

**Double Standards: Comparing Right to Information
Applications Received by Different Public Entities Within
the Delhi Government**

Department of Political Science – Honors Thesis

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1. Introduction

Corruption has long plagued governance at all levels in India¹. Such deeply entrenched corruption in the world's largest democracy deprives millions of vulnerable and marginalized citizens of rights and aid that they are legally entitled to and has stolen hundreds of billions of dollars in illegal capital flows from India's economy since Independence².

The Right to Information Act of 2005—which allows any Indian citizen to apply for the disclosure of specific information by any government department or agency (from hereon, 'public entities')—truly challenged the status quo by providing formal institutional machinery to aid citizens in demanding information regarding the policies of the government as well as decisions and actions taken by its public officials.

In my honors thesis, I explore the differences, if any, among the RTI applications that different types of public entities attract. Most entities, through their employees can be categorized as either “public-facing” and the latter as “industry-facing”. These two types of entities probably foster two different types of corruption: the former likely involve shakedowns and abuse of authority by low-level government bureaucrats who interact with ordinary citizens on a daily basis, while the latter likely involves kickbacks and high-level quid-pro-quo arrangements between political elites and powerful businessmen. My analysis uses the Delhi government's public entities as a proxy for those of the Central government for reasons I will elaborate on later in my honors thesis.

¹ “Governance in India: Corruption.” Council on Foreign Relations. Council on Foreign Relations. Accessed April 17, 2020. <https://www.cfr.org/background/governance-india-corruption>.

² Ibid. 1

On the outset, I conjectured that if I were to sort the RTI petitions targeting different entities of the Delhi government—obtained from the Delhi government’s online database³—into categories on the basis of their content, I would find a clear difference between the types of RTI petitions that public-facing public entities attract and those that industry-facing public entities attract. I expected public-facing public entities to receive more specific and fewer general RTI applications. I also expected public-facing entities to receive more applications concerning the redressal of personal grievances but this expectation was more tentative because the redressal of personal grievances can cut across categories.

My research strategy randomly sampled RTI applications sent to three Delhi government departments: the Directorate of Education (a public-facing public entity), the Finance Department (an industry-facing public entity), and the Transport Department (a hybrid of the two types). I analyzed three samples of 100 RTI applications that each of the public entities received using coding criteria that I drew from my expectations, which I formulate below as hypotheses.

The evidence does not support my hypothesis that public-facing public entities receive more specific than general RTI applications and attract more appeals for the redressal of personal grievances. Indeed, the most interesting finding from my analysis was not in my hypothesis at all; namely, that a significant chunk of the sampled applications received by the Directorate of

³ Search Your Question. Accessed March 24, 2020.
http://delhigovt.nic.in/rti/spio/search_ques.asp.

Education are invalid. Delving into the drivers behind these invalid enquiries reveals much about the RTI's institutional infrastructure and the ways in which it is maybe falling short of its goals.

2. Background and Origins of the RTI Act

2.1. Brief History

The Right to Information (RTI) Act was passed on the 15 June 2005, and it was enacted on October 12, 2005.⁴ It “mandates timely response to citizen requests for government information...”⁵ Specifically, it mandates every department of the federal and state governments to share any information sought by Indian citizens via RTI petitions. The implementation of the RTI has changed the paradigm in drastically increasing transparency and accountability in governance in India.

However, it is important to note that the “effectiveness of the law hinges on its use by citizens as well as enforcement by public authorities and both rely, to some extent, on the awareness and knowledge of law.”⁶ Because the effectiveness of the RTI Act relies so heavily on “buy-in” from citizens and from the governments indicates that true transparency and accountability are difficult goals to achieve.

In a cultural and historical context where secrecy and opaque governance had long been the norm, the RTI Act has been a game-changer. The Official Secrets Act of 1923 had established and

⁴ Khanwalker, Varsha. "THE RIGHT TO INFORMATION ACT IN INDIA: ITS CONNOTATIONS AND IMPLEMENTATION." *The Indian Journal of Political Science* 72, no. 2 (2011): 387-93. Accessed January 29, 2020. www.jstor.org/stable/42761423.

