



CORPORATIONS AND STATES: A Customer-Service Corporation inside the Punjab State Police

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On August 22, 2013, the deputy chief minister of the Indian State of Punjab came to the new Punjab Police Call Centre to inaugurate the 181 Helpline, declaring: “Punjab has become the first state in the country to introduce this round the clock Police non-emergency service where you can contact and interact with the police . . . at anytime of the day or night” (*Hindustan Times* 2013b).¹ While touted as a hotline for all non-emergency issues, the impetus for the 181 Helpline was the fallout from the internationally infamous 2012 rape and murder of a female student in Delhi, which had brought crowds to the streets across India to protest sexual violence and the failure of police to provide security for women. At the time, the chief minister of Delhi had hastily established a similar 181 number for women in distress. But as one Delhi government official observed, people had “mistaken it with the Delhi government’s customer care number” (Chandel 2013) and were inundating the three male operators manning the phones with calls about gas connections, voter ID cards, and blocked drains. In contrast, the more deliberately planned Punjab police call center was to address two problems facing women who needed the police: first, access to police personnel and, second, persuading police to take their complaints seriously and follow through on them.

For the press release photo of the hotline's inauguration (Fig. 1), the deputy chief minister is pictured seated at one of the call stations across from a uniformed female police officer looking at the computer screen with her hand on a mouse. The temporary nameplate in front of him suggests that his own ministerial desk was fused with the call station, and that the female police officer might at any moment take a complaint call and pass it directly to him, whereupon he would immediately dispatch the phalanx of mostly male police officers standing attentively behind him to sort out the problem.



Figure 1. Sukhbir Singh Badal, Deputy Chief Minister of the Indian State of Punjab at the inauguration of the new Punjab Police Call Centre (*Hindustan Times* 2013b).

But the photo was misleading. Instead of being run by the police, as the photo implied, the management and staffing of the call center operations had been outsourced to a private company, Ziqitza Healthcare Ltd. This was done, the deputy chief minister explained, to “ensure complete professionalism.” It was Ziqitza, with its expertise in a particular form of customer service, that would deliver on the minister’s pledge that complaints be dealt with in a “time-bound manner” and that no complaint would be dismissed (“disposed of”) until “the complainant is satisfied that his grievance has been addressed” (*Hindustan Times* 2013a).

Anthropological discussions of this kind of arrangement, following their designations as “public-private partnerships” (PPPs), have emphasized the relationship between the public and the private, or the state and the non-state. Such a police-corporation arrangement as the 181 Helpline is usually seen as a form of “pluralization of governance” (Benda-Beckmann, Benda-Beckmann, and Eckert 2009) in which states increasingly share governance functions, however we might define them, with other institutions. These studies tend to focus on how states are “confronted with other actors, with which [they are] in overlapping and complex relations of conflict, negotiation, alliance, compromise, avoidance, etc.” (Bierschenk

and Olivier de Sardan 2014, 16; also Ferguson 2010). Despite this emphasis on the institutional heterogeneity, pluralism, porousness, and multiplicity of contemporary governance orders, anthropological analyses still, as Beatrice Juaregui (2016, 11) observes, overwhelmingly focus on the relation between state and non-state actors, rather than on whatever emerges in their combination.

We can distinguish two main lines of approach to the state/non-state relationship, though they are often combined: the first focuses on the spatial metaphor of the *boundary* between the state and the non-state; the second, under the heading of neoliberalism, emphasizes the *control* or *management* of normally government functions by a private entity. Let's consider each in turn.

First, anthropological work on state/non-state *boundaries* has shown how these boundaries become reified, and emphasized the analytic inadequacy of this state/non-state distinction. Work on the "making" (Beek 2012; Hansen and Stepputat 2001; Mitchell 1991, 1999) and "blurring" (Gupta 1995) and "porousness" (Bernstein 2020) of state boundaries has given us a much better understanding of how people encounter state actors and how these experiences generate ideas about states. Indeed, a focus on "porous social orders," as Ilana Gershon (2019) has argued, has proved highly productive for anthropology generally. However, even a critical focus on the boundary and its character draws our attention away from the ways non-state actors like corporations, NGOs, and churches sometimes plunge into the relations between state offices, levels, and divisions. And PPPs can bring non-state actors into state activities not only through the pores of small-scale, informal interaction but also through the large pipes of authorized contracts.

Second, the policy-oriented scholarship oriented by the concept of neoliberalism also concentrates on the state/non-state distinction, on privatization in the form of the marketization of state services through *management* by privately owned entities with an orientation to profit (Ganti 2014; Anjaria and Rao 2014). Here, the actions of a wide variety of non-state institutions often become conflated as "the market." However, privatization is not the same as marketization. Services provided by private actors are not always marketized and can be effectively insulated from a profit orientation by states that retain "considerable control" over them (Kuriyan and Ray 2009). As scholars of the U.S. prison system have shown, although the profit-orientation of corporate-run prisons are a concern, "there's a politics there that isn't simply profits" (Kilgore quoted in Gilmore 2014). Furthermore, states themselves are often oriented to revenue generation (Davis 2003, 100).² Both advocates and critics of neoliberalism conventionally figure corporations as market actors. Yet they are at the same time governance institutions, set-

ting policies for their own operations as well as the social terrains they operate on (Anderson 2017; Khan 2017).

The topology of inside and outside founded on the distinction between state and non-state, mired in early modern political theory, creates an impediment to seeing the complex ways non-state actors mediate divisions within the state and can sometimes reinforce its separation from other non-state actors. I suggest we might do better by setting aside this topological metaphor in favor of a biological one: the relations of bodies, microbiota, and the environment. Debate continues on the ratio of human cells to the cells of microorganisms in an ordinary body, but a recent study argues we probably have as many microorganisms (bacteria, fungi, and viruses) in and on our bodies as we do human cells, though they make up very little of our body mass (Sender, Fuchs, and Milo 2016). Although gut microbiota receive much of the attention, microbiota also reside in our eyes, ears, lungs, on the skin, and other places, different strains forming what biologists call “communities” in different parts of our bodies, doing different things. Depending on their prevailing mix on the skin, for example, bacteria can prevent the invasion of pathogens or promote disease. Gut bacteria appear to shape the relation between the digestive system and the brain through interactions with the nervous system. Non-human microorganisms are internal others to human cells, but a good portion of them are integral to the ordinary functioning of a human body, contributing to the integrity of a body even as they enmesh it with its environmental surroundings (Paxson and Helmreich 2014, 166; Wolf-Meyer 2017).

