

## “When India Was Indira”

*Indian Express's Coverage of the Emergency (1975-77)*

*When Prime Minister Indira Gandhi imposed censorship in the summer of 1975, few newspapers tried to withstand the attack on press freedom. This historical study used framing theory to examine how Indian Express constructed its position against the Gandhi regime during the twenty-one-month National Emergency. The qualitative content analysis of the Indian Express's coverage demonstrated its struggle to frame the Emergency as authoritarian. More broadly, the analysis provided a way to understand how journalism functions under censorship.*

On the night of June 25, 1975, news presses along Delhi's Fleet Street, home to several mainstream English-language newspapers of India, plunged into darkness at the start of a power cut that denied people print news for two days. Elsewhere in the country, presses faced a different problem: they were raided and stopped, and newspaper bundles were seized. By the early hours of June 26, hundreds of political leaders, activists, and trade unionists opposed to the ruling Congress party were imprisoned.<sup>1</sup> But because of the absence of major newspapers, few among the public learned of the arrests, which were to become increasingly common in the next few months—a period called “the Emergency” in India.<sup>2</sup>

The purported goal of the Emergency, which lasted from June 26, 1975, to March 21, 1977, was to control “internal disturbance” and thus enable smooth governance and usher in national development.<sup>3</sup> To achieve this goal, the Emergency suspended the

constitutional rights of Indian citizens and instituted strict controls on the freedom of speech and press. Censorship—and in some cases prior restraint—was employed on newspapers and magazines. The government, led by Prime Minister Indira Gandhi, expelled several foreign correspondents, withdrew accreditation from reporters and arrested more than two hundred journalists.<sup>4</sup> Most publications succumbed to the Emergency, choosing to abide by the laws of censorship, which prohibited publishing anything critical of the government.

Even so, among the English-language press, two newspapers—*Indian Express* and *The Statesman*—tried to withstand the attack on free speech.<sup>5</sup> As most newspapers were “filled with fawning accounts of national events, flattering pictures of Gandhi and her ambitious son, and not coincidentally, lucrative governmental advertising,” *The Statesman* and the *Indian Express* helped produce counter-frames by using visual and verbal rhetoric and by reporting issues that were otherwise suppressed.<sup>6</sup> Despite the efforts of these newspapers, Gandhi held a strong grip on the press, at least during the Emergency censorship.

This article analyzes the *Indian Express's* framing of the Emergency to address larger questions about the functioning of journalism under censorship, namely, to what extent can a free press act as the Fourth Estate if freedom of expression is curtailed?<sup>7</sup> And, more specifically, how did the *Indian Express* construct its role in the Emergency versus the Gandhi regime? The study begins with a brief review of the Emergency and Indian press. The next



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section delineates the theoretical framework of framing. It then explains and undertakes a qualitative content analysis of news text and cartoons that appeared on the front and editorial pages of the *Indian Express* during the Emergency.

On June 26, 1975, Gandhi imposed the Emergency, legitimized under the Indian Constitution, to battle corruption, economic slowdown, growing population, and political dissent from the opposition parties. The proclamation declaring the Emergency was broadcast over All India Radio. It advanced that “a grave emergency exists whereby the security of India is threatened by internal disturbances.”<sup>8</sup> These “internal disturbances” mainly referred to the opposition’s increased efforts in demanding Gandhi’s resignation after she was accused of corruption. Two weeks before the Emergency, Allahabad High Court annulled Gandhi’s 1971 parliamentary election on the grounds of corrupt practices, in particular for spending more money than permitted and for using official machinery and government officials in her campaign.<sup>9</sup> Although Gandhi went on to negate the corruption charges, eventually winning the case in the Supreme Court in November 1975, the High Court judgment served as a catalyst for reviving protests against her.<sup>10</sup>

The protests were led by socialist leader Jayaprakash Narayan (popularly known as JP), who opposed Gandhi even before the High Court judgment was delivered. In fact, starting in January 1974, JP had been organizing a series of agitations against the Gandhi-led Congress to eliminate corruption and usher in educational and electoral reforms.<sup>11</sup> These largely nonviolent agitations were in the form of strikes and closure of universities. The agitations were conducted with the support of students and the capitalist class.<sup>12</sup> Urban workers, rural landless, and the poor did not participate in these agitations because they had benefited or had expected to benefit from poverty alleviation measures that Gandhi was implementing as part of her turn to the left in 1969.<sup>13</sup> The measures included subsidized loans from nationalized banks and jobs on government work projects. In comparison, a large section of the capitalist class saw Gandhi’s leftist stance as a threat to its economic and social status. Therefore, when JP started the agitation against Gandhi, the capitalist class readily joined him.

In the weeks leading to the Emergency, Gandhi’s authority was further challenged. The Congress party lost to the JP-backed Janata Front in the elections for the north Indian state of Gujarat.<sup>14</sup> Together, the Gujarat election results and the Allahabad High Court judgment provided more teeth to the opposition movement against Gandhi. Most of the newspapers, too, urged Gandhi to “uphold democracy” and “uplift and transform the political scene” by stepping down from her office at least until the Supreme Court decided on her corruption case.<sup>15</sup> After these vociferous calls for resignation, Gandhi felt increasingly threatened and declared the Emergency leading to the arrests of opposition leaders including JP.

Besides curtailing political dissent, the Emergency was used to fight problems that, in Gandhi’s view, stymied India’s growth. A host of actions came to be severely punished, from economic crimes such as hoarding, tax evasion, smuggling, and product adulteration,

to forms of behavior such as inefficiency, rumormongering, lack of productivity at work, and overproductivity with respect to procreation.<sup>16</sup> In addition, Gandhi introduced a twenty-point economic program to steer the country forward. It included lowering the price of essential commodities, providing land-sites for the landless and weaker sections, banning barbarous customs such as bonded labor, reviewing agricultural minimum wages, expanding irrigation, accelerating power schemes, developing the handloom sector, implementing agricultural ceilings, and liquidating rural indebtedness.<sup>17</sup>

By 1976, the twenty-point program became twenty-five-point after Gandhi’s son, Sanjay Gandhi, added five more. These additional points aimed at abolishing dowry, eradicating casteism, promoting literacy, and encouraging ecological balance and family planning.<sup>18</sup> Of these, the last two became particularly important during the Emergency. In Delhi, Sanjay dedicated himself to “beautification” of the city, resulting in the planting of thousands of trees and resettlement of thousands of slum dwellers.<sup>19</sup> Demolition of slums was a prerequisite for the resettlement and Sanjay was at the forefront of these activities. Similarly, Sanjay intensified

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the ongoing family planning program as he heralded sterilization to be the means by which every Indian could contribute to a more prosperous future. While sterilization was presented as a generally applicable norm, in practice it was directed at the poor, and it invoked the small-family ideal already prevalent in urban, upper-caste families.<sup>20</sup> Indeed, these measures helped in addressing the social and economic issues plaguing the country. But the extent to which these goals were achieved was a matter of debate. Furthermore, and more importantly, the use of coercion in implementing the goals outweighed consent. Such a dictatorial move was unprecedented in the history of independent India.