⁵ “About Right to Information Act 2005.” Right to Information. Accessed January 29, 2020. <https://rti.gov.in/>.

⁶ Ibid. 4

entrenched this culture of opaque governance during colonial times. This Act blocked almost any prospect of information-sharing by government departments. To contextualize just how much the government and judiciary's focus on information-sharing has changed, it is useful to note that the Supreme Court of India only recently ruled, in March 2019, that the RTI Act supersedes the Official Secrets Act.⁷

2.2. International and Domestic Context for Passage of the RTI Act

The argument that freedom of information and the values of transparency and accountability are essential to the preservation and expansion of democracy has been globally validated many times, and it has pushed governments everywhere from the United States and Canada to the United Kingdom and France to pass legislation granting citizens the right to freely seek information regarding government policies and actions⁸. The Freedom of Information Act in the United States and the British Information Bill are prime examples. This argument also gained significant political currency when the UN adopted a Charter of Human Rights citing the freedom of information as a right that citizens are entitled to⁹. It was this international burst of legislation in the late 20th century which, in part, helped construct a political context conducive to the eventual passage of legislation focusing on transparency in India¹⁰.

⁷ Rajagopal, Krishnadas. "RTI Trumps Official Secrets Act, Says SC." *The Hindu*. *The Hindu*, March 14, 2019. <https://www.thehindu.com/news/national/rti-trumps-official-secrets-act-says-sc/article26537346.ece>.

⁸ Viswam, S. "The Right to Information." *India International Centre Quarterly* 10, no. 2 (1983): 175-85. Accessed January 29, 2020. www.jstor.org/stable/23001642.

⁹ Khanwalker, Varsha. "THE RIGHT TO INFORMATION ACT IN INDIA: ITS CONNOTATIONS AND IMPLEMENTATION." *The Indian Journal of Political Science* 72, no. 2 (2011): 387-93. Accessed January 29, 2020. www.jstor.org/stable/42761423.

¹⁰ *Ibid.* 8

The domestic political context for the RTI's proposal through which the RTI Act was passed in parliament is generally acknowledged as a uniquely democratic and bottom-up process of advocacy by citizen groups and activists.¹¹ A grassroots movement in the Indian state of Rajasthan in the early 1990s and precipitated the rise of the Mazdoor Kisan Shakti Sangathan (MKSS).¹² MKSS was able to translate grassroots-level demands into a policy proposal for the government to consider. Gradually, this movement was successful in gaining national traction. Prior to this, similar pieces of legislation—some of which arguably fell short of pushing for true transparency and accountability¹³—had been passed by multiple state legislatures in India. Acts passed in the states of Tamil Nadu and Madhya Pradesh¹⁴ are prime examples of precedents to the RTI Act.

From 1996 to 2005, the Indian government and parliament engaged with citizens' groups such as the National Campaign for People's Right to Information (NCPRI) and activists in order to create a working draft of the RTI bill. As a result, the Freedom of Information Act was passed by the parliament in 2002, followed by the passage of the arguably more robust RTI Act in 2005.¹⁵

2.3. The RTI Act's Institutional Infrastructure

The manner in which the RTI Act has been institutionalized and implemented is also quite interesting. Every government department at the center or state level is mandated to appoint an

¹¹ Madhavan, Esha Sen. "Revisiting the Making of India's Right to Information Act: The Continuing Relevance of a Consultative and Collaborative Process of Lawmaking Analyzed from a Multi-Stakeholder Governance Perspective." Berkman Center for Internet & Society at Harvard University. Accessed January 27, 2020.

https://cyber.harvard.edu/sites/cyber.harvard.edu/files/Publish_Sen_Madhavan.pdf.

¹² Ibid. 11

¹³ Ibid. 11

¹⁴ Madhav Godbole. "Right to Information: Write the Law Right." *Economic and Political Weekly* 35, no. 17 (2000): 1423-428. Accessed January 29, 2020. www.jstor.org/stable/4409194.

