Drafting a request for information under the Right to Information Act 2005
Flow chart of the Request for Information

Citizen

Request

- information in 30 days
- OR
- information in 40 days
  (Information related to 3rd party)

(48 hours - if information concerns the life or liberty)

(Add 5 days if the request is submitted to Assistant Public Information Officer)

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OR

Decision 30/40 days

Public Information Officer

Flow chart of the Request for Information (if rejected)

Citizen

Request

Decision 30/40 days

PIO

1st Appeal

30 days

Decision

30/45 days

Senior Officer

2nd Appeal

90 days

Final Decision

Central/State Information Commission

Complaint

90 days

30 days
Request for obtaining information

A person, who desires to obtain any information under this Act, shall make a request in writing or through electronic means in English or Hindi or in the official language of the area in which the application is being made, accompanying such fee as may be prescribed, specifying the particulars of the information sought, to the PIO or the APIO. s.6(1)
where such request cannot be made in writing, the PIO shall render all reasonable assistance to the person making the request orally to reduce the same in writing.
An applicant shall not be required to give any reason for requesting the information or any other personal details except those that may be necessary for contacting him. s.6(2)
Deemed refusal

If the PIO fails to give decision on the request for information within the period specified the PIO shall be deemed to have refused the request. s.7(2)

The requester shall be provided the information free of charge where a public authority fails to comply with the time limits specified. s.7(6)
Intimation

Where a decision is taken to provide the information on payment of any further fee representing the cost of providing the information, the PIO shall send an intimation to the requester, giving the details of further fees, the calculations, requesting him to deposit that fees...

s.7(3)
...and information concerning his or her right with respect to review the decision as to the amount of fees charged or the form of access provided, including the particulars of the appellate authority, time limit, process and any other forms.

the period intervening between the despatch of the said intimation and payment of fees shall be excluded for the purpose of calculating the period of thirty days. s.7(3)
Where the person to whom access is to be provided is sensorily disabled, the PIO shall provide assistance to enable access to the information, including providing such assistance as may be appropriate for the inspection. s.7(4)
The applicant shall pay such fee as may be prescribed.

The fee shall be reasonable and no such fee shall be charged from the persons who are of below poverty line. s.7(5)

The requester shall be provided the information free of charge where a public authority fails to comply with the time limits specified. s.7(6)
An information shall ordinarily be provided in the form in which it is sought unless it would disproportionately divert the resources of the public authority or would be detrimental to the safety or preservation of the record in question.

s.7(9)
The Right to Information Rules

2012
This part of the presentation provides an introduction to the Right to Information Rules, 2012.


These Rules supersede both the RTI (Regulation of Fee and Cost) Rules, 2005 and the CIC Rules (Appeal Procedure) 2005. Now we have a single set of rules instead of those two sets of rules.
Topics Included:
- Application fee
- Fees for Providing information
- Fee for inspection of records
- Postal charge
- Person below poverty line
- Mode of Payment
- Second appeals
- Preconditions
- Presence of the appellant
- Presentation by the Public Authority
Rule 3 says an application for information under the RTI Act should be accompanied by a fee of Rs. 10.

The Rule mandates the application should not contain more than 500 words, excluding any annexures and addresses of the PIO and that of the applicant.

However, the PIO should not reject and application “only on the ground that it contains more than 500 words”.
A person who is below poverty line need not pay such application fee.

She has to enclose “a copy of the certificate issued by the appropriate Government in this regard” to claim such fee waiver.
Fee for providing information is as follows:

A page in A-3 or smaller size : Rs. 2
A large size paper: actual cost
Samples or models: actual cost
Diskette or floppy: Rs. 50.
A publication: price fixed/ Rs. 2 per page of photocopy for extracts
Fee for inspection of records is as follows:

First hour of inspection: Free
Each subsequent hour or fraction thereof: Rs. 5.
Postal charge

Public authorities will bear the postal charges for sending information to the requester.