This metaphor redirects our attention from boundaries to what private corporations actually do *within* the workings of states, including to how different ideological orientations and types of sociotechnical practices engage one another within shared practices. In doing so, first, it becomes easier to see how the key function of non-state actors can be the mediation among different state-actors (Solanki 2019), not only shaping the state/non-state boundary, like gut bacteria that simultaneously relate a body to its environment and shape the relations between digestion and the brain. Second, it allows us to put to one side the question of whether a state is retreating or advancing, strengthening or weakening, to see emerging configurations of institutional governance. Healthy organ functioning does not depend on the share of the biological work done by the body’s “own” cells. Third, displacing the focus on the state/non-state distinction reveals the extent to which non-state actors, like microbiota, have always been integral to the operations of states, not just as the objects of their practices but as co-agents (Hibou 2004). This has been true for as long as states have been contracting and forming

corporations like the English East India Company and Virginia Company, even if the role of non-state actors has increased as neoliberal ideologies have succeeded in orienting states. A history of state dependence on different kinds of non-state actors connects early modern states to what is derisively called the Contractor Raj of contemporary India. Finally, instead of reducing the private sector to profit interests, the metaphor directs us to the institutional specificities of corporations, each with its own bureaucracies, technologies, activities, discourses, and orientations—and how they shape the normal and pathological workings of different organs of states, like different strains of microbiota finding a niche in the outer ear or the lungs.

In a neoliberal frame of reference focused on control or ownership, the Ziqitza operation has been called “outsourcing,” but, as I will show, it is working in the gut of the police, generating complaints, forcing responses, displacing other cases, making the police work for “customer satisfaction” as the corporation constructs it. A database, phones, texts, emails, paper documents, interface software, contracts, and ways of talking all combine into a socio-technical system of intimate disjuncture and fusion between a corporation and the police at the station house level while constructing a new capacity of senior officers to oversee the work of subordinates.

I focus in this article not on case outcomes nor on the success or failure of this program or its overall effect on the criminal justice system in Punjab. Rather, my goal is to examine changes in early-stage police engagements to further our understanding of the relations between corporations and states, relations increasingly central to governance in India’s Contractor Raj. I argue that an analysis of the Ziqitza 181 Helpline allows us to see how integral corporate bureaucracies can be to basic state functioning, and how much it matters what *kind* of bureaucracy states recruit. In this case, an organization specializing in ambulance services was recruited, rather than a corporation experienced with logistics, financial services, or technical support, or an NGO providing legal services to women. Like microbiota, organizations like the Ziqitza helpline are non-state things integral to states, and not only by posing as others against which states define themselves. Instead, they become part of its basic functioning, even as they alter how states work.

This article will show that by moving away from a focus on boundaries and the profit orientation of non-state institutions, less studied aspects of corporation-state relations come into view. First, corporations can be tightly integrated into state operations, transform relations among state actors, and strengthen rather than undermine state functions. Ziqitza helped central police officials discipline

district-based police, even as it hardened early-stage police work against the involvement of politicians and other influential actors. Second, corporations can act as governance institutions under the strong control of state actors, governing both state and non-state actors through bureaucratic procedures rather than through profit-oriented market transactions. While pursuing its corporate profits, Ziqitza has not marketized the processing of complaints to the police.³ The character of corporation-shaped governance depends less on their status as private, profit-seeking institutions than on the contractual arrangements and the orientations and operational practices, such as Ziqitza's gendered customer service, that they bring into state practices. Third, software, obliquely translating bureaucratic relations of authority and command, can configure relations among corporations and state actors. In this case, software allocated different capacities to Ziqitza staff, central police officers, and district-based police to access and change information in the 181 record system.

A CORPORATE SOLUTION TO THE PROBLEM OF EXCESS SOLIDARITY

In liberalizing contemporary India, the zeal for contracting corporations to take over public sector services is well-known (Gupta and Sivaramakrishnan 2011; Sharma 2006, 2008), especially in the area of information and communication (Kuriyan and Ray 2009). A variety of government reforms in Punjab and elsewhere in India introduced customer service as a way of improving efficiency and ensuring the dignity of citizens (Clarke and Newman 2008). In the face of the intense public outcry over sexual violence and the security of women, the Punjab deputy chief minister eagerly supported the project for a women's police helpline, to portray himself as a reformer ahead of the 2014 election.

The 181 Helpline eventually expanded to include other vulnerable populations, including children, the elderly, and "non-resident Indians" (Indian citizens living abroad) and came to serve the entire population of the state. But it was originally designed to solve problems faced by women, particularly access to police and documentation of their complaints (Baxi 2014; Satyogi 2019). Women's movement outside the home and immediate neighborhood, especially in rural areas, is often restricted, and many lack the means of transport to get to a police station. Beyond these challenges, many women are reluctant to appear in police stations, as these are morally fraught, even dangerous places, and many women are unwilling to go to one without a male relative to protect them. "One of the most significant features of the helpline is that it removes the need for physical contact with the

police in most of the situations” (*Hindustan Times* 2013a), said Dinkar Gupta, the senior police official who had lead the effort to establish the helpline. Women also have more trouble getting their complaints documented and registered.⁴ State organizations are so closely associated with documentation that it is often forgotten that many functionaries sometimes refuse to generate documents for a variety of reasons. In India, as in other places (Beek 2012, 556–57), one of the major problems with the police is that they regularly refuse to register complaints and initiate legal proceedings. Even those women courageous enough to go to a police station sometimes find themselves dismissed by police officers who question their virtue and the veracity of their claims. Sometimes police, usually men, reject the standing of women to act for themselves and demand that they be represented by a husband or another male relative, who may be kin of the perpetrator if not the perpetrator himself. More broadly, police in India (as elsewhere) often are unwilling to get involved in domestic abuse cases. As Beatrice Jauregui (2016, 75) observes, “this form of violence against women” is “conceived by many people as a ‘private matter’ and widely considered by many police to be a less serious offense not worthy of their attention.”

The leading proponent for the helpline was Dinkar Gupta, then additional director general (security). A member of the elite Indian Police Service, he was among the bureaucrats of the post-liberalization Indian state who were “refashioning as agents of reform” (Gupta and Sivaramakrishnan 2011, 4). Gupta had been experimenting for years with ways to allow citizens to document police action or inaction. He told me how, when he was a more junior officer in a provincial city, he had mounted letterboxes around the city and waited hopefully for complaints to pour in. He received very few. And the ones he did get often lacked the crucial pieces of information that would enable him to act on them. He had also tried involving himself directly with the public in different ways. During certain hours of the day, he would man the complaint phones of the department himself, a practice so strange for an officer of his high rank that it seemed to generate more suspicion than confidence in the police. He had also tried public meetings, so-called open *katcheris* or courts, an old hybrid forum developed in the British colonial period as a cross between appeals to royal officials and bureaucratic office hours (Hull 2012, 105–7). Gupta set up large tents and welcomed citizens to come and talk with him about their problems, even problems with the police. However, he reported that most people were reluctant to voice their allegations in an open hearing.

