

March 29, 2021

Mr. Claude Doucet  
Secretary General  
Canadian Radio-television and Telecommunications Commission (CRTC)  
Ottawa, Ontario  
K1A 0N2

## INTRODUCTION

1. Regarding Broadcasting Notice of Consultation 2020-374-1, the Indigenous Music Alliance submits its comments on *Broadcasting Notice of Consultation CRTC 2020-374 and 2020-374-1: Call for comments on the Commercial radio policy framework review*.
2. The Indigenous Music Alliance is a not-for-profit professional association for the development and promotion of Indigenous musical artists and entrepreneurs through advocacy, education, and event production. The Indigenous Music Alliance produces and presents the International Indigenous Music Summit.
3. We appreciate the opportunity to provide an Indigenous perspective on the questions raised during this proceeding.

## PREAMBLE

4. Indigenous peoples hold a unique and special place within Canadian society. As noted during the context of Broadcasting Proceeding 2019-217, *Co-development of a new Indigenous Broadcasting Policy*, “The Government of Canada is committed to renewing the relationship with Indigenous peoples, based on the recognition of rights, respect, co-operation and partnership. Engagement and consultation in the development of policies that may impact Indigenous peoples are integral components of the reconciliation agenda.”<sup>1</sup>
5. Section 35 of the *Constitution Act, 1982*, affirms the collective rights of distinctive Indigenous societies, flowing from their status as original peoples in Canada.<sup>2</sup> Section

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<sup>1</sup> CRTC, “Co-development of a new Indigenous Broadcasting Policy”, <https://crtc.gc.ca/eng/archive/2019/2019-217.htm>

<sup>2</sup> Government of Canada, Treaties & Agreements, <https://www.rcaanc-cirnac.gc.ca/eng/1100100028574/1529354437231>

35.1 also recognizes that the Government of Canada has a duty to consult and accommodate Indigenous groups on issues that might adversely impact potential or established Indigenous rights.<sup>3</sup>

6. It is important to recognize that Indigenous people have a special constitutional relationship with Canada, based on the recognition that “*all relations with Indigenous peoples need to be based on the recognition and implementation of their right to self-determination, including the inherent right of self-government.*”<sup>4</sup> Put simply, Indigenous peoples are not an equity seeking group - we are a sovereignty-affirming group, and as such, are entitled to targeted supports and policies within this framework.
7. As such, it follows naturally that Indigenous musicians and the Indigenous-owned music industry also hold a unique and special place within the Canadian broadcasting system, and that this special constitutional relationship should equally be reflected within the CRTC’s policies, including but not limited to the Commercial Radio Review.
8. Indigenous peoples are not an equity seeking group. We are a sovereignty-affirming group and as such, are entitled to targeted supports and policies that are equal to the targeted supports and policies offered to English and French Canada.
9. Throughout this proposal, we use the word industry because this industry infrastructure truly exists. APTN published the first-ever *National Indigenous Music Impact Study* in 2019. This study looked at the contributions made by the Indigenous music community and the impact these contributions have made on the Canadian economy, and social fabric of the country. In total, 620 industry insiders completed surveys, and 70 interviews were held to gain unique insights into the industry.
10. According to the *National Indigenous Music Impact Study* - which remains the only study of its kind in Canada to-date, Indigenous music contributed almost \$78 million in GDP to Canada’s economy in 2018, and accounted for more than 3,000 FTE across the country.<sup>5</sup> The study also recognized that the Indigenous-owned industry is currently facing many challenges, including being excluded from the rooms in which the most important decisions are made. We see this as a time to create important opportunities where unparalleled direction can take place to dismantle patterns of institutionalized exclusion.
11. Indigenous musicians have contributed greatly to the success of the Canadian music industry, both commercially and critically. The 2020 JUNO Awards featured 3 Indigenous award winners across a variety of categories - Tom Wilson (Contemporary Roots Album of the Year), iskwē (and director Sarah Legault) (Music Video of the Year), and Celeigh Cardinal (Indigenous Album of the Year). Indigenous artists also feature prominently among the nominees for the 2021 JUNO Awards: Leela Gilday, Terry Uyarak, Burnstick Julian Taylor and Crystal Shawanda in Indigenous Artist/Group of the Year, as well as additional nominees in the Contemporary Roots Album of the Year (Leela Gilday, Julian Taylor, William Prince), Breakthrough Album of the Year (Crown Lands) and Blues Album of the Year (Crystal Shawanda). Moreover, 4 of the last 6 Polaris Music Prize winners

