



Toronto, October 19, 2020

Via GC Key

Mr. Claude Doucet
Secretary General
**Canadian Radio-television
and Telecommunications Commission**
1 Promenade du Portage
Gatineau, Quebec
J8X 4B1

Re: Intervention – 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 – Broadcasting Notice of Consultation CRTC 2020-336

Dear Mr. Doucet;

Stingray Radio Inc. ("**Stingray**") is a member of the Canadian Association of Broadcasters (CAB) and supports the Association's application for emergency regulatory relief filed July 13, 2020.

Stingray, like most broadcasters, has been significantly impacted by the ongoing pandemic. Revenues between March and August 2020 declined by approximately 50% compared to the same period last year. While we have seen modest improvement in the early weeks of the 2020-2021 Broadcast Year, we remain significantly below our 2019-2020 revenues for the same period and do not expect to reach 2018-2019 revenue levels for so long as the pandemic continues to impact the communities our stations serve. Moreover, as we are currently in the second wave of the pandemic and provincial governments are once again closing businesses and asking Canadians to stay home. These circumstances create a significant level of uncertainty in predicting advertising revenues for the foreseeable future and could derail Stingray's recovery efforts.

Although Stingray received federal government emergency support, notably the Canada Emergency Wage Subsidy (CEWS), which provided material support and allowed us to retain most employees and maintain our operations across the country, we believe that the CAB's proposal for emergency relief is necessary to help Stingray manage the negative economic impacts of the first phase of the pandemic. As for the second wave of the pandemic, being in its early stages, it is hard to estimate the pressure it will exert on our business that will further challenge our recovery efforts as we work towards maintaining our quality programming to our listeners in markets small and large across the country.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Boyd".

Andrew Boyd
Vice-President, Finance
Stingray Radio Inc.

cc. Ian Lurie, President, Stingray Radio

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