Gupta had even set up a special police line for women once before. He had staffed this women’s helpline with police officers, mostly female, and instructed

them to be sympathetic to callers and ensure police action on their problems. He claimed this had proved a complete failure. The police, he told me, had not been “humane” and “didn’t show sensitivity.” In the end, he explained, the call-takers were police officers first, and responded brusquely if not suspiciously to callers. Their loyalties lay with their fellow police officers whose excuses for inaction they sympathetically accepted. As one officer put it to me, “They treat other police as family.” Lastly, most police officers considered this work in a call center as a kind of punishment that deprived them of the social influence and opportunities for graft offered by regular police posts. Many worked harder on getting transferred out of the call center than on running it.

After this experience, Gupta proposed hiring a private corporation to operate the police call center. Although the supposed efficiency, lower costs, and forward-looking symbolism of embracing the private sector no doubt formed part of the appeal of the initiative for the state government, advocates of private contracts often have other reasons to recruit private companies (Kipnis 2008). In this case, Gupta and other reformers at the senior level of the police administration wanted to engineer an organizational opposition within lower-level police operations by producing a monitoring entity that did not share lines of authority, cultural affinities, or, for the most part, gender with the majority of police personnel and divisions. From the perspective of police reformers, the police suffered from an excess of solidarity. For American organizational gurus and corporate CEOs, who have championed the organizational advantages of solidarity and a shared “culture” (e.g., Soderquist 2005, Welch 2005), there can be no such thing as too much solidarity. But here, Gupta played Lévi-Strauss to their Durkheim. As he saw it, the common values and orientations, the feelings of solidarity, the shared culture, had undermined the police-run call center system. With the new arrangement, Gupta aimed to fuse two organizations with rather different “cultures” into a functional opposition as a way of promoting service to citizens and increasing the oversight power of the central police administration. Critics of public-private partnerships often point to the conflicts of interest of the private actor, since the goals of profit-seeking and public good diverge. However, Gupta insisted to me that the corporate staff had no conflict of interest; it was police who had a “conflict of interest” between their loyalty to fellow police and the proper conduct of police work in the service of citizens.

The design of the call center/police hybrid was also engineered to exclude completely another group that has long been profoundly enmeshed with the police: politicians. Police in Punjab, as in other Indian states, is run by the state

government, with police administrative divisions often roughly corresponding with electoral divisions. Politicians develop relationships with senior police officers posted in their area. By most accounts (including those of many police I talked with), elected officials, especially members of the Punjab State Legislative Assembly (MLAs), routinely intervene in police operations, squashing investigations and encouraging questionable charges against opponents or the opponents of their political clients and extended family. Politicians induce police to do their bidding through a mix of bribes and threats to have officers transferred to less desirable posts.

By contrast, politicians appeared to have no means to engage the Ziqitza helpline. Call center personnel answered calls from around the state, and case managers similarly dealt with police in whatever district the complaint came from. Thus local politicians had no one to cultivate a relationship with. Politicians were also prevented from threatening to transfer managers or supervisors because the state government could not fire or transfer employees of a private contractor.

In reply to my skeptical questions about the success of this insulation from political involvement, the 181 manager insisted, “We are private sector. Politics is not intervening in private sector. We are free, totally free, no one is forcing us, no one is giving some bribe. Politicians can’t transfer, they can’t do anything. We don’t even get calls from politicians.” While there was every incentive to conceal this sort of intervention, none of the staff I asked recalled being asked to alter or close a case outside of normal procedures at the behest of anyone outside of Ziqitza and the police.

LAW-AND-ORDER POLICING VS. (LIMITED) CUSTOMER SERVICE

Whereas Gupta emphasized different interests and orientations as the source of disjuncture between call center and police, a more fundamental separation limited call center involvement in police investigations. This was built into the system by the operational model of the corporation awarded the contract, Ziqitza Health Care Limited. The core business of Ziqitza had been the provision of emergency ambulance services in India. Founded in 2004 in Mumbai, the company now operates in ten states throughout India. According to its website, the idea for a “world class” ambulance service was sparked by the contrast between the founders’ experiences with their parents’ health-care emergencies in India and in the United States.⁵ When the mother of one of the founders fell ill at night in India, they ended up driving her to the hospital themselves. A few days later, the other found-

er's mother collapsed in New York City and was treated within minutes by a 911 ambulance. Operating a police helpline was an extension of this private emergency ambulance business, with the same goal of increasing responsiveness.

We could imagine the police recruiting a company with experience running different kinds of call centers, like banking, cable TV, or telecom—or perhaps even a women's health or social welfare NGO with strength in helping women navigate the legal system. All such organizations are focused on delivering a service rather than monitoring actors who provide a service. Each of them would have brought its own ideological orientations, but all of them would have been primed to see complaints through to their final resolution, perhaps all the way through a police investigation and court trial. However, modeling 181 on the ambulance business formatted the work of monitoring the police in a particular way, limiting the monitoring to the initial stages of police engagement. In the ambulance business, the goal is to get immediate medical care to someone, not to treat the patient through a full course of care. Similarly, in its 181 operations, Ziqitza aimed to ensure that callers received preliminary police service, not to follow the progress of cases or monitor the performance of police beyond that point.

The independence of call center operations from police and politicians stemmed not only from its organizational separation but also from the ways differences of gender, class, and cultural orientations between the customer service organization and the police were deployed. The call center was intensively gendered by design, a feminine institution over against the masculine police, similar to what [Aradhana Sharma](#) analyzed as feminized NGOs over against the masculinized state (2006, 68). Both call center staff and police embraced this gender construction, and it was enacted through practices from hiring to styles of communication. During the period of my research, the manager and supervisors of the Ziqitza helpline operation were all men. Several men also worked the phones during the night shift. But during the day, when the bulk of the calls came in, the phones were staffed almost exclusively by female call-takers. In the daytime, the staff called “case coordinators,” who managed the cases and dealt with the police, were also all women. The women the company hired were young (early to mid-twenties), middle-class, and none whom I talked with had any friends or relatives in the police service. While there are many women in the Punjab police and even police stations staffed entirely by women, men far outnumber women in police service. So the transactions between Ziqitza and the police were overwhelmingly between young Ziqitza women and older male police officers.