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<sup>3</sup> *ibid*

<sup>4</sup> Department of Justice, “Principles respecting the Government of Canada’s relationship with Indigenous peoples”, <https://www.justice.gc.ca/eng/csj-sjc/principles-principes.html>

<sup>5</sup> APTN, *National Indigenous Music Impact Study*, <https://corporate.aptn.ca/musicstudy/>

are Indigenous: Jeremy Dutcher (2019), Lido Pimienta (2017), Buffy Sainte Marie (2015) and Tanya Tagaq (2014).

12. Despite this clear record of critical acclaim and success, it is also clear that there remains a disconnect when it comes to the representation of Indigenous artists and songs on commercial radio. An analysis of all-format airplay in Canada over the period of 2016-2020 shows that not a single Indigenous artist appeared within the Top 100.<sup>6</sup>
13. Despite the growth of the audio streaming market, radio remains an important consumption channel for Canadians. Data from the latest Communications Monitoring Report 2020 cites that in 2019, 84% of Canadians listened to traditional radio services in a given week, compared to 42% of Canadians who accessed an online streaming service in a given month.<sup>7</sup>
14. According to public opinion research commissioned by the CRTC, seven in ten Canadians report listening to commercial radio at least once on a weekly basis, which is the most of any broadcast platform.<sup>8</sup> Moreover, at least four in 10 Canadians listen on a daily basis.<sup>9</sup> Within this research, music was identified as the most important aspect of commercial radio for Canadians, followed by local news content.<sup>10</sup>
15. While Canadians appear to be generally satisfied with their listening experience on commercial radio, satisfaction falls when it comes to commercial radio's variety of programming, diversity of songs, genres and artists, promotion of Canadian content.<sup>11</sup> In fact, commercial radio's overreliance on popular music was identified as an issue by Canadians.<sup>12</sup>
16. Radio also remains the number one source for music discovery in Canada, according to research conducted by Nielsen via their *Canada 360 Music Report 2019*. According to that report, 66% percent of Canadian music listeners reported discovering new music via the radio compared to 43% via streaming services.<sup>13</sup>
17. Commercial radio is particularly important to a lot of Indigenous families because subscription-based streaming services like Spotify, Apple Music, and Amazon Music require credit cards and high speed Internet and cell phone data isn't affordable or isn't available. The existence of a "digital divide" in terms of Indigenous people's access to Internet services has been widely reported in the media. While 94% of Canadians have access to the internet at home, this falls to only 24% of households within Indigenous

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<sup>6</sup> Please see data submitted by Advance.

<sup>7</sup> Communications Monitoring Report 2020, CRTC, <https://crtc.gc.ca/pubs/cm2020-en.pdf>

<sup>8</sup> Attitudes and opinions towards commercial radio in Canada - Final Report, Ipsos Public Affairs for CRTC, <https://epe.lac-bac.gc.ca/100/200/301/pwgsc-tpsdc/por-ef/crtc/2021/090-19-e/POR090-19-Final-Report.html>

<sup>9</sup> *ibid*

<sup>10</sup> *ibid*

<sup>11</sup> *ibid*

<sup>12</sup> *ibid*

<sup>13</sup> Canada Music 360 2018: Report Highlights, Nielsen Canada, <https://www.nielsen.com/wp-content/uploads/sites/3/2019/04/canada-music-360-report.pdf>

