organizations in 2020 to produce the [Internet Shutdown Advocacy Needs Assessment Report](#). The report outlined the key challenges that advocates face when confronted with the threat of internet shutdowns, the perceived socio-economic impacts of shutdowns, and key resources and skills gaps that civil society needs in these countries to

DEFINING INTERNET SHUTDOWN

For the purpose of this report, an “internet shutdown” is defined broadly to include not only internet blackouts (when the government completely cuts off access to the internet) but also internet throttling (when the network is deliberately slowed) and major instances of blocking (when major social media platforms and messaging applications are blocked).

engage in longer-term and more strategic advocacy against shutdowns. Through this survey-based research, respondents noted that resource constraints and the rapid-response nature of advocacy related to shutdowns leads to short-term campaigns focused on ending a shutdown rather than longer-term advocacy to prevent them from happening in the first place.

Respondents also repeatedly called for support and resources to build multi-sector national coalitions and raise public awareness about internet shutdowns and circumvention strategies.

In response, OPTIMA has worked with civil society groups in countries in Africa and Asia to build multistakeholder “Prepare & Prevent” networks to develop localized resources, trainings, and advocacy strategies to mitigate internet shutdowns and protect those who are the most vulnerable and targeted. OPTIMA has also developed the [Prepare, Prevent, Resist Internet Shutdowns Resource Library](#), the [Interactive Internet Shutdown Risk Assessment and Resource Guide](#), and the [OPTIMA network measurement training](#).

Coalitions such as #KeepItOn are doing significant work to highlight the threat of internet shutdowns on the international stage, pressure governments, document shutdowns and their impacts, track trends through the #KeepItOn data tracker & annual reports, and coordinate among diverse actors in countries experiencing internet shutdowns. Additional efforts (and resources) are needed to 1) support internet shutdown advocacy at the national level; 2) understand the nuanced ways that internet shutdowns impact specific vulnerable populations; 3) engage in longer-term efforts to better prepare key groups for potential shutdowns; and 4) build multi-sectoral coalitions able to deter governments from imposing internet shutdowns. For this reason, OPTIMA has worked with key digital rights organizations in Bangladesh, India, Senegal, and Tanzania to produce this series of country-specific Internet Shutdown Advocacy Needs Assessments. These assessments sought to better understand the nuanced ways in which internet shutdowns occur in different countries, including:

- Patterns and trends in technical mechanisms used in specific places to shut down the internet;
- Political and social triggering events and government for shutting down the internet;
- Perceptions of the wider impact of shutdowns on economies and societies;
- Differential impacts that shutdowns have on specific vulnerable groups and marginalized populations;
- Laws and regulations that contribute to an enabling environment for internet shutdowns and inhibit advocacy related to censorship and internet shutdowns;
- Perceptions about future risk of internet shutdowns; and
- Perceptions about civil society preparedness and advocacy capacity in areas such as awareness-raising and stakeholder engagement, documentation of impact and network measurement, circumvention strategies and protection of vulnerable communities, and legal capacity to engage in litigation.

This research is meant to not only inform global audiences about specific shutdown threats and civil society perceptions in these countries, but also to **serve as a starting point to collaboratively develop national advocacy strategies and engage in deliberate outreach, training, and resource development to target identified challenges and needs in each country.** These needs assessments extended the survey-based methodology used in the 2020 report to localize and build in additional space for deliberation, debate, and discussion amongst key communities.

The methodology for each report included three stages:

1. Literature reviews on internet shutdown history and background.
2. Survey of key stakeholders: Internews and partner organizations in each country developed, localized, and translated survey questionnaires. These surveys were then distributed to a certain number of key stakeholders who are impacted by internet shutdowns or influential in internet shutdown advocacy.
3. Community deliberation and focus groups: Survey findings were analyzed and presented during in-person national workshops in each country, inviting respondents and other key stakeholders from the Prepare & Prevent networks to discuss the findings, provide additional nuance or detail, uncover disagreements or differences within stakeholder groups, and identify recommendations for advocacy strategy and distribution of resources. In India, due to the volume and complexity of internet shutdowns across the country, additional focus groups were conducted with key communities experiencing internet shutdowns.

“The contribution of people on the ground in the fight against internet shutdowns is vital around the world — and it will remain that way until we end this rights-abusing practice for good. We rely on people to report, monitor, run measurements and provide context whenever the internet is shut down. Understanding the local context is crucial in pushing back against internet shutdowns globally.”

Felicia Anthonio

It is important to note that the results described in these reports, while based in part on survey findings, are not representative of wider populations in these countries. The methodology specifically sought to uncover the perceptions and experiences of certain communities central to internet shutdown advocacy: civil society organizations working on digital issues, journalists, entrepreneurs, students, higher education institutions, health providers, telecommunications operators, human rights organizations, women’s rights organizations, and minorities and other marginalized groups. Thus, this research is largely qualitative in its methods and its findings, and percentages used throughout this report represent a relatively small, non-generalizable sample size. (For a detailed discussion of the research methodology and demographics for this report, see Appendix A.)

We hope that these reports are useful to advocacy communities in these four countries as well as to the wider community related to internet shutdowns, as well as donor organizations and international groups looking to support internet-shutdown advocacy. We would welcome and encourage replication of this needs assessment process and methodology in other countries experiencing or at risk of experiencing shutdowns. Please reach out to the authors for more

information on this and other OPTIMA reports on internet-shutdown advocacy needs, the methodology, and the Prepare & Prevent networks and resources.

Introduction

Internet usage in India has grown substantially in the past decade. As of January 2022, [India ranked behind only China](#) in terms of total number of internet users, with approximately 658 million people online. This is a significant facilitator for India's civic and economic growth. A 2017 [report](#) by the Indian Council for Research on International Economic Relations (ICRIER) and the Broadband India Forum found that a 10% increase in either total internet traffic or mobile internet traffic led to an increase in India's GDP of 3.3% and 1.3%, respectively. The internet has also been invaluable in facilitating pluralism and dissent -- for instance, people belonging to the [Dalit community](#) in India have created websites, discussion forums, and social media spaces to exchange ideas and issues from their own vantage points. These discussions, in turn, have allowed them to build a collective consciousness and to organize in new ways.

However, India also has a [lower internet penetration per capita](#) than the global average, and its [highly stratified society](#) is one factor, as access to the internet has remained deeply unequal and often has been determined by a person's socio-political status, including [gender, caste, religion, geography, and economic position](#). In India, women "are 15% less likely to own a mobile phone and 33% less likely to use mobile internet," according to [research published](#) by the Observer Research Foundation and youth-led think tank Nikore Associates. The same article noted that the urban-rural digital divide is also particularly pronounced, with a rural broadband penetration rate of just 29% compared with a national average of 51%. The rural-urban gap widens in specific Indian states, with rural communities facing significant access hurdles in Assam, Rajasthan, and Madhya Pradesh.

This context of a deeply unequal digital India highlights the problems posed by the widespread practice of internet shutdowns in the country. Internet shutdowns are a disparate measure that not only impacts every form of communication across the affected terrain, but also marginalizes those who were disadvantaged to begin with.

For four years running, India has held the notorious distinction of being the country with the greatest [number](#) of internet shutdowns, according to data from the digital-rights organization Access Now. It also has some of the [longest-lasting](#) imposed shutdowns in the world. These shutdowns have been carried out in a variety of contexts and rationales -- from protests to incidents of violence, and even for the prevention of cheating in competitive exams. In a significant number of cases, these orders have been enabled by the permissive legal framework that empowers the government to carry out internet shutdowns. Occasionally, shutdowns have been carried out [in direct contravention](#) of the law.

In India, a predominant number of internet shutdowns target mobile internet services, which is the most common way people access the internet. As a result, in almost all cases of internet shutdown, a suspension order impacts a significant number of people in the affected terrain, widening the scope of harms done. In addition to suspension orders, the government has also been known to order slowing of internet speeds in certain parts of the country (“throttling”), as well as whitelisting only a select number of websites that residents of an affected area can use (“filtering”). Research conducted or maintained by the [Software Freedom Law Center](#), [Access Now](#), and Internews’ [OPTIMA](#) project considers such instances to count as internet shutdowns for advocacy purposes, because the events cut access to major internet services to segments of a population.

India has a vibrant civil society and tech sector that have huge potential to collaborate on advocacy to challenge and, ideally, prevent internet shutdowns. Resistance to shutdowns, both via public advocacy and litigation, is vital and can be effective: Over the past few years, persistent civil society advocacy, both at domestic and international levels, have led to some gains. Earlier in 2022, the Kolkata High Court intervened and successfully reversed an ongoing shutdown order. A constitutional challenge to the legal framework that permits internet shutdowns is currently pending in front of the Guwahati High Court in northeastern India. Additionally, the Supreme Court of India has admitted a [petition](#) challenging four states – Arunachal Pradesh, Rajasthan, Gujarat and West Bengal -- for ordering internet shutdowns to prevent cheating during state civil service exams. Such instances offer avenues for directed strategic advocacy efforts to demonstrate the impact of shutdowns on fundamental rights, the economy, and civic participation.

In addition to legal strategies, there is a need to work intensively in specific communities that are most affected by shutdowns to truly understand their digital needs and how they can participate actively in advocacy and internet-shutdown preparation and readiness. This report draws on a survey as well as data collected from workshops with key communities that are impacted by shutdowns and integral to advocacy responses. These workshops allowed our research team to present survey findings and document discussions and disagreements in a focus group setting. They also provided the opportunity for diverse communities to reflect on these findings and collaboratively determine recommendations for policy and advocacy approaches. Workshops were conducted in Delhi, Guwahati, Hyderabad, and Jaipur.

“A large range of impacts of internet shutdowns are still unknown and undocumented. We need to do much more to fight against the Kill Switch in terms of building awareness, finding technical solutions, litigate. We are getting there but there is a lot more to do”

Radhika Jhalani, SFLC

Through this report, we seek to provide insight into the challenges facing a diverse range of players in Indian civil society in advocating against internet shutdowns. The recommendations included at the end of the report are based on collective reflections and

determinations of key needs and strategic priorities of the communities consulted for this research and the wider Indian “Prepare & Prevent” network, coordinated by the Software Freedom Law Center (SFLC) and The Bachchao Project. The recommendations are currently being implemented through Internews’ OPTIMA project, and we encourage interested parties to contact the authors to participate in coalition activities and to support this work.

Key Findings

- **Internet shutdowns are a common experience in India.** Most respondents (76%) to the survey of digital rights advocates and others related to the field reported having experienced internet shutdowns.
- **Internet shutdowns target key states.** Internet shutdowns are disproportionately experienced by those living in the state of Rajasthan and in Jammu and Kashmir, followed by Assam, Manipur, West Bengal, Uttar Pradesh, and Haryana.
- **Internet shutdowns disproportionately impact key localities and populations.** Respondents living within the same state sometimes reported different experiences. That may be in part because in India, district authorities and local administrative bodies often have significant power to order shutdowns.
- **Key Stakeholders feel they have low levels of technical and legal understanding and expertise.** While many respondents had experienced shutdowns, most (60%) said they don’t understand how these incidents occur technically or how related laws apply. While 38% of respondents said they considered themselves experts on shutdowns and related issues, a significant number of respondents lacked the expertise to fully assess and document their own experiences of such occurrences.
- **Shutdowns occur for many perceived reasons.** Almost a quarter of respondents (22.2%) said they believed that internet shutdowns are triggered by protests, followed by incidents of communal violence (17%), and cheating on exams (12.4%).
- **Internet shutdowns are likely to continue.** Many respondents (49%) found it likely or very likely that authorities would shut down the internet in the year 2022-23, while 22% found it somewhat likely, and only a handful (8%) of respondents found such a possibility very unlikely.
- **Knowledge about circumvention tools and strategies is low.** Indian digital rights activists and others, especially minorities or other vulnerable groups, need more familiarity with strategies and tools for overcoming internet shutdowns. Many survey respondents reported that they do not use VPNs and circumvention tools, perhaps in part because of concerns about their legality due to persistent targeting of VPN users by police and even Parliament. Additionally, more than half (58%) of the respondents who answered that they were worried about using VPNs identified as belonging to a minority linguistic, ethnic, caste, or religious group.
- **There is a need for more advanced network measurement skills.** Respondents report that there is medium- to low capacity for network measurement, but less than

10% capacity to collect/analyze using the following tools (OONI Probe- X%, OONI run, X%, IODA Dashboard, NDT speed test, ripe and Censored Planet).

- **Respondents reported mixed levels of their own capacity to carry out various forms of advocacy against shutdowns:** While there was moderate- to high capacity reported for strategic litigation and research, capacity for supporting more vulnerable communities during shutdowns was reported as low.
- **Engagement with ISPs and telcos is a challenge.** Groups reported that they need support to more effectively engage on the issue of shutdowns with a variety of stakeholders, particularly with internet service providers (ISPs) and telecommunications companies (telcos). Enthusiasm on the part of private companies, including ISPs, to engage seems to have dropped significantly in the past seven to eight years, perhaps in part because authorities are using this tactic more aggressively and the companies involved depend on the government's regulatory approval and therefore are not only obliged to carry out official orders but also reluctant to be seen as non-compliant.
- **Engagement with other powerful stakeholders is also a challenge, as is expanding advocacy beyond human rights communities.** Survey respondents reported difficulties engaging with other powerful groups, such as information ministries and legislators. There is a need to develop targeted advocacy strategies and narratives for specific policymakers at the local, regional, and national level. There is also a need to consider better and more extensive outreach to tech-reliant communities and sectors that could be allies in anti-shutdown campaigning.

Background

Internet usage in India has grown by leaps and bounds in the past decade. As of January 2022, India ranked behind only China in terms of total internet usage, with approximately [658 million](#) users online. India's total base of internet subscribers -- that is, the number of people subscribed to internet services offered by providers -- reached 776.45 million by 2020, a 225% increase from 2014 (238.71 million), according to a [report](#) released in 2021 by the Telecom Regulatory Authority of India (TRAI). Dramatic [growth](#) occurred in both rural and urban India, with the former recording expansion of 228% over those six years, while the latter increased 171%.

Research has shown that the internet is a critical tool for India's social and economic growth. A 2017 [report](#) by the Indian Council for Research on International Economic Relations (ICRIER) and the Broadband India Forum found that a 10% increase in either total internet traffic or mobile internet traffic led to an increase in India's GDP of 3.3% and 1.3%, respectively.

Despite this growth, total internet penetration across India's population of [1.4 billion](#) in 2022 remains relatively low, at [58.51%](#) in December 2020. In contrast, other BRICS countries, like [Brazil](#) and [China](#), reported a higher internet penetration during this period, with about 81.34%

and 70.4%, respectively. This indicates a significant challenge for India in ensuring equitable access across the country and reducing the digital divide.

One that contributes to the overall digital divide is gender. A 2020 [study](#) by Dvara Research, which reviewed existing literature on women's access and use of mobile phones, found that women in India had less access to phones, were more constrained in the geographic location in which they may use the phone, and were hampered by socio-cultural barriers to access, including the stereotypical notion that women don't need a phone. As [96.7%](#) of Indian internet subscribers rely on their phones for access to the internet, the mobile phone is the barrier to entry for many women in terms of their access to the internet.