Both call center staff and police agreed that there was a strong difference between the way staff and police engaged callers. Many of the female Ziqitza staff had BAs in communications, psychology, or commerce, and roughly 10 to 15 percent came with experience working phones in the customer service divisions of telecom and banking companies. None had any previous experience in police work. The original 181 staff were trained by senior police staff so that they would understand the police system as a whole, as well as its processes and procedures. Ziqitza corporate staff trained them on the application software and what they called the “soft skills” of customer service (Fernandez and Sosa 2005, Hochschild 1983, Krishnamurthy 2004; Mirchandani 2012). As the call center manager put it, in contrast to the police, “we are soft-spoken, we take his or her complaint, we understand his/her problem.” They hired staff who can “stay patient, calm even when the caller is very angry,” he said. One senior officer in a rural district emphasized that call center staff have a “point of view different from policing.” In contrast to the police, who ask “direct information questions” that elicit short answers, call center staff get people to “open up,” because “civilians feel relaxed with them.” Although no one would mistake the call center staff as activists for women’s empowerment, both the female and male staff shared a sense of mission and were proud of their role in helping people, especially women.

A final but critical difference between call center staff and the police was their views on police and policing. Although a service ethic is increasingly cultivated among the police, one senior officer shared with me the common view that the police have not escaped the colonial legacy of police in India, saying, “Here, police is about law and order, not the service of the public” (see Dhillon 1998, 2005). Views of the police among Indians are ambivalent, as Jauregui (2016, 90–94) has shown. Police officers are sometimes valorized as fearless defenders of law and order in extraordinary circumstances, but more often, they are associated with day-to-day extortion, discrimination, intimidation, and unwarranted violence, even if these activities have a complex relation to the legitimacy of the police (Khanikar 2018). Further, negative views of the Punjab police were shaped in the conflict between the Sikh nationalist movement and the Indian central government from the 1980s through the early 1990s, when police operated alongside the military and paramilitary groups, joining in the torture and extrajudicial executions of young Sikh men (Human Rights Watch 1994). Overall, many Punjabis resent the police considerably and think of the police as akin to the mafia, a corrupt force that exercises unjust quotidian power over people.

This prevailing public view of the police rarely found overt expression in the course of Ziqitza call center work, and yet the middle-class staff shared the civilian skepticism about the honesty and diligence of the police. At the same time, routine experience with the police gave call center staff much more nuanced views of the police. Indeed, by 2016, Gupta expressed to me some concern that case coordinators were growing more sympathetic to the police because of the rapport fostered over several years of working together. However, most call center staff remained at least ambivalent toward police. One case coordinator told me, “After more than two and a half years [working at the call center], I still don’t know whether police are good, bad, very good, or how they are!” Generally skeptical of excuses police gave for not fulfilling duties, the call center staffers often seemed to relish their ability to make the police do what they thought needed to be done, a dynamic I will discuss below.

DISCIPLINING THE POLICE THROUGH SOFTWARE

The contract with Ziqitza brought into police operations a whole community of other software corporations and systems to manage data and communications, such as Drishti-Soft Solutions Pvt. Ltd., which handled the communications software. The operations of the call center and initial police response were tightly integrated through software systems, especially the main database interface designed for Ziqitza called Infodispatch. These software systems regulated response times, distributed complaints throughout the police administrative hierarchy, and documented the actions of police. Through its ambulance business, you could say that Ziqitza came to specialize in monitoring the actions of its own staff. A key problem in ambulance operations was to know if ambulances actually arrived when they were supposed to and if the staff performed their jobs satisfactorily. The problem resembled that of police: you call them, but they don’t turn up; if they turn up, they don’t always do their job. For the police helpline, communications and information technology designed to monitor internal workings of the ambulance system was redeployed to track the actions of police. The software was barely modified. Rather than situating the call center within police operations, Ziqitza software incorporated police into its own operation, simply replacing ambulance drivers and EMTs with police officers.

So how did this system work? The core call center staff were the call-takers (designated “call counselors” in early Ziqitza documents), with around ten on duty during the day. Through a series of exchanges with the caller, designated as the “complainant,” a call-taker would gradually assemble a case on her screen, hop-

scotching around the screen between checkboxes and drop-down menus for things like “police station,” type of victim (“women,” “children,” “NRI” [non-resident Indian], “others”), and “type of complaint.”

Call-takers selected the type of complaint through a drop-down menu. When the call center opened, complaint types mirrored the law: thirty types of complaints that closely reflected the legal designations of criminal actions predominating in police charges. But the call-takers and case coordinators did not passively accept the complaint types given them by the police and software developers. When they encountered situations that didn’t fit the existing categories, they asked the software managers to add new complaint types to the system. Over the first two years, the list expanded to more than seventy types, transforming a legally-based, bureaucratic categorical scheme into a menu of narrative descriptors used to characterize the caller’s situation as closely as possible (Table 1). Reflecting, perhaps, the status of both police and call center staff, no caste crimes were included among the complaint types, despite the fact that the *Crime in India* reports of the National Crime Records Bureau from 2014 to 2018 record that between 118 and 147 caste crimes occurred per year in Punjab.⁶

Typically, the call-taker would select the complaint type after the first minute or two. But she would often change it to something else in the course of her exchange with the caller. Such changes reflected the call-taker’s changed understanding of the event, contrasting with the practice described by Pooja Satyogi (2019) of police “re-working” complaints to increase the likelihood of legal success. There were also text boxes for “caller name,” “victim name,” and most important, “complaint description,” the brief (30–100 words) prose account of who was involved and what happened. Sometimes these descriptions closely resembled the language and sentiment of the caller, with quotations or other less-direct forms of reported speech. Exchanges with callers occurred overwhelmingly in Punjabi, with Hindi and English sometimes mixed in, but the software was in English and text could only be entered using Roman characters. Call-takers were supposed to use only English, but there was a fair amount of Hindi and occasionally Punjabi in Roman script mixed in. Consider this redacted complaint record from August 2014, which mixes Hindi and English, with loose grammar, punctuation, and capitalization:

wife of sadar [REDACTED],she was complains that from last 1 year-2012 Sep . . .
unke ghar par chori ho gyi thi gold ki [some gold was stolen from her house] and
 she also complaint . . . police station *tripuri patiala* . . . SHO name- [REDACTED]

. . . DDR-210714 . . . no FIR registered. . . . She went there many times but no result found.