- communities.<sup>14</sup> Beyond music, commercial radio has played an important role in keeping Indigenous communities connected, particularly during the COVID-19 pandemic.<sup>15</sup>
18. Public opinion research highlighted that Indigenous people were more likely to report that there was not enough commercial radio programming being offered in their preferred language.<sup>16</sup> Moreover, Indigenous respondents were also most likely to report lower levels of satisfaction with streaming services, further underscoring the importance of making radio more representative.<sup>17</sup>
  19. As the *National Indigenous Music Impact Study* recommends, it is clearly time to “consider ways to increase the percentage of Indigenous music on mainstream, Indigenous and satellite radio stations.”<sup>18</sup>
  20. Moreover, discovery is one of the most powerful tools we have in the fight against racism and discrimination in Canada, so it is imperative that Indigenous artists are featured alongside Canadian and international stars on commercial radio stations.
  21. With a music-specific lens, the *National Indigenous Music Impact Study* highlighted that two thirds of their interview respondents experienced challenges and barriers within their careers specifically related to their identity, including prejudice, ignorance, tokenism, stereotyping, colonialism and intergenerational trauma.<sup>19</sup> These challenges and barriers are in addition to industry-specific barriers such as access to funding and a lack of access to marketing and promotional activities.<sup>20</sup> As the report notes, “Indigenous artists in the music industry are facing specific barriers and challenges while also operating in an environment that has systemic barriers and challenges.”<sup>21</sup>
  22. In recognition of this reality, work has already begun to build a National Indigenous Music Office, based on the successful work of the Indigenous Screen Office. This is a work in progress led by an Advisory Council of Indigenous people, and this submission is an initial product of this critical work. The National Indigenous Music Office will officially be announced in June 2021 at the International Indigenous Music Summit.
  23. Indigenous-led organizations are integral to ensuring Indigenous sovereignty. In the film space, the Indigenous Screen Office was established in order to “support and develop Indigenous screen storytellers and Indigenous stories on screens as well as increase representation of Indigenous peoples throughout the screen industries.”<sup>22</sup> We believe that ensuring Indigenous people need to be centred within curatorial and decision-making spaces, and that this work can be driven through a National Indigenous Music Office which can play a role in supporting Indigenous sovereignty through storytelling.

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<sup>14</sup> Samuel Centre for Social Connectedness, Digital Equity for Indigenous Communities, <https://www.socialconnectedness.org/digital-equity-for-indigenous-communities/>

<sup>15</sup> CBC, Indigenous radio call-in show a 'bridge' keeping communities connected during pandemic, <https://www.cbc.ca/news/indigenous/manitoba-nci-radio-call-in-show-1.5944830>

<sup>16</sup> Ipsos Public Affairs for CRTC

<sup>17</sup> *ibid*

<sup>18</sup> APTN, *National Indigenous Music Impact Study*, <https://corporate.aptn.ca/musicstudy/>

<sup>19</sup> *ibid*

<sup>20</sup> *ibid*

<sup>21</sup> *ibid*

<sup>22</sup> Indigenous Screen Office website, <https://iso-bea.ca/about/>

24. We believe that once it is formalized, the National Indigenous Music Office will play a key role in fostering the success of Indigenous musicians, and the Indigenous-owned music industry in Canada. The structure, governance and role of this National Indigenous Music Office will be decided and led by Indigenous people, some preliminary functions may include: determining the specific supports needed to ensure that Indigenous artists and music is represented and supported within the commercial radio sector (and Broadcasting sector) by specific, targeted supports; the development of tools like an “authenticity stamp” to ensure and promote authentic Indigenous content creators; as well as the creation and management of the data and evidence that is still required to better understand and support Indigenous artists and music industry.

## MAPL

25. Originally adopted in 1971, the MAPL system was originally developed to “increase exposure of Canadian musical performers, lyricists and composers to Canadian audiences”, in addition to strengthening the Canadian music industry’s creative and production components.<sup>23</sup>
26. MAPL defines a Canadian musical selection for the purpose of the Canadian content regulations for radio according to four criteria: **music, artist, performance and lyrics.**<sup>24</sup> Two out of the four criteria must be fulfilled to qualify as a Canadian musical selection.
27. The MAPL system has served Canadian recording artists well for many years. It has built a bedrock for which much of the Canadian Music Industry stands upon today. It has helped provide a springboard for artists to compete on the airwaves in Canada, and as a result helped their businesses grow into ticket sales, t-shirts and in some cases, international success.
28. However, a lot has changed in the last 50 years. The creative process of writing, collaborating and recording has changed. The consumption of music by fans is vastly different. The representation of Canadian talent on the global stage has also grown immensely, with more Canadians working internationally than ever before. We have also changed as a society. We’re trying to be more compassionate, be better listeners, and to make more space for those previously excluded by our business. The creative process of writing, collaborating and recording has changed. The consumption of music by fans is vastly different.
29. We are supportive of the revised MAPL proposal put forward by the ADVANCE, CCMIA, CIMA, CIMA, MMF, MPC, and SAC submission. While a full explanation of the revised system’s rationale is explained in their submission, we have included this framework below.
30. In the CANCON/FAIR PLAY System, a composition would need 6 (six) points to qualify as CANCON/FP eligible.
- a. Artist/Band/Performer – (2 Points)\*