Additionally, in a country as heterogeneous and stratified as India, access to the internet is also determined by an individual's socio-economic status. The [National Family Health Survey](#) (NFHS) of 2019-21 showed that, while 72.5% of urban males and 51.8% of urban females have used the internet, only 48.7% of rural males and 24.6% of rural females have ever used the internet. In a separate [study](#) done by the Birla Institute of Technology and Science in Pilani, researchers found that, as compared to the rest of the Indian population, individuals with disadvantaged caste identities had lower rates of internet access, internet literacy, and internet use. Therefore, despite the aforementioned growth of internet usage, access remains deeply unequal.

Despite these disparities in access, it is clear that the internet is an invaluable resource in the facilitation of dissent and pluralism. It also is vital for elevating the issues of marginalized and minoritized communities. In India, for instance, people belonging to the Dalit community have created separate websites, discussion forums, and social media spaces to exchange ideas and discuss issues from their own vantage points. That, in turn, has allowed them to [contribute](#) to the formation of a unique community consciousness.

Internet shutdowns, therefore, are a threat not only to aggregate social and economic development in India, but also to the livelihoods and political capacities of under-resourced communities. Switching off access to a critical public resource like the internet further marginalizes those who were already marginalized, and it severely impacts the economic growth of the country. In the subsequent sections, we unpack these issues in greater detail.

Media and Internet Freedom in India

Even as internet use has expanded, internet freedom in India has been on a steady decline over the past five years. Freedom House's "Freedom On The Net" 2021 [report](#) rated India as "partly free" in terms of internet access, content restrictions, and violations of user rights.

In 2020, for instance, amid rising geopolitical tensions between India and China, the government [banned](#) more than 100 Chinese mobile [apps](#) via the use of a restrictive, opaque legal mechanism for blocking content. Similar provisions were used to censor [tweets critical](#)

of the government's policies during the raging second wave of the Covid-19 [pandemic](#) in 2021, as well as during the large-scale farmers [protests](#) of 2020 and 2021.

In early 2021, the government also [issued](#) the “Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules,” which immediately stirred controversy. The rules introduced new content-removal authorities; obligations for online intermediaries such as search engines, social media platforms, and internet service providers to appoint in-country representatives; and requirements for private messaging services to be traceable. At the time of writing this report, 17 challenges to these rules were [pending](#) across various High Courts in the country.

Internet Shutdowns in India: A Closer Look

Internet shutdowns are one of the most severe threats to digital freedom in India. The country continually topped the list of countries with the highest number of shutdowns for [four](#) years starting in 2018 through 2021.

Geography, Frequency, and Rationales

The geographic distribution of internet shutdowns has widened and their frequency has increased over the years. Through 2019, 2020, and 2021, a significant number of shutdowns were effectuated in the context of civic and political protests against controversial legislation. For instance, in December 2019, when the Indian Parliament's controversial adoption of the [Citizenship Amendment Act](#) (CAA) spurred massive mobilizations across the country over concerns that it discriminates against Muslims, internet shutdowns were [ordered](#) in 12 states at different times, including in Assam, West Bengal, Meghalaya, and Uttar Pradesh. Similarly, during the aforementioned farmers protests of 2020-21 against three controversial agricultural bills, authorities [restricted](#) internet access repeatedly in and around Delhi; at the same time, the Haryana State government suspended services in three districts for more than 72 hours, and later extended the shutdown to 17 of the state's 22 districts.

Another trend in Indian internet shutdowns is pre-emptive restrictions. The shutdown imposed on Jammu and Kashmir in August 2019, for instance, began as the Indian government abrogated Article 370 of the Indian Constitution, effectively eliminating autonomous governance in the region, and authorities detained political leaders. The government used a variety of commonly cited [rationales](#) to justify this restrictive move: the preservation of “state security,” maintenance of order, and prevention of violence.

By the end of 2019, though cell phone service had mostly been [restored](#), the internet shutdown [continued](#) and ranked as the longest imposed in a democracy, extending for more than [550 days](#), with services either suspended or throttled. Even when internet access was restored, the government [continued](#) to block access to websites, whitelisting only 301 websites that the residents of the area could use.

Access to 2G networks was restored in January 2020, while 3G and 4G networks were restored for the first time in Ganderbal and Udhampur districts on a “trial basis” in [August 2020](#), a year on from the original shutdown. It was only in [February 2021](#), 17 months after the total disruption, that 4G networks were restored in Jammu and Kashmir, albeit with continuing short-term restrictions.

Another popular rationale for internet shutdowns has been the ostensible prevention of cheating during competitive exam periods, including in higher education. This [justification](#) has been [used](#) most often in [Rajasthan](#) state, although the states of [West Bengal](#) and [Arunachal Pradesh](#) have also cited such reasoning. Governments feel justified to order the suspension of internet before, or during exams, ostensibly to [prevent](#) “disruption of public safety due to fake news and false rumors,” or to prevent question papers from being leaked (see “Knowledge About Shutdowns and Past Experiences” sub-section in “Detailed Research Findings” section below). Unlike the shutdown imposed in Kashmir, shutdowns in lieu of exams are [shorter](#) in duration, lasting usually during the day of the exam. Nevertheless, such measures are usually [arbitrary](#) and [violate](#) existing principles of law.

Technical Methods

Mobile internet seems to be the predominant target of various state and local governments across India that impose internet shutdowns. Access Now’s [#KeepItOn Report](#) of 2021, which collates data on internet shutdowns globally, found that, of the total number of networks affected by shutdowns in 2020 worldwide, 72.90% involved mobile networks. In India, according to [TRAI](#), 96.7% of internet subscribers rely on their phones for access to the internet.

Given that users in India access the internet almost entirely via mobile phones, this propensity to target mobile internet also means that such shutdowns impact the largest number of the populace in an affected area. This is further exacerbated by the fact that India’s telecom sector is [dominated](#) by a handful of powerful companies, which makes it easy for officials to rely on these operators when ordering internet shutdowns. All it takes therefore, is for officials to issue an order to all ISPs with regional offices in a specific geographical area. And the government has the [authority](#) to do so, in part based on a British colonial-era law that gives authorities control over telegraph lines.

The Legal Framework

Over the years, various levels of government in different parts of India have relied on two legal frameworks to order internet shutdowns: a) section 144 of the Code of Criminal Procedure, 1973 (CrPC), and b) section 5(2) of the Indian Telegraph Act and the Temporary Suspension of Telecom Services (Public Emergency or Public Safety) Rules, 2017 [“the TSTS Rules”]. This section provides a brief overview of these frameworks.

Section 144, CrPC

Prior to 2017, internet shutdown orders were predominantly issued under [section 144](#) of the CrPC. Section 144 empowers an authorized official (including a District Magistrate or a sub-divisional magistrate) to issue an order, if they are convinced there is i) sufficient grounds, ii) need for immediate prevention, iii) need to prevent obstruction, annoyance, or injury to any person lawfully employed, etc.

A bare reading of Section 144 makes clear that it does not provide any direct, explicit source of power for governments to order internet shutdowns. Accordingly, district magistrates have [interpreted](#) this section to mean that their “*sole opinion*” allowed them to direct telecom service providers to disrupt services. This [meant](#) that the discretion to direct any suspension of internet vested solely with the magistrate, with only general scrutiny of courts. Orders issued under this provision are ex-parte, meaning there is no mechanism to review or appeal such orders, a reality that has [perpetuated](#) this pattern of actions.

The TSTS Rules

Section 5(2) of the Indian Telegraph Act of 1885 allows the government to stop “telegraphic transmission” in times of public emergency or in the interest of public safety. The [phrase](#) “telegraphic transmission” is broadly defined, and authorities have interpreted it to include access to the internet as well.

The TSTS Rules create a procedure for the government to exercise power under section 5(2) of the Telegraph Act, in relation to internet services. The Rules empower either (a) the Secretary to the Home Ministry in the case of the central government, or (b) the Secretary to the Home Department in the case of the state government, to suspend internet services; Rule 2 explicitly says such suspension of services can only be implemented by these authorities.¹

The Rules also prescribe a Review Committee that is responsible for examining whether an internet shutdown complies with Section 5(2). In 2020, the Indian government inserted an amendment to the Rules that restricts the maximum number of days for which an internet shutdown can be ordered to [15 days](#).

Judicial Pronouncements

A few cases of strategic litigation have challenged specific instances of internet shutdowns in various locations around India. However, in only two instances have Indian courts stopped an ongoing internet shutdown. The first was in 2019, when the Gauhati High Court admitted a [petition](#) challenging the suspension of mobile internet in parts of Assam and ordered the authorities to restore such services. A constitutional challenge to the TSTS Rules is currently [pending](#) in front of the same court. The second was in 2022, when the Kolkata High Court [issued](#) a stay imposed against an internet shutdown order that was meant to shut down

¹ Rule 2

services in several districts of West Bengal, to prevent cheating during secondary school exams.

Apart from these, two other judicial pronouncements deserve attention in this context. The first is the case of [Faheema Shirin R.K v State of Kerala](#), in which the Kerala High Court determined that access to the internet is a fundamental freedom.

The second is the case of [Anuradha Bhasin v. Union of India](#), in which the Supreme Court was called in to intervene in the then-ongoing internet shutdown and total communication blockade imposed in Kashmir. The petitioners claimed that the action of the Indian government violated their rights to media freedom and to practice any profession, as guaranteed by Article 19(1)(a) of the Indian Constitution. Unlike the decision in *Faheema Shirin*, the Supreme Court did not rule on whether access to the internet was a fundamental right. However, it did agree with the petitioners that “the right to freedom of speech and expression under Article 19(1)(a), and the right to carry on any trade or business under 19(1)(g), using the medium of internet is constitutionally protected.”

Additionally, the Court determined that the legal framework that empowered the government to order internet shutdowns also contains certain legal safeguards. It ordered that:

- All orders passed under the TSTS Rules are to be published in the public domain, so that they could be amenable to judicial review.
- Orders that are passed under the TSTS Rules are to be “reasoned.”
- Internet shutdowns can only be temporary and not “indefinite.”

Ironically, despite citing these procedural safeguards, the Supreme Court [refused](#) to intervene in the then-ongoing internet shutdown in Kashmir, which by that time had gone on for five months. Rather, it only asked the state government to review all the relevant shutdown

orders, and ordered it to allow usage of essential internet services in areas where there was no possibility of immediate connection restoration.

Brief primer on the Telecommunications Bill, 2022

In September 2022, the government of India released the Draft Indian Telecommunication Bill, 2022 with the aim to “*develop a modern and future-ready legal framework in telecommunication*”.¹ touches on a number of issues related to digital rights and telecommunication services, including suspension of telecommunication services.

Clause 24(2)(b states that the Union Government has the power to suspend any telecommunication network if there exists an instance of “*public emergency or in the interest of public safety*”, and that it is necessary to do so in the interests of “*the sovereignty and integrity of India, the security of the State, friendly relations with foreign states or public order or for preventing incitement to the commission of an offence.*”

It is of interest to note that while similar power vests with the government under the TSTS Rules, 2017, the Telecommunication Bill enacts none of the safeguards of the Rules, nor does it fix any of the issues that existed with the Rules. For instance, while a recent amendment to the Rules fixed the maximum number of days for which an internet shutdown can be enacted¹, the Bill foresees no such limitations, instead emphasizing that such an action can be maintained for as long as the public emergency or the interest of public safety requires so.¹ In addition, there is no judicial oversight or accountability mechanisms built into the decision process behind a suspension order. This further exacerbates the existing issues around lack of transparency in the legal framework for internet shutdowns.

The Bill was open for public consultation for a while, and during this time met with severe pushback. It is hoped that the government takes into account the criticisms, and significantly reforms the provisions relating to internet shutdowns before cementing it as law.

Impact and Response

Internet shutdowns impact every aspect of an individual's life, as well as disrupt the ongoing digital economy of the affected region. In most severe cases, they cut off every means of communication and block [especially](#) the most vulnerable populations — such as women, LGBTQ+ individuals, persons with disabilities — from getting a range of support services they need.

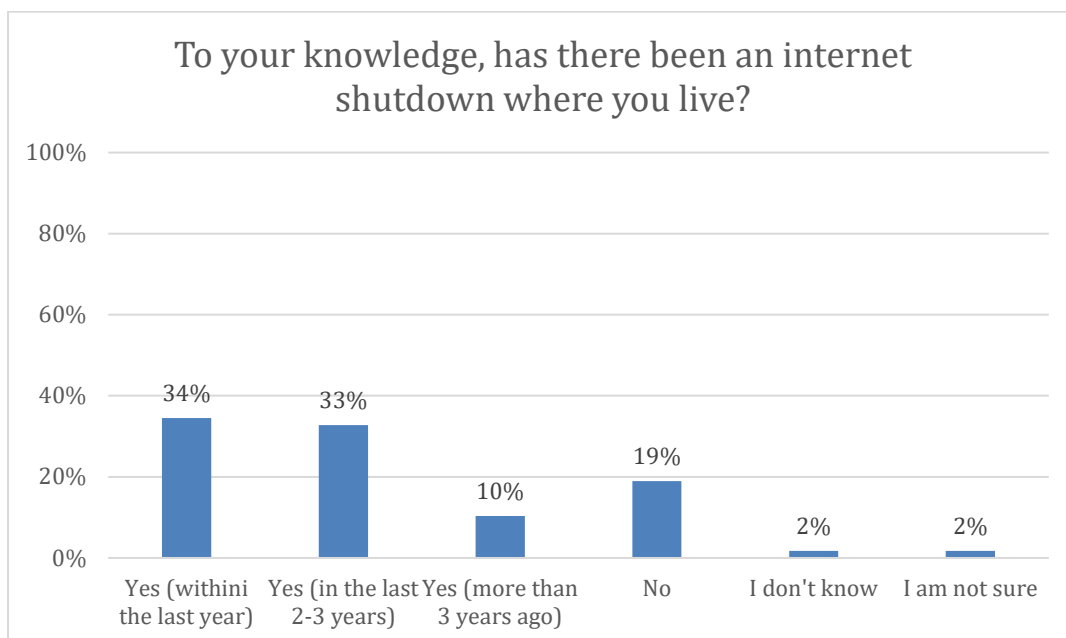
Access to such online support and services is even more critical during times of crisis, including the ongoing Covid-19 pandemic. For instance, in early 2020, many Kashmiris were unaware of the risks of the virus, given that they had been under a communication blackout since August 2019. As a result, not only were they [subject](#) to a particularly severe public-health risk, but the absence of verified information also allowed rumors and misinformation to flourish.

Similar phenomena can be observed in other parts of India that have faced internet shutdowns. Since most modern media outlets rely on the internet for their operations, such outlets may find it difficult to produce reliable and trustworthy news for the general public without online access. For instance, the 100-day internet shutdown in [Darjeeling](#) in 2017 over a brief spurt of separatist unrest allowed rumors to spread, including about casualties in clashes between police personnel and protesters. In [Guwahati](#), during the CAA protests, internet shutdowns were used as a way to “quell agitation” but failed to control rumor-mongering and uncertainty.