These two, also from August 2014, are more typical:

The caller informed that she met with an accident. She went to the police station to lodge complaint at Phase-8 Mohali and talked with SHO [REDACTED] but SHO misbehaved with her. Kindly investigate the matter

[REDACTED] says his daughter went to a gyan hospital for checkup to dr. [REDACTED]. he misbehaved with his daughter . . . they went to police station for his complaint *sherpur (sangrur) thana* [police station] . . . [REDACTED]-sho-30/1/2013 . . . no registration of fir kindly solve the matter.

Table 1. All the types of complaints logged in one month in August 2014. Note how the descriptors overlap (e.g. “Police inaction” and “Non registration of FIR”; “Attack” and “Hurt”).

Police inaction	Land dispute
False implication in case	Property Dispute
Non registration of FIR	Landlord-Tenant dispute
Police mis-behaviour	
Family Dispute	Accident
Matrimonial dispute	Threat
Domestic Violence	Hurt
Harassment for Dowry	Attack
Cruelty by Children	Stalking (Physical)
	Kidnapping/Abduction/Ransom
Cyber Crime	Rape/Rape Attempt
Fraud	Attempt to Murder
Cheating	Demand of Protection
Robbery	Blackmail
Theft	
Snatching	Abuse & bad language
Duped by Travel Agent(s)	Misbehaviour
Fake profile on Social Networking	Obscene Calls/SMS
	Eve-teasing
Drug sale/Supply	

When the call-taker saved the record, the complaint was “registered” in the database and given a unique case number consisting of a three-letter geographical code, a type code, and a six-digit number, for example, JLD-CT-201976, “JLD” for the city of Jallandar, “CT” for complaint. The call-taker would give this “complaint number” to the caller, so he or she could reference the case in future dealings with

the 181 helpline or directly with the police. The record produced by the helpline thus functioned as a kind of preliminary “First Information Report” or “FIR.” The FIR, written by police and signed by a complainant, is the legal document that sets the process of criminal justice in motion (Commonwealth Human Rights Initiative 2015). The 181 complaint record was designed to compel the production of an FIR where appropriate. The problem of police refusal to document was thus tackled by establishing a prior documentation process run by Ziqitza.

Once registered, the case would appear on the tracking page of the interface of a case coordinator sitting nearby. She would “tag” it with a color code depending on the *urgency* (the temporal frame in which it needed to be dealt with) and *importance* (the seriousness of possible harm) (Fig. 2).

Red	Amber	Yellow	Blue	Green
Emergency	Urgent - Yes	Urgent - No	Urgent - No	Suggestions/ Feedback
	Important - Yes	Important - Yes	Important -No	
TAT Immediate	TAT 7 Days	TAT 15 Days	TAT 30 Days	TAT 30 Days
E	U I	NUI	NU NI	

Figure 2. Tagging calls, with a “turn around time” (TAT). Ziqitza powerpoint, 2014.

Each code had a corresponding “turn around time” (TAT): seven days for amber, fifteen days for yellow, thirty days for blue. Emergency cases tagged red required that police be immediately dispatched to the location of the complainant. The concept of turnaround time originated in customer service, but it can be found in laws enacted in the past decade throughout India requiring that government services, such as an application for a car registration or a Right to Information application, be processed within a statutorily specified length of time (Sharma 2013; Webb 2010). In contrast, by instituting such time-bound responses through the procedures of a private corporation, the Punjab police were able to discipline police practices without establishing a legal requirement of timely action, which would have given callers the right to demand timely “service.”

Records were emailed and texted to the “concerned” officers at the station house and district levels. An important feature of the Ziqitza system was that the records were also emailed to superiors at the headquarters of the Punjab State Police in the state capital, Chandigarh. Each recipient had to be individually entered and the records would go out in quick succession, including to Gupta himself. By 2017, with some three to four thousand complaints logged a month from across the state, close oversight at the center was impossible. But in the first years Gupta

(and later his staff) made a habit of dipping in every once in a while and contacting a subordinate about a case. Similarly, a senior police officer in charge of another district told me he made a habit of randomly calling complainants to ask about police behavior. Such practices made the cell phones of senior officers rather like Bentham's watch tower: subordinates never knew if someone was following their actions or not, but must act as if there might be. Like the architects of the monitoring systems for welfare programs described by [Rajesh Veeraraghavan \(2022\)](#), call center staff and central police officials talked about many such features as simply technical matters, while district-based police highlighted their political functions.

The police officers responsible for dealing with complaints found these turn-around-time requirements burdensome and even irritating. Police new to the 181 system would sometimes contact the call center to get the turnaround-time tag changed, to give them more time to deal with a complaint. But 181 staff would almost always refuse such requests, unless the police could convincingly explain why the initial complaint mischaracterized a situation. Such appeals highlight the way the Infodispatch software structured the oversight relation between the call center staff and the police by distributing different capacities to each. Call center staff had complete access to all the information in the database and could change it, though any changes were logged and linked to individual staff members. In contrast, police staff and even senior officers like the heads of district police outside Chandigarh headquarters were not able to read some information the call center gathered, and they were also denied access privileges to alter any information in the database.

The station house officers (SHOs), the officers in charge police stations, as well as their subordinates, complained to me that the ease of initiating a complaint through 181, as opposed to coming to the station, led to a spike in the number and triviality of complaints. [Santana Khanikar \(2018, 39\)](#) observed that Delhi police are normally treated as “*mai-baap* [mother-father] to the people, sought after for all kinds of tasks, whether they involve a law-and-order situation or not.” Nevertheless, station house officers I spoke with estimated that the number of complaints had risen to four or five times their number before 181, above what they considered “normal.” They estimated that only one in four of these complaints were actual police matters. People started calling, for example, when someone was drunk and making a disturbance when previously they would have handled it themselves or just let it go. As one SHO told me with frustration, “Everyone goes to the police for everything now.”

The police who needed to respond to complaints also resented how they had lost discretion over which cases to pursue. This discretion was a key feature of what we might consider a common police business model, in which they devote time and energy to cases most likely to generate personal financial or political gains. Police also felt people were playing with them, eager to see them hop to it. As one SHO put it to me, “people think 181 cops will rush there, so they call. We have to do it, we run around like crazy trying to clear [181 cases] up, put aside other work.” Once or twice a month, the heads of district police would send their subordinates lists of cases that were past their turnaround times, though many police told me these letters were less about getting subordinates to clear overdue cases and more about being able to show their own superiors in Chandigarh their commitment to the 181 system.