However, when the postal charge exceeds Rs. 50, the requester has to pay the remaining balance.
A person who is below poverty line need not pay any of the following:

- Fees for Providing information
- Fee for inspection of records
- Postal charge

She has to enclose “a copy of the certificate issued by the appropriate Government in this regard” to claim such fee waiver.
Fees under these rules may be paid in any of the following manner:

(a) in **cash**, to the public authority/ PIO against a proper receipt;

(b) by demand draft or bankers cheque or **Indian postal Order** payable to the Accounts Officer of the public authority;

(c) by **electronic means** to the Accounts Officer of the public authority; if facility for receiving fees through electronic means is available with the public authority.
Calcutta High Court in Avishek Goenka Vs Union of India (WP No.33290 of 2013 dt. 20.11.2013)

..the authority should not insist upon requester’s whereabouts when post box number is provided..
In case...they may insist on upon personal details...duty of the authority to hide such info. ..
Rules 7-15 deal with the appeal process. The Appendix to the Rules provide a format of second appeal to the Central Information Commission.

CIC cannot dismiss an appeal “only on the ground that it has not been made in the specified format”. However, such an appeal should be “accompanied by documents as specified in rule 8”. Next page provides a list of such documents.
Second appeals should be accompanied by the following documents:

(i) a copy of the application submitted to the PIO
(ii) a copy of the reply received, if any, from the PIO;
(iii) a copy of the appeal made to the First Appellate Authority
(iv) a copy of the Order received, if any, from the First Appellate Authority;
(v) copies of other documents relied upon by the appellant and referred to in his appeal
(vi) an index of the documents referred to in the appeal

All such enclosures should be authenticated and verified by the appellant.
Preconditions for filing of second appeal before CIC:

1. The appellant should have filed an appeal before the First Appellate Authority AND

2. The First Appellate Authority should have passed a final order OR A period of 45 days from the date on which such appeal was preferred should have elapsed.
The appellant may be present before CIC:
✓ in person or
✓ through his duly authorized representative or
✓ through video conferencing, if the facility of video conferencing is available, at the time of hearing of the appeal by Commission.
The Public authority may authorize
✓ any representative or
✓ any of its officers to present its case.
FORMAT OF APPEAL

1. Name and address or the appellant
2. Name and address of the CPIO to whom the application was addressed
3. Name and address of the CPIO who gave reply to the Application
4. Name and address of the First Appellate Authority Who decided the First Appeal
5. Particulars of the application
6. Particulars of the order(s) including number, if any, against which the appeal is preferred
7. Brief facts leading to the appeal
8. Prayer or relief sought
9. Grounds for the prayer or relief
10. Any other information relevant to the appeal
11. Verification/authentication by the appellant
https://rtionline.gov.in/
This is a portal to file RTI applications/first appeals online along with payment gateway. Payment can be made through internet banking of SBI & its associate banks, debit/credit cards of Master/Visa and RuPay cards. Through this portal, RTI applications/first appeals can be filed by Indian Citizens for all Ministries/Departments and few other Public Authorities of Central Government. RTI applications/first appeals should not be filed for other Public authorities under Central/State Govt. through this portal.

https://rtionline.gov.in/
The Government of India always lays emphasis on making the lives of its citizens easy, smooth and making India truly democratic and keeping this in mind the RTI Act has been established.

RTI stands for Right To Information and has been given the status of a fundamental right under Article 19(1) of the Constitution. Article 19(1) under which every citizen has freedom of speech and expression and have the right to know how the government works, what role does it play, what are its functions and so on.

The Act confers right to the citizens to know as to how the taxpayers money is being spent by the Government.

Please note that this forum is not to be used for redressal of general grievances.
CIC Online facilitates online filing of Complaint and Second Appeal with the CIC.
COMPILATION OF OMs & NOTIFICATIONS ON RIGHT TO INFORMATION ACT, 2005:

http://persmin.nic.in/DOPT/RTICorner/Compendium/COMPENDIUM_Final.pdf
Guidelines on Internship for Undergraduates pursuing five year integrated course in Law or graduates pursuing Bachelor's degree in Law under the Centrally sponsored Scheme on "Improving Transparency and Accountability in government through effective implementation of Right to Information Act"

Fellowship

Right to Information Fellowship 2015 guidelines
Nine year old Pranav forced Delhi police to register an First Information Report to trace his lost bicycle by filing an application under the RTI
Eight year old Aishwarya wrote a three-point application to the PIO of the Chief Minister’s office seeking an answer to why the garbage is being dumped in front of her school.
1. Please indicate the **daily progress** made on my application so far i.e. when did my application reach which officer, for how long did it stay with that officer and what did he/she do during that period?