¹⁵ Ibid. 12

information officer who is responsible for attending to RTI petitions aimed at that department. This institutional framework was also meant to allow legal recourse in case RTI petitions were ignored or answered inadequately. Within the institutional framework of the RTI, Information Commissions (ICs) are the final appellate authorities mandated to deal with complaints from citizens who have been denied the due process offered under the RTI Act. Along with a federal Central Information Commission (CIC), every state also has a State Information Commission.

3. Scope and Context

3.1. Why India?

My study of the kinds of RTI applications that different types of public entities (a more inclusive category referring to the ministries of state governments and the central government as well as agencies and public sector enterprises controlled and operated by both tiers of government) attract focuses on New Delhi. To fully understand and appreciate how these public entities operate, the modes of corruption they are sometimes involved with, and how the public views them, it is important to understand the landscape of governance and corruption in India.

India is ranked 80th out of a total of 180 countries in the 2019 edition of Transparency International's Corruption Perceptions Index¹⁶ and high-level rent-seeking by industrial and economic actors as well as petty corruption are both known to be entrenched in India. The corruption harbored by the Indian government is well-documented and its ministries are involved

¹⁶ e.V., Transparency International. Transparency International - India. Accessed March 23, 2020. <https://www.transparency.org/country/IND>.

in corruption in different ways.¹⁷ Examples of relatively petty corruption by “street-level bureaucrats”—which the average Indian encounters on a regular basis¹⁸—abound, just as examples of higher-level, high-stakes corruption involving political elites and high net-worth businessmen¹⁹ are also prominent in India’s public memory.

3.2. Why Delhi?

Within India, I will focus on RTI applications received by the Government of Delhi. New Delhi is, for many reasons, a suitable focus for this thesis. Also, what I will learn from analyzing the applications received in Delhi can shed some light on the same issues on a national level.

New Delhi is the seat of the Indian government and the national capital of India. It is home to the Central Legislature, Supreme Court, and the Government of India and all its ministries and other public entities. This ensures that New Delhi is almost always the stage for an extraordinary amount of political and protest activity. National movements with political ends often kick off or culminate in New Delhi since the capital gives such movements easy access to the spotlight. The anti-corruption movement of 2011²⁰ is a particularly prominent example of such a movement. The

¹⁷ “Governance in India: Corruption.” Council on Foreign Relations. Council on Foreign Relations. Accessed April 17, 2020. <https://www.cfr.org/background/governance-india-corruption>.

¹⁸ Burke, Jason. “Corruption in India: 'All Your Life You Pay for Things That Should Be Free'.” The Guardian. Guardian News and Media, August 19, 2011. <https://www.theguardian.com/world/2011/aug/19/corruption-india-anna-hazare>.

¹⁹ Desai, Ronak D. “India Continues To Rank Among Most Corrupt Countries In The World.” Forbes. Forbes Magazine, March 7, 2018. <https://www.forbes.com/sites/ronakdesai/2018/03/07/india-continues-to-be-one-of-the-most-corrupt-countries-in-the-world/#1260bc7e79c6>.

²⁰ Mitu Sengupta (2014) Anna Hazare's Anti-Corruption Movement and the Limits of Mass Mobilization in India, *Social Movement Studies*, 13:3, 406-413, DOI: [10.1080/14742837.2013.860025](https://doi.org/10.1080/14742837.2013.860025)

frequency of such political activity implies a local civic culture that at least recognizes and acknowledges popular demands of transparency and accountability.

There is also evidence that citizens of Delhi show significant levels of political participation as well as political problem-solving.²¹ A 2003 survey found that citizens in Delhi engage in a wide variety of political problem-solving practices ranging from formal methods to informal methods.²² After the passage of the RTI Act in 2005, it is clear that sending in RTI applications constitutes one of these formal channels for “problem-solving.” For all these reasons, New Delhi is a suitable focus for this thesis. Findings from Delhi can be extrapolated, within reasonable limits, to the rest of India.