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<sup>23</sup> *The MAPL System*, CRTC website, [https://crtc.gc.ca/eng/info\\_sht/r1.htm](https://crtc.gc.ca/eng/info_sht/r1.htm)

<sup>24</sup> *Radio Regulations*, SOR/86-982 at section 2.2(2).

- b. Composition (up to 4 points). Based on CA writer in writing splits\*.
    - i. 1-25% - 1 Point
    - ii. 26%-50% - 2 Points
    - iii. 51% - 75% - 3 points
    - iv. 76% -99% – 4 Points
    - v. Note: **Any 100% Canadian-written composition auto-qualifies as CANCON/FP.**
  - c. Indigenous artist - (1 Point)
  - d. Visible Minority Canadian artist - (1 Point)
  - e. Woman artist - (1 Point) – (either 50% of band or lead vocal performance on track)
  - f. CA entity owns the master in Canada (can be artist) - (1 Point)
  - g. CA entity owns the publishing (can be writer) - (1 Point)
  - h. Canadian producer - (1 Point, 2 if Indigenous/Visible Minority or Woman)
  - i. Canadian engineer - (1 Point, 2 if Indigenous/Visible Minority or Woman)
  - j. 50% or more of recording (tracking) done in Canada - (1 Point)
31. \*Denotes a mandatory point. For any song to be deemed CANCON/FP either Point 1 OR at least 2 points from Point 2 must apply.
32. We believe that this is an important part of affirming Indigenous sovereignty. It is critical for the Indigenous music industry to hold the responsibility to define what is Indigenous in any revised MAPL system or otherwise. This is a task for the National Indigenous Music Office, who can work to develop a system that is appropriate and feasible to implement.

## INDIGENOUS QUOTAS FOR COMMERCIAL RADIO

33. Indigenous people have a special constitutional relationship with Canada, and this commitment should also be reflected within the CRTC's approach to quotas for Indigenous music on commercial radio.
34. Specifically, we note that the quotas developed for French-language music on commercial radio have been a success, and were implemented in order to “maintain a French-language presence on radio and provide exposure for francophone artists.”<sup>25</sup> We believe that a similar policy objective is necessary to better support Indigenous artists and the Indigenous-owned music sector in Canada.
35. As the CRTC is aware, the specific quota is contingent on the type of radio station, and the category of music the commercial station broadcasts.<sup>26</sup> Beyond the 35% Canadian content quota, French-language radio stations must devote at least 65% of their popular music broadcast on a weekly basis to French-language content, while commercial radio stations must ensure that at least 55% of the popular music broadcast between the hours of 6:00am and 6:00pm from Monday-Friday consist of French-language

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<sup>25</sup> CRTC, French-language music and Canadian content on radio, [https://crtc.gc.ca/eng/cancon/r\\_french.htm](https://crtc.gc.ca/eng/cancon/r_french.htm)

<sup>26</sup> *ibid*

selections. Moreover, at least 10% of all Special Interest music is devoted to Canadian selections.<sup>27</sup>