2. Please give the **names and designations of the officials** who were supposed to take action on my application and who have not done so.
3. **What action would be taken** against these officials for not doing their work and for causing harassment to the public? By when would that action be taken?

4. **By when** would my work be done now?”

No prescribed form.
Reasonable fees
Allows partial disclosure.

OFF THE MARK.com

ENOUGH ABOUT MY DAY, HOW WAS YOURS?

ENOUGH ABOUT MY DAY, HOW WAS YOURS?

ENOUGH ABOUT MY DAY, HOW WAS YOURS?

JUST THE RUBBISH JUST THE RUBBISH JUST THE RUBBISH

GOVERNMENT OFFICIAL AT HOME

© Mark Parisi, Permission required for use.
P.I.O has a ‘duty to assist’ requesters.
No need to give reasons for requesting information.
Law is ‘applicant blind’

- No need to give personal details except address for contact.
Information concerns the life or liberty to be provided within 48 hours.
Information to be provided expeditiously, within 30 days of receipt of request.
Deemed to be refused if no response is given.
Requests by Associations

Paragraph 8 of the ‘Guide for the Public Authorities- Guidelines for the public authorities under the Right to Information Act,2005’, published by Department of Personnel & Training, Ministry of Personnel, P.G. and Pensions, Government of India states as follows:

“8. The Act gives the right to information only to the citizens of India. It does not make provision for giving information to Corporations, Associations, Companies etc. which are legal entities/persons, but not citizens. However, if an application is made by an employee or office bearer of any Corporation, Association, Company, NGO etc. indicating his name and such employee/office bearer is a citizen of India, information may be supplied to him/her. In such cases, it would be presumed that a citizen has sought information at the address of the Corporation etc.”
 Citizen Auditors

- Right to information includes inspection of records, works and taking certified samples of material
“If I went for an audit and asked for comments, you could give it to me in a day, in a month, in six months, or never give it and I could not do anything about it except remind you. Today, the government has empowered citizens with the RTI Act. We are asking for similar powers so that my audit queries are answered in 30 days.”

*Outlook, 11 July 2011*
Flow chart of the Request for Information

Citizen → Request

- Information in 30 days
- OR
- Information in 40 days
  (Information related to 3rd party)
  (48 hours - if information concerns the life or liberty)
  (Add 5 days if the request is submitted to Assistant Public Information Officer)

Public Information Officer

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Flow chart of the Request for Information (if rejected)

Citizen → Request → PIO

- Decision 30/40 days

PIO → 1st Appeal

- 30 days

PIO → 2nd Appeal

- 90 days

Senior Officer → Final Decision

Central/State Information Commission

Complaint

90 days 30 days
Complaint
Voluntary disclosure of maximum (16 categories of) information on Nationwide network.
## Compliance under Section 4(1)(b) of Right to Information Act, 2005

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- History
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- Supreme Court Rules, 2013
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- Other Links - Compendium of Circulars, Supreme Court Officers and Servants (Conditions of Service and Conduct) Rules, 1961
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- Supreme Court Rules, 2013
- Practice and Procedure
- Other Links - Compendium of Circulars, Supreme Court Officers and Servants (Conditions of Service and Conduct) Rules, 1961
Paragraph 2 of the ‘Guide for the Public Authorities- Guidelines for the public authorities under the Right to Information Act, 2005’, published by Department of Personnel & Training, Ministry of Personnel, P.G. and Pensions, Government of India states as follows:

“2. The Act casts important obligations on public authorities so as to facilitate the citizens of the country to access the information held under their control. The obligations of a public authority are basically the obligations of the head of the authority, who should ensure that these are met in right earnest. Reference made to public authority in this document is, in fact, a reference to the head of the public authority.”