4. Analyzing RTI Petitions in New Delhi

4.1. Differentiating among Public Entities

The assigned domain of a given ministry within the Indian government has implications for who and how it interacts with Indian society and the Indian economy. I classify ministries on the basis of their interactions with the public or with industrial or economic actors is to identify all ministries as either “public-facing” or “industry-facing.” The key distinction between the two categories is the degree to which a ministry’s mandated duties necessitate interaction with the Indian public at a grassroots level, as opposed to generally higher-level organized interactions with, for example, representatives from various industrial actors.

²¹ Harriss, John. "Political Participation, Representation and the Urban Poor: Findings from Research in Delhi." *Economic and Political Weekly* 40, no. 11 (2005): 1041-054. Accessed April 6, 2020. www.jstor.org/stable/4416334.

²² Ibid. 20

4.2. Public-Facing Entities

I classify as “public-facing” a ministry with a mandate that impacts the lives of all classes of Indian citizens in tangible ways. These ministries also tend to employ a sizeable corps of “street-level bureaucrats”²³ who interface and interact directly with thousands of citizens.

Intuitively, I conjecture that since public-facing ministries tend to rely on street-level bureaucrats who have regular grassroots-level interactions with the public, most of the corruption such ministries are involved with tends to be linked to these lower-level bureaucrats. This corruption would also likely manifest itself as simple abuse of the power that these bureaucrats are entrusted with wherein a clear private gain is not necessarily sought. This breed of corruption is not necessarily by mutually-beneficial exchanges, trading favors, or kickbacks, but by the abuse of the power vested in a street-level bureaucrat. Entrenched corruption plaguing the police force controlled and organized by the Ministry of Home Affairs is an example of such corruption.²⁴

4.3. “Industry-Facing” Entities

By contrast, the type of corruption industry-facing ministries foster tends to be centered around mutually beneficial arrangements involving exchanges, trading favors, and kickbacks pocketed by senior officials and politicians. This is less an ordinary low-stakes shakedown and more a well-organized, high-stakes rent-seeking exercise often involving political elites. The 2G spectrum

²³ Richard Weatherley and Michael Lipsky (1977) Street-Level Bureaucrats and Institutional Innovation: Implementing Special-Education Reform. *Harvard Educational Review*: July 1977, Vol. 47, No. 2, pp. 171-197.

²⁴ Lamani, Ravikanth B., and G. S. Venumadhava. “Police Corruption in India.” *International Journal of Criminology and Sociological Theory* 6, no. 4 (December 2013): 228–34. <https://ijcst.journals.yorku.ca/index.php/ijcst/article/view/37944/34411>.

scam²⁵ and the “coalgate” scam²⁶ are examples of such corruption, both prominent in the Indian public’s collective memory.

As I am distinguishing “public-facing” and “industry-facing” ministries as well as the distinct types of corruption they tend to be involved in or the grievances their actions give rise to, I infer that the public’s response to such corruption—via channels such as public interest litigation, legal recourse, or RTI petitions—differs accordingly.

4.4. Research Questions and Hypothesis

I hypothesize that if I sort the RTI petitions targeting different ministries of the Delhi government—obtained from the Delhi government’s online database²⁷—into different categories on the basis of their content, I will notice that there is a clear difference between the types of RTI petitions that public-facing ministries tend to attract and those which industry-facing ministries tend to attract.

Specifically, I am interested in the following two questions: (1) Do public-facing public entities attract more specific RTI applications than general ones, while industry-facing public entities attract more general applications? (2) Do public-facing public entities receive more applications

²⁵ Bhattacharya, Ananya. “An Indian Court Finds Nobody Guilty in a \$4.7 Billion Telecom Scam.” Quartz India. Quartz, December 21, 2017. <https://qz.com/india/1162649/2g-scam-an-indian-court-finds-nobody-guilty-for-rs30000-crore-telecom-scandal/>.

²⁶ Desk, India Today Web. “Explained: What Is the Coal Scam All about in Which Former Jharkhand CM Madhu Koda Was Held Guilty.” India Today, December 13, 2017. <https://www.indiatoday.in/india/story/explained-what-is-the-coal-scam-all-about-in-which-madhu-koda-is-held-guilty-1106352-2017-12-13>.

