



October 19, 2020

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

Dear Mr. Doucet:

Re: *Broadcasting Notice of Consultation CRTC 2020-336*

Cable Public Affairs Channel Inc. ("CPAC") has reviewed the application made by the Canadian Association of Broadcasters ("CAB") and the Commission's comments in the above-referenced public notice.

CPAC is in a different position than many other broadcasters. CPAC benefits from mandatory distribution as a basic service. CPAC is prohibited from broadcasting commercial messages other than sponsorship messages for closed captioning or described video. Accordingly, some of the compliance factors identified in the CAB application and in the CRTC's public notice are not directly applicable to CPAC.

Other compliance factors could, however, be relevant to CPAC, particularly in the future. CPAC's broadcasting and production activities were significantly disrupted by COVID-19, including as the result of the unprecedented changes made to the Parliamentary calendar and to Parliamentary operations. Despite this disruption, and the internal changes CPAC itself was required to make to its operations and programming production methods, CPAC continued to offer uninterrupted and comprehensive Parliamentary coverage including the House of Commons' very first virtual committee meeting on April 28th, all House of Commons and Senate proceedings related to COVID-19 measures, special House of Commons sittings that took place in July and August and 64 hours of live and virtual parliamentary committee hearings.

CPAC also provided many hours of other public affairs programming related directly to the COVID-19 pandemic and the response of Canada's federal, provincial and territorial governments. Between mid-March and the end of August,

THE CABLE PUBLIC AFFAIRS CHANNEL
LA CHAÎNE D'AFFAIRES PUBLIQUES PAR CÂBLE

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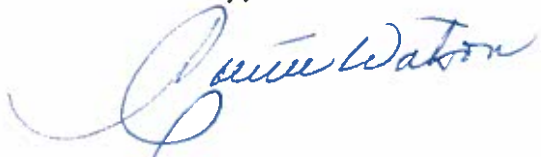
these represented 741 hours of live news conferences.

All of CPAC's programming is provided in both official languages, simultaneously and with closed captioning as required by our conditions of licence. CPAC has met its regulatory obligations for the 2019/2020 broadcast year and, we believe, provided an essential service for Canadians by providing access to Parliamentary programming and timely and in-depth access to federal, provincial and territorial pandemic updates, most often live.

No one knows what the future holds and whether circumstances could arise related to the pandemic that could have an impact on our future operations. We are, therefore, encouraged by the Commission's expressed intention to review compliance issues carefully, if they do arise, and to take into account the extremely challenging and unprecedented environment we face, and may in the future face, in performing our role in the broadcasting system.

We look forward to reviewing the other first round comments in this proceeding.

Yours truly,



Colette Watson
President & General Manager

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