O.M.No.1/412008-IR dated: 25th April, 2008
“19. An another important point to note is that it is not sufficient to publish the above information once. The public authority is obliged to update such information every year. It is advisable that, as far as possible, the information should be updated as and when any development takes place. Particularly, in case of publication on the internet, the information should be kept updated all the time.”
Let the people participate in decision making

- Voluntarily publish relevant facts while formulating important policies or announcing the decisions which affect public.
Every public authority should voluntarily provide reasons for its administrative or quasi-judicial decisions to affected persons.
Students

And their right to information
“For a system to foster meaningful proliferation of knowledge, it must itself be crystal clear to its core.”

-- Justice Sanjib Banerjee, Calcutta High Court.

Transparency plays an important role in a student’s life. After the RTI Act entered into force, many students started filing requests for copies of their evaluated answer scripts.
In *Central Board of Secondary Education & Anr. v. Aditya Bandopadhyay & Ors.*, the Supreme Court ruled that the examining bodies will have to permit inspection of evaluated answer sheets by examinees and provide certified copies of the evaluated answer sheets, when requested.

Civil Appeal No. 6454 of 2011, Date of judgment 9 Aug. 2011.
In September 2008, a division bench of the Delhi High Court upheld an earlier judgment directing the Union Public Service Commission (UPSC) to disclose the following:

- Marks obtained by the applicants for the Civil Services Preliminary Examination 2006 in General Studies and in Optional Papers.
- Cut-off mark for the combined total of raw General Studies marks and scaled optional paper marks.
- Model answers.

Union Public Service Commission v Shiv Shambhu and Ors, LPA No. 313 of 2007 and CM APPL. No. 6468/2007, 3 September 2008
However, UPSC approached the Supreme Court and filed a Special Leave Petition against the judgment (Special Leave Petition (Civil) 23250 of 2008).

On 18 November 2010, the Supreme Court dismissed the petition and made the following Order:

“The Union Public Service Commission has completely changed the pattern of its examination and the next examination for the year 2011 shall be held according to the changed format. In view of this development, there is no need for any adjudication by this Court on this matter.”
In March 2009, UPSC was directed by CIC to disclose marked factual summary sheets prepared before personal interview of the civil services (main) examination of 2000.

In another case, CIC directed Ministry of Human Resource Development to disclose:
• Copy of recruitment rules for certain post of secretary.
• Number of applications received along with details.
• Details of selection procedure followed.

Venkata Rao requested Vishakhapatnam Steel Project that complete information in respect of the following should be provided to him:

- Procedure for conduct of interviews for selection of Manager and Dy. Manager
- Criteria/basis of selection of candidates.
- Score of marks obtained by the successful candidates and the appellant.
- List of candidates who appeared in the interview.

CIC directed that the information should be furnished within 15 working days.

The Supreme Court was concerned with the issue whether a cooperative society would fall within the definition of a public authority under the RTI Act. The Supreme Court held as follows:

“BURDEN TO SHOW: 40. The burden to show that a body is owned, controlled or substantially financed or that a non-government organization is substantially financed directly or indirectly by the funds provided by the appropriate Government is on the applicant who seeks information or the appropriate Government and can be examined by the State Public Information Officer, State Chief Information Officer, State Chief Information Commission, Central Public Information Officer etc., when the question comes up for consideration.”
CIC while deciding a case has cited the decision of Supreme Court of India in the matter of *Girish R. Deshpande vs. CIC and others* (SLP (C) no. 27734/2012) in which it was held as under:

--Department of Personnel & Training, O.M. No. 11/2/2013-IR (Pt.), 14 Aug. 2013
"The performance of an employee/Officer in an organisation is primarily a matter between the employee and the employer and normally those aspects are governed by the service rules which fall under the apression 'persona? information', the disclosure of which has no relationship to any public activity or public interest. On the other hand, the disclosure of which could cause unwarranted invasion of the privacy of that individual."

The Supreme Court further held that such information could be disclosed only if it would serve a larger public interest.
Case Study

RIGHT TO INFORMATION ACT
2005
In 2002, NMDC applied for permission to undertake mineral exploration in an area in the Bailadila forest reserve in the largely tribal district of Bastar in Chhattisgarh.

