



September 30, 2010

Two pages by fax to 819-994-0218

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

Dear Mr. Morin:

Re: *CRTC Broadcast Notice of Consultation 2010-623*

1. Friends of Canadian Broadcasting is a watchdog for Canadian programming on radio, television and new media supported by 100,000 Canadians. Friends does not seek to appear at an oral hearing, if one should occur. This submission focuses on local television in smaller communities throughout Canada.
2. Friends was concerned to note that that, despite conclusive evidence presented at the recent community TV hearing (2009-661) demonstrating that more than 80% of the extremely local community TV channels that existed in Canada more than a decade ago have been closed, the new policy does not address these closures.
3. The new policy does implement some after the fact measures to improve access to the mainly big-city cable-run community channels that remain. However, even if these measures were effective, they do nothing to restore access to the huge majority of Canadian communities that used to enjoy their own access studios and channels.
4. Since the cable-controlled community channels that remain are mainly located in larger centres that also enjoy public or private broadcaster service, the failure to address closures in smaller communities that may have no other source of local television – many with no newspapers or radio stations – is particularly inappropriate, given the community sector's unique ability to facilitate programming with modest budgets.

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5. We are also puzzled to note that, although the Commission acknowledges in its analysis in 2010-622 that very few community groups in Canada have come forward asking for over-the-air low-power licenses, and that the reason is the difficulty of funding such channels, that the Commission nonetheless elected to deny holders of these licenses access to the Local Programming Initiative Fund, value-for-signal payments, or any direct access to the cable levy collected for "local expression".
6. We therefore support the proposal by the Canadian Association of Community Television Users and Stations (CACTUS) to direct the 0.5% of cable gross revenues that would become available under the CRTC's proposal in 2010-623 towards the creation of a Community Access Media Fund to which independent non-profit community-run access channels could apply for support.
7. Although 0.5% is only one quarter of the amount needed to establish a healthy community TV sector country-wide according to the research CACTUS presented this spring, we recommend that these funds be used to focus on those smaller communities most in need – those that have lost access over the past decade, and which currently have no other source of local television.

Yours sincerely,



Ian Morrison
Spokesperson
Friends of Canadian Broadcasting

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