The actions of the call center were designed to force the police to produce a paper document within the designated turnaround time: an “action taken report” or “ATR” (Fig. 3). Unlike the first information report (FIR), a legal document prescribed by the Indian Code of Criminal Procedure (1973), the action taken report is a document genre drawn from worldwide customer service practices. It is codified not by statute but by 181 Helpline procedures and the Ziqitza software (Lessig 1999; Manovich 2013; Berry 2011).

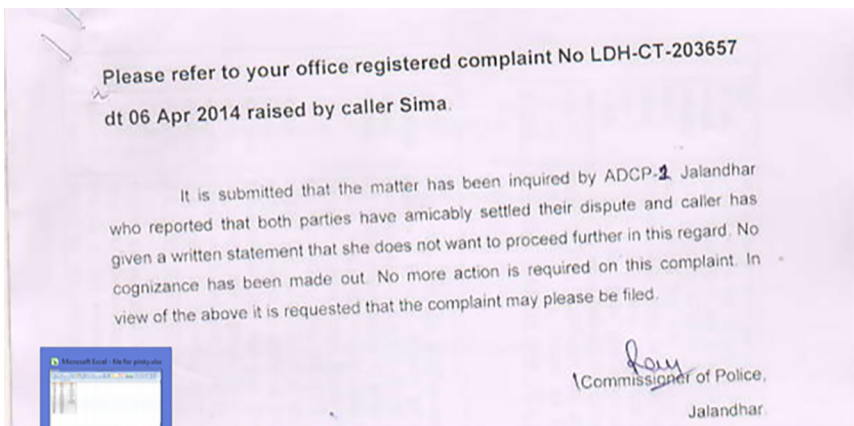


Figure 3. On-screen image of scanned Action Taken Report (ATR) uploaded to the 181 database, 6 April 2014.

The way 181 deployed gender and status relations was most clearly manifest in exchanges regarding the late submission of ATRs. One of case coordinators’ main jobs was to monitor the submission of ATRs and review open cases. The

case coordinator database interface displayed cases ordered by the date they were required to be closed, based on their turnaround time. Case coordinators would move methodically down the list, calling police officials to remind them that a complaint was coming due or to criticize them for failing to take action within the required turnaround time. In these late-action conversations, police officers would typically explain to case coordinators, usually a woman, why the business had been complicated by various factors: the dishonesty of the complainant, intervening court cases, the ill health of a police officer, police understaffing, the lack of a transport vehicle, lack of petrol, and so forth. Such problems in fact pervade the Indian police (Jauregui 2016, 76–81). Although the case coordinators would attentively listen to these excuses, they would usually dismiss them and, using the direct imperative, insist that the police have someone go and talk to the complainant and submit an ATR right away. Policemen would often finesse this uncomfortable if mild subordination by addressing the case coordinators as “daughter” (*beti*). On the one hand, this figured the policemen as superiors, but the kinship trope also allowed them to take polite orders from the case workers as they might fondly indulge the wishes of an insistent daughter.

The ATR was a persuasive genre. Policemen would write ATRs to liberate themselves from call center monitoring by arguing that they had taken the required or appropriate actions on the complaint and that the complaint should be “filed” or “closed.” In rare cases, ATRs would succinctly declare that an FIR had been registered. Some ATRs included extended accounts explaining that the complainant was lying or that the offense was not “cognizable,” that is, it was not an offense for which an FIR can be registered. The largest number of ATRs declared rather blandly that the disputing parties had reached a compromise and the complainant had withdrawn the complaint. Police in India often arbitrate disputes in an effort to get the disputing parties to reach a compromise before or instead of filing legal charges (Jauregui 2016, 76–81), especially, as Pratiksha Baxi (2014) shows, in cases of sexual and domestic violence (see also Basu 2015). As I’ll describe below, many of these ostensible compromises appear to have resulted from the pressure of police, kin, and other powerful individuals involved.

If ATRs were not filed on time, case coordinators would threaten to “escalate” the case, another term drawn from the customer service world. In customer service practices, “an escalation is a scenario in which a customer is not pleased with an employee interaction and wants someone at a higher level within the company to resolve the complaint” (Williams 2018). In the 181 context, *escalate* meant moving up the police hierarchy and bringing the problem to the attention of an

officer's superior. Functionally, it resembled a petition, a document submitted to a higher authority to appeal the actions or inactions of lower-level officials. Yet an important conceptual difference exists related to the centrality of the caller in customer service: a petition usually focuses on the agency of the addressee, his or her ability to grant a request (Cody 2009, Hull 2012, 86–111, van Voss 2001); in contrast, escalation, focuses on the agency of the caller, his or her intensification of demands.

The prospect of escalation created a strong incentive for the police to file ATRs that would falsely report a caller's withdrawal of the complaint. In the early months of the call center operations, this occurred fairly commonly. But the practice gradually declined as police came to understand and adjust their practices to the final step of the call center's role in the case: determining if the caller was "satisfied."

THE BUREAUCRATIC PRODUCTION OF SATISFACTION AND DISSATISFACTION

As the deputy chief minister announced at the opening of the call center, the satisfaction of complainants was a central aim. In a public comment five months after the helpline had opened, he declared that the service had received 117,000 calls, with a "satisfaction level of 78 per cent," and claimed that he himself had "checked the satisfaction level of a number of complainants" (Tribune News Service 2014). The generation of bureaucratically recognized signs of satisfaction constituted a major component of the work of the 181 call center and the police work generated through it. It is an important question how these efforts to determine the satisfaction of callers might shape their views of the events, their political agency, police, and the Punjab state more generally. But I am here focused on how satisfaction was constructed as a bureaucratic object of police/call center practice, and how it shaped the state's attempts to relate to citizens.

After receiving the ATR, case coordinators would call back the original caller to determine whether he or she was "satisfied" or "not satisfied" with the actions documented in the ATR. The software configured satisfaction in three degrees: "satisfied," "partially satisfied," and "not satisfied." But for reasons no one could explain, case coordinators construed responses in a binary and never checked the "partially satisfied" box. As the voluminous literature on consumer surveys suggests, determining the satisfaction of an individual with respect to something is considered a complex task. It is akin to the problem of determining an "opinion," which, like satisfaction, is conceptualized as an irreducibly subjective, even interior

fact (Hull 2010). In customer-service practice, satisfaction is figured as a mental state in relation to some expectation. The complainant's own utterances constituted the only evidence for satisfaction available through and authorized by call center procedures. Case coordinators would call back many times to reach the original complainant. They would not accept the testimony of anyone else (not the complainant's husband, wife, son, father, mother, sister, or children), since that person could not provide genuine evidence of the complainant's mental state, but also might willfully or unintentionally provide a false account. While call center staff were trained to be attuned to the emotional qualities and social complexity of phone interactions, the determination of satisfaction as a bureaucratic object put an overwhelming emphasis on the propositional content of a complainant's speech. This insistence on the propositional content of utterances reflected the awkward legalization of satisfaction.