²⁷ Search Your Question. Accessed March 24, 2020. http://delhigovt.nic.in/rti/spio/search_ques.asp.

relating to the redressal of grievances than do industry-facing public entities? I hypothesize that public-facing public entities to receive more specific than general RTI applications. I also hypothesize that public-facing entities to receive more applications concerning the redressal of personal grievances, but this is a weaker hypothesis because even industry-facing public entities control processes that individuals interact with and are personally affected by. Such interactions can create situations wherein someone who has not been treated according to the law or standard procedure and who feels wronged can mount a claim for redressal of a personal grievance even against an industry-facing public entity.

5. Data

5.1. The Sampled Data

The data that I am examine in my honors thesis to test my hypotheses and expectations is the Delhi government's online database, which catalogues each RTI application that the Delhi government has received and every reply given by the Delhi government. These petitions are driven by a variety of motivations; target different departments and agencies within the Delhi government; and address a wide range of policies, events, and bureaucratic processes. The different agencies and departments within the government of Delhi, as listed on the webpage hosting the database, range from the departments of education, environment, employment, finance—which largely mimic their counterparts in the Central government in terms of their mandate—to specific government agencies and public sector enterprises such as the Agricultural Marketing Directorate, the Central Jail, and the Delhi Transport Corporation. I refer to all these departments, agencies, and public sector enterprises as “public entities” within the government of Delhi.

The database includes a list of categories of complaints for each public entity. For instance, an RTI application targeting the Department of Education can be categorized as concerning Admission & Withdrawal, Examination, Policy Matter, Recruitment Rules, or Redressal of Personal Grievances. I can also choose to ignore these categories and view all the ungrouped RTI applications together. Once I select a particular public entity and enter a search command for all the RTI applications targeting that public entity, 20 of these applications are indexed on one page and I can click on them to view a pop-up window with the full text of each application. In total, the Delhi government has received 29, 0685 RTI applications to date,²⁸ since the RTI Act was enacted in 2005. 98.8% of these applications have been ‘disposed of’.²⁹ This body of applications constitutes a sizable sample from which I can draw any inferences about the types of RTI applications different ministries attract.

5.2. Limitations

While I am utilizing these data to glean important insights about how the Delhi government’s public entities interact with RTI applications, it is also important to acknowledge that this database and the applications catalogued on it lack some key pieces of information that would have provided me with a more comprehensive view of the types of RTI applications different public entities attract. For instance, the precise date on (or even the year in) which an application is made is not in the database. While the text of some applications and the replies they have received includes certain key dates which imply the general period in which the application was made, this information is inconsistent and not completely reliable.

²⁸ Application Status. Accessed March 24, 2020.

http://delhigovt.nic.in/rti/spio/application_status.asp.

²⁹ Ibid. 28

Secondly, there is no standardization or consistency to the formatting of the text for any of the catalogued applications and replies. For instance, some applications are written in Hindi while others are written in a mixture of English and Hindi. It is also often difficult to determine what exactly the object and aim of a given application is since some of the demands and enquiries in the database are phrased in confusing and cryptic ways or in the form of incomplete sentences. Therefore, a fair amount of educated guesswork and deduction is necessary to determine the objective and nature of an application.

6. Methodology

6.1. Exploring My Hypotheses

As I have discussed previously, some public entities have a great degree of grassroots-level interaction with the public and others are more removed from the public and tend to interact primarily with businesses. Public entities in the former category operate via a vast machinery of grassroots-level personnel I refer to as “street-level bureaucrats.”³⁰ These public entities probably also tend to be more engaged in low-level corruption—generally in the form of abuse of power and shakedowns by street-level bureaucrats—while ministries in the latter category are more likely to be engaged in exchange-based corruption that emphasizes mutual benefit and involves members of the political and bureaucratic elite. I expect there to be clear differences between the types of RTI petitions that public-facing ministries tend to attract and those that industry-facing ministries

³⁰ Richard Weatherley and Michael Lipsky (1977) *Street-Level Bureaucrats and Institutional Innovation: Implementing Special-Education Reform*. *Harvard Educational Review*: July 1977, Vol. 47, No. 2, pp. 171-197.

tend to attract, specifically in terms of how general or specific they are and whether or not they relate to the redressal of personal grievances.