Detailed Research Findings

Knowledge About Shutdowns and Past Experiences

We received 58 responses when we asked respondents about their past experiences encountering internet shutdowns. Out of these, about 19% of respondents said they had not faced any internet shutdowns, while about 4% of respondents either did not know or were not sure. The rest of the respondents (approximately 77%) all reported having experienced shutdowns. The largest portion of respondents said they'd experienced shutdowns within the past year (34%), followed by shutdowns that happened two to three years ago (33%), and shutdowns that took place more than three years ago (10%).



These experiences of internet shutdowns can be further mapped to the states where the respondents live (Table 1).

Table 1: Regional demographics capturing the variance in frequency of internet shutdowns

Last encountered shutdowns	State	Total number of respondents
Within the last year	Rajasthan	10
	Kashmir	4
	Haryana	2
	Delhi	1
	Jharkhand	1
	Arunachal Pradesh	1
	West Bengal	1
	Total	20
Within the last two-three years	Andhra Pradesh	3
	Jammu	1
	Kashmir	2
	Assam	3

² N=58

	Manipur	2
	West Bengal	2
	Uttar Pradesh	3
	Delhi	2
	Madhya Pradesh	1
	Total	19
More than three years ago	Manipur	2
	Haryana	1
	Kashmir	1
	West Bengal	1
	Maharashtra	1
	Total	6

Even within the same state, respondents reported different frequencies of shutdowns they had experienced. There are several intersecting reasons that explain this variance.

First, internet shutdowns in India are often “hyperlocal” in nature, meaning that instead of occurring statewide, a shutdown might be directed at only a specific district or a smaller area within the state.³ As a result, respondents living in different cities, even within the same state, might have stark differences in their experiences of internet shutdowns.

A note on the use of the word “hyperlocal”: In the Delhi workshop, which was attended by a variety of digital-rights experts from both national and international organizations, participants discussed in great detail the word “hyperlocal” and its usage in the context of internet shutdowns. Attendees noted that a) describing a shutdown as hyperlocal might inadvertently trivialize its impacts, and b) given the variation in population sizes in different Indian states, there can be no clear delineation of what a hyperlocal shutdown looks like. Accordingly, they recommended that instead of using the word “hyperlocal,” specific facts should be used to describe an internet shutdown. For example, the attendees suggested saying, “The shutdown in X state impacted 5,000 people in the district/city/locality/tower(s) of Y for a period of Z days.”

This line of reasoning is also useful to keep in mind for domestic and international

³ Interview with MF

advocacy against internet shutdowns. Under [Article 19](#) of the International Covenant for Civil and Political Rights (ICCPR), restrictions on freedom of expression must [fulfill](#) the tests of legality, legitimacy and necessity, and proportionality. In particular, the proportionality test [states](#) that any restriction must be, among other characteristics, “the least intrusive instrument amongst those which might achieve their protective function.” In such light, the lack of factual clarity about what constitutes a “hyperlocal” internet shutdown might allow governments imposing such measures to claim that their action is proportional because it is “hyperlocal.”

Accordingly, we do not recommend using the word “hyperlocal” while describing or conducting advocacy related to internet shutdowns.

A second possible reason for different respondent reporting of their experience with shutdowns may be because there is no clear, uniform definition of internet shutdowns. While one respondent might consider a throttled (slowed-down) internet to be a shutdown or the extension of an ongoing shutdown, another respondent might not. This is especially key to understanding the variations in the responses in Kashmir, where the original internet shutdown was imposed in August 2019 and 2G internet was technically restored in January 2020. These were further intercut with periodic, shorter-interval shutdowns throughout the period, which might have impacted only specific districts within [Kashmir](#). As a result, respondents may interpret and describe their ongoing situation based on their individualized understanding and opinions about what constitutes an internet shutdown.

The third possible reason for variations in experiences of shutdowns is that, during interviews, several respondents stated that they found it tricky to assess whether an internet shutdown has been carried out in their area, because their mobile phones did not contain any immediate visual cues. Without clear information about the government’s actions, individuals would interpret the ongoing issues with internet access very differently.

“The phenomenological experience of seeing internet shut on your phone ... what’s so interesting is that just looking at the phone, you wouldn’t be able to tell. As in, at the top (of the menu screen of the mobile phone) you would still have Jio, or Airtel, it would still have the bars, connectivity, all of those things. If you go into your settings, it still looks like the data package is on and that it is running. But then you go to open any website, and that’s just kind of endlessly loading. It seems like a particular kind of shutdown — that’s why I called it jamming; I think that’s what the locals of Kashmir also call it.”

- Interview with MF

“I don’t know the technicality of what happened, but I could not access Zoom. I could send emails from my phone . . . it took some time to go, but I could send it. Maybe it is because emails took up less bandwidth? I tried connecting with my hotspot, but nothing worked. Maybe it was not a shutdown as such, but they slowed the internet to the extent that you can’t really do much.”

- Interview with KB

A fourth potential explanation for varied experiences emerged in the Hyderabad workshop. Attendees noted that, in specific areas that are considered neither “urban” nor modern economic centers, the year-round, chronic lack of access to stable internet means that citizens are “unaffected” by internet shutdowns, simply because they have never enjoyed reliable or prolonged access to the internet. A participant in the Delhi workshop noted that internet shutdowns must also be understood from the perspective of communities that don’t have internet access because of a lack of telecommunications infrastructure. One participant from the state of Telangana (whose government is well-known for embracing and encouraging internet connectivity and governance) in the Hyderabad workshop shared:

“We don’t have any [mobile] towers, and therefore no internet. It is more an issue of internet access than internet shutdowns.”

A fifth explanation for varying experiences with shutdowns arose in the same Hyderabad workshop, when attendees noted that even within specific geographic or administrative areas such as districts or cities, internet shutdowns may be imposed on specific settlements or areas to disable access for particular groups or communities. Consequently, even where diverse publics (along the lines of class, caste, religion, degree of urbanization etc.) co-exist in the same larger geographic spaces such as cities or states, some of them may never be affected by or have knowledge of internet shutdowns. One participant shared her experience of discussing the occurrence of internet shutdowns with IT professionals and students in neighboring areas of her own state, but the others had no experience or information about these shutdowns.

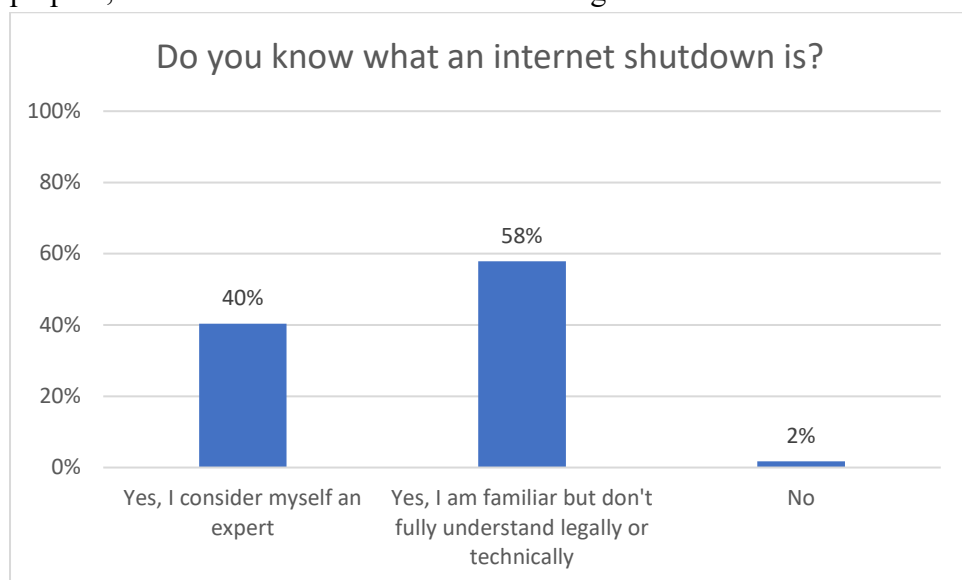
“When I explained to them that 50 kilometers (i.e. approximately 32 miles) from the venue [of the discussion], there was a shutdown (after showing them a map of India where the internet shutdowns were marked), they were surprised that something like that was happening.”

A sixth reason was discussed in the Guwahati workshop, where a participant from Manipur noted that there was difference in how people access the internet. Since shutdowns in the region had typically been targeted at mobile networks, people accessing the internet through broadband services may not be impacted at all.

Finally, this variance in experiences might coincide with a respondent’s technical or legal understanding of internet shutdowns. When asked about whether they were familiar with the concept of an internet shutdowns, 60% of the 57 respondents reported that, while they were familiar with shutdowns, they did not understand how these occur, technically or legally, while only 38% considered themselves expert on shutdowns and related issues. The rest (1.7%) reported that they did not know much about shutdowns.

Interestingly enough, of 23 respondents who considered themselves experts on shutdowns, 10 reported that they had never personally experienced a shutdown, leaving only 13 respondents who had both experienced shutdowns in the past and had the technical and legal expertise surrounding the issue.

Ultimately, this meant that within our pool, a significant number of respondents lacked the expertise to fully assess and document their own experiences of internet shutdowns. This is a critical gap of knowledge, and means that researchers, activists, and other key stakeholders working in this area should prioritize empowering local communities — including those who reside in shutdown-prone areas — in a way that they are able to independently document, prepare, and assess their own situations during and after an internet shutdown.



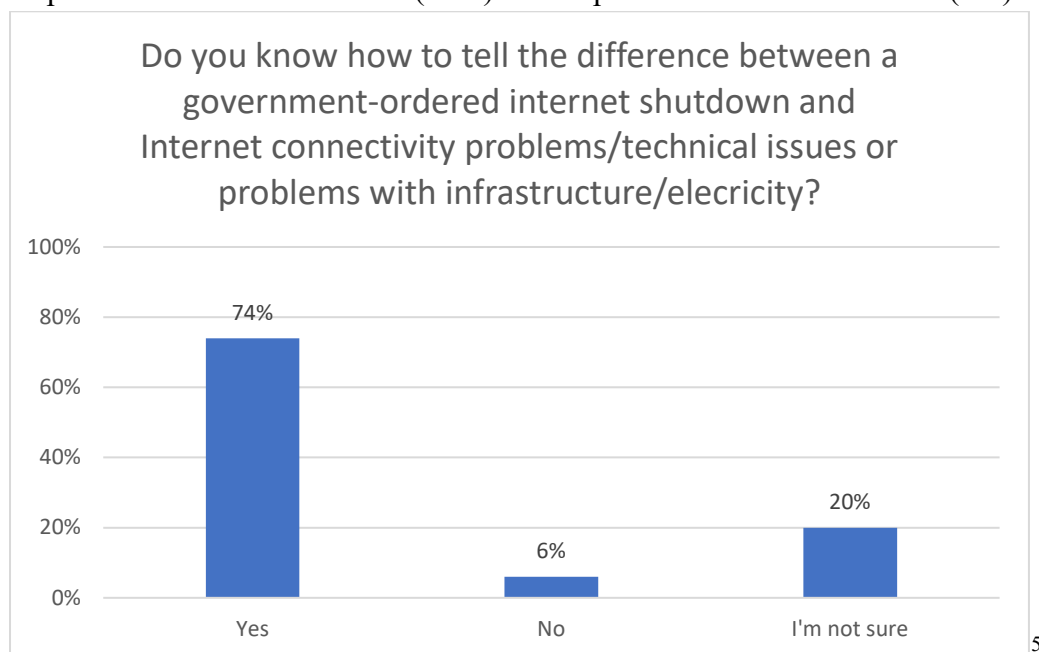
These findings were reflected in all of the workshops. In the Jaipur workshop, for instance, participants arrived at a general consensus that there was very little knowledge and understanding of how shutdowns are legally or technically implemented. In addition, in the Hyderabad workshop, participants expressed confusion about the objective behind carrying out an internet shutdown. There was no understanding of how to tell the difference between an intentional shutdown and technical issues that may slow or cut off internet access. Similarly, in the Guwahati workshop, participants stated that there was no clear understanding about when a shutdown was happening and when it was a case of a phone not working properly.

Additionally, participants in the Hyderabad workshop did not have knowledge about the laws that authorize internet shutdowns, nor about the procedural safeguards that do exist in some instances. Indian law on internet shutdowns is fragmented: multiple laws or regulatory measures can be invoked to impose shutdowns. Despite the legal requirements of a public notice, transparency is limited about shutdowns orders. This combination of fragmented,

⁴ N=57

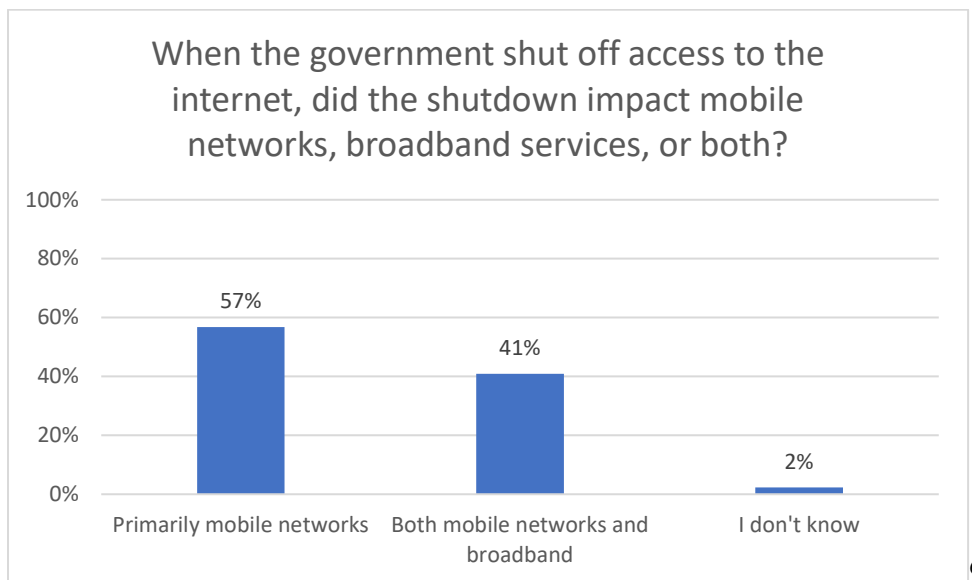
inaccessible laws and opacity in which and how laws are invoked for shutdowns prevents citizens from clearly understanding the legal framework.

We also asked respondents if they knew the difference between government-ordered internet shutdowns and internet connectivity/technical issues, to which we received 50 responses. A predominant number of respondents out of this pool answered yes (76%), followed by respondents who were not sure (20%) and respondents who answered no (4%).



Once respondents indicated that they had experienced a shutdown in the past, we asked them about the nature of services that were targeted by these reported incidents of shutdowns, We received 44 responses, of which the majority (56%) reported that mobile internet was impacted by ordered instances of shutdowns, while 40% of respondents reported that both broadband and mobile internet services were affected when they had encountered an internet shutdown. This confirms the finding of [Access Now](#) (see: Background), which had reported that across worldwide reported internet shutdowns, governments seemed to largely target mobile internet services.