Case coordinators would begin their questioning by informing the complainant of the content of the action taken report, and asking if it was accurate. If the ATR itself claimed the complainant was satisfied, the case coordinators would usually approach the question of satisfaction by a direct query, "Is it true, are you satisfied or not?" using one or another English or Hindi/Punjabi word for satisfied (satisfied, *santosht*), agreed (*sehmat*), or even happy (*khush*). If the ATR made no such claim, the case coordinator would initiate a more open conversation about police actions. They would ask about the manner of police: "How was the behavior?" (behavior or *vyavaahar*); "Was his behavior right [*sahi*] with you?"; "They didn't say anything wrong [*galat bat/gal*]?"; "There was nothing inappropriate?"; "Are they being completely helpful?" They would also ask what official actions were taken, including those required by police procedure (recording a statement, giving them required documents, taking information, photos, and anything else needed for an investigation). Lastly, they would ask if the police committed any offence, such as threatening them, demanding a bribe, or beating them.

Such questions were meant to serve two key functions. First, they were to engender in the caller what the police and call center considered legitimate expectations of the police. Second, they were to frame the issue of satisfaction in relation to police service rather than to the events themselves and/or the larger socio-political situation. Without bracketing out the actual events (the theft of a valuable, a beating, the loss of a family member), complainants would have found questions about satisfaction offensive or even outrageous.

Records show that complainants often reported not being satisfied because someone was not keeping to the terms of a compromise brokered by the police. As

a junior police official told me, “the fights start up after compromises, some people are not satisfied with the bargain.” Callers also reported to case coordinators that police were impolite, did not provide required documents, did not return stolen property they recovered, demanded bribes, stole from complainants, and even beat them up. Such complaints against the police themselves almost never resulted in formal charges or reprimands, though they sometimes did provoke informal scoldings by superiors.

Some complainants directly disputed the claims of police ATRs. This entry in the record from 2016 is typical: “Caller is Disagree with ATR, due to police has not initiated any action in her case. . . . Hence case is closed . . . and is Tagged as Totally Dis-Satisfied.”

And indeed, as they gained experience with 181, police more frequently oriented their practices to the bureaucratic documentation of satisfaction in order to limit the quasi-judicial role of case coordinators. In an effort to buttress their ATRs, police would sometimes ask 181 callers to sign affidavits that they were “satisfied,” or sign the bottom of a blank piece of paper, which was later inscribed by the police themselves with a fabricated declaration of satisfaction. The head police officer of a rural district told me that police in his district asked complainants to sign statements that they are “satisfied according to the law” (*kanun ke anusar*). However, reports confirm his observation that they would often become “not satisfied” as their cases moved through the 181 process. As he stated, complainants often expressed new dissatisfaction when they did not see action on their cases. However, what police typically described as a change of mind was likely often a matter of a different mode of documentation.

But the most common reasons for “dissatisfaction” had little to do with police wrongdoing. Complainants didn’t limit their expectations of the police to respectful behavior and adherence to correct legal procedure. They demanded actions that the police wouldn’t or couldn’t quickly take, such as the summary arrest of an accused person, or that police deal with a civil matter such as a property dispute, which only the courts can address. Such grievances were so common that case coordinators kept the following phrases in an open text window to quickly copy-and-paste into records: “But according to the complainant no action has been taken by police”; “but police has not initiated any action against the accused.” As case coordinators sometimes more forthrightly documented: the “complainant wants justice.” Gupta explained to me that it was not possible to get “100 percent satisfied,” “because they want police to do things they can’t do.” They want a “good postman” or “stagnant water” taken care of. A police officer in Ludhiana also told

me that this created a great problem for the police, especially in the beginning: “People had (the) feeling that anything can be done through 181, since it has to please me.”

The official police case and the call center case diverged once the call center made a determination about satisfaction. If a caller was not satisfied after the police filed their ATR, case coordinators escalated the complaint by submitting it to a senior superintendent or commissioner. This, however, ended the involvement of the call center, which would “close” or “file” the case. Case coordinators would recommend the complainant pursue it themselves at the district level by calling or visiting these senior officers.

HF. Daily Not Satisfied Caller Report					
18th Feb 2014					
Sr. No.	Case ID/ Tag	Caller Name/ Caller No.	District/ Complaint Type/ Category	Complaint Description	Status/ Satisfactory Index
1	AMR-CT-142636	██████	Amritsar City	Caller informed that her neighbor ██████ harassed and used abusive languages with her due to some minor dispute. Caller has not lodged any complaint to PS.	Closed
	Amber	██████	Others		Not Satisfied
2	BRN-142162	██████	Barnala	Complainant informed that ██████ ██████ attacked her on 13.02.2014. Complainant told that she has lodged her complaint at police station Tallewal on 13.02.2014. Complainant wants police help	Closed
	Amber	██████	Women		Not Satisfied
3	BRN-137561	██████	Barnala	caller informed that he lodged complaint in SSP office against ██████. They marked it city Barnala police station on 6/12/13. Complainant no 3792 police done compromise at that time. But accused is not fulfilling his words. According to caller, accused also give threatening to lodge a false complaint against him.	Closed
	Yellow	██████	Others		Not Satisfied
4	BTL-137503	██████	Batala	Complainant informed that her she is being harassed by her in-laws. She lodged a complaint at SSP office on 06-01-2014 then her complaint marked to DSP ██████. But according to the complainant no action has been taken by police.	Closed
	Yellow	██████	Family dispute		Not Satisfied
5	BTL-140573	██████	Batala	Complainant informed that his wife ██████ was attacked by ██████ and ██████ on 15/5/2013. He lodged the complaint at Police Station Qadian on same day FIR number ██████ and he also registered the complaint on 181 with case id:44878. But still no action has been done.	Closed
	Amber	██████	Police inaction		Not Satisfied
6	FRD-143885	██████	Faridkot	Caller informed that she and her family members are being harassed by her relatives ██████ ██████ ██████ on daily basis. She has lodged a complaint in Bajakhana Police Station.	Closed
	Amber	██████	Family dispute		Not Satisfied
7	FRD-140961	██████	Faridkot	Caller informed that ██████ (S/o ██████) has been threatening him that he will kill him due to some old dispute. He has lodged his complaint in Chowki Kotwali on 4-February -2014. But no action is being taken by police.	Closed
	Yellow	██████	Threat		Not Satisfied

Figure 4. Daily Not Satisfied Caller Report, Ziqitza, 18 Feb 2014.