In 2006, the State Government of Chhattisgarh recommended to the central government that a prospecting license in the same area be given to Tata Iron and Steel Company (TISL), who had proposed to set up an iron and steel manufacturing plant in the state.
In 2007, the central government conveyed its approval to the state government, provided the state government ensured that TISL complied with the applicable rules and regulations and obtained environmental clearance under Section 2 of the *Forest Conservation Act*.

Subsequently the state government granted a prospecting license to TISL for two years, but waived the conditionality of setting up the iron and steel plant on the advice of the central government.
NMDC challenged a decision through a writ petition before the Delhi High Court on the grounds that:

- the central government had not given the mandatory environmental clearance through its Ministry of Environment and Forests under Section 2 of the *Forest Conservation Act*, and

- NMDC ought to have been given preference under the MMDRA because it is a public sector company.
NMDC claimed that it had originally filed a revision petition before the Mines Tribunal against the grant of license by the state government to TISL. It was during these revisional proceedings that NMDC became aware of the impugned order.

NMDC alleged that the impugned order was kept secret, but they were able to access the order through the Right to Information Act, 2005 (RTI Act). Using this information, NMDC was able to show that the central government’s approval letter was treated as an order for grant of license, even though the mandatory environmental clearance was not obtained by the company.
The Court held that the central government had failed to comply with Section 2 of the *Forest Conservation Act* before issuing its approval for the grant of license to TISL by the state government.

Therefore the central government’s approval, and all the proceedings under the MMDR Act leading to the order of grant of the prospecting license, were quashed as contrary to law and outside the Union Government’s jurisdiction.
Way ahead

- Right to Service law
- The Whistle Blowers Protection Act, 2014
- Privacy protection law
- Public Records law
- Private sector under the RTI Act
- Environmental Right to information law
- Spending openly: Track your taxes
Way ahead

- India withdrew from the prestigious ‘Open Government Partnership’, launched in 2011, to “secure commitments from governments to promote transparency, empower citizens, fight corruption” and so on.
- India had been a steering committee member for months before its withdrawal.
- So far 69 countries have joined the partnership.
- For membership, a country “must endorse a high-level Open Government Declaration, deliver a country action plan developed with public consultation” and so on.
Exemption from Disclosure of Information under the RTI Act
Introduction

The most complex and most controversial part in the implementation of the RTI Act is application of exemptions.

This presentation provides an introduction to the basic concepts of exemption from disclosure of information under the RTI Act.

First we will discuss why do we need these exemptions at all and then we will go through some of the basic concepts of exemptions.
Section 3

Section 3 of the RTI Act states: “Subject to the provisions of this Act, all citizens shall have the right to information.”

That means right to information is not an absolute right. It is subject to certain provisions of the Act. What are those provisions? Section 8, 9 and 24 contain such provisions, subject to which citizens can exercise their right to information.
Exclusions

The RTI Act, through section 24, **partially excludes** the following from the ambit of the Act:

- the intelligence and security organisations specified in the Second Schedule
- Information furnished by such organisations to the Central Government
- intelligence and security organizations (established by the State Government) notified in the Official Gazette.

We will be discussing these ‘exclusions' in detail, in another chapter, entitled ‘Exclusions’.
Exemptions

The most difficult and the most controversial aspect of the Act is the application of these exemptions. PIO can only reject a request under Sections 8 and 9.

Section 7 (1) of the RTI Act states as follows:

“...the Central Public Information Officer … on receipt of a request under Section 6 shall, … either provide the information … or reject the request for any of the reasons specified in Sections 8 and 9 ...”
Two categories

Section 8 and section 9 of the Act contain these exemptions (Section 7 (9) is not an exemption).

Exemptions can be divided into two categories:

- **Absolute exemptions**
- **Qualified exemptions**
Absolute exemptions

Exemptions which are not subject to public interest test.

Section 9 is the only absolute exemption.
Qualified exemptions

Exemptions which are subject to public interest test. Here, the decision makers must consider whether there is greater public interest in disclosing the information or withholding the information (popularly called - balancing the public interest).