⁵ N=51 (Rounding issue so real numbers are: 74.51%, 5.88%, and 19.61%)



As indicated earlier, an overwhelming amount of India’s internet access occurs through the mobile phone. As a result, an internet shutdown that targets only mobile internet services would still impact the majority of the population, especially individuals who do not have broadband access to supplement their mobile internet usage. As our interview with a respondent from Assam confirms, it is a common phenomenon that even during ongoing mobile internet shutdowns, broadband services would continue to operate in offices and commercial buildings.⁷

Perceptions of Government Rationales for Shutdowns

We received a large, varied pool of responses to the question of what respondents believed were the reasons government authorities might shut down the internet. Respondents could choose more than option, and almost all did. This corresponds to the reality that officials often use similarly worded and/or closely connected reasoning side by side to justify an internet shutdown.

In the survey, respondents believed that curbing protests was one of the most common triggers (22.2%), followed by shutdowns as a response to incidents of communal violence (17%) or as a way to prevent cheating in exams (12.4%). Respondents were also provided the opportunity to offer other rationales in an open-ended format. One respondent wrote “to prevent people from documenting what is happening” or “on the anniversary of important days when the government preempts protests.”

⁶ N=44

⁷ Interview with K

Without Warning? Pre-Shutdown Notifications Vary from State to State

The procedures (or their absence) that precede an internet shutdown also vary across states, and our interviews allowed us to capture some of these nuances.

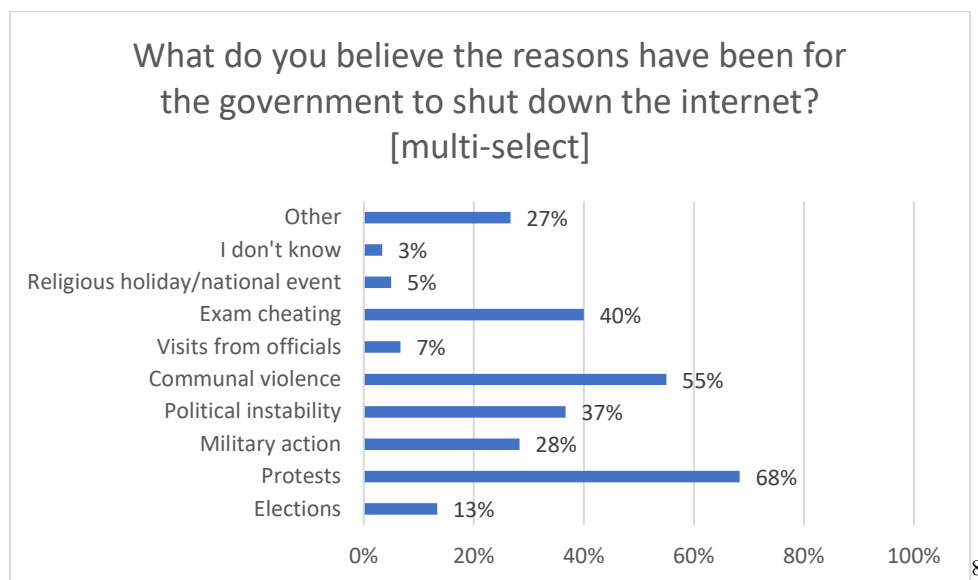
A journalist from Rajasthan revealed that in some instances, the local district administration provides “pre-information,” basically notices to the news media for publication a day in advance of an internet shutdown specifying the expected duration. Such pre-information allows a measure of preparedness, although the journalist also said these notifications often result in long queues at ATMs, since internet shutdowns also rule out online transactions.¹ The pre-information is, however, provided only sporadically.

Contrast this with accounts from a researcher working in South Kashmir, who stated that internet shutdowns in the region are often unannounced and there is no way of knowing when network services will be restored. Therefore, planning for upcoming shutdowns is often impossible. Sometimes, a warning of a shutdown might come very shortly beforehand – maybe 20 minutes, for instance – as local news groups on WhatsApp report about a shutdown that just started in another district. In such cases, the neighboring localities would have a small window of time to brace themselves.¹

Ultimately, authorities in a particular state have discretion over whether to give prior notice, since the law does not obligate them to do so (see: [Legal Background](#)). This regional variation illustrates the often random interpretation of laws by authorities, which in turn allows them impunity for the consequences of shutdowns.

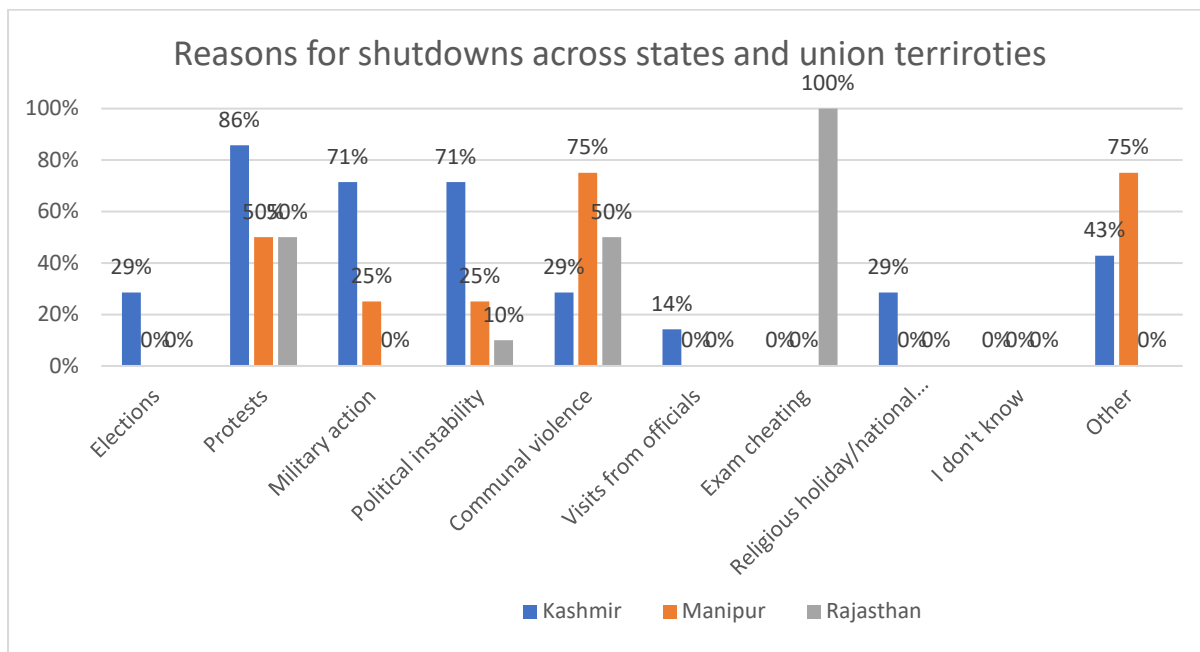
While respondents were specifically asked to provide what they *believe* are the reasons the government shuts down the internet, a few of the open-ended responses reference the explicit rationales that government authorities often provide to justify internet shutdown orders. Several respondents wrote “public order,” “national security,” “law and order,” “public safety,” and “rumor-mongering.” According to Access Now’s #KeepItOn [dataset](#) that tracks internet shutdowns in India and other countries, “Law and order,” “public order,” and “national security” are some of the most commonly cited rationales by governments across states in India. Of course, some of these justifications, including “law and order” and “rumors” are ambiguous enough that they can potentially be misused. For instance, in 2021,

the Internet Freedom Foundation [found](#) that most of the internet shutdown orders issued between Jan. 10, 2020, and Sept. 25, 2021 by the Office of the Divisional Commissioner of Udaipur followed an identical format: a) an official recommended that internet services be suspended due to “law and order” concerns, b) the divisional commissioner expressed satisfaction with the recommendation without citing any reasons, and c) the commissioner suspended internet service.



To compare the regional variations in the perceived reasons for carrying out internet shutdowns, figures from three states — Rajasthan, Kashmir, and Manipur — are mapped side by side. As mentioned earlier (see: “Background”), reports external to this study have shown that Rajasthan topped the list of states with the highest number of internet shutdowns carried out to prevent cheating in exams, while in Kashmir the most popular reasons for shutting down the internet seemed to be protests and military action, and in Manipur, communal violence seemed to be most common reason given for a shutdown.

⁸ N=60



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Each of these states and union territories, have their own histories of social and political conflicts, and the reasoning deployed behind internet shutdowns must be accordingly contextualized against such history. For instance, historically, both Kashmir and Manipur have been heavily militarized, with extensive deployment of security personnel. As a result, shutdowns in response to military action fit within this factual matrix for these two regions.

On the other hand, in the Delhi workshop, one attendee pointed out that in Rajasthan, competitive exams are a way for people to get recruited for government jobs, and as such, these exams are a highly political affair. Accordingly, the stakes of conducting these competitive exams are seemingly high enough for the government to justify the blunt instrument of cutting internet access in an ostensible effort to prevent cheating. Independent research seems to confirm this: for instance, the internet was cut off during the [Rajasthan Teacher Eligibility Test \(REET\)](#), which is required for employment as a primary/secondary teacher in government-run schools, a position that comes with good benefits. As such, the government might feel justified shutting down the internet to prevent the question paper from being leaked, or to prevent cheating during the exam.¹⁰

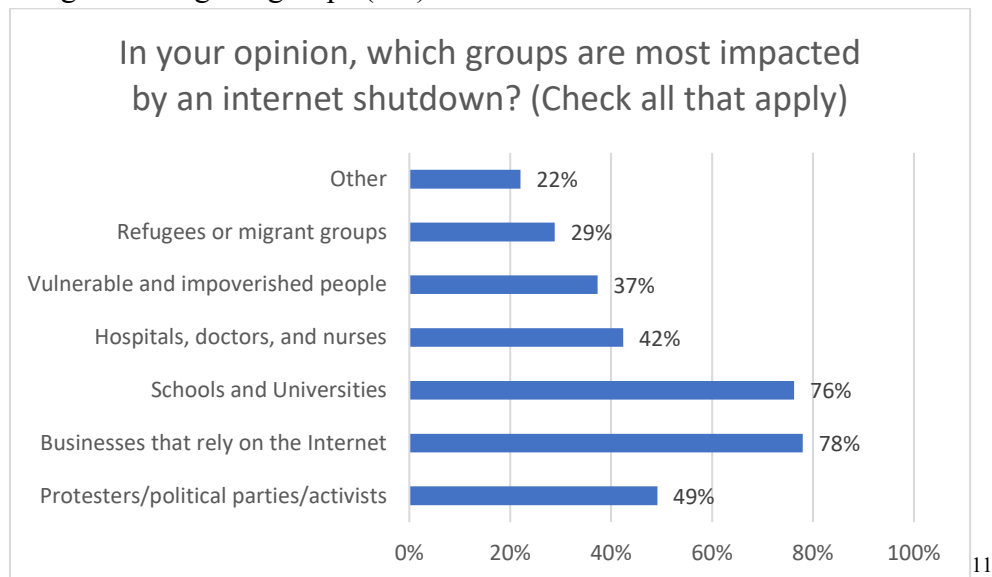
Impact of Shutdowns: Groups Most Affected

Two survey questions related to the impact of internet shutdowns. The first asked respondents to select all the groups they believed were most impacted, with the option of selecting multiple answers, as well as providing open-ended responses.

⁹ Respondents number from 4 through 10

¹⁰ Please note that this does NOT justify internet shutdowns during exam times.

All 60 respondents answered this question, providing a diverse pool of responses. Businesses that rely on the internet are perceived as one of most impacted groups (23%), followed by schools and universities (22%), and then protestors, political parties, and activists (14%). The groups perceived to be less affected were vulnerable and impoverished people (11%) and refugees or migrant groups (8%).



The open-ended responses revealed nuanced understanding of how wide-reaching and disparate the impact of internet shutdowns can be. For instance, a researcher and student previously based in Gurgaon (officially Gurugram), located in the northern Indian state of Haryana, near Delhi, said her previous research on internet shutdowns had revealed that Kashmir had an up-and-coming cafe culture, where small eateries would aim to attract customers by the promise of free Wi-Fi. But of course, without reliable and continuous internet services, such businesses would suffer immensely.

Similarly, another journalist based in Kashmir said a significant amount of Kashmir’s businesses rely on the internet to communicate with prospective buyers and advertise their products. These entrepreneurs include fashion designers, handicrafts makers, and sellers of horticultural products.

A Rajasthani journalist said that state government, in order to prevent cheating on competitive exams, had introduced requirements that students do not take exams in their hometown, in order to avoid potential favoritism by someone who knows them or their family. But at the same time, if the government also is shutting down the internet to prevent cheating in that way, it creates extreme difficulties for students trying to navigate towns or cities they don’t know to find their unfamiliar exam locations or to pay for food or for transportation.

¹¹ N=59

Several respondents highlighted that internet shutdowns uniquely impact women. A journalist based in Kashmir, for instance, cited the region's poor health infrastructure and said the 2019 internet shutdown and communications blackout increased the difficulty for women who need to travel outside the region for care that isn't offered there, such as in-vitro fertilization (IVF). Another activist and student based in Madhya Pradesh said many women survivors of sexual violence during times of communal (religious) unrest rely on the internet as an outlet for discussion and to find formal or informal support groups, because the stigma surrounding sexual violence sometimes rules out reliance on family members. In the Jaipur workshop, participants pointed out that women gained more autonomy and financial support because of the internet, and suspension of services impacted this severely.

The effects of internet shutdowns on other types of vulnerable communities became a focus during the Hyderabad workshop. Those participants particularly cited poor or government-marginalized communities and minority communities that are at high risk of persecution or mob violence. Households and communities in poverty or on the margins depend on the internet to access social services that provide the most basic requirements, such as food, a daily wage, and healthcare. In the Jaipur workshop, participants identified these communities further and defined the specific impact of internet shutdown on these groups. Participants discussed the problem when workers who depend on government social programs for their income are unable to document their work for the day. Additionally, individuals who depend on the internet to manage welfare programs (such as ration cards) are unable to avail the services during a shutdown, and thus are denied basic necessities. Additionally, gig workers who depend on platform apps like Rapido, Ola, and Uber for their employment lose income during a shutdown.

Understanding the Unique Needs & Challenges of Specific Impacted Communities

Participants in the Hyderabad workshop cited several challenges for advocacy with local communities when it comes to internet shutdowns:

First, in areas where internet availability was rare or spotty on a regular basis, **internet access is seen as a luxury and not a right.** Therefore, internet shutdowns were not considered an issue of "rights" or democratic liberties, but rather a practical problem to work around. In areas where communities do not have access to the internet in the first place, conversations about internet shutdowns would seem premature or entirely irrelevant.

Second, the compounded impacts of shutdowns are not comprehensively documented, archived, or discussed. Therefore, while each individual may be impacted in different ways, **there is no common knowledge or understanding of effects on others or on local communities, local social institutions, and local economies.** So there may not be enough awareness among individuals in local communities of, for example, the loss of business or other opportunity due to the loss of internet connectivity.