As for press censorship, although it was new in independent India at the time of the Emergency, the British Crown rule, or Raj, instituted censorship repeatedly to check opposing voices during the colonial era. Several anti-British newspapers ceased publication instead of surrendering to restrictions on their freedom.<sup>21</sup> National leaders such as Mahatma Gandhi were staunch supporters of the freedom of the press and urged newspaper editors to express their ideas fearlessly.<sup>22</sup> After India became independent in 1947, freedom of expression was included under Article 19(1) of the Indian Constitution. Unlike the American Constitution or others in which freedom of the press is mentioned as one of the fundamental rights, the Indian Constitution does not specifically mention freedom of the press, but it is considered to be an integral part of the larger “freedom of expression.”<sup>23</sup> Based on the First Amendment Act of 1951, the Indian courts, in the past, have considered press freedom as a fundamental right.<sup>24</sup>

Therefore, newspapers reported rather freely on topics ranging from politics to developmental issues in the decades after the independence. There was also a rapid growth of newspapers in English and Indian languages.<sup>25</sup> While the latter were limited to specific geographic regions, English-language newspapers had a national reach with the majority of their readers comprising the intelligentsia and the upper sections of the society. Most English-language newspapers were financed by businessmen with deep

pockets.<sup>26</sup> Because business interests dominated mainstream English-language newspapers, some of them were critical of Gandhi for her nationalization of banks and abolition of privy purses.<sup>27</sup> The press further sharpened its adversarial role after the Allahabad High Court judgment. For Gandhi, this closed the gap between the opposition parties and the press, both of which criticized her for continuing in the office.

The ruling government saw the opposition party and the press as prime agents of the “internal disturbance.” With the government already owning the broadcast media, Gandhi accused and censored the free press—especially the English-language press—for contributing to the “internal disturbance” by airing the opposition’s criticisms.<sup>28</sup> But another view repudiated the claim; according to a survey conducted before the Emergency, the mainstream English-language press displayed a wide divergence of opinion on major issues.<sup>29</sup> Nonetheless, a variety of methods besides censorship were used to control the press. These included selective allocation of government advertising, increases in the cost of newsprint, mergers of news agencies, interruptions of postal and banking services, and fear-arousal techniques among newspaper publishers, journalists, and individual shareholders.<sup>30</sup>

For the *Indian Express*, which had been generally critical of the government before the Emergency, the problems were particularly pronounced. The newspaper was forced to appoint government nominees on its board of directors and realign its editorial policies. The ownership, however, remained with Ramnath Goenka, a Marwari-Tamil business tycoon who led a press agitation against the British in the Quit India Movement of 1942. Goenka’s hardened stance against the Emergency—despite the dilution of the board—invited ire as sporadic instances of raids, pecuniary pressures, prior restraint, and court cases continued.<sup>31</sup> The newspaper was able to fight the harassment because of strong financial backing and the support it received from the courts.<sup>32</sup>

The effects of press censorship extended beyond national boundaries. A survey at the end of 1975 showed that the percentage of the world’s population living in societies with a free press declined from 35 percent to 19.8 percent during that single year.<sup>33</sup> The main reason for the decline was the imposition of the Emergency on the world’s largest democratic country. The Emergency also strengthened the trend of increasing governmental control of mass media in countries scattered throughout Asia, Africa, and South America.<sup>34</sup>

Despite these consequences, revisionist literature refrained from calling the Emergency “authoritarian,” and instead made a case for its continuities with the rest of post-independence history.<sup>35</sup> It argued, for example, that campaigns such as the family planning program, under which millions of Indians were sterilized, were not intrinsic to the Emergency and, in fact, predated it. Historian Bipan Chandra posited that the Emergency was a period of experimenting with authoritarianism that, nevertheless, aimed to preserve the status quo and so did not usher in a radically new politics, either fascist or totalitarian.<sup>36</sup>

In any case, the significance of the Emergency and the resultant press censorship in Indian history produced several descriptive studies.<sup>37</sup> Coming as they did soon after the Emergency, most of these studies documented the impact of censorship on the news organizations, making only occasional remarks on the press coverage. The studies thus fell short of examining how news content mobilized—or failed to mobilize—the people against the Gandhi regime during the Emergency. Recent scholarship, too, has failed to address the question. More generally, Emma Tarlo noted that the Emergency remains too recent to be of interest to historians yet too distant to have attracted the attention of other social scientists.<sup>38</sup>

Therefore, the aims of this article are twofold: First, it attempts a more systematic study of the press coverage, chiefly, of the *Indian Express*. Second, and more significantly, it problematizes the coverage of the Emergency and examines the news content to provide insights into the imprint of governmental power on the newsmaking process. Such a scrutiny of the news content will be undertaken using the conceptual lens of framing.

The concept of framing stems from the idea of frame, a central organizing idea for making sense of relevant events and suggesting what is at issue.<sup>39</sup> Kenneth Burke, in his book *Attitudes toward History*, theorized frames in terms of poetic forms that create

“meanings, attitudes and character” for handling the significant factors of the time.<sup>40</sup> Further, Todd Gitlin, while studying the student New Left movement in the 1960s, defined news media frames as persistent patterns of “selection, emphasis and exclusion” by which verbal or visual discourse is constructed.<sup>41</sup> Thus, to frame is to “select some aspects of perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation and/or treatment recommendation for the item described.”<sup>42</sup>

Journalists often make stylistic choices in newswriting and presentation to produce intended effects on readers. Frames are thus rendered with the help of “signifying elements” or framing devices.<sup>43</sup> According to William A. Gamson and Kathryn Eilene Lasch, there are five such devices that signify the uses of frames: metaphors, exemplars, catchphrases, depictions, and visual images.<sup>44</sup> The creation and interpretation of these devices and frames vary with—and are anchored in—the sociopolitical and cultural context. Therefore, for analyzing the frames, messages in mainstream newspapers can be seen as cultural texts that create realities through democratic conversations or as monologues produced by powerful interests and used by audiences in their own ways.<sup>45</sup>

In the Indian context, framing has been used to study the newspaper coverage of several issues including international war, health crises, and contemporary social problems.<sup>46</sup> The application of framing to the historical case outlined in this article helps explore the following research questions: How did the *Indian Express* frame the Emergency? And how did the frames change or evolve over time?

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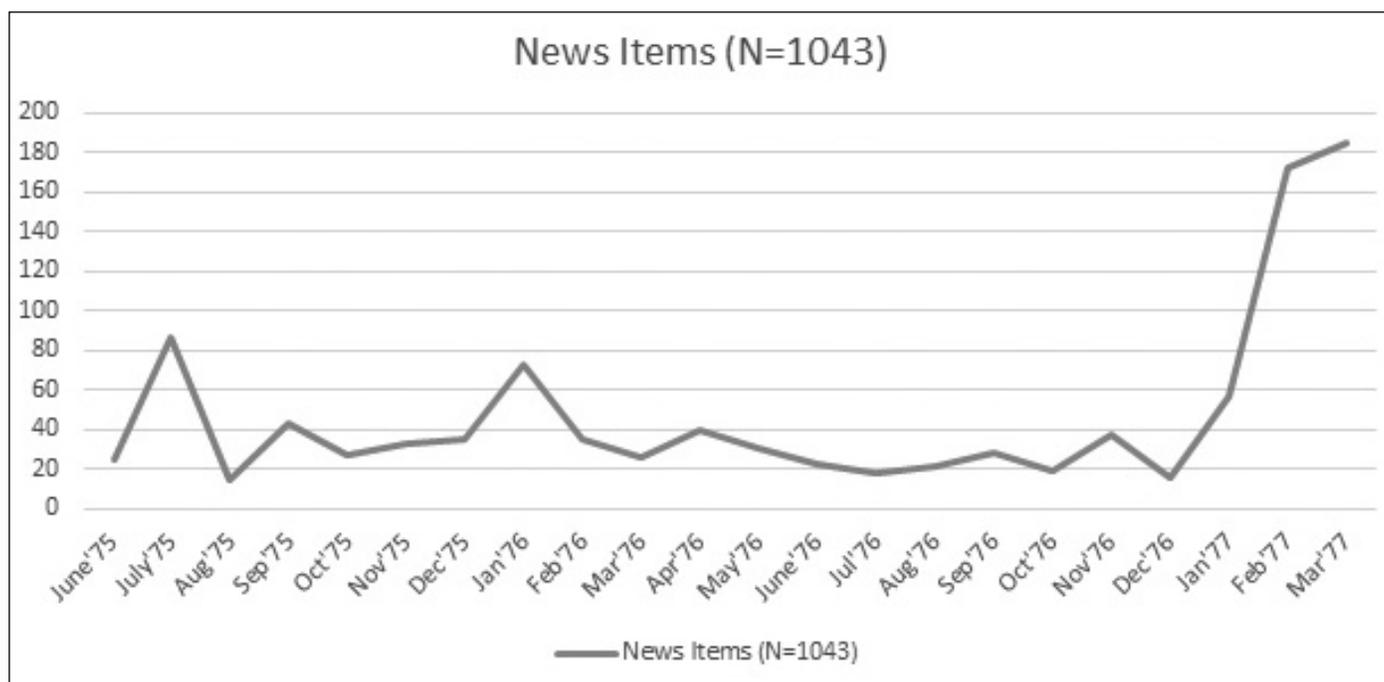


