



**Independent
Media Arts Alliance**
**Alliance des arts
médiatiques indépendants**

Response to CRTC Public Notice 2010-623

September 30, 2010

Comment by the Independent Media Arts Alliance

imaa-aami

6560 ave. de l'Esplanade #304, Montréal, QC H2V 4L5
(514) 522 8240 | info@imaa.ca | www.imaa.ca

Mr. Robert Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario
K1A 0N2

By electronic submission

Re: CRTC Broadcasting Notice of Consultation 2010-623

Identification

- 1) The Independent Media Arts Alliance (IMAA) is a non-profit national association representing 80 artist-run, non-commercial film, video and multi-media production facilities, exhibitors and distributors across Canada. Our network of member organizations serves over 12,000 independent media artists.

Appearance

- 2) If an oral hearing is held, our organization wishes to appear, by videoconference from the CRTC office in Montreal. We feel it is important that the Commission hear the point of view of community-based media artists and producers of non-commercial, audio-visual content on the future of the community television sector.

Community TV policy

- 3) The IMAA received the news of the Commission's new community television policy (2010-622) with disappointment. We simply don't understand the disconnect between the clear and substantial evidence presented at the 2009-661 hearings, and the status quo outcome of the community television policy review process.
- 4) Comprehensive documentation presented by CACTUS at those hearings established that more than 80% of the locally focused ("hyperlocal") community TV channels that existed in the 1980s and 1990s have been closed. The Commission's new policy does not address this drastic reduction

in local access, content production and opportunities for residents of communities across the country.

- 5) We understand that the new policy has been modified to include some measures intended to improve residents' access to community channels that remain. But even if these measures have the desired effect, they will not help the over 80% of Canadians who used to benefit from access to studios and channels – but who don't anymore.
- 6) We find the historical record presented by CACTUS compelling. It documents a history of ever-increasing reduction in access, channels and studios, and the decline meaningful resident input and engagement in the management and operation of the sector. In effect, the slow extinction of what was once a thriving participatory form of expression.
- 7) The remaining community channels are principally owned by the cable industry and located in larger towns and cities. They have further been affected by their operators' regionalization of programming such that unique, locally created content makes up a decreasing proportion of their programming schedules.
- 8) That communities whose studios and channels have been closed or regionalized have been entirely left without service or access is regrettable and inappropriate.

The potential of community involvement

- 9) The community sector has historically demonstrated an ability to facilitate local programming with very modest resources. It seems entirely logical and appropriate that resources be put in place to help these communities to actively support and develop means to create, distribute and share community content and expressions. We would respectfully suggest that such an approach should be a pro-active goal of community television policy.
- 10) Accordingly, we support the renewed proposal by the Canadian Association of Television Users and Stations to use the 0.5% of cable gross revenues that would become available under the CRTC's proposal in 2010-623, for the establishment of a Community-Access Media Fund to which independent non-profit community-run access channels could apply.
- 11) Although 0.5% is only one quarter the amount to establish a healthy community TV sector country-wide according to the research CACTUS

presented this spring, it could be used to focus on those smaller communities most in need: those that have lost access over the last decade, and which currently have no other source of local TV.

- 12) We feel that the CAMF model is an excellent basis for the promotion of grass-roots community production and broadcasting initiatives that would begin to restore the principles and potentials of community involvement, local accountability and creative expression to the community television sector.

Media artists have a role to play in community broadcasting

- 13) As we outlined in our submission to the 2009-661 hearings, members of the Independent Media Arts Alliance are interested in the potential of local broadcasting initiatives to expand dialogue in their communities. Members of our network in different regions of the country have expressed interest in contributing to the establishment of such grass-roots initiatives.
- 14) Artists working in contemporary media of film, video and digital multi-media have something to offer and contribute to the concept of community expression. Our community has built up organizations, producers and professionals who have a lot to offer to cultural expression in their communities through the broadcast system. Yet our milieu currently works outside of the broadcast sector because its participants see few opportunities for meaningful access and distribution within the current cable-run community channel model.
- 15) The fundamental difference between emerging grass-roots, non-profit community initiatives and long-established industrial undertakings needs to be acknowledged. Without resources or access to the revenue streams currently allocated through the BDU license levy collected for local expression, or to the Local Programming Initiative Fund, or value for signal payments, community groups that could potentially come forward to establish meaningful, locally relevant broadcasting initiatives face a significant challenge.

Directing 0.5% revenues to a Community-Access Media Fund

- 16) We respectfully suggest that the Commission validate the community based potential of the community television and move to allocated the proposed 0.5% of the cable gross revenue license levy to the innovative, and forward-thinking Community-Access Media Fund proposed by CACTUS.

- 17) We would further suggest that dialogue between the Commission and stakeholders would be an excellent way to develop the CAMF proposal into active and functioning Fund. Given the extensive experience of Canadian civil society in generating and managing similar initiatives, it is legitimate, reasonable and entirely feasible to develop the CAMF model as a means of promoting and funding local expression through the community broadcast sector – renewing Canada’s once-proud leadership in this media form.
- 18) Thank you for the opportunity to comment and present our views in this proceeding.

**** END OF DOCUMENT ****