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SPEAKING LIBERTIES: A COMPARATIVE STUDY OF FREEDOM OF SPEECH AND EXPRESSION IN INDIA, USA AND UK

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ABSTRACT

The liberty to speak and express oneself is a principal pillar of democracy which ensuring the ability of individuals to freely express themselves and actively engage in public discourse is a fundamental right. The following comparative study examines various ways of protecting this fundamental right across India, USA and UK. The first amendment to the constitution in the USA is a strong barrier against government intervention with free speech. The American historical context has significantly impacted this legal framework, which emphasizes on individual expression and the freedom to express anything regardless of how contentious or offensive it may be. Though the right itself has some restrictions, it is taken for granted in the UK as one of its essential freedoms that includes speech and expression. The UK regulatory framework for protection of free speech includes domestic laws and international laws. However, the Indian approach towards freedom of speech is based on a more moderate model compared with other countries. The Indian Constitution grants these rights, also article 19 (2) has “reasonable restrictions” which are allowed for the protection of social interests.

Understanding the nation’s perspective on free speech requires a close examination of its historical background rooted in the Indian fight for independence and a commitment to equal rights. This study analyses how these approaches have developed following the influence of relevant dates in law and court rulings. It discusses some of the current issues that come with the digital age like; online hate speech and false information. These challenges prompt distinct strategies in both countries. This research offers valuable insights into the diverse dynamics of freedom of speech, contributing to a more comprehensive understanding of how democratic societies steer the complex terrain of this concept while justifying the core values of democracy.

Index Terms - Freedom of Speech, Comparative Analysis, Legal Framework, India, United States, Constitutional Protection, Historical Context, Cultural Factors, Contemporary Challenges, Free Expression.

CHAPTER I

INTRODUCTION

Freedom to speak and express is a basic right which empowers individuals to voice their views, share ideas, and participate in critical debates. The protection and interpretation of this freedom vary significantly across the globe, reflecting diverse contexts. Among the nations that have grappled with the intricacies of this freedom, India, the United States of America emerge as distinct exemplars, each with its own unique trajectory of development, interpretation, and application of this cherished liberty¹.

The comparative exploration of this right in India, the USA and UK offers a compelling lens through which to study the complex interplay of legal, cultural, and societal dynamics that shape the boundaries of this fundamental right. On the surface, these three nations have different histories, legal traditions and socio-cultural backgrounds. The democratic India that has many cultures and different languages, but whose basic freedom of speech lies down in the constitution. In comparison, USA is a mature democracy that has over time developed strong constitutional guarantees of freedom of expression and remains a benchmark example to other nations².

These countries appear to be poles apart but are united by their love for democracy upholding human rights as an integral aspect thereof. This shared foundation underscores the profound significance of analyzing the ways in which they navigate the obstacles that inevitably emerge in the way of this freedom. Through an in-depth comparative study, this research aims to unearth the commonalities and disparities in how India, USA and UK have grappled with this freedom, offering valuable insights that transcend borders.

1.1. Statement of Problem

Although vital, this right in democratic nations had been a matter of continuous arguments and disarrangements. The central problem addressed by this comparative study is the divergent paths taken by these three nations in safeguarding and interpreting this crucial human right.

¹Manupatra, <https://articles.manupatra.com> accessed on October 18, 2023].

² As highlighted by Aequitas Victoria (2022) in their comparative analysis in the U.S. and India, available at <https://www.aequivic.in/post/comparative-analyses-> (last accessed on October 18, 2023).

Despite their shared commitment to democratic values, India, USA and UK have developed distinct legal, cultural, and societal responses to the challenges posed by free speech.

1.2. Research Questions

1. What are the historical, legal, and cultural foundations which influenced the protection of the freedom in India, USA and UK?
2. How landmark cases and historical events form the jurisprudence of free speech in these three nations?

1.3. Research Objective

1. To examine the historical, legal and cultural dimensions of freedom of speech development from India, USA and UK.
2. To examine how landmark legal cases and historical events have shaped the jurisprudence of freedom of speech in these three countries.