Figure 1: The Indian Express contained a dearth of news items during the Emergency until the uptick in its final months.

This study employed a qualitative content analysis guided by the concept of framing. A qualitative approach was chosen because of the nature of the data. To evade censorship, journalists often relied on nuances of language and visuals, which were more amenable for a qualitative study.<sup>47</sup> The data came from the Delhi edition of the *Indian Express* obtained from the microform collection at the Center for Research Libraries, Chicago. At the time of the Emergency, the *Indian Express* was the largest newspaper chain in India, publishing from multiple cities in English, Hindi, Marathi, Tamil, Telugu, and Kannada.<sup>48</sup> The demand for the newspaper was so high that it was also sold in the black market.<sup>49</sup>

The period of the study was the twenty-one months of the Emergency, from June 26, 1975, to March 21, 1977. The actual study, however, began June 28, 1975, as the newspaper was not published on the first two days because of power failure. Further, space constraints limited this study to focus on key moments. These moments were determined by the sudden rise or fall in the frequency of news items, which were usually due to a major political event or a policy change (Figure 1, above, and Figure 2, below).

The research involved scanning and analyzing the front and editorial pages of the *Indian Express*. These pages are relatively

more important for framing because of their higher visibility and impact.<sup>50</sup> News deemed of high public importance is generally reported on the front page, whereas the editorial page carries the position of the newspaper on an issue. News stories, editorials, opinion pieces, cartoons, letters to editor, thought-for-the-day quotes, book reviews, and advertisements featuring on the scanned pages were all part of the qualitative analysis.

Given the large volume of the data, a spreadsheet was maintained for carrying out the analysis. The spreadsheet contained metadata of all the news items.<sup>51</sup> It also had quotes from and notes on the news items, which were prepared based on a close reading of the scanned pages. The analysis began by locating news items containing the keyword “Emergency.” The news items thus identified were chronologically examined to elicit emergent frames and were accordingly classified. Furthermore, each news item on the scanned page was analyzed for manifest and latent connections to the Emergency using Gamson and Lasch’s five framing devices: metaphors, exemplars, catchphrases, depictions, and visual images.

For example, an article comparing censorship during the Emergency to that during the British rule used exemplar as a framing device because, according to Gamson and Lasch, exemplars are current or historical events used in framing.<sup>52</sup> Similarly, photograph captions referring directly or indirectly to the

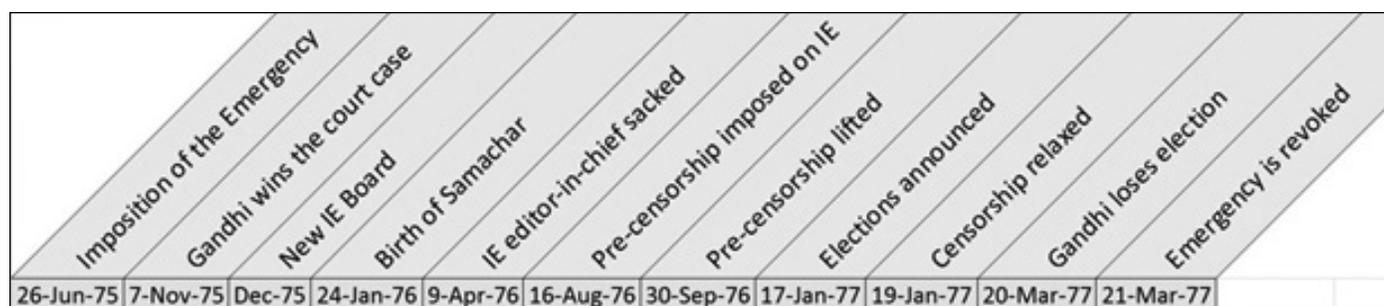


Figure 2: A timeline of the Emergency presents major events from June 26, 1975, to March 21, 1977.

Emergency are catchphrases: “single theme statements, taglines, titles or slogans” that capture the essence of events.<sup>53</sup> Moreover, the five framing devices were not mutually exclusive and were sometimes used in conjunction with others to rhetorically construct the Emergency frames.

The five framing devices, their examples, the frames that the news items contained, and remarks on each news item were noted in the spreadsheet. Particular attention was paid to the placement of the news items during the analysis. In sum, 1,043 news items were analyzed.<sup>54</sup> The spreadsheet used for the analysis was then read several times to draft the narrative. Additional sources such as memoirs, books, and articles were also consulted to construct the narrative and to supplement the research.

The *Indian Express* framed the imposition of the Emergency as an attack on democracy and free speech. In the June 28 edition, the newspaper issued a front-page apology for not appearing during the last two days and reported on the mass arrests.<sup>55</sup> The editorial page, however, was more prominent in framing as it ran a blank editorial (Figure 3)—a metaphor for censorship that was soon adopted by other newspapers opposing the Emergency including *The Statesman*. An opinion piece next to the blank editorial criticized the government for failing to execute socio-economic reforms: “The pathetic helplessness of the Government is to be seen in the fact that it is unable to implement even the greatly watered down program of relief to the people.”<sup>56</sup>

Such candid accusations, though, invited the censor’s blue pencil, leading to the weakening of the frame. Censors tightened control on news, including a ban on blank editorials. The newspaper was made to frame the Emergency as one promoting democracy and development. News articles with a single source justifying the Emergency became common in the upcoming months as evident from the headlined catchphrases: “Emergency an Era of Discipline: Vinoba”; “Shah Lauds Indian Efforts at Stability”; “Neighbors Endorse Gandhi’s Stance”; “Hungary Supports Gandhi’s Policies”; “India Hasn’t Become a Police State: NYT”; “India’s Achievements Dramatic: McNamara”; and “McNamara Sees Great Progress in economy.”<sup>57</sup>

On another level, the exclusion of counter sources such as those of dissenting political leaders, and the use of attribution in the news articles conveyed the constructed reality to discerning readers, who were, after all, having the first-hand experience of living in the Emergency. Phrases within quotation marks were used as metaphors that distanced the newspaper’s position from reportage, as in the article headlines: “Mrs. Gandhi ‘Proud of Democracy’”; “Emergency ‘Not Meant for Terrorizing People’”; and “Mrs. Gandhi Best Hope of India.”<sup>58</sup>

Meanwhile, the only manifest form of adversarial reporting was on Gandhi’s election case. A couple of weeks before the Emergency, Allahabad High Court invalidated Gandhi’s 1971



Figure 3. The blank editorial published on June 28, 1975, became a metaphor for censorship that spread to other newspapers as an expression of opposition.

parliamentary election on the grounds of corrupt practices.<sup>59</sup> The High Court directed that she be unseated from the office for six years.<sup>60</sup> As a result, Gandhi appealed to the Supreme Court and won the case on November 7, 1975, after a series of hearings.<sup>61</sup> The English-language newspapers’ coverage of the case amounted to checking governmental power during the Emergency.

