



YOUTH MEDIA
ALLIANCE
MÉDIAS JEUNESSE

Montreal February 13th, 2020

Mr. Claude Doucet
Secretary General,
CRTC
Les Terrasses de la Chaudière
Central Building
1 Promenade du Portage
Gatineau, Quebec
K1A 0N2

**Re: CRTC Broadcasting Notice of Consultation CRTC 2019-379:
«Applications by the Canadian Broadcasting Corporation/Société Radio-Canada (the Corporation) to renew the broadcasting licences for its various English-and French-language audio and audio-visual programming services ». (CRTC 2019-0280-0, CRTC 2019-0279-2, CRTC 2019-0282-5, CRTC 2019-0281-7)**

Dear Mr. Doucet,

1. On behalf of the Youth Media Alliance / Alliance Médias Jeunesse (YMA-AMJ), we wish to thank you for this opportunity to contribute to the Commission's review of the broadcasting licence renewals of the Canadian Broadcasting Corporation (CBC) and of the Société Radio-Canada (SRC). It is our understanding the Commission will be holding a public hearing commencing on the 25th of May 2020 to discuss the issues raised during this consultation and **the YMA-AMJ wishes to take part in this public hearing to represent the views of Canada's young children and youth who are avid viewers of television programming.**
2. In addition, the YMA-AMJ wishes to assert at the outset that our members wholeheartedly **support the renewal of the CBC/SRC broadcasting licences.** The CBC/SRC acknowledges in its application that it has entered into a period of transition to a path that fully spans all of the new platforms and we are encouraged by the enhanced commitments the Corporation is proposing towards children and

youth programming. As mentioned in the CBC/SRC supplementary brief (page 1) there is a need for a *“bridge between legacy regulation and this future framework (of online platforms); a bridge that supports and strengthens the role and differentiating characteristics of the public broadcaster”*.

3. The CBC/SRC clearly states the Corporation *“needs to be able to target its children’s and youth programming in a responsive manner, with multi-platform offerings in some cases or the most appropriate platform in others”*. We agree with the CBC/SRC proposal to serve audiences wherever they are - and whenever they want - to watch their favourite programming.
4. YMA-AMJ is an ardent supporter of the Canadian Television sector (both private and public) because we believe in the critical role Canadian television broadcasters have, in telling our stories, highlighting our talent, and sharing our values that are truly Canadian. The Alliance also believes Canadian broadcasters have a fundamental responsibility to provide quality programming to our children and youth.
5. It has been close to seven years since the Commission last reviewed the licence conditions of the CBC/SRC, having handed out a five year licence in 2013, and then administratively renewed the licences on two other occasions, in 2018 and 2019. In that time, conventional broadcasters, including public broadcasters, have faced revolutionary changes in technology and viewing habits and have responded by innovating on content and delivery to attract and especially maintain audiences/viewers.
6. The increasing availability of non regulated streaming services, such as Netflix, Amazon Prime, Apple TV+, and more recently, Disney +, is diverting viewers away from local and national broadcasters. Ultimately, Canadian broadcasters are unable to offer programming that can compete with such non-regulated services that have tremendous programming budgets at their disposal. Recent market data estimates that there are now over 6.2 million Canadian subscribers to Netflix and that this non-regulated foreign service generated revenues of over a billion dollars in Canada in 2019. This is but one example of the increasing competition facing the Canadian broadcasting system and particularly our national public broadcaster.
7. The Commission knows that our members are ardent defenders of the importance of Canadian children, and youth programming, in providing our children and youth with Canadian values and stories, all the while contributing to their intellectual, social and cultural growth.
8. Historically, the CBC/SRC has played a fundamental role in providing Canadian children and youth with quality programming, which has over time, influenced the hearts and minds of a great majority of Canadians. However, in the context of the current public broadcasters’ licence renewal, we feel it is critically important to have an open discussion with the CBC/SRC and secure their ongoing commitment

to this programming genre, in the context of an increasingly complex television market, with increasing competition for audiences/viewers.

9. The Canadian Broadcasting Act clearly states that «the programming provided by the Canadian broadcasting system should be varied and comprehensive, providing a balance of information, enlightenment and entertainment for men, women **and children** of all ages, interests and tastes» (Broadcasting Act (1991) art.3(i)(i)). We consider that this concern within the Broadcasting Act should be at the forefront of the CBC/SRC programming plans for the future.
10. The YMA-AMJ has appeared a number of times before the Commission in recent years, to stress the importance of ensuring a strong presence of original Canadian children and youth programming within the different sectors of the Canadian broadcasting system: conventional television (including the CBC/SRC), specialty and pay television, video on demand, SVOD and digital media platforms.
11. The YMA-AMJ firmly believes that, notwithstanding the increasing availability of different platforms and streaming services, the Commission should require there be specific exhibition requirements for children and youth programming on the services of public broadcasters such as the CBC/SRC. The present licence renewal offers a new opportunity for the Commission to revisit this question with CBC/SRC and clearly re-establish the importance of Canadian children and youth programming within the Canadian broadcasting system as enunciated in the Broadcasting Act.
12. More specifically, in relation to the CBC/SRC renewal application we have noted the Corporation's commitment in its latest three year strategic plan *Your Stories, Taken to Heart*, issued in May 2019, that one of its priorities is to serve Canadians by: "*Engaging with young audiences: The Corporation strives to become a leader in bringing the best content to children and youth with the goal of enriching their lives and engaging them with their country*". The YMA-AMJ salutes this commitment of the CBC/SRC towards our children and youth and we sincerely hope the CBC/SRC will transform this priority into strong commitments to the development, production and broadcasting of Canadian content for our children and youth, on all traditional and online platform services provided by the CBC/SRC.
13. Keeping the above in mind, the Commission may wish to discuss with the CBC/SRC (and possibly the Canadian Media Fund - CMF) the year by year decreasing amounts being spent by the CMF on programming for children and youth. The CMF's commitment for children and youth programming was 63.5 million dollars in 2015-2016 and by 2018-2019 the commitment dropped significantly (36%) to 40,7 million dollars. Does such a significant drop affect the CBC/SRC in meeting its objectives in this genre of programming ? The CMF has acknowledged in its latest annual report "*that children and youth programming has experienced significant decreases in the past three years as content consumption has shifted from conventional broadcasters to online platforms*".