1.4. Research Methodology

The study utilizes mainly doctrinal research by involving the analysis of legal texts, judicial decisions, laws, provision on constitution, and scientific literature. The doctrinal approach provides a detailed analysis of the regulatory and constitutional foundations of the freedom in India, USA and UK. This refers to a case-by-case comparison of legislation on free speech in France and the UK as well as historical perspective to the development, jurisprudence on the issue, the current understanding by scholars in both countries.

It depends on thorough legal scrutiny that identifies the commonalities and distinctions inherent in such intricate free speech processes as adopted by each of these three nations in question. This approach gives a firm basis upon which to compare issues surrounding the research questions, including additional insights about historical and cultural elements.

1.5. Review of Literature

1. **Sunstein, C. R. (1994).** In this article by Cass R. Sunstein, free speech within the scope of democratic governance is discussed. Sunstein examines this tension of free speech – democracy versus regulation of speech in order to preserve other democratic values (such as equality and public order).
2. **Rai, M. (2014).** The free speech and international human rights as it relates to the human rights declaration. In his book, “Free Speech as Human Rights”, Mohan Rai discusses the significance of freedom of expression for it is also a manifestation of other human rights.
3. **Khurana, R. (2014)³.** This paper examines free speech politics within the Indian environment.” Ritu Khurana explores the context behind free speech in India; the issues specific to India and their potential.

4. **Heins, M., & Price, T. J. (2019)**⁴. This article talks about the changing face of free speech in the era of digitalisation, debating internet access as a first amendment right. Marjorie Heins and her co-author Travis J. Price look at the legal consequences that come along with using the Internet to exercise one's right to free speech.

³ Khurana, R. (2014). "Freedom of Speech: The Indian Scenario." *Journal of International Social Research*, 7(31), 301-310

⁴ Heins, M., & Price, T. J. (2019). "The Fight to Keep Internet Access A First Amendment Right." *Communications of the ACM*, 62(2), 23-25

CHAPTER II

FREEDOM OF SPEECH - A THEORETICAL FRAMEWORK

2.1 Conceptualizing Freedom of Speech

It is a fundamental principle in democratic nations representing crucial aspect of individual freedoms. In the 1st Amendment of the US Constitution safeguards this right. Essence of this principle is concisely captured in the well-known remark by Justice Oliver Wendell Holmes Jr. stated in *Schenck v. United States* (1919), "Even the strictest protection of free speech would not shield a man who falsely yelled fire in a theater and created a panic." This statement emphasizes that, while important, the right to free expression has limitations and must be balanced against other communal goals.

This freedom is guaranteed by the Indian Constitution under Article 19(1)(a). However, Article 19(2) lists particular exclusions in defense of state interests like India's integrity and sovereignty, public order, decency, friendly relations with other nations, and national security.

The right of speech is protected by several laws in the UK among them is The Human Rights Act of 1998. The Human Rights Act has allowed the Convention on Human Rights to be incorporated into national law. In this context, it creates a free-thinking democratic system that allows for different views among free people. Nonetheless, it should be stated that freedom of speech is not free or unlimited

2.2 Historical Development

The origins of American freedom of speech can be drawn from their colonial past. In case of John Zenger in 1735, a printer who criticized the British colonial government in New York, the notion of truth as a defense in libel cases was introduced, laying the foundation for broader protections of free speech. The 1st Amendment, ratified in 1791, solidified the commitment to free speech, and over the centuries, the Apex Court of U.S.A. has issued landmark decisions that have further refined the boundaries of this freedom.

In India, the freedom of speech movement was intrinsically linked to the struggle for independence.

Prominent leaders like Mahatma Gandhi and Jawaharlal Nehru recognized the significance of free expression as a tool for mobilizing the masses against colonial rule. The framing of the Indian Constitution in 1950 sought to ensure that free speech would continue to play a central role in India's democracy.