Satisfaction reports produced by Ziqitza, occasionally reported in the press, were designed to pressure district police to perform. In the beginning, the deputy chief minister threatened to transfer any senior superintendent of police whose satisfaction rate consistently remained among the bottom three districts, like relegation of the worst-performing teams in the English Premier League, but he never followed through with it. Ziqitza produced daily (Fig. 4), weekly, monthly, quarterly, and annual reports on the satisfaction rates broken out by police administrative units (district, commissionerate, zone, range), type of complaint, and several other criteria. These satisfaction reports were sent to the chief minister, the police headquarters in Chandigarh, and the heads of district police forces. The Ziqitza manager of 181, like managers working in other kinds of customer service, took satisfaction rates as a key metric of his organization’s performance, even though

they mainly reflected police actions. When I asked him about it, he acknowledged that when you are talking of police matters, many people just can't be satisfied. Nevertheless, he quickly rattled off which district-level police officers have good satisfaction rates and which don't (even when posted to different districts). He hoped the senior central police officers who received the satisfaction reports he produced would not only be pleased at the performance of his organization but also they would use them to evaluate the performance of their district-level subordinates.

CONCLUSION

In the Indian state of Punjab, the 181 system has appeared quite successful in forcing the police to respond to complaints. City residents have much more confidence in 181 than the usual 100 number, as evidenced by the number of calls taken: as of 2018, 181 received nearly fourteen times the number of calls received by the regular police-operated 100 number. It expanded beyond a focus on women, and by 2018 nearly two-thirds of complaints came from men and did not concern specifically women's issues. The successes of the helpline inspired plans to replace the 100 number with the Ziqitza system. There were even reports of policemen helpfully advising people who had turned up to police stations to return home and initiate their complaint through 181 for a better police response. The increased responsiveness—however limited—of police to the sorts of people and events they often ignored before shows the “surprising affinity of some aspects of what we call ‘neoliberalism’ with certain forms of progressive politics” (Ferguson 2010, 170). It is important to note, however, that the effect of the 181 system on the progress of cases beyond the initial stages, outcomes, and the overall criminal justice system remains unclear.

Ziqitza and its software brought the language and documentation practices of customer service into police work. What are called “petitions” or “appeals” in the regular governmental idiom became “escalations.” Ziqitza didn't judge whether police work was procedurally correct or justice was done; it was concerned about whether the caller was satisfied or not. Proper procedure and justice were related to how Ziqitza constructed satisfaction, but they were different. Ziqitza treated the percentage of satisfied callers as a metric to subtly pressure police action to shift its orientation from procedural law enforcement to one of individual satisfaction—or at least to the generation of bureaucratically authorized signs of satisfaction.

By analogizing non-state actors like Ziqitza to microbiota, I do not intend to revive a naturalized, functionalist, organismic conception of the state, but rather to deploy a more fruitful model of relations between parts of states and other kinds of actors. The public-private partnership between Ziqitza and the Punjab police is certainly characteristic of the liberalizing changes in Indian state institutions in which private, profit-oriented entities blur a boundary of the state by taking up governmental functions. But other crucial aspects of such arrangements come into view when we set aside the state/private opposition and concentrate on the two different types of sociotechnical practices each organization uses, how they engage one another, and how they transform relations among managerial divisions of the police. It is less important that the Punjab 181 helpline was run by a non-state, profit-oriented corporation than that a corporate-bureaucratic customer-service model vesting power in the oral word of the customer blended with and challenged a governmental bureaucratic model vesting power in the written word of officials.

ABSTRACT

In 2013, the Indian state of Punjab contracted with a corporation to operate a new police phone helpline. The corporation not only takes complaints but also monitors, directs, and reports police responses to them and conducts satisfaction surveys. This essay explores the tensions and effects of using American techniques of corporate customer service to promote procedural law enforcement within police practices in India. It examines the ideological, procedural, communicational, and technological practices through which police procedure is combined with corporate customer service. Moving beyond a concern with privatization and the distinction between state and non-state, the article uses the metaphor of the human microbiome to reconceptualize how to understand the involvement of outside actors within state operations. [corporation; state; police; communication; software; bureaucracy; India]

NOTES

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1. I began the research for this article in 2014 as part of team from the Bharti Institute of Public Policy at the Indian School of Business, Mohali, with which I was affiliated at the time. The Government of Punjab had hired the Bharti Institute to do an evaluation of the 181 Helpline with an eye to the good press a favorable evaluation would generate ahead of the 2014 election. The Bharti Institute team was given unlimited access to all the people involved with the 181 system and all of its documentation, including audio recordings of phone communications and the database of complaints and correspondence, as well as reports of the performance of the system throughout the state. As part of this team in 2014, and then as an independent researcher each summer from 2015 to 2018, I had conversations with the Ziqitza call center managers, call staff, and technical people. I sat with call-takers as they took calls and with case coordinators as they talked with police to manage responses to complaints. I also spent time with the senior police officers at Punjab Police Headquarters in Chandigarh who established and managed this system, as well as officers and staff in four rural and urban district police offices who responded to the complaints generated by the 181 Helpline.
2. I am grateful to Melissa Burch for drawing my attention to the insights that the literature on the U.S. prison system has for an understanding of privatization.
3. Transactions were not marketized as in other schemes involving private contractors providing government services (Carswell and Geert De Neve 2022). Neither the government nor callers paid Ziqitza for processing individual complaints; rather, the government paid Ziqitza on the basis of the number of “seats,” that is, call-takers, it staffed. The similarity of the experience of calling 181 and bank or telecom customer-service numbers lead some Punjab residents to refer to 181 callers as “customers.” Now and again Ziqitza staff also used the word *customer* to refer to callers, but they mostly used the terms *callers* and *complainants*, terms approved by both Ziqitza and the police.
4. However, Pooja Satyogi (2019) describes a Special Protection Unit for Women and Children in Delhi that sympathetically engaged women coming to the unit with complaints.
5. This webpage, <http://zhl.org.in/about-us.html>, has been taken down since I accessed it in 2017 and replaced with a page that omits the stories of the two founders’ contrasting experience with ambulance services.
6. These statistics are widely seen as undercounting caste crimes as defined under the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989.

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