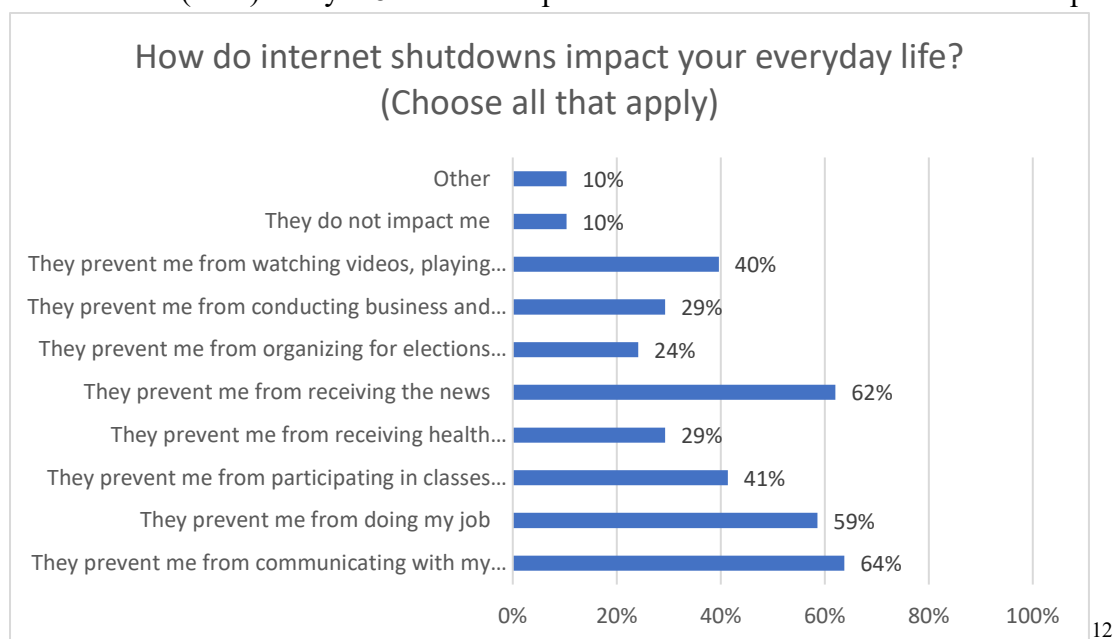
Third, **when internet shutdowns are imposed on already-marginalized communities, those residents may be reluctant to challenge the action for fear of government reprisals.** One participant, speaking of a community frequently repressed by law enforcement under the guise of "state security concerns," said, "When we realized that a shutdown has been imposed for security purposes, we thought it was a security issue and we didn't want to [further] question the police [about the imposition of the shutdown]."

This category of community may appear broadly as “the poor” but primarily comprises individuals from marginalized caste communities (across religions and regions), migrant workers, and other groups that are economically marginalized for historical reasons. Two attendees in the Hyderabad workshop from less-resourced geographic regions with a high population of Adivasi communities explained the disproportionate impact on their communities because they rely so much on social services that require internet connectivity.

Minority communities at high risk of persecution or mob violence are not only more likely to be subject to internet shutdowns at the slightest hint of public unrest or mischievous rumors, but also are more likely to suffer greater anxiety and trauma from shutdowns due to the risk of violence, heightened isolation, and the inability to communicate with each other. One attendee in the Hyderabad workshop specifically cited the effect on Muslim communities in India. Furthermore, attendees noted that these specific impacts are even less likely than others to not be documented and so are practically invisible. These communities also are the least likely to have the social, economic, or political resources to understand internet shutdowns and circumvent them.

Impact of Shutdowns: Everyday Life

Respondents were asked to indicate how internet shutdowns impacted their everyday lives. Out of 58 responses to this question, the largest share reported that shutdowns prevented them from communicating with friends and family (17%), receiving the news (16%), and doing their jobs (15%). Others said it posed barriers to participating in classes and receiving an education (11%). Only 2.8% of the responses said internet shutdowns do not impact them.



¹² N=58

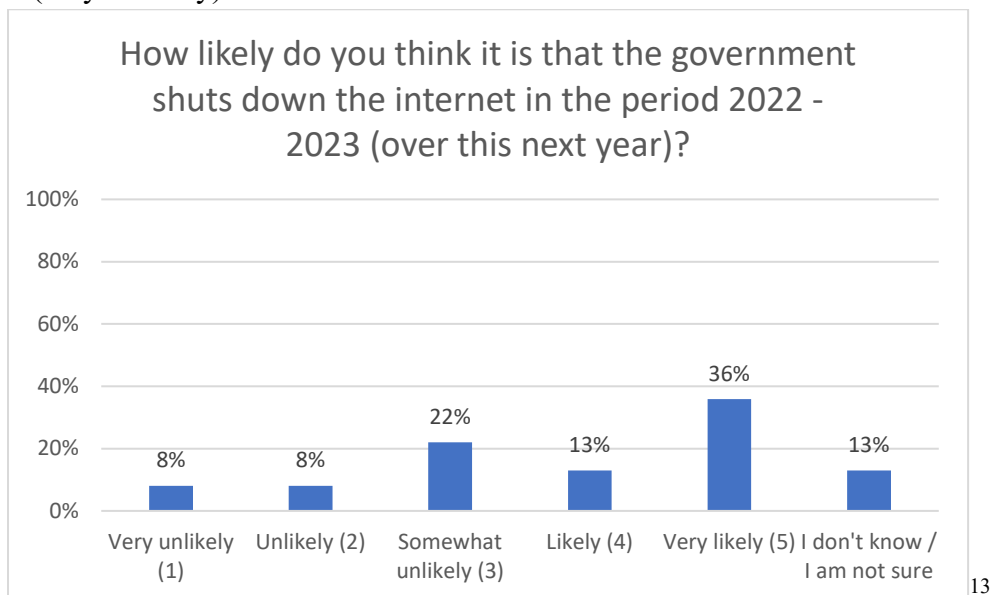
Similar to the previous questions, respondents had the option of providing additional, open-ended answers. Journalists referenced the difficulty of collecting key information on the ground, and respondents observed that internet cutoffs eliminate some of the most common sources of local news -- messaging platforms like WhatsApp and Telegram.

Respondents working with international organizations or working remotely reported unique difficulties during internet shutdowns. For instance, the founder of an LGBTQ+ non-profit organization based in Manipur said they relied on an uninterrupted supply of electricity and the internet for their work, yet both are still a luxury in their region, so basic and essential tasks such as communicating with international donors became difficult.

Risks of Future Shutdowns and Perceptions of Legal Systems

Shutdown Risks and Reasoning

We received 53 responses when we asked respondents to assess the likelihood that the Indian government would shut down the internet in the year 2022-23, on a scale of 5 (very likely) to 1 (very unlikely).



The largest number of respondents (36%) found it very likely that the Indian government would shut down the internet during that timeframe, while only a handful of respondents found such a possibility very unlikely. This apprehension is not unfounded, since internet shutdowns in India are rampant and often seem to be the first response for governments around the country in the face of unrest. After the data-collection period for this report, for instance, more than 10 internet shutdowns were [reported](#) around the country: including in Jharkhand, Assam, Rajasthan and Kashmir.

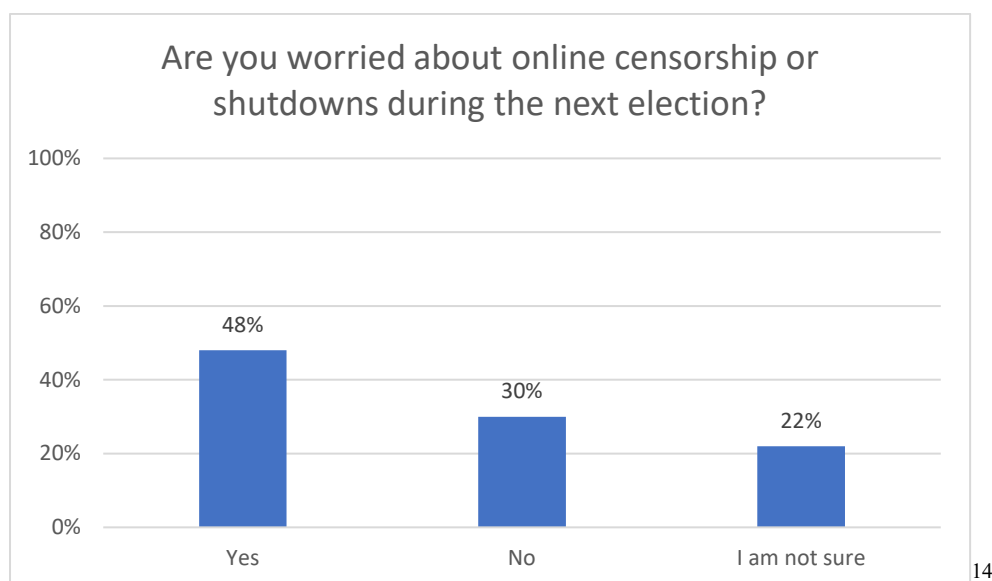
Interestingly enough, some respondents believed it was unlikely that the government would order an internet shutdown in the coming year and explained their answer by noting the

¹³ N=53 (Rounding issue so real numbers are: 7.55%, 7.55%, 22.64%, 13.21%, 35.85%, and 13.21%)

government’s own dependence on the internet. For instance, a teacher/activist in Telangana and a journalist in Manipur stated that, during elections, political parties rely on the internet -- especially social media platforms and messaging services -- for campaigning and to disseminate information. As such, cutting off the internet during these times would also harm their interests. Indeed, there have been numerous [reports](#) that the current ruling party, the Bhartiya Janata Party (BJP), uses the internet to [serve](#) its electoral goals.

Similarly, attendees in the Hyderabad workshop expressed skepticism that authorities would order internet shutdowns during or around election times, with the same reasoning -- that they depend on it for their own campaigning. However, the attendees did note that certain services could be censored during elections.

This discussion also relates to the next question, which asked respondents if they were worried about censorship or internet shutdowns during upcoming elections. The margin of respondents saying no (42%) is only slightly more than the respondents saying yes (39%).



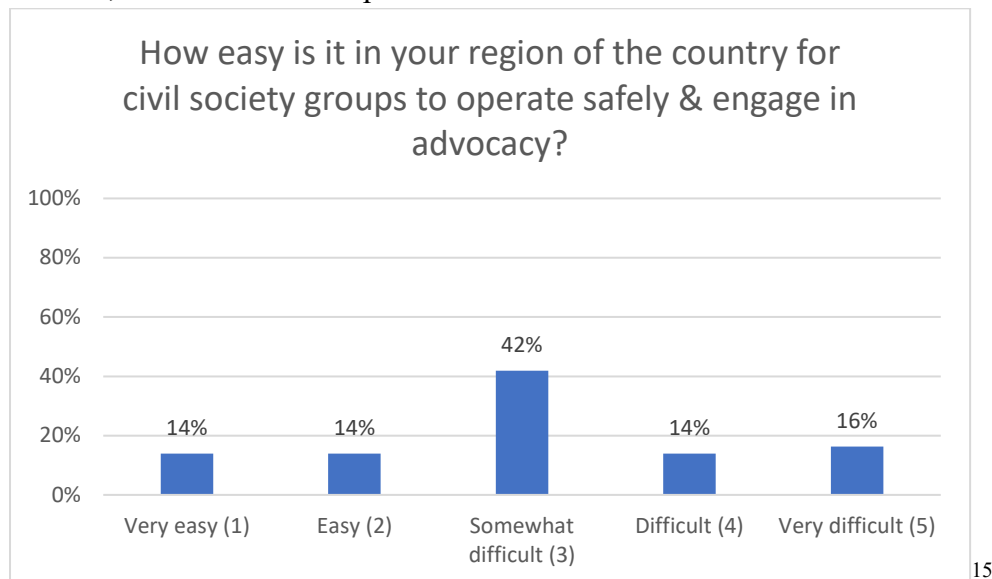
This question, however, did elicit some variation by region. The largest single proportion of respondents who said they were concerned about shutdowns/censorship were from Kashmir (21%), followed by respondents located in Andhra Pradesh (13%) and Delhi (13%).

Civil Society’s Freedom to Operate

We also asked respondents to rate how easy it was for civil society in their region to operate safely, with the scale ranging from 5 (Very difficult: civil society cannot openly and safely

¹⁴ N=50

engage in advocacy) to 1 (Very easy: civil society is unimpeded by laws, norms, or threats). For this, we received 43 responses.



Most respondents (42%) believed it is somewhat difficult for Indian civil society to operate safely and engage in advocacy. In this response pool, there were interesting regional variations. Of the five responses from individuals based in Kashmir, three rated the difficulty level as 5, one respondent rated it as 4, and one rated it as 3. This produces an average difficulty rating of 4.4 in Kashmir. In contrast, the average difficulty rating in Rajasthan (n = 8) was 1.85. Despite both regions having a history of continuous internet shutdowns, this disparity speaks to the dramatic restrictions on civil society work in Kashmir. (Given the comparatively low number of responses for this question, these findings would require additional research.)

Perceptions of India’s Legal System and Understanding of the Law

One significant part of our research involved perceptions about India’s legal systems, since as discussed previously, statutes create a lot of the problems with the existing regulatory framework for internet shutdowns. Accordingly, we asked respondents to describe a) their perception of India’s legal system, and b) their understanding of the laws that permit government entities to cut access to the internet or block social media platforms. In both cases, we asked respondents to also answer if they thought the law made it easier for government authorities to circumvent accountability for their actions.

All of the respondents who answered these questions, answered in the affirmative for all of the questions, indicating that laws in India make it easier for the government to shut down the internet and avoid accountability. This clearly indicates a skepticism – even cynicism -- about

¹⁵ N=43

the legitimacy of India's legal framework in relation to the government's authority to censor, block, and cut access to the internet and social media platforms.

Given that the respondent pool had a large number of lawyers, researchers, and experts who had engaged with India's legal system at different points, the opportunity to offer open-ended responses yielded a rich, diverse body of opinion and analysis.

Respondents generally believed India's legal system promoted a culture of impunity. This meant that whenever it came to the government ordering the suspension of the internet or blocking of social media platforms, it could do so without respecting the procedural safeguards built into the law. Respondents also pointed out that, in the lower levels of the administrative hierarchy, officials seem ignorant of existing legal jurisprudence, further perpetuating the misuse of the legal system.

In particular, respondents pointed out that the Review Committee constituted for reviewing suspension orders was ineffective in truly preventing or questioning the government's practices for multiple reasons: reviews did not take place sufficiently, there was a lack of transparency in the committee's operations, the panel was made up entirely of bureaucrats (thereby evading independent judicial scrutiny), and the committee has no power to quash a suspension order already issued. In addition, the safeguards introduced by the TSTS Rules were treated as mere formalities by the administrative officials who should be otherwise upholding them. For instance, since a recent amendment to the TSTS Rules stated that suspension orders could not be valid for more than a period of two weeks, the administration at the Union Territory of Jammu and Kashmir kept renewing these orders every two weeks. As such, respondents stated that they did not believe that the rules had created any difference, since all suspension orders were produced after the suspensions happened, were often replicas of each other, and generally do not conform to the law.