All the exemptions under section 8(1) are qualified exemptions.
Discretionary

That means exemptions under section 8 are discretionary, not mandatory.

The PIOs may make discretionary disclosures of exempt information, as a matter of their discretion, when public interest in disclosure outweighs the harm to the protected interests.
Lifespan of exemptions

Again, exemptions under section 8 (1) can be divided into two categories, based on their lifespan:

- Time limited exemptions
- Perpetual exemptions
Time limited exemptions

Section 8(3) imposes time limit on exemptions. Clauses (b), (d), (e), (f), (g), (h) and (j) of Section 8(1) are time limited exemptions, which are no longer valid exemptions after 20 years from the date of the record.

It is implied that clauses (a), (c) and (i) of Section 8(1) are not time limited exemptions. They are perpetual exemptions.
Rejection of requests

Under the RTI Act, for PIOs, it is very difficult to withhold information:

- They have to communicate the reasons for rejection of a request for information to the requester.
- PIO can only reject a request under Sections 8 and 9.
- Reasons should include justification for applying an exemption.
Rejection of requests

If PIO rejects a request for any of the reasons specified in Section 8 and 9, the PIO should, under Section 7 (8), communicate to the requester:

1. the period within which an appeal against such rejection may be preferred
2. the particulars of the appellate authority
3. the reasons for such rejection
Reasons for rejection

The phrase `Reasons for rejection` has two components:

First, the provision under which information is exempt and secondly, reasons justifying for applying such exemption.
Reasons for rejection

Sometimes information may fall under an exemption under section 8, but still the PIO may wish to disclose it, `if public interest in disclosure outweighs the harm to the protected interests`. In such case the PIO may record:

1. factors favoring public interest in disclosure.
2. factors favoring public interest in non-disclosure.
3. how and why the former are more important than the later - or the other way around, if the PIO decides to withhold the information.
Justification

The Central Information Commission (CIC), in a Decision, held as follows:

Through this Order the Commission now wants to send the message loud and clear that quoting provisions of Section 8 of the RTI Act *ad libitum* to deny the information requested for, by CPIOs/Appellate Authorities without giving any *justification* or grounds as to how these provisions are applicable is simply unacceptable and clearly amounts to *malafide denial* of legitimate information attracting penalties under section 20(1) of the Act.

CIC, in another Decision, held as follows:

The PIO has to give the reasons for rejection of the request for information as required under Section 7(8) (i). Merely quoting the bare clause of the Act does not imply that the reasons have been given. The PIO should have intimated as to how he had come to the conclusion that rule 8(1) (j) was applicable in this case.

Section 7 (9) is not an exemption

Section 7 (9) of the RTI Act is not an exemption. It states as follows:

An information shall ordinarily be provided in the form in which it is sought unless it would disproportionately divert the resources of the public authority or would be detrimental to the safety or preservation of the record in question.
Disproportionate diversion of resources

The RTI Act does not offer any definition of this phrase. There is no ceiling on how much time and resources a public authority can spend on a request.

For example, under the UK Freedom of Information Act, an authority can refuse a request when it estimates that it will cost them in excess of the appropriate cost limit to fulfill a request. The limit is 600 pounds for central government and 450 pounds for other public authorities.
There is no such upper limit in India.

Public authorities cannot reject a request even if it would cause disproportionate diversion of resources to grant the request. However, they can offer the information in a different form to prevent disproportionate diversion of resources.

For example, a requester seeks certain information in electronic form and the public authority holds the information, in the form of hundreds of files. Here, the public authority has to spend its resources to convert such information into electronic form. Instead, it can offer the information in hard copy under section 7 (9).
Disproportionate diversion of resources

CIC, in a Decision, held as follows:

“Sec. 7(9) of the Act does not authorize a public authority to deny information. It simply allows the authority to provide the information in a form easy to access ... But this provision does not exempt disclosure of information, only adjustment of the form in which it is provided.”

-- Decision No.10/1/2005- CIC, dt. 25.02.2006
Thank you!

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