36. There is currently no mandated percentage of representation for Indigenous music to be aired or recognized within commercial radio entries as part of Canadian content. As highlighted in the *National Indigenous Music Impact Study*, there is a need to profile Indigenous artists within the mainstream, including commercial radio, as opposed to what the report describes “niche” appearances in Indigenous-only spaces.<sup>28</sup>
37. We believe that commercial radio stations should be required to meet a minimum quota on Indigenous airplay, and moreover, that this airplay needs to happen within peak listening hours, similar to the policies developed specific to the French-language market.
38. We are proposing that commercial FM radio stations include Indigenous music as part of their Canadian content.
39. We propose that adult contemporary, contemporary hit and country radio stations be regulated to ensure new Indigenous music (recorded within a one-year period) are included within playlists within 6:00am-12:00am (seven-days a week).
40. In terms of specific quotas, we propose the following over a four-year period: 3% of Indigenous content for two years, 4% for one year, and 5% after one more additional year.
41. The advantage of a strong quota system is that it helps with “star building” - something that the French-language music industry has done very successfully. It takes lots of plays and spins for an artist to generate the type of attention that builds a career, and a systemic, targeted approach to ensuring Indigenous representation in high and medium rotation cycles will undoubtedly assist with the discoverability and success of Indigenous artists within the mainstream framework.
42. A strong Indigenous presence on commercial radio - and during peak listening hours - is an important tool in the fight against racism and discrimination in Canada.
43. It has been suggested - erroneously - that there is not enough high-quality Indigenous music for commercial radio to play. We vehemently disagree with this assertion, and as noted elsewhere in this submission, Indigenous artists, albums, and songs have garnered significant critical acclaim across a number of genres by the mainstream industry, including the JUNO Awards and the Polaris Music Prize.
44. Moreover, we wish to recognize the growing professionalization of Indigenous music. Through programs like the Canada Council for the Arts’ Creating, Knowing and Sharing program and the Indigenous Music Development Program (Music Manitoba), the capacity of Indigenous artists to create and disseminate music that meets the requirements of commercial radio stations.
45. The existence of Indigenous stations like Canadian Indigenous Peoples’ Radio (Sirius XM channel 165), the Indigenous Music Countdown, and development of Indigenous radio stations like NCI FM, CFWE and others has had a positive impact on the entire ecosystem’s ability to grow, develop and reach new audiences.
46. The spillover effects from these development opportunities have been numerous. One key example is that the Indigenous Music Countdown is now recognized by FACTOR as

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<sup>27</sup> *ibid*

<sup>28</sup> APTN, *National Indigenous Music Impact Study*, <https://corporate.aptn.ca/musicstudy/>

a factor demonstrating success, and has thus played an important role in making Indigenous applicants more competitive within that funding stream.

47. When Jeremy Dutcher accepted the 2018 Polaris Music Prize, he said “Canada, you are in the midst of an Indigenous renaissance. Are you ready to hear the truths that need to be told? Are you ready to see the things that need to be seen?”<sup>29</sup> The *National Indigenous Music Impact Study* also highlights this sense of optimism and momentum, noting that the size and growth of the Indigenous music community has resulted in a “growing interest in listening to and following Indigenous artists”. We believe that there is clear and palpable momentum around Indigenous artists and music, and we believe that it is time for the CRTC to impose measures that would improve its visibility on commercial airwaves.
48. Notably, the CRTC’s recent publication of its “*What You Said*” Report from its ongoing consultations around the co-development of an Indigenous broadcasting policy also documents widespread support for quotas for Indigenous music. Participants in that consultation “felt strongly that if there was a requirement for a specific minimum percentage of Indigenous music to be aired by all radio broadcasters, this would vastly increase the changes for discoverability of their music.”<sup>30</sup>
49. It will also be important to be able to regularly measure the real impact of these quotas, and whether or not they are successful in increasing the proportion and frequency of Indigenous music on commercial airwaves. We propose that these quotas are reviewed every five years to ensure that they are continuing to meet the policy goals of increasing Indigenous representation on commercial radio.

## CANADIAN CONTENT DEVELOPMENT

50. Canadian content development (CCD) has played an integral role in supporting the music industry.
51. The goal of CCD, within the context of the *Broadcasting Act*, is to support the development and promotion of Canadian content. This funding supports the creation of new content and a wide variety of activities integral to the functioning of the sector, including showcases at music festivals, professional development and training, award shows, conferences as well as local, regional and national music initiatives.
52. In 2019, Canada’s radio broadcasters contributed a total of \$46 million in CCD contributions across all types of CCD.<sup>31</sup> Through basic contributions, over-and-above contributions and tangible benefits, CCD funding is allocated to important music industry organizations like FACTOR, Musicaction, Radio Starmaker Fund (Fonds Radiostar) as well as directly to national, provincial, and territorial music industry associations engaging in eligible activities. In short, this funding is significant to the music industry ecosystem.
53. Basic CCD contributions, which are tied to the broadcaster revenues, are expected to continue to steadily decrease. During broadcast year 2018-19 for example, the sector

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<sup>29</sup> *ibid*

<sup>30</sup> CRTC, “What You Said Report: CRTC Early Engagement Sessions, Phase One of the Co-Development of a New Indigenous Broadcasting Policy”, <https://crtc.gc.ca/eng/publications/reports/radp1/radp1.htm>

<sup>31</sup> Communications Monitoring Report 2020



accounted for \$1.4 billion in revenues in 2019, but experienced a slight 4% decline in revenues year-over-year.<sup>32</sup> As a result, we anticipate basic CCD contributions will decline as well. However, we would highlight that overall, the sector's profitability remains relatively strong, with the PBIT margin reported at 17.3%.