I sampled RTI applications and replies catalogued in the Delhi government's database, sampling RTI applications targeting a wide variety of public entities: the Directorate of Education, the Finance Department, and the Transport Department.

6.2. My Chosen Archetypes

The Directorate of Education is mandated to “impart free education to students from Class I to XII irrespective of caste, colour, creed, religion”,³¹ “provide facilities to teachers for teaching and updating their knowledge.”,³² and “provide elementary education to the students.”³³ I chose the Directorate of Education as an example of a public-facing public entity which, due to the nature of its mandate, tends to interact with ordinary citizens through a corps of street-level bureaucrats. Its mandate entails the construction and operation of schools and all the supporting educational infrastructure they require. This allows for ample grassroots-level interaction between personnel working for the Directorate and ordinary citizens. Because of this reason, it is fairly reasonable to label the Directorate of Education a public-facing public entity. Practices such as bribery and bias in seat allocation for children are also well-documented within the Directorate and often cause a furor amongst citizens when they are highlighted in the media.³⁴

³¹ Directorate Of Education Govt. Of NCT Of Delhi. Accessed March 31, 2020. [http://web.delhi.gov.in/wps/wcm/connect/DOIT_Education/education/home/about us/about the department](http://web.delhi.gov.in/wps/wcm/connect/DOIT_Education/education/home/about%20us/about%20the%20department).

³² Ibid. 31

³³ Ibid. 31

³⁴ “Meanwhile, Sisodia Puts out List of 'Corrupt' Officials in Education Department.” The Indian Express, August 23, 2015. <https://indianexpress.com/article/cities/delhi/action-against-school-principal-placement-officer-for-bribery-sisodia-expresses-shock/>.

The Finance Department is charged with the state's fiscal policy and financial management, budgets, and taxation.³⁵ Most of these domains relate to high-level, macro-scale policymaking, as opposed to specific processes which individuals interact with on a day-to-day basis. The exception to this norm is taxation as tax-collection is a process that engages individuals. However, the Finance Department primarily concerns itself with tax policy, and even revenue officers employed by the state of Delhi can hardly count as "street-level bureaucrats." Thus, for the purpose of this honors thesis, I classify the Finance Department as an almost-purely industry-facing public entity.

The Transport Department is mandated with issuing driver's licenses, transportation permits, and enforcing pollution controls as well as vehicle registration requirements. The Department also deals with local policy matters relating to private and commercial transportation. Due to the mixed nature of these responsibilities, it interfaces with millions of vehicle-owners, commercial vehicle operators, as well as other actors involved directly or indirectly with the transportation industry. The prevalence of touts and bribery in bypassing standard procedures to obtain permits, illegal registrations, and so on is well-documented.³⁶ Given the complex makeup of the Department's mandate, it is unreasonable to label it a public-facing or industry-facing public entity. I consider it a hybrid of a public-facing and industry-facing public entity.

³⁵ "Allocation of Work amongst Various Departments of Government of NCT of Delhi as per Allocation of Business Rules, 1993, Notified Vide Notification." Government of NCT of Delhi. Accessed April 5, 2020. [http://delhigovt.nic.in/rTI/Allocation of work amongst various departments of Government.pdf](http://delhigovt.nic.in/rTI/Allocation%20of%20work%20amongst%20various%20departments%20of%20Government.pdf).

³⁶ Tnn. "CM Arvind Kejriwal Lands at Transport Office, Finds It 'a Den of Corruption': Delhi News - Times of India." The Times of India. Accessed March 31, 2020. <https://timesofindia.indiatimes.com/city/delhi/cm-lands-at-transport-office-finds-it-a-den-of-corruption/articleshow/65030380.cms>.

