



Ontario  
Association  
of Broadcasters

October 19, 2020

M. Claude Doucet,  
Secretary General  
CRTC  
Ottawa, Ontario

**Re: Broadcasting Notice of Consultation CRTC 2020-336**  
**CAB request for Regulatory Relief for Canadian Broadcasters**  
**in regard to the COVID 19 Pandemic**

1. We are filing these comments on behalf of the member stations of the Ontario Association of Broadcasters (OAB). Our members are primarily involved in radio broadcasting, thus our comments are primarily related to that sector.
2. At this time, we will not be commenting upon specific aspects of the CAB's proposal. However, in assessing the CAB proposal, we respectfully suggest that the following principals should be considered:
3. Key Principals

1. In PN 2020-336, the Commission pointed out that there are various stakeholders in the Canadian Broadcasting system which might be affected by the CAB proposal. These included the creative and arts sectors, persons with disabilities and the general public through emergency alerting.

Key Principal: All of benefits to these organizations flow from the financial viability and ongoing operation of Canadian radio stations. Should stations fail, none of these benefits will be available today, or in the future.

Restated: A station that is off the air benefits no one.

2. While specific note is made of funding for the Canadian audio-visual production industry and other non-broadcast content creators, the Public Notice is silent on the content created by radio stations themselves.

Private sector radio is a creative sector in its own right. With staffing of over 8,000 Canadians, stations produce over 400,000 hours of original spoken word content annually. According to the CRTC's Statistical and Financial Summaries, Programming expenditures in 2019 were in excess of \$488M, more than double the expenditures of CBC/Radio Canada.



Private Sector Radio stations are core to community identity; they are the most local of all electronic media. Not only do the stations provide news and information, shows in all day-parts entertain and enlighten residents to the communities which they serve.

This ongoing service is invaluable at all times, particularly during a Pandemic, during which the stations are considered an essential service.

Key Principal: The Creative output of Canadian radio is just as much in jeopardy as any other cultural sector. The value of maintaining radio's enormous benefits should be considered when balancing the CAB proposal against competing needs from other groups.

3. The Commission is not faced with a "fatal alternative" between station closure/ job losses in the creative radio industry and job losses in the creative music industry. Broadcasters are not the only source of support for music creators.

The Department of Heritage has traditionally provided support for the music industry. Should funding from broadcasters decline, the possibility exists for the Department of Canadian Heritage to expand that support.

Beyond the direct financial implications, the potential closure of and reduction in tuning to Canadian radio stations impacts the exposure and dissemination of the very product created by the Canadian music industry.

Key Principal – A decision which helps ensure the survival of the Canadian broadcast industry does not irretrievably damage the Canadian music Industry.

4. The environment in which broadcasters operate has irreversibly changed - While Canadian broadcasters must seek regulatory and financial relief, foreign digital giants are not subject to any of those challenges. Thus decisions which appear to enhance overall public benefits can have the unintended consequence of irretrievably damaging the Canadian cultural industry of radio broadcasting

Key Principal – Regulations which in a closed regulatory environment might provide a *net benefit* to the Canadian cultural sector could create a *net loss* to Canadian culture as stations close or lose tuning to unregulated players (as a result of that regulation).



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4. The Ontario Association of Broadcasters is keenly interested in this proceeding. We would appreciate the opportunity to reply once filings have been made by other parties.

Sincerely,

Doug Bingley  
President  
Ontario Association of Broadcasters