

October 19, 2020

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

Filed Electronically

Dear Mr. Doucet,

Re: Broadcasting Notice of Consultation CRTC 2020-336 – Call for comments on an application by the Canadian Association of Broadcasters requesting regulatory relief for Canadian broadcasters in regard to the COVID-19 pandemic

1. Pelmorex Weather Networks (Television) Inc. (“Pelmorex”) is the broadcasting licensee of the Canadian specialty services The Weather Network and MétéoMédia, Canada’s trusted sources for weather forecasts, news and emergency alerts. We are pleased to provide the following comments on the above-noted proceeding.
2. Specifically, Pelmorex is intervening in support of the Canadian Association of Broadcasters (“CAB”) July 13 Part 1 Application seeking immediate regulatory relief to Canadian broadcasters, and the CAB’s intervention to this proceeding. Pelmorex is a member of CAB and we support the CAB’s responses to the questions in the notice of consultation.
3. The COVID-19 crisis has had a significant impact on private broadcaster revenues, and continues to do so. We note that since the Commission posted this notice of consultation on September 17 many Canadian provinces have entered a “second wave” of COVID-19 cases and have started to reimplement significant business restrictions. While the CAB application seeks relief for the 2019-2020 broadcasting year (which ended August 31, 2020), it is clear that the duration and impact of this most recent outbreak remains unknown. Indeed, while we remain optimistic about an economic recovery, it is still too early to even say if the worst is behind us. It is premature to begin requiring broadcasters to “make up” spending shortfalls from the previous year.
4. The CAB proposal for deemed compliance for spending requirements for the unprecedented 2019-2020 broadcasting year provides the clarity and certainty broadcasters need to face present and future challenges related to the pandemic. It very simply seeks to help stave off what could otherwise be the major devastation of a significant portion of Canada’s broadcasting industry. While we recognize and support the Commission’s objective of balancing the needs of

all stakeholders in the broadcasting sector, we believe that this will be best met at this time by helping keep Canadian broadcasters operational.

5. We appreciate the opportunity to participate in this important proceeding. Should the Commission have any questions or require further information, please contact the undersigned.

Yours truly,

A handwritten signature in black ink, appearing to be 'KE', written over a horizontal line.

Kurt Eby
Director, Regulatory & Government Relations
Pelmorex Weather Networks (Television) Inc.

E-mail address at which a copy of this filing may be requested: regulatory@pelmorex.com