14. As the Commission noted in its Notice of Consultation (CRTC 2019-379 no.17) *“By virtue of its activities and important contributions to meeting the broader objectives of the Act, the Corporation should produce, commission and make available audio and audio-visual content on multiple platforms that meets the needs of and reflects the diverse Canadian population, including those from the following groups: women, Indigenous groups, ethnic and multicultural groups, official language minority communities (OLMCs), children and youth, Canadians with disabilities, and LGBTQ2 Canadians”*.
15. The Commission well-knows, children and youth are the future, and if we fail to see our culture and values reflected in the entertainment and information sources they consult on different platforms, what kind of future will we have as a country? The CBC/SRC, if anything, has to be front and center in supporting the availability of quality Canadian content developed with our children and youth in mind, not only on conventional television services, but also on numerous digital, on-demand, interactive, and virtual reality, platforms.
16. The YMA-AMJ fully agrees with the CBC/SRC when it states that one of its main objectives, in moving towards a new licence period, is to strive to become a leader in bringing the best content to children and youth with the goal of enriching their lives and engaging them with their country.
17. We have taken note of the shifting ways Canada’s children and youth are watching their favourite content by age groups, as presented in the CBC/SRC supplementary brief (page 6), and we agree with the Corporations’ proposed approach to be able to better respond to these different viewer (age) groups by first setting *“a cross-platform goal described as a total number of exhibition hours for combined conventional television and digital platforms, and second, an accompanying condition of licence setting a minimum exhibition obligation for conventional television”*.
18. The CBC/SRC has proposed – in its application for licence renewal - to have as a condition of licence for its French language services 110 combined hours of original children’s and youth programming on both conventional television and on digital platforms, while maintaining a minimum 80 hours of this genre of original programming on the conventional French language television network ICI TÉLÉ. This seems to be appropriate when we compare it to historic commitments of CBC/SRC.
19. However, with regard to its English language services, the CBC/SRC is proposing - as a condition of licence - a total 80 combined hours of original children’s and youth programming on both the CBC conventional network and the digital platforms, with a minimum 40 hours of original children’s and youth programming, per broadcast year, on CBC Television. At face value, this is a reduction of original children’s and youth programming commitments on CBC’s conventional English

language television network since in its most recent licence period it had yearly commitments of 52 hours a year of original children's and youth programming!

20. With regards to other elements, in the CBC/SRC licence renewal application, we agree with the proposed condition of licence of 15 hours a week of children's programming on each of CBC and SRC's conventional television networks.
21. We also agree with the CBC/SRC proposal to change the age group for programming aimed at children from 12 years and under, to 13 years and under, although it would be of interest to have access to a breakdown of how much programming will specifically be aimed at children 13 and under, and to youth aged 14 to 17 years old.
22. In addition, we have taken note and agree with CBC/SRC's proposal to increase its condition of licence for independent production for Canadian children's programming from 75% to 80% for each linguistic market.
23. We do not, however, agree with the proposal of the CBC/SRC to delete the CRTC's licence expectation that states the "*Commission expects the licensee to broadcast a minimum 5 hours per week, averaged over the broadcast year, of Canadian programming aimed at youth age 12-17*" (Note: this would cover youth 13 to 17 under other changes requested by the CBC/SRC).
24. We also disagree with the CBC/SRC proposal to delete: "*The Commission expects the hours of programming for children under 12 years of age to be reasonably allocated between programs for preschool and school-age children*".
25. This completes the YMA-AMJ response, to the Commission's call for comments on the licence renewals of CBC/SRC, and we look forward to discussing this important file with the Commission at the public hearing in May 2020.
26. Should you require any additional information or clarifications from the Youth Media Alliance, please feel free to call me and should you wish to learn more about our ongoing activities I invite you to visit our website at: www.ymamj.org/en/

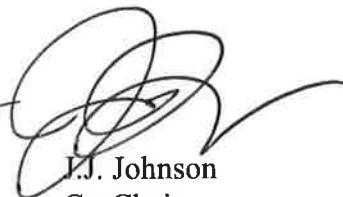
Please accept, Mr. Doucet, my very best regards,



Chantal Bowen
Executive Director
YMA-AMJ



Marysol Charbonneau
Co-Chair



J.J. Johnson
Co-Chair

Youth Media Alliance (YMA) seeks to enrich the lives of Canadian children and teens by helping improve the quality of the content created for them on all screen-based media. The Alliance pursues its mission of encouraging high-quality content by presenting annual awards of excellence to the best productions targeting young English- and French-speaking Canadians. It offers ongoing training tailored to the special needs of youth production professionals through workshops, seminars, and special events such as the Children, Youth & Media and Média-Jeunes conferences. Since 2015, the Youth Media Alliance has developed and now offers three scholarships: the YMA Andra Sheffer, the YMA Thérèse-Pinho and the YMA Steven DeNure Scholarships. It also conducts original research investigating the impact of screen-based media on young people. Finally, Youth Media Alliance advocates for the needs of Canada's child and youth media consumers in matters of public policy.

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