After the judgment, the government took more restrictive measures even as it claimed that the “censorship is relaxed” and the Emergency “temporary.”<sup>62</sup> The measures included introducing laws to stifle adversarial reporting (Prevention of Publication of Objectionable Matter Act), repealing existing laws to limit press coverage of parliamentary proceedings (Protection of Publication Act), and abolishing the Press Council.<sup>63</sup> The *Indian Express* questioned the deployment of these legal, presumably permanent, measures. An editorial asked the government to reconsider the ordinances because withdrawing the immunity conferred on the press could enable the government to ban publication of any news story it dubbed “objectionable” even after the end of censorship.<sup>64</sup> A follow-up editorial headlined “Press under Pressure” outlined the characteristics of the press in a democratic regime, highlighting that freedom from governmental control or pressure was a “vital necessity” for a free press.<sup>65</sup>

Yet another editorial continued on the same theme as it wrote that “freedom of thought and expression is an ideal which has to be preserved against the winds of conformity. . . . If this safeguard for the liberty and rights of the citizen were diluted, the fabric of democracy could weaken.”<sup>66</sup> The editorial appeals were supported through cartoons that commented visually on the impact of press restrictions and the Emergency.<sup>67</sup> One of Abu Abraham’s cartoons showed an elephant, which represents royal power in Asian culture,

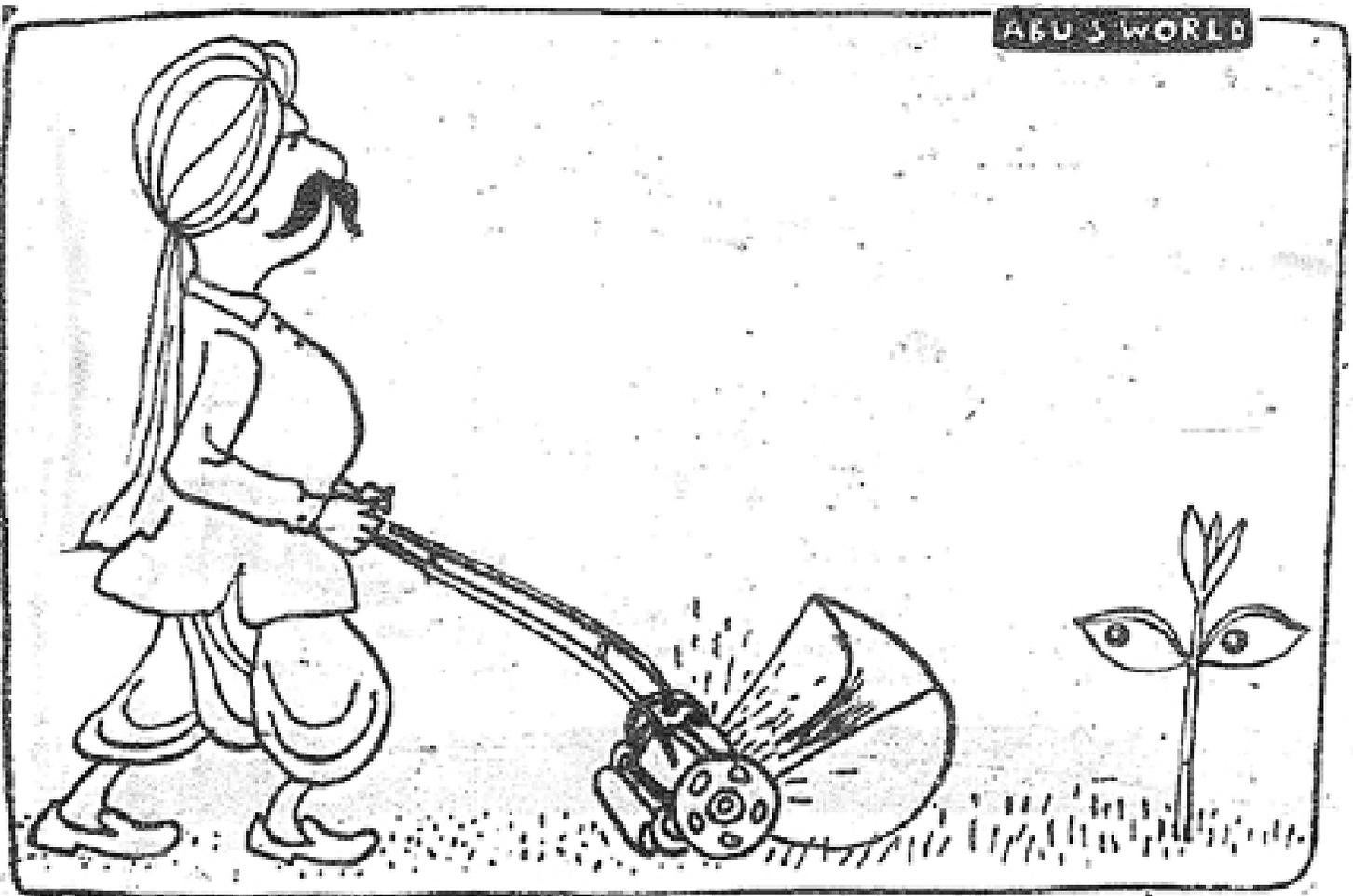


Figure 4. In an Abu Abraham cartoon of January 26, 1976, in the *Indian Express*, a gardener mows grass endowed with watchful eyes, another metaphor for censorship.

with a road roller mowing grass. In a second cartoon, the same task was accomplished by a gardener (Figure 4).<sup>68</sup> These cartoons symbolized the abrogation of naysayers in the name of development. Another cartoon caricatured army personnel keen to take on an “anti-fascist rally,”<sup>69</sup> alerting the reader to ironfisted measures that the Congress government could take to curb public meetings.

The *Indian Express* was so overtly critical of the attack on press freedom for the first time since the imposition of the Emergency that the last weeks of December 1975 saw the government appoint its officials on the newspaper’s editorial board.<sup>70</sup> The government also merged four news agencies to form a single, nationalized news agency called “Samachar,” which, according to historian Michael Henderson, became a vehicle of official propaganda.<sup>71</sup>

The number of news items on the Emergency increased toward the beginning of 1976 (Figure 1, page 204). These framed the Emergency as democratic and pro-development. One article spanning more than a half-page reproduced the text of the president’s speech, which stated that the Emergency had increased efficiency and had “a dramatic effect on the health of the nation.”<sup>72</sup> A related article reported on the Congress party’s proposal to “go to the villages and mobilize the rural poor and the agricultural labor for bringing about social transformation.”<sup>73</sup> News articles also focused on the twenty-point program—Gandhi’s policy initiative to improve agricultural and industrial production as well as public services.

