



October 5, 2020

Mr. Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa ON K1A 0N2

Filed electronically

Dear Mr. Doucet:

Re: Broadcasting Notice of Consultation CRTC 2020-324 – Call for comments on low-motion programming

1. Shaw Communications (**Shaw**) provides the following comments in response to Broadcasting Notice of Consultation CRTC 2020-324 – *Call for comments on low-motion programming (BNC 2020-324)*.
2. In BNC 2020-324, the Commission asks “whether it should amend the existing exemption order relating to still image services to include low-motion programming and the services offering such programming.” The Commission suggests that independently-owned low-motion services should not benefit from the regulatory protection of the 1:1 ratio under section 19 of the *Broadcasting Distribution Regulations* because these services make “a limited contribution to the Canadian broadcasting system.”¹
3. Shaw agrees with the Commission’s proposal as well as the proposed definition of low-motion programming. However, in BNC 2020-324, the Commission only states that “BDUs could not count still image programming services including low-motion programming services toward meeting their 1:1 ratio requirement.” To be consistent and for the reasons identified in BNC 2020-324, the Commission should similarly clarify that, if a BDU distributes a *related* low-motion service, this service should not be counted towards, or trigger, a 1:1 requirement.

¹ BNC 2020-324, para. 8.

4. We thank the Commission for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dean Shaikh". The signature is fluid and cursive, with the first name "Dean" and last name "Shaikh" clearly distinguishable.

Dean Shaikh
Vice President, Regulatory Affairs
Shaw Communications Inc.

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