Over many centuries, the United Kingdom's dedication to speak freely has grown stronger. The battle has historically involved notable acts which include abolishment of licensing laws dating back to the 16th century and opening up the earliest publication houses or granting people voting rights. The UK's dedication towards free speech and exchange of ideas was paved by these milestones.

2.3 Philosophical Underpinnings

Freedom of speech in both countries is rooted in philosophical underpinnings that emphasize the value of individual autonomy and democratic discourse. In the United States, thinkers like John Stuart Mill's harm principle, that states that individuals should be free to express themselves unless they harm others, have influenced the legal framework. Mill's ideas echo in many U.S. Supreme Court rulings that prioritize protecting speech, even when it is offensive or controversial⁵.

In India, the philosophical underpinnings are deeply intertwined with the principles of democracy, social justice, and the quest for a more equitable society. The Constitution of India, in addition to safeguarding this freedom also includes social and economic rights to uplift marginalized sections of society. This reflects the broader philosophy that free speech should contribute to the social and moral development of the nation while ensuring inclusivity.

Hate speech is a major problem for the concept of unlimited free speech. Marginal groups in the United Kingdom have been afforded protection from hate speech by legal provisions. The critics say that these provisions may infringe on freedom of expression, highlighting the need to find balance between harm and fundamental rights like freedom of expression.

⁵ van Mill, Freedom of Speech, <https://stanfordencyclopediaofphilosophy.org/entry/freedom-of-speech/>.

CHAPTER III

LEGAL FOUNDATIONS

3.1 United States: The 1st Amendment

In United States, legal foundation of this principle is the 1st Amendment to the Constitution. It stands as a profound testament to the nation's devotion to protecting individual liberties. The First Amendment expressly prohibits Congress from passing any legislation that restricts the right to free speech. It was ratified in 1791 and is included in the Bill of Rights. It reads as : "Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the

right of the people peaceably to assemble, and to petition the government for a redress of grievances⁸." The 1st Amendment has been the subject of numerous landmark cases, refining the scope and limitations of freedom of speech. Prominent rulings such as *New York Times Co. v. Sullivan* (1964) established the rule that public officials must demonstrate genuine malice in order to prevail in a defamation case., thereby strengthening protections for free speech, especially in the context of political debate. It also articulated the "actual malice" standard for defamation in the context of public figures. Similarly, *Brandenburg v. Ohio* (1969) set the modern standard for when speech inciting violence can be restricted, emphasizing that speech can only be curtailed when it incites "imminent lawless action."

3.2 India: Article 19(1)(a) and 19(2) of the Constitution

Article 19 (1) (a) of India's constitution, which states that "all citizens shall have the right to freedom of speech and expression," serves as the foundation for the country's free speech laws. Nevertheless, the Indian legal framework is far more fine-tuned⁶ as opposed to absolute protection of a First Amendment. Article 19 (2) of the Constitution of India allows "reasonable restrictions" to be imposed for protecting the sovereignty or integrity of India, public order, decency, morality, maintaining relations among States friendly or international peace and

⁶ Right to Internet and Fundamental Rights, <https://www.legalserviceindia.com/legal/article-2967-right-to-internet-and-fundamental-rights.html> (visited Oct 18, 2023).

security. This serves as a legal justification for limiting hate speech that undermines national security, public safety and order. Courts in India have sought meaning in "reasonable restrictions," and it strikes a fine equilibrium between individual rights and those of State and Society. Free speech in India is permitted with certain bounds which are necessary to safeguard public order or the sovereignty of the country.

3.3 United Kingdom – Various Legislations

The legal foundation of this right in the United Kingdom is primarily established through the following legal instrument like Human Rights Act 1998, European Convention on Human Rights, Common Law, Constitutional Principles like rule of law, Defamation Laws: Defamation law is a part of general legal framework designed not only for protecting freedom of speech but also for protecting individual honor, Media Regulations which The regulatory bodies like Ofcom for broadcast media and IPSO for print and online media also shape up the legal environment surrounding freedom of expression. They determine ethical code and fair play in journalism

CHAPTER IV

HISTORICAL PERSPECTIVE

4.1 Evolution of Free Speech in India

The historical evolution of freedom of speech in India is closely intertwined with its struggle for independence from British colonial rule. Early nationalist leaders recognized the power of free expression in mobilizing the masses against colonial oppression. Such figures as Mahatma Gandhi employed newspapers and speeches to mobilize Indians in their quest for independence. In 1947 upon attaining independence, the Indian constitution with article 19(1)(a) providing for freedom of expression. This showed a determination of upholding and fostering the democratic precepts that informed the battle for sovereignty^[6].