6.3. Testing My Hypotheses

As I note above, once I choose a certain public entity is chosen and search for all the RTI applications targeting it, the website returns pages with a maximum of 20 RTI applications per page. Hyperlinks to every other numbered page of results are at the bottom of each page, which makes it possible to know how many pages of results there are in total for a given public entity. To construct a fairly representative sample from among these large pools of RTI applications, I use a random number generator to select 100 applications for each of the three entities which I have chosen.

I then read through the sampled applications and take note of their content. In order to test my hypotheses, I will code specific metrics in each application. These metrics are:

- (1) whether the subject of the application is general or specific in nature;
- (2) and whether the subject of the application happens to relate to the redressal of a personal grievance of some kind

These coding metrics are linked closely to the distinctions between public-facing and industry-facing public entities. My hypotheses that enquiries targeting public-facing entities tend to refer to specific issues, processes, entitlements, or problems more often than general policy-related enquiries is fairly intuitive because public-facing entities tend to control several institutions and processes which ordinary citizens interact with on a daily basis. Government schools are an example of such an institution and admission of pupils to government-run schools is one example of such a process. Both of these examples come up quite often in the RTI applications I sample.

As for my second hypothesis, I chose to focus on RTI applications that demand the redressal of a personal grievance since one of the major goals of the RTI was to create a more transparent channel for the redressal of grievances that ordinary members of the public have with respect to their treatment by specific government processes or personnel. While public-facing public entities tend to be involved with more processes involving direct interaction with people, as I had mentioned before, industry-facing public entities may also attract appeals for the redressal of personal grievances via RTI applications because the policy matters exercise control over can frustrate and hurt the interests of ordinary citizens directly or indirectly. For instance, a tax code approved by the Finance Department can encourage bureaucrats from the same department to harass some business-owners and hurt their business interests disproportionately. This may prompt these business-owners to demand a redressal of personal grievance via the avenue offered by the RTI.

My first hypothesis about the general or specific nature of applications, is fairly intuitive but it is not immediately obvious which category of public entities will attract more applications regarding the redressal of grievances. Thus, my second hypothesis is weak.

7. Analysis

7.1. General Observations

I sampled 300 RTI applications in total and a 100 applications each from the full pools of RTI applications received by the Directorate of Education, the Department of Finance, and the Transport Department, respectively. The frequencies of different categories of RTI applications—which I coded as detailed above—are summarized in Figure 1:

			Education	Transport	Finance
General			15%	35%	44%
Specific			34%	63%	55%
Invalid			51%	2%	1%
Redressal of a Personal Grievance			8%	9%	11%

Figure 1

I had hypothesized that public-facing public entities would attract more specific enquiries than general ones and that industry-facing public entities would attract more general enquiries than specific ones. I chose the Directorate of Education as the archetypical public-facing public entity. As shown in Figure 1, the difference between the percentage of general enquiries (15%) and that of specific enquiries (34%) is 19%, which is large. Hence, this hypothesis is supported.

However, counter to my expectations, the Finance Department attracted more specific enquiries (55%) than general ones (44%). Although the difference between the two is smaller at 11%, it is not trivial. As the Finance Department is an archetypical industry-facing public entity, this finding is quite surprising and against my expectations. Overall, I conclude that the difference between the respective proportions of specific and general enquiries for the archetypical public-facing public entity and the archetypical industry-facing public entity is significant if large, in a direction that supports my hypothesis in the former case but not the latter. Given this, I conclude that my initial conjecture was not well-founded.

The Transport Department—my chosen archetype of a hybrid public entity with public and industry-facing characteristics—seems to attract many more specific enquiries (63%) than general ones (35%) with a much bigger difference than for my public-facing entity.