The newspaper, for example, printed an article based on its

survey of student-life in hostels in several states. The article “20 Point Programme Better Life in Hostels” reported that mess charges came down and students became more disciplined under the program:

The emergency has helped hostel authorities to refuse admission to “unwanted” students. Many hostels were in the past centers of politics. Gambling and smuggling often led to group fights, resulting some time in murders. All this is now a thing of past.<sup>74</sup>

Further, the *Indian Express* published advertisements that valorized the Gandhi regime and the twenty-point program, thereby framing the Emergency as pro-development. The advertisers included the educational sector (Figure 5), banking industry,<sup>75</sup> and the states.<sup>76</sup> For example, the north Indian state of Uttar Pradesh gave an advertisement that recounted its “success story” and justified the supremacy of the center over the state, or the centralization of power—a position that was rationalized during the Emergency.<sup>77</sup> As a framing device, visual images were also used to lionize Gandhi. One of the charges against the press was the failure to publish Gandhi’s photograph often enough on the front page.<sup>78</sup> Therefore, the *Indian Express* regularly carried Gandhi’s image as she addressed the masses and met foreign delegates and party officials. This selection and emphasis promoted a personality

cult and thus framed the visual discourse on the government and the Emergency in a positive light.

Even as the *Indian Express* was framing the Emergency as pro-development and democratic, it frequently juxtaposed these frames with counter-frames. The newspaper used visual and verbal rhetoric to frame the Emergency as authoritarian and opposing free speech. Quotes from Abraham Lincoln, Mahatma Gandhi, Swami Vivekananda, Jawaharlal Nehru, and others were often published as the thought-of-the-day on the editorial page. The quotes contained latent references to the Emergency and censorship. For example, in the quote, "Public opinion, though often formed upon a wrong basis, yet generally has a strong underlying sense of justice—Lincoln," the emphasis was on democracy and social justice.<sup>79</sup> In comparison, the quote by Tacitus more directly critiqued the fabricated, deceptive sense of peace: "A deceitful peace is more hurtful than open war—Tacitus."<sup>80</sup> Quotes also conveyed the importance of freedom, lost because of the censorship: "The most beautiful thing in the world is freedom of speech—Diogenes."<sup>81</sup>

Similarly, catchphrases were used as news headlines and cartoon captions in framing the Emergency. A week before the Emergency, Congress President D.K. Barooah coined a slogan, "India is Indira, Indira is India," which became popular given the absolute power Gandhi assumed afterward.<sup>82</sup> The articles made subtle changes to the slogan to foreground the Emergency. An article that reviewed a book on the history of Buddhism was titled "When India was Indu."<sup>83</sup> Others used the slogan to signal the prevalent climate of sycophancy.

Despite these minor subversions, the *Indian Express* avoided writing about the attack on its own journalists. The newspaper did not report the arrest and imprisonment of one of its leading correspondents or Goenka's firing of the editor-in-chief under government pressure.<sup>84</sup> This engagement in self-censorship by the exclusion of news stories against the Emergency indirectly reified government-sponsored frames—something that most of the other newspapers were consistently following.<sup>85</sup> Meanwhile, government harassment was costing Goenka's chain more than \$10,000 a day.<sup>86</sup> By the end of 1976, Goenka said that he had exhausted his resources and "might not be able to hold out much beyond the New Year."<sup>87</sup> But, there was a turnaround as Gandhi announced the general elections in March. Three days after the announcement, on January 21, 1977, press censorship was lifted.<sup>88</sup>

There was a steep increase in the news items critical of the Emergency after the censorship ended (Figure 1, page 204). Government-sponsored frames nosedived. In addition to framing the Emergency as assaulting democracy, free speech, and human rights, the newspaper challenged the status-quo and pitched for the release of the detainees. Thousands of people were still detained under the Maintenance of Internal Security Act (MISA), which gave the government powers of detention without trial. One editorial headlined "Free Them Now" read:

The continued incarceration of such large number of persons, with all that it means in terms of hardship and agony for their families, who often have been deprived of their bread-winners, is a blot on Indian democracy and cannot be reconciled with any conception of respect for human dignity and freedom.<sup>89</sup>

The *Indian Express* also reported incidents that were not published under censorship. One that stood out was of a painter who committed suicide protesting against MISA and the Emergency.<sup>90</sup>

The painter had sent a letter to Gandhi, calling her government "godless and devoid of all humanity" before immolating himself.<sup>91</sup> Another letter published in the letters-to-the-editor section of the *Indian Express* gave a litany of reasons for calling the Emergency a "dictatorship":

If the authority to declare a state of emergency without any relation to objective conditions, detention without trial at the sweet will of the executive, a total censorship of the press without the permission to reveal that it is suffering from the imposition, a complete bar to legal remedies against executive injustice, an effective ban on the functioning of the opposition parties, the unbridled utilization of the mass media of information to propagate absolutely one-sided views can be said to be attributes of democracy, one would like to know how it differs from dictatorship.<sup>92</sup>

Moreover, the *Indian Express* used exemplars to hark back to the pre-independence era when the British rulers exploited the country. One book review headlined "Gandhian Crusade Recalled," reviewed Mahatma Gandhi's handling of social vulnerabilities and detailed the course of development that he wanted the country to follow.<sup>93</sup> Another essay reconstructed the history of censorship in

Figure 5. Some ads, such as this one for a college, lauded the Gandhi regime. *Indian Express*, August 1, 1976.

colonial India.<sup>94</sup> In the tradition theorized by Burke, the essay reproduced a poem written by a British colonel sympathizing with the plight of India, “Now politicians rule the day/obscurants call the tune/integrity has fled away/and honesty’s inopportune.”<sup>95</sup> Further, depictions were used to make visual commentaries on the political climate of the country, as in the cartoon in which opposition leaders were shown to be constricted partly due to their own policies, but perhaps more so because of the Emergency (Figure 6). Gandhi’s twenty-point program, which became twenty-five-point after her son Sanjay Gandhi added five more, was caricatured with a politician lying on a bed of nails holding a placard that read “Long Live the 25-Point Programme” (Figure 7).

The most infamous feature of the Emergency, ostensibly, was forced sterilization. It was conducted under the family planning program launched by the government in 1952 to control population and thereby to promote economic development.<sup>96</sup> Although the *Indian Express* sporadically published news articles and cartoons on various aspects of sterilization, it was a two-part series published on the front page on March 7, 1977, that first used evidence based on field reporting to prove the coercive tactics used in sterilization.<sup>97</sup> The series narrated the tales of forced sterilization in two villages—Pipli and Uttawar—near Delhi. The first article cited a forced sterilization that went wrong leading to the death of a young, childless widower.<sup>98</sup> The second explained how policemen with batons and loudspeaker rounded up villagers in Uttawar to perform sterilization.<sup>99</sup> It also mentioned that the case of Uttawar was not unique and that “the same pattern was repeated” in neighboring villages.<sup>100</sup>

In time, forced sterilization was to be inextricably linked to the Emergency, although this was not entirely true. Marika Vicziany cited the involvement of police in sterilization even before the Emergency.<sup>101</sup> On the other hand, Arvind Rajagopal proposed that sterilization and “urban beautification,” under which slums were decommissioned, acquired their enormous, authorized coercion between 1975 and 1977.<sup>102</sup> These maneuvers contributed to the unpopularity of the Gandhi regime. As an example, in the lead-up to the elections, an editorial that assessed public mood in Uttar Pradesh remarked: “This election is about the emergency and for villages the emergency is nasbandi [sterilization].”<sup>103</sup>

Meanwhile, opposition leaders including JP offered to lift the Emergency if voted into power. JP galvanized people “not to miss this opportunity to choose between freedom and slavery.”<sup>104</sup> In comparison, a guarded Gandhi in an effort to redeem her image



Figure 6, above. Opposition leaders are depicted as constricted by both their politics and the Emergency. Abu Abraham, *Indian Express*, January 8, 1977. Figure 7, below. A politician reclines on a bed of twenty-five nails, a reference to the “25-Point Programme.” Abu Abraham, *Indian Express*, March 3, 1977.



blamed her underlings for the atrocities and asked the electorate to “forget and forgive” the Emergency.<sup>105</sup> Elections were held in mid-March, and on March 21, the newspaper headline read: “Mrs. Gandhi Loses by 55,000 Votes.”<sup>106</sup> The Emergency was revoked the same day.