Nevertheless, it should be emphasized that the path of freedom of speech in India has never been smooth and easy. Indian state has always faced challenges such as hate speeches, religion tensions and sedition that have sometimes resulted in limitations of free thought. The historical context also includes other events that impacted the developments of free speech, such as the Indian partitioning in 1947, resulting in subsequent communal violence which required some restrictions towards public order and safety considerations⁷.

4.2 Evolution of Free Speech in the United States

This history of freedom of speech in the US lies in its colonial as well as revolutionary backgrounds. The nation derived its foundations on these free expression principles while Enlightenment ideas significantly influenced early American political thoughts. The 1791 U.S. Constitution's First Amendment protected the right to free speech and the press.

The jurisprudence of free speech developed because the nation went through various milestone events and legal cases. The Schenck v. United States (1919) decision, which introduced the "clear and present danger" test, exemplifies the balance between speech protection and

⁷ Article 19: "Mapping the Free Speech Debate in India," Economic and Political Weekly (2021), <https://www.epw.in/engage/debate-kits/article-19-mapping-free-speech-debate-india>

necessary limitations. The civil rights movement in the 1960s further expanded the understanding of free speech as a means of challenging racial segregation and discrimination⁸.

4.3 Evolution of Free Speech in the United Kingdom

The development of free speech in the UK is very complex as society evolves, courts interpret and legislatures change their minds. One of the vital historic documents has influenced the formation of constitutional principles within UK – it is the Bill of Rights of 1689. This act affirmed the principle of parliamentary rule and made some elementary constitutional guarantees of the freedom of speech in the House. The enactment of Reform Acts during this time also expanded voting rights thereby enhancing political participation hence increasing demand for expressive freedom. Moreover, World War II that followed and the associated despicable acts only emphasized the necessity of safeguarding basic rights.

The European Convention on Human Rights (1950) and the Universal Declaration of Human Rights (1948) were created by them., which formulated the legal framework for human rights, including freedom of expression, in the UK. Therefore, the act was enforced into the UK laws which empowered the individual in case he/she desired to enforce his/her rights in a UK court. The free speech situation in the UK is affected by both legal progress as well as societal transformations that are based upon the democratic idea. Over a period of time, protections for free speech have continued to extend but these must also be balanced in order to reconcile them with public interests.

⁸<http://publishing.cdlib.org/ucpressebook/view?docid=ft2r29n8c5;chunk.id=0;doc.view=print> (last accessed October, 18, 2023).

CHAPTER V

CULTURAL AND SOCIETAL FACTORS

5.1 Cultural Influences on Speech

India, a diverse and pluralistic society with a long history of cultural traditions, the concept of speech often carries a strong emphasis on respect for diversity, harmony, and communal values. The Indian cultural milieu, characterized by a myriad of languages, religions, and traditions, has historically led to a nuanced approach to speech. This multiculturalism manifests itself in the placement of emphasis on both collective rights and group identity as well as on individual freedoms. The cultural factor of America is highly individualistic and emphasizes personal expression and the right to disagree. The strong legal protection of speech provided by the first amendment⁹ stems from this emphasis on personal rights. The history and social background led to UK's language development, hence its culture revolution. As such, this adds color to communication that includes diversity of accents, multicultural effect and rules regarding politeness and sense

5.2 Media and Public Opinion

The media serves as an informant, and an opinion maker on public discourse in each country. Media landscape in the US has a big impact on democracy by influencing attitudes of Americans in regards to the world they live in. Freedom of press in a democratic nation includes, among others, the right to inform on, scrutinize, challenge the policies of the governments. The media context in India is also vibrant and varied, featuring several languages and channels. The Indian media has played a pivotal role in shaping public opinion and exposing issues of societal concern. However, it has also faced challenges related to ownership, political influence, and sensationalism¹⁰

⁹Mauricio J. Alvarez & Markus Kemmelmeier, Free speech as a cultural value in the United States, *Journal of Social and Political Psychology*, Vol. 5, Issue 4, p. 707, 2017.