In a similar vein, respondents argued that the Information Technology Rules must be seen in the context of the already-existing censorship and surveillance regime in India. Given the weak procedural safeguards for government surveillance, the traceability requirement for messaging platforms can make it easy for the government to take action against dissidents and journalists. In addition, the insistence on automated content takedowns and a general political atmosphere of intimidation, coupled with the requirement for local compliance/grievance offices, skew incentives of companies towards over-censoring/ and over-compliance with overbroad and/or unconstitutional orders, or face the immediate arrest of their staff.

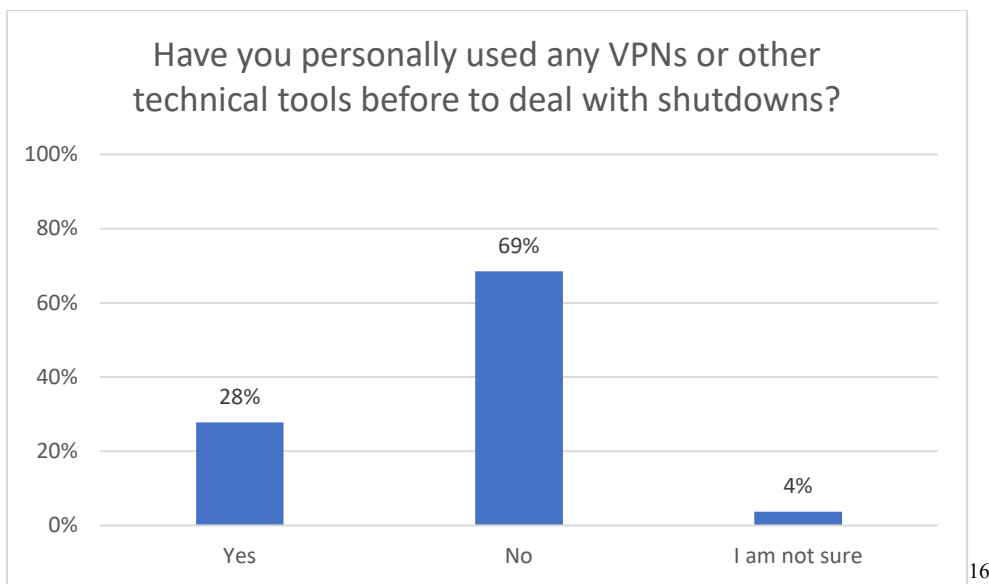
Civil Society Preparedness and Capacity

In the final section of the survey, we asked questions to assess respondents' legal and technical capacity related to advocacy, litigation, and campaigning on internet shutdowns.

Circumvention Strategies and Tools

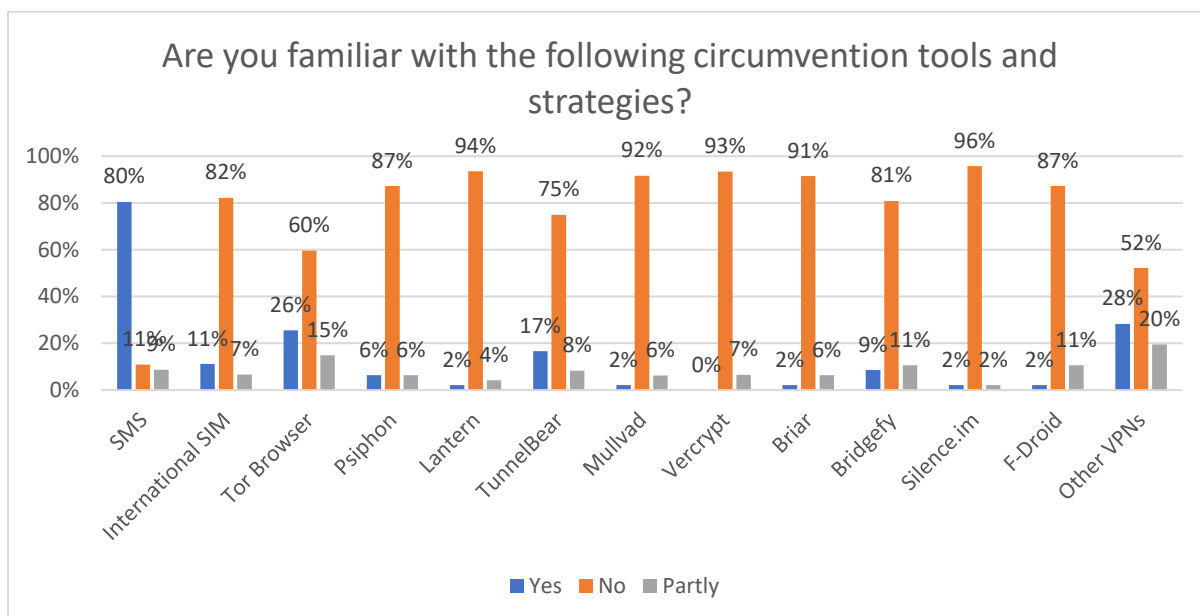
The first question probed familiarity levels on using virtual private networks (VPNs). A VPN provides an encrypted connection to the internet by creating a portal between devices. When using a [VPN](#), the device connects to the VPN’s server, which is located overseas, and the IP address of the original device is hidden, allowing the user to visit websites that might otherwise be restricted.

For this question, 53 people responded. As displayed below, most (96%) displayed a level of familiarity with VPNs, although the number who had actively used them was low (28%) compared with those who were merely familiar with the concept of VPNs but hadn’t used one (68%).



We also asked respondents to list their familiarity with specific VPNs and other tools and strategies commonly used by individuals seeking to circumvent some degree of internet shutdown.

¹⁶ N=54



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Except for the strategy of using SMS services during a shutdown, respondents report being mostly unfamiliar with the other strategies and tools. This is a critical finding and a potential route of reform and future work, and it speaks to the earlier point about equipping and empowering communities living in shutdown-prone areas to prepare for, cope with, and resist internet shutdowns on their own.

In the Hyderabad workshop, some participants mentioned the use of VPNs and satellite phones during a shutdown, and other attendees said journalists, for instance, might circumvent an internet cutoff by using offline recording devices or satellite phones.

Two respondents, a researcher working on internet-shutdown issues and a journalist, made the interesting point that certain regions of India that experience more restrictions on freedom of speech may have more substantial knowledge about VPNs and other circumvention strategies, but also might have more fear of using them because of the record of government repression.

One reason for the overall lack of knowledge surrounding VPNs may be the uncertain regulatory status of such tools in India. In Kashmir, the Indian police opened hundreds of [cases](#) against people who used VPNs to circumvent the 2020 social media ban on alleged grounds that the individuals sought to “promote unlawful activities and secessionist ideology.” Similarly, in late 2021, a parliamentary committee [recommended](#) permanently blocking VPN services across the country. While such a measure has not been implemented yet, some attendees in the Hyderabad workshop confirmed that the legal risk of possible arrest for VPN usage likely drives some people away from exploring these tools. Similar

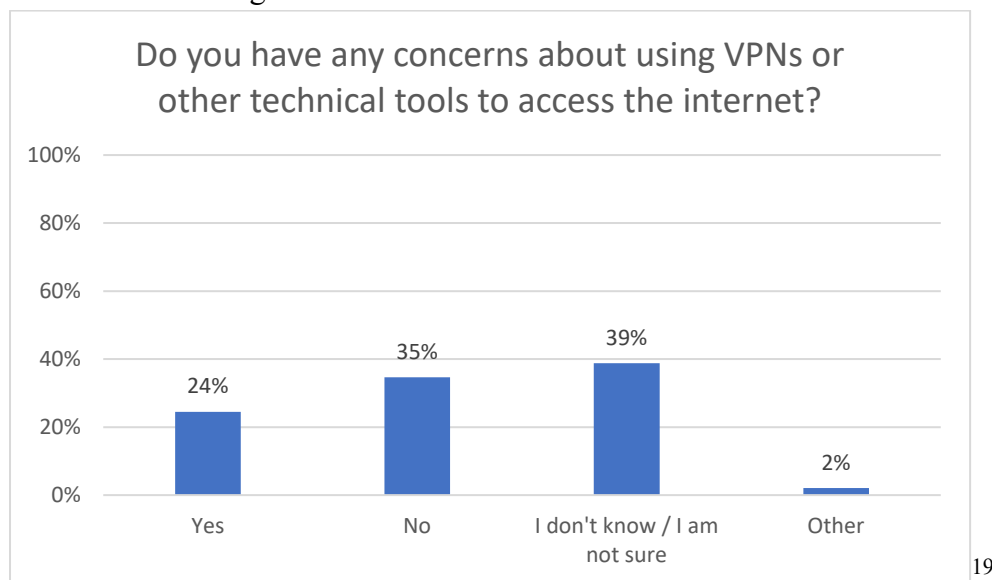
¹⁷ Respondents number from 27 to 48

sentiments were expressed in the Jaipur and Guwahati workshops, where participants stated uncertainty about the legality of VPNs as a reason for their low adoption.

“Are VPNs illegal? I don’t think I’ve used one before. Is it risky to use?”

Another blow to the potential utility of VPNs is a recent [directive](#) by the Indian Computer Emergency Response Team (CERT-in) that, among other provisions, requires VPN providers to store their users’ information, including their names, email IDs, contact numbers, and IP addresses for a period of five years. This has been controversial and met with resistance from VPN providers. ExpressVPN, for instance, removed its India-based VPN servers, [stating](#) that the directive “is incompatible with the purpose of VPNs, which are designed to keep users’ online activity private [...] The law is also overreaching and so broad as to open up the window for potential abuse.” Other popular services like SurfShark and NordVPN have [followed](#) suit.

We asked respondents if they had any worries about using VPNs or other technical tools to access the internet. Of the 49 responses, about 34% said no, while about 24% said they did have concerns. Interestingly, 58% of the respondents who answered that they were worried about using VPNs also identified as belonging to a part of a minority linguistic, ethnic, caste, or religious group. In contrast, 23% of the respondents who answered that they were not worried about using VPNs identified as such.¹⁸



Advocacy Capacity to Stop or Prevent Shutdowns

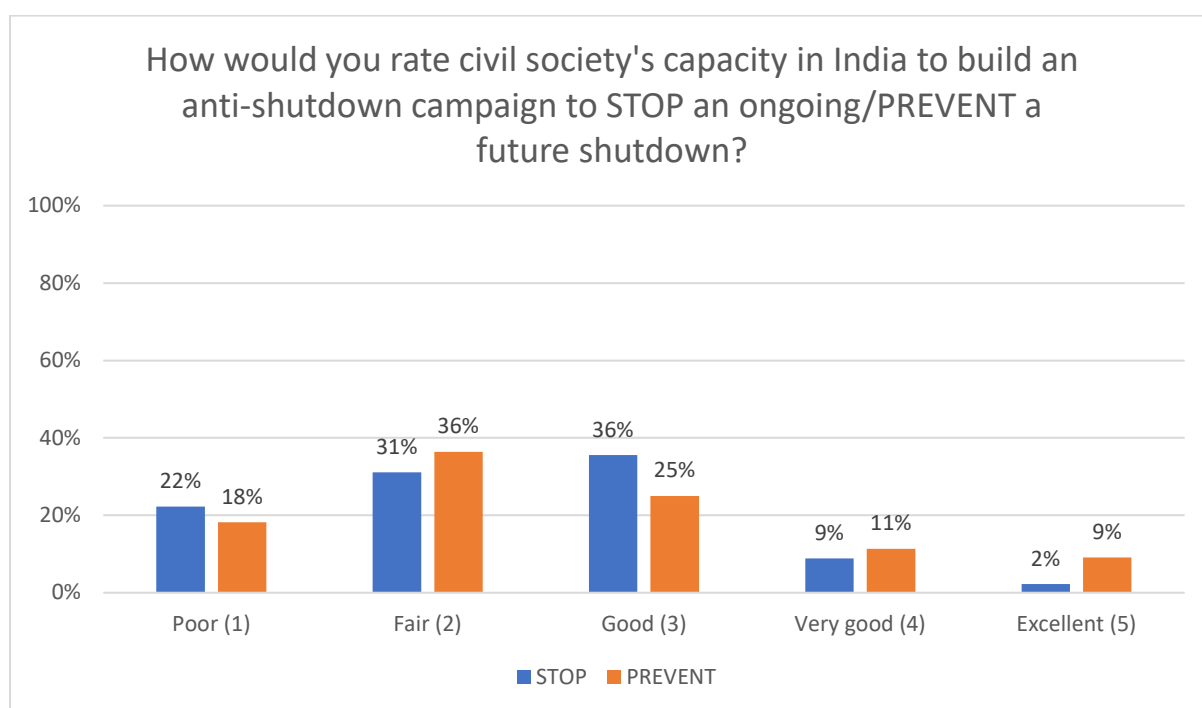
¹⁸ Important to note low numbers of respondents and therefore these percentages are not representative and should be treated as anecdotal, but they are included here to spur additional dialogue on challenges and areas for further research and resource deployment

¹⁹ N=49

Respondents revealed that the capacity of civil society in India to either stop an ongoing shutdown (n = 45) or work towards preventing a future shutdown (n = 44) was moderate to low – on average, 2.37/5 and 2.56/5 respectively.

OPTIMA’s earlier work on shutdown issues worldwide points to some of the likely reasons for this capacity shortfall. Respondents in that survey [cited](#) resource constraints as well as the fact that the need for rapid-response advocacy in the event of shutdowns drains limited energy from more long-term campaigning on the issue.

In the current research, Delhi workshop attendees noted the limited participation in advocacy movements, with only specific digital-rights organizations actively working on this issue. For meaningful change, a more collective front will be needed, and lessons from internet shutdown studies need to be communicated more widely, they said – for example, via engagement with social media artists and influencers.

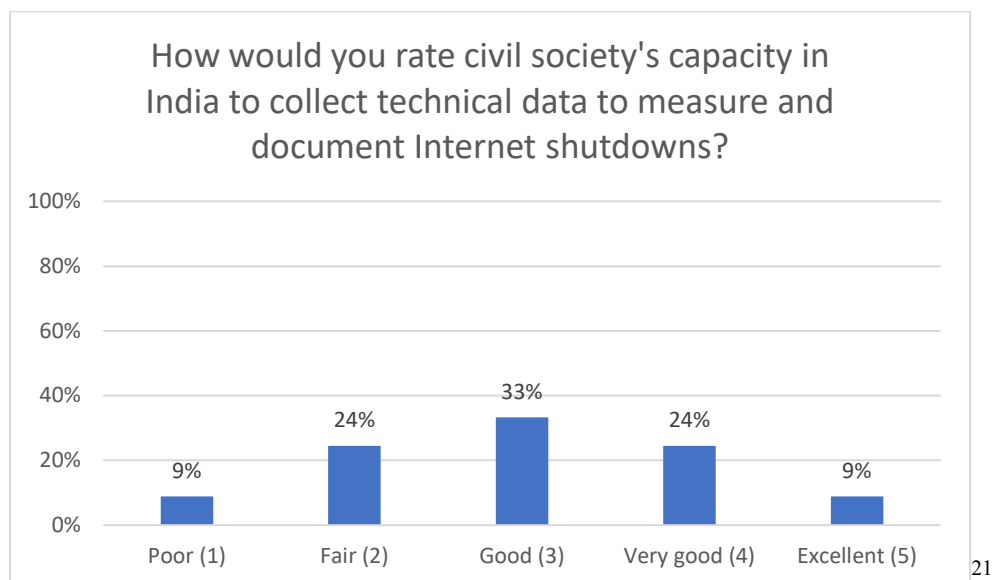


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In areas where connectivity is usually unreliable in normal circumstances, governments can more easily claim that no internet shutdowns took place or that authorities had no role to play in such shutdowns. Network measurement, which involves collecting technical data and documenting internet shutdowns, can refute such claims by [publicizing](#) empirical evidence. Research drawing on network data and analysis has been used to support past court cases related to shutdowns. Respondents in the survey (n= 45) assessed that India’s civil society had moderate to high capacity to collect technical data and document internet shutdowns, with an average score of 3/5.

