



NCRA/ANREC
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20 February 2020

Claude Doucet
Secretary-General
Canadian Radiotelevision and Telecommunications Commission
Ottawa, Ontario, K1A 0N2

Dear Secretary-General,

Re: Broadcasting Notice of Consultation CRTC 2019-0280-0

1. We are writing on behalf of the National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires ("NCRA/ANREC") in support of an application by the Canadian Broadcasting /Société Radio-Canada ("CBC/SRC") to renew the broadcasting licences for its English-language audio services. We would like to speak at the hearing.
2. The NCRA/ANREC is a not-for-profit national association working to recognize, support, and encourage volunteer-based, non-profit, public-access campus and community-based broadcasters in Canada. We provide advice and advocacy for individual campus and community ("c/c") stations, and conduct lobbying and policy development initiatives with a view to advancing the role and increasing the effectiveness of our sector. We currently represent 108 not-for-profit member radio stations in nine provinces and two territories.

3. We support the renewal of all of the CBC/SRC's licenses. Our intervention speaks only to matters related to the CBC/SRC's broadcasting services and how they may impact the c/c radio sector.
4. We will comment in three areas: local radio programming, regulating online content, and consultation with Indigenous communities. We will not respond to most of the questions posed in the Notice of Consultation because they are outside of our expertise.

Local Radio Programming

5. The CBC/SRC's mandate, as described in the *Broadcasting Act*, does not specifically refer to local programming, but states that it should "reflect Canada and its regions to national and regional audiences, while serving the special needs of those regions." We note that the CBC/SRC has committed to "prioritizing local connections" as a key part of their most recent corporate strategy.¹ We support this in principle; in our experience, they have done an excellent job providing local and regional radio programming across the country, within the limitations of their budget and the vast number of communities that they serve.
6. However, the core mandate of the c/c sector is to serve local communities. CRTC 2010-499 states:

"12.... The programming of campus and community radio should distinguish itself from that of the commercial and public sectors in both style and substance, offering programming that is rich in local information and reflection andmeet(ing) the needs and interests of the communities served by these stations in ways that are not met by commercial radio stations and the Canadian Broadcasting (CBC)."

"14. Campus and community stations offer programming based on the needs and interests of a community through:

- maximum use of Canadian-produced programming;
- the broadcast of local and regional news and information;
- the broadcast and promotion of local cultural and artistic expression;
- the promotion of Canadian emerging talent with an emphasis on local musical and spoken word talent; and
- the broadcast of local and regional content related to social, economic and community issues."

"49... In the Commission's view, locally relevant spoken word programming produced by campus and community stations is an important way in which these

¹ CBC/Radio Canada: Your Stories, Taken to Heart:
<https://site-cbc.radio-canada.ca/documents/vision/strategy/2019-strategic-plan-en.pdf>

stations can fulfil their mandates and roles in the communities served and in the broadcasting system as a whole.”

7. Most of the programming produced by our sector is local, since our purpose is to serve particular communities and to fulfill the objectives set out above. Our members broadcast a significant amount of locally-focused and locally-relevant content that is comprehensive, carefully researched, and high quality, and is produced and presented by community members. This includes news and analysis on a wide range of topics, interviews, magazine-style programs, arts and culture programs, and programs focusing on municipal affairs and politics, science, technology, business, health, elections coverage, and numerous other subjects of interest to local listeners.
8. The CBC/SRC's commitment to prioritize “significant local and regional content that is relevant to people in their communities” leads us to question whether they may be planning to develop and broadcast content on AM/FM or online that could be seen as duplicating or competing with our member stations, which could affect those stations' market share and listener support. Since c/c stations rely on their listeners and communities to remain financially viable, a loss of support could be devastating.
9. Therefore, to the extent that CBC/SRC's local programming plans may affect the c/c sector, we ask that the Commission take steps to ensure that any local services provided by the CBC/SRC are distinctly oriented to the CBC/SRC's mandate as a national broadcaster rather than encroaching on the c/c sector's role in serving local communities. We also ask that CBC/SRC work together with the NCRA/ANREC and local c/c stations to the greatest extent possible to ensure that our respective local content remains complementary rather than competitive.

Regulating Online Content

10. **We would like to comment on the Commission's questions posed about regulating online content (Q22 - 24).**
11. As the CBC/SRC states in their application, public, private, and community broadcasters play unique roles in the Canadian media system, and each benefit from structures that strengthen their capacity to fulfill their designated role. The CBC/SRC has asked that its regulatory framework be tailored to its role as Canada's national public broadcaster and “not be ancillary to, or otherwise based upon, the regulatory regimes applicable to community or private broadcasters.” We are in support of this request.
12. We have no comment on the merits of the CBC/SRC's proposal of a new flexible approach to content commitments. However, if the Commission decides that such an approach is appropriate for the CBC/SRC's programming, we believe that this same

approach may not be similarly appropriate for the c/c sector. We therefore ask that the Commission not generalize its determinations on this topic to apply to our sector as well.

13. This is relevant to the issues raised in several Qs in the Notice of Consultation for this proceeding. For example, the outcome of this proceeding will determine whether the Commission focuses its regulation of the CBC/SRC's programming activities on the provision of content via traditional television and radio services (Q23) or expands its regulation to the CBC/SRC's online services; and whether the CBC/SRC's online programming should be included when determining whether its content requirements are met (Q24). In our submission, the answers to these questions should not be determinative of how the same questions are answered in future proceedings related to c/c radio, because the relevant considerations are different for our sector.

Consultation with Indigenous Communities

14. We support the CBC/SRC's proposal to add a condition of license requiring biannual consultations with Indigenous communities. Building on this idea, we think it would be valuable for the Commission to host annual consultations with Indigenous communities that include a variety of broadcasters and media, similar to the formal consultations held with OLMCs every two years.

Conclusion:

15. Thank you for your consideration of our feedback.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barry Rooke', written in a cursive style.

Barry Rooke
Executive Director
NCRA/ANREC

c/c: Canadian Broadcasting/Société Radio-Canada

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