¹⁰Sevanti Nina's, How India's Media Landscape Changed Over Five Years, June 6, 2019,

The establishment of regulators like IPSO, IPA and Ofcom has helped make the press accountable and ethically correct while not compromising on freedom of speech in the United Kingdom.

5.3 Civil Society Movements

Civil society movements and advocacy groups are instrumental in influencing the boundaries of freedom of speech in both countries. In the USA, advocacy organizations, like the American Civil Liberties Union

(ACLU), has played a crucial role in safeguarding free speech rights through litigation, education, and public advocacy.

In India, civil society organizations and grassroots movements have been vital in advocating for free speech and pressuring the government to uphold democratic principles. One of the exemplary cases whereby civil society activism has contributed towards transparency and accountability to the government is the right to information movement in India. The cultural and sociological contexts exist differently in India, USA and UK thus informing the peculiar ways with which free speech is conceptualized. These elements are either enabling or limiting when it comes to free speech expression. This reflects the complicated relationships between culture, ethnics, media together with civil society in these democracies. These aspects are important as they help to understand the holistic meanings of free speech in these countries. Various civil society organizations and civil movements have significantly participated in promoting and upholding freedom of speech in the UK. This freedom is one of the well- established principles in the UK; however, the movements such as Campaign for Press and Broadcasting Freedom, Index on Censorship 1972, Free Speech Union and Media Reform Coalition addressed some issues, promoted inclusivity, and ensure the protection of this fundamental right

CHAPTER VI

CRITICAL ANALYSIS

6.1 Balancing Free Speech and Societal Interests

The examination of free speech in India, USA, and UK is still facing a paradox between personal freedoms and public concerns. The US Constitution's first amendment places stringent limits on interference by government in American speech, stressing free expression, including that which is derogatory or troublesome. The tight protection provides vast liberty of speech, but it limits controlling hate speech, incitement, and misinformation^[OB].

On the other hand, India adopts a subtle stand that accepts "reasonable limitations" that are meant to further specific state aims regarding freedom of speech. On one side this flexibility allows the Indian government to counter possible harm; on the other, it breeds concerns regarding a possible abuse of such laws against criticizing the government actions.

6.2 The Impact of Historical Context

Specifically, the historical context of every nation has been very influential in the definition and enforcement of free speech. In the USA, the legacy of the American Revolution and the civil rights movement have reinforced the importance of free speech as a means of challenging injustice and advocating for change. The

historical commitment to individualism and dissent has strengthened the First Amendment's protection.

In India, the legacy of the independence movement and the struggle against colonial oppression has framed freedom of speech as a means for social justice and nation-building. The historical backdrop of communal tensions and the partition of India has, at times, led to a more cautious approach to maintaining social harmony.

6.3 Various Case laws regarding freedom of speech and expression in India USA and UK

Brandenburg v. Ohio¹¹

The famous Brandenburg case before the US Supreme Court established the modern standard for restricting speech that incites violence. The Court ruled that speech can only be restricted if it directly incites "imminent lawless action" and is likely to produce such action. This decision set a high bar for limiting free speech rights, emphasizing the importance of protecting even controversial or offensive speech.

Kedarnath Singh v. State of Bihar¹²

The Supreme Court clarified that criticism of the government is not seditious unless it incites violence or creates public disorder. The case delineates the boundaries of free speech and the reasonable restrictions that can be imposed.