This study illustrated the use of framing by the press in seeking to fulfill its watchdog function under an arguably authoritarian rule. The *Indian Express* framed the imposition of the Emergency as an attack on free speech. But this framing did not last beyond a day; the government made the newspaper reframe

the Emergency as democratic and pro-development. The reframing was done through selecting and emphasizing pro-government commentaries and excluding counterarguments. Under censorship, the *Indian Express* persistently ran articles that justified the need for the Emergency and endorsed the Gandhi regime and its policies. Some editorials, however, did contain counter-frames, but they were overpowered by the government-sponsored frames. For example, one editorial began with the detention under MISA:

The turbulent events following the Allahabad High Court judgment of May 12 in the election case involving the Prime Minister were followed by the declaration of an emergency under which thousands of people are held in detention for political dissent without trial.<sup>107</sup>

The editorial then went on to back the Emergency by asserting its necessity for the nation's stability and growth:

It is not a case that can be dismissed off-hand. The uncertainty caused by the Allahabad High Court judgment had let loose some elements who seemed ready enough to take political dissent beyond the confines of constitutional permissibility. . . . Fortunately, the record of the year is not one of unrelieved bleakness. The country is blessed with a bumper crop and inflationary pressures are being beaten back.<sup>108</sup>

The *Indian Express's* coverage during censorship thus presented a conflict between framing the Emergency as democratic versus framing it as authoritarian. The newspaper employed metaphors in the form of a blank editorial, cartoons, book reviews, letters, and thought-of-the-day quotes to signal its opposition to censorship and the state. With the end of censorship, the government-sponsored frames nearly disappeared and the Emergency was framed as an attack on democracy, free speech, and human rights. The newspaper reported on the Emergency abuses, such as detention without trial and forced sterilization, of which the latter became "synonymous with the Emergency."<sup>109</sup>

This study, however, could not find conclusive evidence of the linkage between the Emergency and forced sterilization, at least to the extent the literature suggested. While news articles did report on forced sterilization, most mentioned the issue in passing; only a couple of articles reported exclusively on forced sterilization. It is possible, though, that more such articles were published in the inside pages of the newspaper or after the Emergency, both of which were beyond the scope of this study. Further research is needed to understand how mass media helped reframe the narrative of sterilization from one of economic progress to one of government oppression.

Nonetheless, this study demonstrated how journalism functions under censorship. The marked increase in adversarial reporting after the end of censorship showed that the freedom of expression was vital for the press to perform its role of the Fourth

Estate. The increased demand for uncensored reporting and political news, particularly in a country such as India where politics provoked "news hunger," raised the circulation of the *Indian Express*.<sup>110</sup> Building on these positive developments, the newspaper valorized the power of the reader and free speech:

The Indian reader has proved that he had matured into a discerning member of society and cannot be taken for granted any more. The authorities must realize that any attempt at doctoring the news and projecting only the official point of view is self-defeating. It destroys the credibility of the media, whether it be the press or the radio.<sup>111</sup>

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***"The marked increase in adversarial reporting after the end of censorship showed that the freedom of expression was vital for the press to perform its role of the Fourth Estate. The increased demand for uncensored reporting and political news, particularly in a country such as India where politics provoked 'news hunger,' raised the circulation of the Indian Express."***

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Thus, it can be argued that the *Indian Express* tried to construct its role as a watchdog of the Gandhi regime, even if, for the most part, it ended up supporting the very government it sought to challenge. The measured approach was necessary for the newspaper to survive during the Emergency, especially when many other publications folded.<sup>112</sup> In striving to play the watchdog role, the *Indian Express's* financial clout mattered as much as its reportage on issues of public concern. The newspaper rarely took the Gandhi regime head-on during censorship. Instead, it periodically produced news messages that were intended to be read between the lines—a strategy best explicated through the concept of framing. Such dissemination of news messages pushes the boundaries of journalism, which traditionally weighs clarity over doublespeak, to showcase the expanded journalistic

toolkit that newspapers can invent under censorship. In fact, news organizations in dictator regimes occasionally deploy these framing strategies to varying extents in order to register their resistance to overwhelming power.<sup>113</sup>

The *Indian Express's* framing of the Emergency, particularly after the end of censorship, is important as it helped marshal public support in the struggle for freedom of speech when the government already owned the broadcast media. The ownership structure of the Indian media has greatly changed since the Emergency because of the liberalization of the economy and the entry of foreign media players. Yet, sporadic cases of the government browbeating the press continue,<sup>114</sup> and the struggle for freedom of speech can be observed even today.

## NOTES

<sup>1</sup> Ramachandra Guha, *India after Gandhi* (New York: HarperCollins Publishers, 2007). See also Boobli George Verghese, *First Draft* (New Delhi, Tranquebar Press, 2010).

<sup>2</sup> The airwaves were under government control, therefore radio news did not mention mass arrests.

<sup>3</sup> Indira Gandhi used the umbrella term "internal disturbance" to collectively denote the prevailing socio-economic problems of the country including the political and civil forces that opposed her government.

<sup>4</sup> Government of India, *White Paper on Misuse of Mass Media during the Internal Emergency, August 1977* (Delhi: Controller of Publications, 1977).

<sup>5</sup> Although based on available records, the adversarial role of *The Statesman* and the *Indian Express* during the Emergency has to be considered as a hypothesis for this qualitative study. See, for example, Michael Henderson, *Experiments with Untruth* (Delhi: The Macmillan Company of India Limited, 1977).

<sup>6</sup> Indu B Singh, "The Indian Mass Media System: Before, during and after the National Emergency," *Canadian Journal of Communication* 7, no. 2 (1980): 38-49.

<sup>7</sup> *The Statesman* was not analyzed because of its unavailability.

<sup>8</sup> Bipan Chandra, *In the Name of Democracy* (New Delhi: Penguin Books, 2003).

<sup>9</sup> Guha, "India after Gandhi."

<sup>10</sup> Verghese, "First Draft."

<sup>11</sup> Chandra, "In the Name of Democracy."

<sup>12</sup> This capitalist class consisted of employees of banks and insurance companies, industrialists, businessmen, and rich peasants. Chandra, "In the Name of Democracy."

<sup>13</sup> Chandra, "In the Name of Democracy."

<sup>14</sup> Ibid.

<sup>15</sup> Ibid.

<sup>16</sup> Arvind Rajagopal, "The Emergency as Prehistory of the New Indian Middle Class," *Modern Asian Studies* 45, no. 5 (September 2011): 1003-1049.

<sup>17</sup> Emma Tarlo, *Unsettling Memories: Narratives of the Emergency in Delhi* (Los Angeles: University of California Press, 2003).

<sup>18</sup> Ibid.

<sup>19</sup> Ibid.

<sup>20</sup> Rajagopal, "The Emergency as Prehistory of the New Indian Middle Class."

<sup>21</sup> These included, among others, Mahatma Gandhi's weekly newspapers *Young India*, and later, *Harijan*.

<sup>22</sup> Laxmi Narain, "Mahatma Gandhi as a Journalist," *Journalism and Mass Communication Quarterly* 42 (Spring 1965): 267-70.

<sup>23</sup> Singh, "The Indian Mass Media System."

<sup>24</sup> Ibid.

<sup>25</sup> S.C. Bhatt, *Indian Press since 1955* (New Delhi: Publications Division, Ministry of Information and Broadcasting, Government of India, 1997).

<sup>26</sup> These included, among others, the *Indian Express*, *The Times of India*, and *The Hindu*.