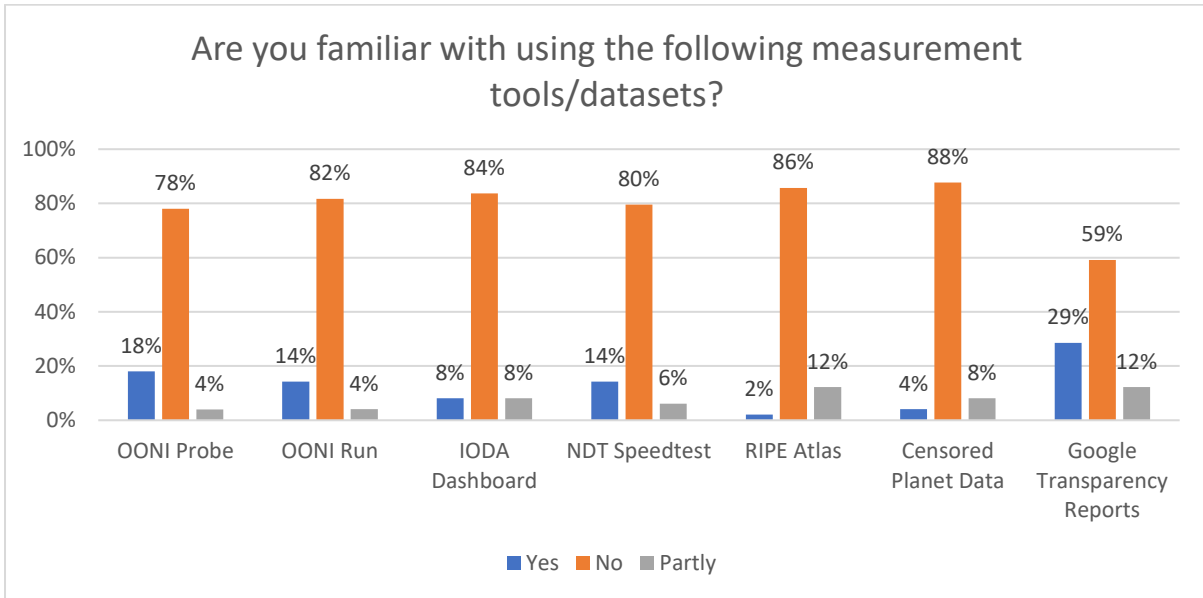
²⁰ N (stop) = 45; N (prevent) = 44

Some Indian communities might have more residents with a higher level of technical skills and background generally, an advantage that could help improve capacity specifically related to monitoring internet shutdowns. Attendees in the Hyderabad workshop, for example, said individuals with general technical skills could be trained to use network measurement tools and datasets. Participants noted that it would be important to ensure that different demographic groups are trained, such as from youth, young women, and even older residents.



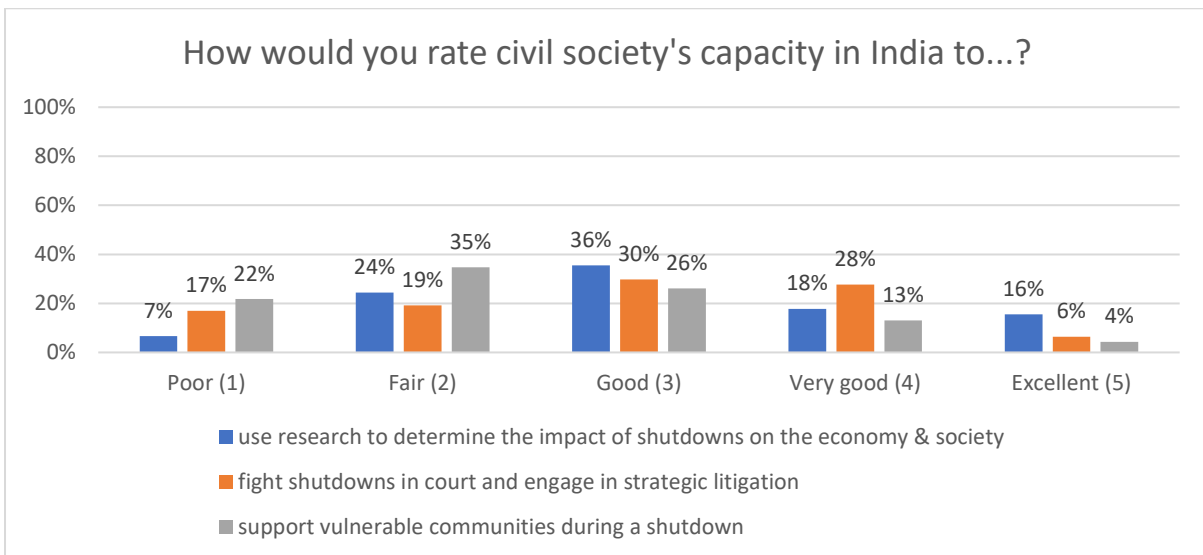
Survey respondents were further asked to rate their familiarity with commonly used network-measurement tools and technical datasets that are used in such measurement. Similar to the question about VPNs, an overwhelming number of respondents reported that they were unfamiliar with all of the listed network measurement tools and datasets. For respondents who reported familiarity with any of these tools (n=44), Google Transparency Reports seemed to be the most well-known, with about 31% of the responses listing familiarity with it.

²¹ N=45



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As noted earlier in this report, there has been notable research and strategic litigation related to internet shutdowns in India, with civil society groups outlining the disparate impacts of such shutdowns on different social groups. Accordingly, we asked respondents to rate their perception of civil society capacity to a) use research to determine the impact of shutdowns on the economy and society, b) fight shutdowns in court via strategic litigation, and c) support vulnerable communities during a shutdown.



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The capacity for research and strategic litigation seemed to be moderate to high (3.1/5 and 2.65/5, respectively), whereas civil society capacity to support vulnerable communities rated

²² Respondents number 49 through 50

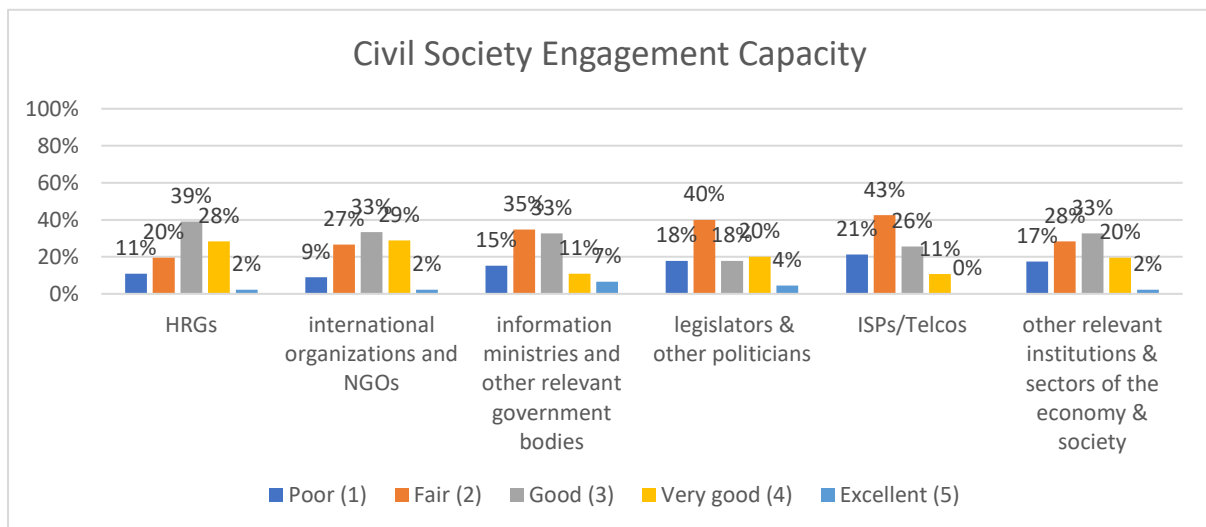
²³ Respondents number 45 through 47

lower (2.43/5). One respondent, a Delhi-based lawyer, activist, and digital-rights expert, said capacity may be low in part because internet shutdowns in India can have such sweeping impact that civil society isn't strong or broad-based enough to address them effectively.

Civil Society Capacity to Engage with Other Key Actors

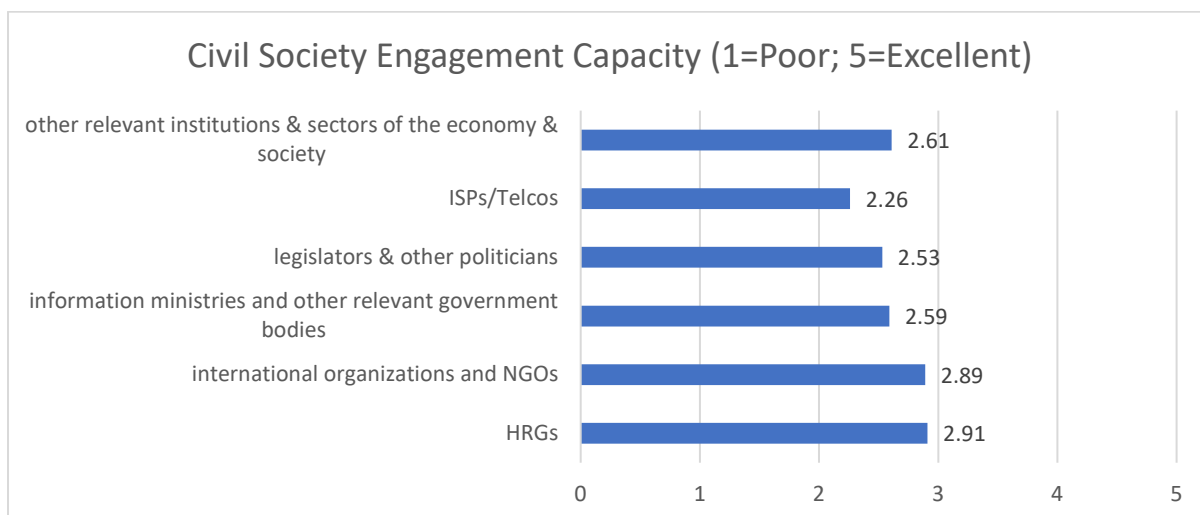
Finally, respondents were asked to rate their perceptions about civil society capacity to engage with other key actors in the internet access and shutdown ecosystem, including ISPs and telecommunications companies, legislators, human rights groups, international NGOs, information ministries, and other relevant sectors like healthcare providers and educational institutions.

Respondents could choose from ratings range from 5 (a great deal of capacity) to 1 (no capacity). The graphic below represents the average value of respondent scores, across these six sectors.



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²⁴ Respondents number from 45 through 47



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The average value across these sectors was consistently on the lower side. Engagement with human rights groups received the highest score (2.9), followed by engagement with international NGOs (2.8) and with other institutions (2.6). Information ministries and legislators each drew scores of 2.5, while ISPs and telecommunications companies seemed to be the most difficult group with which to engage, at 2.25.

It is concerning that respondents perceived such difficulty in engaging with information ministries, legislators, and ISPs, the three stakeholder groups with arguably the most influence and power over policies related to internet shutdowns. Without adequate buy-in from these three sectors, it would be impossible to push for legal reforms and to build advocacy campaigns on internet shutdowns.

The Delhi workshop, which had attendees with a history of advocacy and resistance against internet shutdowns, provided additional insight into this question of engagement with different stakeholders. Some attendees noted, for example, that about seven or eight years ago, when there were only a few digital-rights organizations working in India, private companies (including ISPs) were more likely to participate in meetings on digital-rights issues. But this has changed since then, and private companies are more reticent about getting involved with civil society organizations. This may be in large part because government authorities have used shutdowns more aggressively, and ISPs and other providers don't want to be seen as not complying with such orders, since their licenses depend on government regulators. This leaves them with little leverage to directly resist internet shutdown orders that may otherwise be arbitrary and in contravention of the law.

As for engagement with government actors, the Delhi attendees highlighted the [report](#) of the Parliamentary Standing Committee on Information Technology in 2021, which recommended

²⁵ Respondents number 45 through 47

a significant overhaul of the legal process related to internet shutdowns in India. That could be a powerful tool in advocacy at many levels.

Attendees also suggested that a shift in terminology might help in advocating on internet shutdowns with government bodies and legislators. Using phrasing such as “connectivity,” a less political term than “internet shutdown,” for instance, might smooth engagement with these stakeholders. Attendees also noted that the process of implementing an internet shutdown is decentralized. In other words, engaging only with central government ministries as part of an advocacy strategy would not be sufficient, since it is often state or district officials who order or carry out an internet shutdown.

Recommendations

The following recommendations are based on the findings from the survey and the four workshops, building on the [results](#) of the OPTIMA Needs Assessment carried out in 2020.

- **Develop a strategy for involving ISPs in advocacy to prevent and minimize the impact of internet shutdowns.** One starting point could be to understand what contributes to their increasing reticence in recent years to be involved with civil society organizations on these issues. It also might be informative to scrutinize the licenses for ISPs to understand more clearly what leeway they might have to share information and engage with the public. Research participants further suggested carefully phased engagement, such as starting with a discussion of technical methods used to carry out internet shutdowns, which might open avenues for further discussion. Industry organizations might be valuable interlocutors as well, perhaps providing their companies some collective protection for engagement with civil society and digital-rights advocates.
- **To increase the potential for engagement with government players, assess the interests of various government ministries (other than the information ministries), legislators, and local authorities in maintaining consistent, quality internet connectivity for their own purposes.** This might yield insight into how to work constructively with them to advocate for maintaining connectivity and avoiding shutdowns. An agriculture ministry that relies on the internet for distribution of public goods, for example, might want allies to help support its mission. The 2021 [report](#) of the Parliamentary Standing Committee on Information Technology, which recommended a significant overhaul of the legal process related to internet shutdowns in India, could be a powerful aid in this advocacy, both in engaging members of that committee and in pressing for the recommendations to be implemented. Advocates also could raise awareness of these recommendations in national and regional multi-

"Internet shutdowns have been increasingly used as a tool of oppression. We have seen that be it Delhi, Rajasthan, Kashmir or Manipur marginalized communities are affected the most by these shutdowns. There is either a loss of security or income or healthcare. Most importantly shutdowns violate human rights by silencing voices. Hence there is a greater necessity to prioritize these communities and strengthen the advocacy against shutdowns "

-Chinmayi SK, The Bachchao project

stakeholder events, including the national and regional [Internet Governance Forums](#) (IGFs), and international meetings such as the EU Trade and Tech Council.