Spicer vs DPP 2005 :

Spicer pleaded guilty of using threatening, abusive, and insulting words against the Iraq war protest. A House of Lords affirmed the judgment, arguing that free speech does not extend to absolute expression. It became essential to legislate against such abuse in order to stop disorder and to safeguard the rights of other people.

Miller v. California¹³

Miller is a landmark case that refined the definition of obscenity and the scope of free speech protection. It established the "Miller test," which considers whether material targets "prurient interests," can be "patently offensive," and doesn't have "serious literary, artistic, political, or scientific value." it is important for this decision to regulate the parameters of expressive content.

¹¹ Brandenburg v. Ohio, 395 U.S. 444 (1969)

¹² Kedarnath Singh v. State of Bihar, AIR 1962 SC 955

¹³ Miller v. California, 413 U.S. 15 (1973)

Romesh Thappar v. State of Madras¹⁴

The honorable court ruled in one particular Indian case that prohibition of publication criticizing the state administration infringed against the free speech rights as provided in article 19. That makes this case to be very crucial in laying the groundwork, of free speech which is an integral part of government by consent.

R (Laporte) v. Chief Constable of Gloucestershire (2006):

The police cited public safety as a reason for preventing Mr. Laporte from speaking during a protest. Laporte's lawyers went to the House of Lords challenging the interference in his rights by the police as he was only exercising his freedom of expression.

Schenck v. United States¹⁵

Schenck is particularly remembered as the one who introduced the clear and present danger tests. It reinforced the conviction of a socialist who had distributed anti-draft brochures during the First world war. It indicated that the freedom of speech could be restricted if threat was apparent and impending. Nevertheless, this standard has developed towards stronger safeguards of free speech.

State of Madras v. V.G. Row

Court observed with finality that the state government had acted unconstitutionally by banning a pamphlet which castigated certain governmental policies thereby infringing with the right to freedom of speech and expression. It strengthened free speech basis in Indian democratic setting.

¹⁴ Romesh Thappar v. State of Madras, 1950 SCR 594

¹⁵ Schenck v. United States, 249 U.S. 47 (1919)

CHAPTER VII**CONCLUSION AND SUGGESTIONS****Conclusion**

Comparing the Right of speech in India, USA and UK enlightens one that it's a multi aspect right which requires immense efforts towards its realization. The democracies in the two countries profess similar principles and beliefs about democracy's importance and free speech. However, the legal systems, histories, and cultures are different for each state. The First Amendment in the US has always been used as a strong shield of free speech protecting even distasteful or controversial personal opinions. However, India uses a different method and supports "reasonable restrictions" of speech while taking into consideration general interests of society.

Their understanding of free speech is informed by their respective histories. The legacy of revolution and civil rights' movement in the US further supports the role of dissenting and advocating. Speech has been viewed in India as an instrument in building a nation/

Both countries face current challenges of their times that manifest themselves in cases of cyber- hate speech and/or propaganda. Tackling the adverse effects of unrestrained Internet discourse is still one of the top issues that needs to be resolved.

Suggestions

With time, it is necessary to ensure that freedom of speech remains fluid with societal movements. To this end, the following suggestions are offered:

1. **Balancing Act:** Therefore, both India, USA, and UK need to keep searching for equitable middle grounds between safeguarding speaking freedoms and mitigating dangers to society. Maintaining such balance requires constant communication among these stakeholder groups and the role of judiciary discretion.
2. **Media Literacy:** Media literacy and critical thinking promotion remains important in the era of Internet, as that is the only way for citizens to know what is true or false. Both education systems ought to encompass media literacy programs that help create enlightened and rational publics.
3. **International Collaboration:** Countries should therefore hold joint participation on international platforms to establish mutual mechanisms of dealing with worldwide threats to freedom of expression like cyber hatred and propaganda.
4. **Public Discourse:** It is important that public discourse on matters of national interest is open. It is a necessity for governments, civil societies and the media fraternity to come up with a conducive environment that guarantees freedom of expression without retribution. At the same time, it requires inclusive acceptance and tolerance.

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