<sup>27</sup> Rajagopal, "The Emergency as Prehistory of the New Indian Middle Class."

<sup>28</sup> Indira Gandhi, *Selected Speeches and Writings of Indira Gandhi, vol. III, September 1972-March 1977* (New Delhi: Publications Division, Ministry of Information and Broadcasting, Government of India, 1984).

<sup>29</sup> The survey was conducted by the Indian and Eastern Newspaper Society. See Henderson, "Experiments with Untruth."

<sup>30</sup> Singh, "The Indian Mass Media System."

<sup>31</sup> Boobli George Verghese, *Warrior of the Fourth Estate* (New Delhi: Penguin Viking, 2005).

<sup>32</sup> Boobli George Verghese, "Press Censorship under Indira Gandhi," in *The Third World and Press Freedom*, ed. Philip C. Horton (New York: Praeger, 1978), 220-30.

<sup>33</sup> The survey was conducted by Freedom House, a nongovernmental organization. See "Liberty in World Declined in 1975," *New York Times*, Dec. 28, 1975.

<sup>34</sup> Marcus F. Franda, *Curbing the Indian Press, Part III: Acquiescence and Defiance* (American University Field Staff, South Asia Series, 1977).

<sup>35</sup> Rajagopal, "The Emergency as Prehistory of the New Indian Middle Class." Revisionist literature on the Emergency include Chandra, "In the Name of Democracy"; Emma Tarlo, *Unsettling Memories: Narratives of the Emergency in Delhi* (Los Angeles: University of California Press, 2003); and Prithvi Nath Dhar, *Indira Gandhi, the "Emergency", and Indian Democracy* (New Delhi: Oxford University Press, 2000).

<sup>36</sup> Chandra, "In the Name of Democracy."

<sup>37</sup> See, for example, D.K. Manekar, *The Press Versus the Government* (Delhi: Clarion Books, 1978); Kuldeep Nayar, *The Judgment* (New Delhi: Vikas Publishing House Pvt. Ltd., 1977); and Pra. Ga. Sahasrabudhe & Manikacandra C. Vajpayee, *The People Versus Emergency: A Saga of Struggle* (New Delhi: Suruchi Prakashan, 1991).

<sup>38</sup> Tarlo, "Unsettling Memories: Narratives of the Emergency in Delhi."

<sup>39</sup> William A. Gamson and Andre Modigliani, "Media Discourse and Public Opinion: A Constructionist Approach," *American Journal of Sociology* 95, no. 1 (July, 1989): 1-37.

<sup>40</sup> Kenneth Burke, *Attitudes toward History* (California: Hermes Publications, 1959).

<sup>41</sup> Todd Gitlin, *The Whole World Is Watching* (California: University of Cali-

fornia Press, 1980).

<sup>42</sup> Robert M. Entman and Andrew Rojecki, "Freezing Out the Public: Elite and Media Framing of the US Anti-Nuclear Movement," *Political Communication* 10, no. 2 (1993): 155-73.

<sup>43</sup> Zhongdang Pan and Gerald M. Kosicki, "Framing Analysis: An Approach to News Discourse," *Political Communication* 10, no. 1 (1993): 55-75.

<sup>44</sup> William A. Gamson and Kathryn Eilene Lasch, "The Political Culture of Social Welfare Policy," in *Evaluating the Welfare State: Social and Political Perspectives*, eds. Shimon E. Sapiro and Ephraim Yuchtman-Yaar (San Diego, Calif.: Academic Press, 1983), 395-415.

<sup>45</sup> David Paul Nord, "James Carey and Journalism History: A Remembrance," *Journalism History* 32 (Fall, 2006): 122-27.

<sup>46</sup> See, for example, Crispin C. Maslog, Seow Ting Lee and Hun Shik Kim, "Framing Analysis of a Conflict: How Newspapers in Five Asian Countries Covered the Iraq War," *Asian Journal of Communication* 16, no. 1 (2006): 19-39; Rebecca de Souza, "The Construction of HIV/AIDS in Indian Newspapers: A Frame Analysis," *Health Communication* 21, no. 3 (2007): 257-66; Rebecca de Souza, "NGO in India's Elite Newspapers: a Framing Analysis," *Asian Journal of Communication* 20, no. 4 (2010): 477-93; and Rahul Gadekar, Pradeep Krishnatray and Peng Hwa Ang, "Framing of the H1N1 Flu in an Indian Newspaper," *Journal of Creative Communications* 9, no. 1 (2014): 49-66.

<sup>47</sup> These nuances included metaphors, allusions, double entendres, and other cultural icons which are explained in the analysis.

<sup>48</sup> Henderson, "Experiments with Untruth"; and Verghese, "Press Censorship under Indira Gandhi."

<sup>49</sup> Verghese, "The Warrior of the Fourth Estate."

<sup>50</sup> Another reason to focus on these pages was the large volume of data.

<sup>51</sup> The metadata included the title, author, date, placement and story-type (news article, opinion, letters etc.) of the news item.

<sup>52</sup> Gamson and Lasch, "The Political Culture of Social Welfare Policy."

<sup>53</sup> Ibid.

<sup>54</sup> There were 717 news stories (68.74%), 73 cartoons (7%), 69 photographs (6.62%), 59 opinion articles (5.66%), 49 letters (4.7%), 32 editorials (3.07%), 32 thought-of-the-day quotes (3.07%), 6 advertisements (0.58%), and 6 book reviews (0.58%). Note that opinion articles were often written by staff correspondents.

<sup>55</sup> See "To Our Readers," *Indian Express*, June 28, 1975; and "200 Arrested on the Second Day of Emergency," *Indian Express*, June 28, 1975.

<sup>56</sup> Balraj Mehta, "Blocked Option," *Indian Express*, June 28, 1975.

<sup>57</sup> "Emergency an Era of Discipline: Vinoba," *Indian Express*, July 7, 1975; R Mohan, "Shah Lauds Indian Efforts at Stability," *Indian Express*, June 27, 1976; A N Dar, "Neighbours Endorse Mrs. Gandhi's Stand," *Indian Express*, Aug. 19, 1976; PTI, "Hungary Supports Gandhi's Policies," *Indian Express*, Oct. 1, 1975; PTI, "India Hasn't Become Police State: NY Times," *Indian Express*, Nov. 10, 1975; "India's Achievements Dramatic: McNamara," *Indian Express*, Nov. 7, 1976; and "McNamara Sees Great Progress in Economy," *Indian Express*, Nov. 9, 1976.

<sup>58</sup> UNI, "Mrs. Gandhi 'Proud of Democracy,'" *Indian Express*, July 5, 1975; ENS, "Emergency 'Not Meant for Terrorizing People,'" *Indian Express*, July 30, 1975; and PTI, "Mrs. Gandhi Best Hope of India," *Indian Express*, Jan. 19, 1976.

<sup>59</sup> Guha, "India after Gandhi."

<sup>60</sup> Verghese, "First Draft."

<sup>61</sup> "Gandhi's Election Upheld," *Indian Express*, Nov. 7, 1975. See also "Unanimous Judgment by Supreme Court," *Indian Express*, Dec. 7, 1975.

<sup>62</sup> See, for example, UNI, "Censorship Relaxed, Says Shukla," *Indian Express*, Aug. 26, 1975; ENS, "Emergency Is Purely Temporary, Says Kaul," *Indian Express*, July 12, 1975; PTI, "Emergency for Short Period, says Barooah," *Indian Express*, July 14, 1975; and PTI, "PM: No Decision Yet on Ending Emergency," *Indian Express*, July 14, 1975.