I had picked the Transport Department as a hybrid public entity on the basis assuming that the department's dual mandate to shape transportation policy in concert with issuing various permits and licenses would ensure that it receives a mixed pool of RTI applications, some general and some specific. I expected to see a roughly equal split among general and specific enquiries. However, the 28% margin between the two here is quite large. Clearly, the public-facing components of the department's operations attract extraordinarily high numbers of specific enquiries. Specific questions about the issuance of transportation permits and licenses are probably asked by those who need them for commercial as well as those who need them for personal use.

Lastly, the Directorate of Education, a public-facing entity, did not attract more appeals for the redressal of grievances (8%) than did the Finance Department (11%), an industry-facing entity. This finding again is against my expectations.

7.2. Invalidity and its Implications

The single most interesting finding from my analysis of the RTI applications is that invalid enquiries constitute a significant chunk of the RTI applications received by some public-facing public entities, represented here by the Directorate of Education. A whopping 51% of enquiries were invalid. Enquiries coded as invalid were either incorrectly formatted, incomplete, redacted, or mistyped so that they were entirely incoherent.

I see that this finding about invalid applications as substantively important: it tells us something about the individuals and, in some cases, groups, behind these invalid applications. The RTI Act was conceived and enacted with the aim of democratizing access to information and making the workings of the government and its vast bureaucracy accessible to even the most vulnerable and marginalized citizens of India. The large percentage of invalid applications indicates at least a partial failure of the RTI in terms of increasing access meaningfully for everyone.

Understanding what is behind these applications means considering what it takes to send in an application that stands a good chance of being processed and acted on. There is well-established literature³⁷ dealing with what makes governments processes accessible or inaccessible. Invalid petitions or applications can reveal much about the system soliciting these petitions and applications. For instance, an applicant's literacy can pose serious challenges to the applicant successfully seeking legal or procedural redressal of a grievance of some sort.³⁸

Beyond knowing *how* to put an application together, it can also be important to know *what* specifically one should mention in it in order to increase the odds of it being successful. Applicants who have social and cultural capital and have the relevant know-how can utilize certain discourses and narratives³⁹ to increase the probability of their application being successful. Clearly, a lot goes

³⁷ Brady, Henry E., Sidney Verba, and Kay Lehman Schlozman. "Beyond SES: A Resource Model of Political Participation." *American Political Science Review* 89, no. 2 (1995): 271–94. doi:10.2307/2082425.

³⁸ Jessica Feerman, "The Power of the Pen: Jailhouse Lawyers, Literacy, and Civic Engagement," *Harvard Civil Rights-Civil Liberties Law Review* 41, no. 2 (Summer 2006): 369-390

³⁹ Li, Feng, Yang Liu, and Tianguang Meng. "Discursive Strategy of Opinion Expression and Government Response in China: Text Analysis Based on Online Petitions." *Telematics and Informatics*⁴² (2019): 101238. <https://doi.org/10.1016/j.tele.2019.06.001>.

into making a successful applicant. The individuals who sent in the invalid applications, specifically to the Directorate of Education, may have either been illiterate or otherwise lacked the social and cultural capital to phrase their applications in a manner such that they would be processed. The large number of invalid applications sent in to the Directorate of Education perhaps indicates that the barrier to be met for successful applications is too high, given the characteristics of the population most likely to interact with the Directorate and the resources available to this population.

8. Conclusion

My honors thesis, delves into the differences among RTI applications that different categories of public entities in the Delhi government attract—namely public-facing and industry-facing public entities.

To organize my exploration, I hypothesized that public-facing public entities attract RTI petitions that differ from those that industry-facing public entities attract. I expected public-facing public entities to receive more specific than general RTI applications. While I also expected public-facing entities to receive more applications concerning the redressal of personal grievances, this expectation was weaker.

The findings from my analysis were interesting and somewhat counterintuitive. I found that public-facing public entities do not necessarily receive more specific than general RTI applications and that public-facing public entities do not necessarily attract more appeals for the redressal of personal grievances was also upended. The most interesting finding, however, was that a significant chunk of the sampled applications received by the Directorate of Education were

invalid. Delving into the drivers behind this avalanche of invalid enquiries can reveal a lot of the RTI's institutional infrastructure and the ways in which it is perhaps falling short of its goals.