- **Understanding that preventing shutdowns entirely is unlikely in the near future, help local communities in shutdown-prone areas understand the impacts on others around them, even if some individuals may not be directly or significantly affected.** These local communities also need support so that they can better document these shutdowns and plan in advance for alternative means of access in the event a shutoff affects their areas. This support could take the form of creating simple guides and resources in local languages that inform people of the basic steps they can take before, during, and after a shutdown. Another action could be to create simplified and visual versions of existing reports and research findings on internet shutdown that explain how relevant lessons could be applied in local contexts. Given that part of the issue is capacity and resources, especially in local communities and among rights organizations that could provide such assistance, it will be necessary to also advocate for and secure funding for such initiatives.
- **Support training and exchange of best practices for local communities and civil society organizations in the use of technical tools and strategies before, during, and after an internet shutdown.** This might include a range of skills, from tips and tools they can use personally to facilitate communication with friends and family members during a shutdown to network-measurement training that increases the capacity to collect and analyze technical data and incorporate that into their advocacy. As the OPTIMA Needs Assessment Process in 2020 [noted](#), there is a need for “collective standards regarding what we consider a shutdown as well as knowledge on how to measure different types of shutdowns and how to collect and interpret data from multiple sources.”
- **Increase and improve collaboration and identify synergies among digital rights advocates, civil society groups, and other organizations and individuals.** Citing the example of India’s successful campaign for net neutrality, attendees in the Delhi workshop noted that mainstream involvement from popular media and arts collectives was critical for that campaign to go viral and achieve its objectives. Similar efforts to truly mainstream the issues of internet shutdowns could be similarly effective, especially considering that the most socio-economically vulnerable classes often are the most severely impacted by shutdowns. Bringing these issues to the popular consciousness would help ensure more long-term, sustainable advocacy to reduce the impact of internet shutdowns and ultimately prevent them from occurring in the first place.

Conclusion

As of the time of writing this report, India has already seen [71](#) internet shutdowns in 2022, and if responses from the needs assessment survey are any indication, these numbers will only go up in the coming years. Despite this dubious distinction of “world leader” for internet

shutdowns, over the past few years, persistent civil society advocacy efforts have resulted in some gains, making clear that civil society resistance to internet shutdowns remains one of the only primary ways to push back against these practices.

Through the collection and analysis of responses from a diverse group of Indian stakeholders, this needs assessment report hopes to lay down the groundwork for further advocacy efforts to this end. As the results show, these advocacy efforts cannot be unilateral, nor can they be developed without consideration for the realities of communities living through internet shutdowns. Therefore, we hope to continue to build on the findings from this report in concert with individuals and communities around the country and solicit feedback and best practices from advocates [fighting](#) shutdowns in different contexts. This report forms the first step towards this process.

Acknowledgement

The author would like to thank OPTIMA, Internews, for the opportunity and support throughout the research process, and also to Software Freedom Law Centre (SFLC) and The Bachchao Project (TBP) for their thoughtful feedback and involvement in the conceptualization stage of the work. The author would also like to acknowledge the efforts of the team at Sociolegalliterary for coordinating an important portion of the outreach for the research process.

Appendix

Research Methodology and Respondent Demographics

This study employed a mixed-method research approach, drawing on an initial survey, desk research, and a series of focus groups. Our research team designed and distributed a survey, with both closed and open-ended questions, to assess knowledge around internet shutdowns, experiences during past internet shutdowns, understanding of future shutdown risk, and the needs and challenges that different stakeholders face in conducting internet shutdown advocacy.

The survey

The survey was distributed using snowball sampling, targeting specific participant groups from different fields, geographies and perspectives to ensure a diversity of responses and a holistic understanding of civil society community needs.

The survey asked a variety of questions about shutdown experience, knowledge, and potential capacity to prepare for, prevent, and respond to Internet shutdowns. Respondents received slightly different questions based on their shutdown experience and professional background. All questions were optional, and respondents had the option to remain anonymous.

Respondents were allowed to answer the survey online or to conduct the survey verbally as an interview with someone from the OPTIMA research team. In the latter case, we held semi-structured interviews with respondents, transcribed them into usable responses for our form (with consent), and filled them in. This option was presented as a means to ensure access, language, and digital literacy issues did not preclude participation from key communities. These interviews also offered additional insights into the issue of internet shutdowns, and accordingly, quotes from these interviews have been shared throughout the report, with due attribution and consent from the respondents. Responses were collected from March 1, 2022, to April 21, 2022. We collected a total of 60 unique responses, of which 26 responses were collected via interviews.

Co-Design workshops & Focus Groups

After data collection and preliminary analysis, we sought to reach out to select stakeholder networks to discuss the findings in greater detail. During four in-person workshops held across four cities — Hyderabad, Guwahati, Delhi, and Jaipur — we presented preliminary findings from the data to different stakeholder groups, and facilitated discussion of the findings in focus group settings. These groups included digital rights experts, student groups, and journalists, among others. Responses from these groups were documented and are further incorporated within the report, wherever appropriate. Following the facilitated focus

group discussions, participants were also asked to collaboratively develop sets of recommendations that have been aggregated and incorporated into this report. These workshops were held in Delhi, Guwahati, Hyderabad, and Jaipur. Summaries of these events are included below.

- **Proceedings from Delhi:** Organized by SFLC.IN, with support from Internews, this workshop on July 8th, 2022, had participation from 15 individuals representing domestic and international digital-rights organizations. Given the background of the participants, the discussion in this workshop focused significantly on advocacy and research efforts. The workshop was conducted both physically and virtually at SFLC.in office. The event went on for an entire day with different discussions. There were 2 focused group discussions that took place which discussed how civil society and marginalized groups should respond to shutdowns.

The major take aways were many, primary ones were the need to define what internet shutdowns are, understanding internet shutdowns from the perspective of telecom service providers among others. There was an understanding among the group that Internet shutdowns need more discussions to discuss the ways for fighting back' Participants suggested that, because internet shutdowns have become almost routine, they clearly are being used by government authorities as short-term answers to problems that require long-term, sustainable solutions. It is for this reason that governments resort to suspending the internet to, for instance, prevent cheating in exams, instead of effecting administrative reforms that would more sustainably reduce cheating.

In addition to the discussion, SFLC made a presentation, highlighting the complications that arise while documenting internet shutdowns, and how that impacts litigation efforts. In the absence of any uniform mechanism by which authorities inform their populations of a pending, in-process, or past internet shutdown, tracking of such incidents is done through multiple, fragmented sources: government orders (if they are available), local sources, newspaper reports, and so on. The problem of reliable tracking is exacerbated by the failure of government agencies to maintain any database recording these instances. The lack of timely, official information on shutdowns ultimately makes it harder to challenge them in the court.

- **Proceedings from Guwahati:** Organized by TBP, this workshop was attended by journalists, either working for a specific news portal or on an independent basis. One journalist was from Arunachal Pradesh, two were from Guwahati, and the other two were from Manipur. Similarly to the Delhi workshop, given the background of the participants, the discussion focused significantly on the role of media and journalism before, during, and after internet shutdowns. One participant noted the impact shutdowns had on journalists, going on to say that prior to shutdowns, the government should provide lines of communication to journalists specifically, to ensure that they can carry out their jobs.

There was consensus in the group that further legal and technical training was necessary for journalists to equip them better to write about shutdowns. This included both technical and legal training. One participant had experience interacting with the

courts during an internet shutdown and knew the legal situation better than the others, but he acknowledged this was knowledge he had acquired out of need, and that he would like to learn more.

- **Proceedings from Hyderabad:** Organized by TBP, this workshop went in-depth about the socio-economic impacts of internet shutdowns in India, including on women, religious and caste minorities, and others. Participants narrowed down to two the main advocacy routes that might a counter internet shutdowns. The first was to ensure widespread education and resource-sharing on the impacts of internet shutdowns, which would include treating internet users as consumers.

The second was that any real challenge to internet shutdowns must begin with approaching the courts to challenge the legality of shutdowns. This was particularly important to ensure that communities that are already marginalized and disenfranchised are able to participate in advocacy routes without facing persecution.

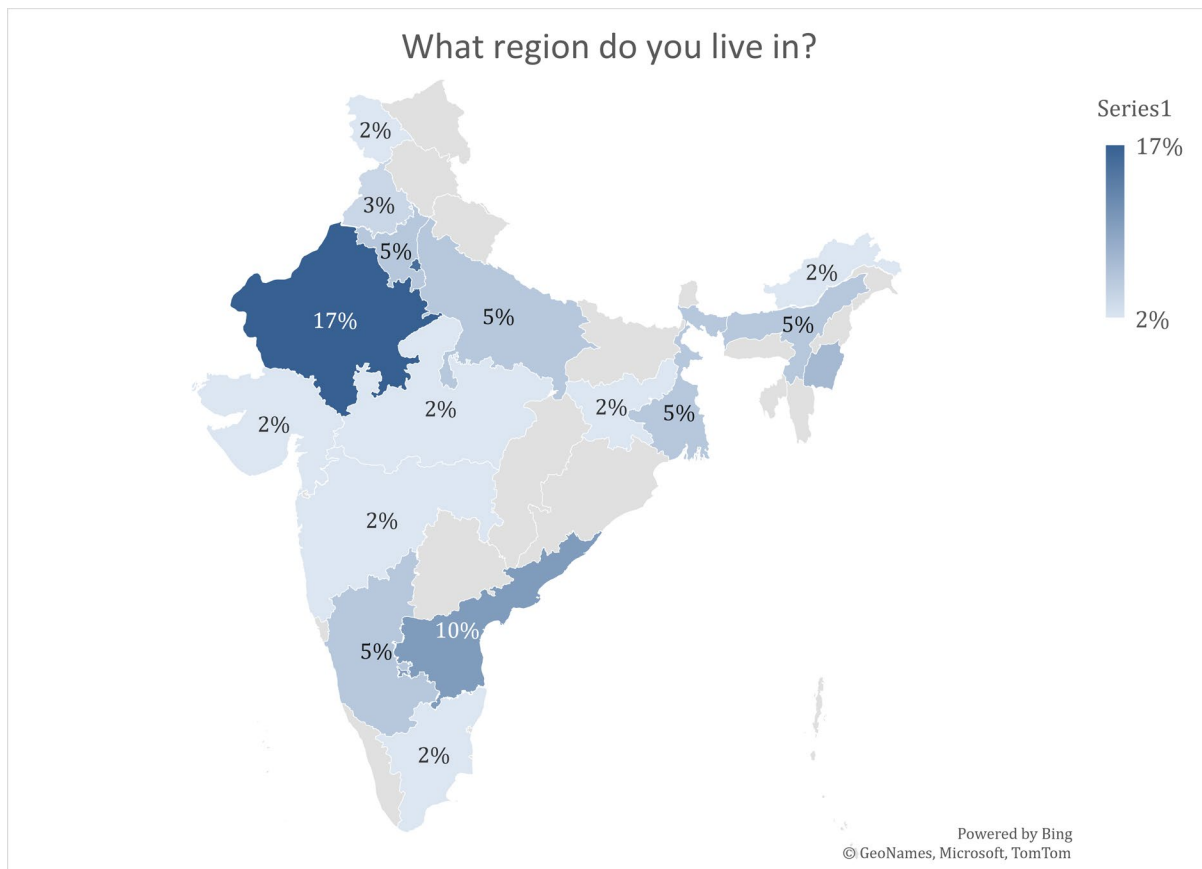
- **Proceedings from Jaipur:** Organized by TBP, this workshop was attended by student activist groups, journalists, and activists, and the discussion went in-depth about the variety of social-welfare programs that were impacted by internet shutdowns and the challenges to grassroots mobilization. Participants noted that women forming self-help groups, gig workers, educators, and individuals using telemedicine were all impacted during an internet shutdown. One participant mentioned that they could not access a government-provided health insurance program during a shutdown, resulting in a large out-of-pocket expense for emergency treatment.

This group also brainstormed on how to involve and engage with ISPs during internet shutdowns. One participant mentioned that they had reached out to their provider after the shutdown, seeking compensation for the loss of service during the days of the shutdowns, only to hear that the provider had no protocols or guidelines for compensating consumers during such outages.

Limitations

Finally, the study did have limitations. Primarily, given the small sample size of responses to the survey ($n = 60$), these findings should not be taken to be representative of the Pan-Indian realities of internet shutdown. This survey was meant to assess the opinions and beliefs of stakeholders who are or could be key participants in internet shutdown advocacy and populations that are impacted by shutdowns, not the general population. The survey findings were, in part, used as a first stage of qualitative research to structure the focus group questions and clarify issues of consensus and dissent.

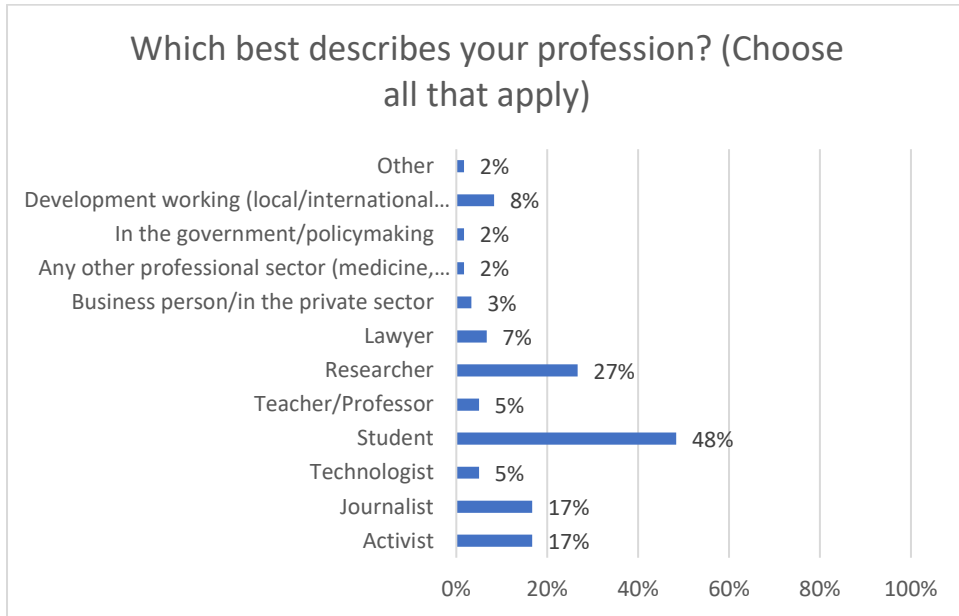
Demographics



As part of the research design and considering the diversity of experiences of internet shutdowns throughout the country, researchers deliberately sought to ensure geographic diversity amongst survey respondents and workshop participants.

The gender ratio of the respondents was slightly skewed, with 23 out of the respondents being female, while 37 were male.

Respondents were also asked to select their professions, and were allowed to choose multiple professional sectors. Several respondents had multiple, overlapping professions, and those reflect accordingly in the percentages.



Respondents were also given the option of self-identifying whether they belonged to a minority linguistic, ethnic, caste, or religious group.