<sup>63</sup> See, for example, ENS, "Ban on Publication of 'Objectionable' Matter," *Indian Express*, Dec. 9, 1975; and PTI, "Press Council Will Be Dissolved on Jan 1," *Indian Express*, Dec. 10, 1975.

<sup>64</sup> "The Role of the Press," *Indian Express*, Dec. 10, 1975.

<sup>65</sup> Ajit Bhattacharjea, "Press under Pressure," *Indian Express*, Dec. 13, 1975.

<sup>66</sup> Kuldeep Nayar, "The Constitution's Performance," *Indian Express*, Dec. 18, 1975.

<sup>67</sup> See, for example, cartoons by Abu Abraham, *Indian Express*, Dec. 10, 1975; Abu Abraham, *Indian Express*, Dec. 11, 1975; and Abu Abraham, *Indian Express*, Dec. 12, 1975.

- <sup>68</sup> Abu Abraham, *Indian Express*, Jan. 26, 1976.
- <sup>69</sup> Abu Abraham, *Indian Express*, Nov. 21, 1975
- <sup>70</sup> Verghese, "Warrior of the Fourth Estate."
- <sup>71</sup> United News of India (UNI), Press Trust of India (PTI), Samachar Bharati and Hindustan Samachar were merged to form "Samachar" on Jan. 31, 1976. The government, however, claimed that it did not initiate the merger and that it was an arrangement among the four news agencies. See, ENS, "News Agencies Have a New Name," *Indian Express*, Jan. 31, 1976; Henderson, "Experiments with Untruth"; and Keval J. Kumar, *Mass Communication in India* (Mumbai: Jaico Publishing House, 2000).
- <sup>72</sup> "Emergency Improves Nation's Health, Says President," *Indian Express*, Jan. 6, 1976.
- <sup>73</sup> ENS, "Barooah Lays Stress on Rural Transformation," *Indian Express*, Jan. 1, 1976.
- <sup>74</sup> Ibid.
- <sup>75</sup> See "Banking Industry's Role in Sharper Focus after Twenty Point Programme," *Indian Express*, April 2, 1976.
- <sup>76</sup> See "UP's Story of Success," *Indian Express*, June 26, 1976.
- <sup>77</sup> Ibid.
- <sup>78</sup> See the article "Indian News Agency Attacks Censorship," *The Times*, July 30, 1975.
- <sup>79</sup> See quote by Abraham Lincoln, *Indian Express*, Feb. 20, 1976.
- <sup>80</sup> See quote by Tacitus, *Indian Express*, Jan. 22, 1976.
- <sup>81</sup> See quote by Diogenes, *Indian Express*, Dec. 4, 1976.
- <sup>82</sup> See the article, "Leadership Indispensable for Nation," *Indian Express*, June 19, 1975.
- <sup>83</sup> V.C. Pandey, "When India Was Indu," *Indian Express*, May 16, 1976. See also the cartoon catchphrase "Indira Is India, but I wish Borooh weren't such a Borooh!" by Abu Abraham, "Private View," *Indian Express*, Feb. 27, 1977.
- <sup>84</sup> The editor-in-chief, S. Mulgaonkar, was reinstated after Gandhi was voted out of power in March 1977. See Pamela Jablons, "India's Press: Can It Become Independent at Last?" *Columbia Journalism Review* 17, no. 2 (July/August, 1978): 33-36.
- <sup>85</sup> Government-sponsored frames are those that show the Emergency as democratic and development-oriented.
- <sup>86</sup> Jablons, "India's Press: Can it Become Independent at Last?"
- <sup>87</sup> Verghese, "Warrior of the Fourth Estate."
- <sup>88</sup> "Govt Not to Enforce Censorship Order," *Indian Express*, Jan. 21, 1977. See also the cartoon by Abu Abraham, *Indian Express*, Jan. 21, 1977.
- <sup>89</sup> Ibid.
- <sup>90</sup> "Artist Killed Himself Opposing Emergency," *Indian Express*, March 6, 1977.
- <sup>91</sup> Ibid.
- <sup>92</sup> Ibid.
- <sup>93</sup> Partha Mukherji, "Gandhian Crusade Recalled," *Indian Express*, Sept. 26, 1976.
- <sup>94</sup> A.G. Noorani, "Censorship in British Raj," *Indian Express*, March 12, 1977.
- <sup>95</sup> C.L. Proudfoot, "For India, with Love," *Indian Express*, March 12, 1977.
- <sup>96</sup> Rebecca Jane Williams, "Storming the Citadels of Poverty," *The Journal of Asian Studies* 73, no. 2 (May, 2014): 471-92.
- <sup>97</sup> See, for example, cartoon by Abu Abraham, *Indian Express*, March 26, 1976; and "Case against Leper's Sterilization," *Indian Express*, Sept. 12, 1975.
- <sup>98</sup> S Dubey and A Sarin, "Forcible Sterilization in Pipli," *Indian Express*, March 7, 1977.
- <sup>99</sup> S Dubey and A Sarin, "The Agony of Uttawar," *Indian Express*, March 8, 1977.
- <sup>100</sup> Ibid.
- <sup>101</sup> Marika Vicziany, "Coercion in a Soft State: The Family-Planning Program of India: Part I: The Myth of Voluntarism," *Pacific Affairs* 55, no. 3 (1982): 373-402.
- <sup>102</sup> Rajagopal, "The Emergency as a Prehistory of the New Indian Middle Class."
- <sup>103</sup> Chanchal Sarkar, "Sterilisation is Main Poll Issue in Rural UP," *Indian Express*, March 12, 1977.
- <sup>104</sup> "JP: It's Choice between Freedom and Slavery," *Indian Express*, Feb. 7, 1977. See also the cartoon by Abu Abraham, "Private View," *Indian Express*, Feb. 10, 1977.
- <sup>105</sup> Samachar, "Forget and Forgive Call by Mrs. Gandhi," *Indian Express*, March 12, 1977.
- <sup>106</sup> "Mrs. Gandhi Loses by 55,000 Votes," *Indian Express*, March 21, 1977.
- <sup>107</sup> "A Year of Hope," *Indian Express*, Jan. 1, 1976.
- <sup>108</sup> Ibid.
- <sup>109</sup> Emma Tarlo, "Body and Space in a Time of Crisis: Sterilization and Resettlement during the Emergency in Delhi," in *Violence and Subjectivity*, ed. Veena Das (Berkeley: University of California Press, 2000): 242-70.
- <sup>110</sup> For "news hunger," see Robin Jeffrey, *India's Newspaper Revolution: Capitalism, Politics and the Indian Language Press* (New Delhi: Oxford University Press, 2000), 260. For evidence of increasing circulation, see Abu Abraham, "Private View," *Indian Express*, March 3, 1977; see also the front-page advertisement, *Indian Express*, Feb. 14, 1977, and Verghese, "Warrior of the Fourth Estate."
- <sup>111</sup> "The Readers Have it," *Indian Express*, March 6, 1977.
- <sup>112</sup> *Seminar*, *Opinion*, *Mother India*, and *Quest* were among those that suspended their publication during the Emergency.
- <sup>113</sup> As an example, see the case of journalism in Hong Kong in Francis L.F. Lee and Angel M.Y. Lin, "Newspaper Editorial Discourse and the Politics of Self-Censorship in Hong Kong," *Discourse and Society* 17, no. 3 (2006): 331-58.
- <sup>114</sup> Most recently, the ruling Bharatiya Janata Party (BJP) government has come under increased scrutiny for arm-twisting various institutions including the press into accepting "Hindu nationalism" and thus being less critical of the state of affairs. See, for example, "...And They Came for Me!" *Economic and Political Weekly* 51, no. 12 (March 2016): 7-8.

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