54. For their part, over-and-above and tangible benefit contributions are also anticipated to decline, due to the nature of the radio market (fewer new stations, fewer transactions in the marketplace).
55. We can acknowledge that COVID-19 has made an impact on the broadcasting sector, as well as most other sectors within the Canadian economy. Put simply, we have no doubt that Canada's broadcasters are suffering; and ultimately, the entire music industry ecosystem is suffering too.
56. As a sovereignty-affirming group, we believe that we are constitutionally entitled to an equal share of CCD contributions alongside Canada's other two founding peoples. At the same time, we also believe that collectively, we all benefit from a healthy music industry ecosystem. This collective, ecosystem-oriented approach builds on the same understanding of the treaties that our ancestors signed, and we believe that it can result in greatness for everyone.
57. We also believe that it is critically important to ensure that Indigenous artists, and the Indigenous-owned music industry, receives benefit from CCD contributions. We believe that commercial radio stations should be mandated to spend a portion of their contributions directly on Indigenous events, presentations and artists.
58. With that in mind, we are requesting that an additional 15% in CCD contributions be added to the existing FACTOR and Musicaction allocations to administer to the benefit of Indigenous artists and the Indigenous-owned music industry through the work of those existing music industry bodies.
59. We have also noted that a large portion of the current activities eligible for CCD discretionary contributions do not effectively serve the purpose of developing and promoting Canadian content. Jointly with our colleagues at Advance, we therefore propose that the 40% of the CCD basic contribution that is presently allocated to discretionary contributions be reduced to 10% percent and the remaining 30% be allocated towards a fund to support the development of female, Indigenous and visible minority artists. This fund would be jointly administered by FACTOR and Music Action in conjunction with the organizations (eg. Advance, Indigenous Music Alliance) which advocate for the underrepresented communities described above.
60. Moreover, we also propose that the National Indigenous Music Office should be deemed an eligible recipient of CCD funds. Similar to the role played by the Indigenous Screen Office, we believe that the National Indigenous Music Office will play a key role in advocating for Indigenous music, artists and the Indigenous music industry, and thus is well-positioned to use CCD to make critical investments into supporting, building and growing the Indigenous music community. This eligibility for CCD should also include the ability of broadcasters to utilize their discretionary funding to support the National Indigenous Music Office and/or Indigenous events, presentations and artists in communities across the country.

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<sup>32</sup> ibid

61. Moreover, a lack of access to data is a challenge for the Indigenous music community. Data is often expensive, or not collected at all. Support for the National Indigenous Music Office that includes investment into the ability to access the type of data that makes it possible to evaluate the success of policies serving the Indigenous community, including quotas.
62. This could include, for example, an investment into an Indigenous equivalent to DMDS, perhaps based on the success of the National Indigenous Music Countdown. Currently, all singles added to the Countdown live in an informal database that is easily accessible to broadcasters. As the CRTC has heard in its recent consultations with the Indigenous community, there is a need for a *“publicly-available online catalogue of Indigenous music, allowing mainstream radio to be aware of and thus have the ability to more readily select from the rich and diverse range of Indigenous music, artists and genres.”*<sup>33</sup>

## SUPPORTING INDIGENOUS BROADCASTING

63. We would like to also highlight the importance and success of Indigenous radio stations in promoting Indigenous talent. Stations like NCI FM and CFWE (among others) often provide Indigenous artists with feedback on their recordings (song length, structure, mixing, and mastering) along with introductions to tools like DMDS in an effort to increase representation on both community and commercial airwaves. Streetz FM also did an incredible job launching the careers of Indigenous hip hop acts like Winnipeg’s Most, but the station had a hard time convincing advertisers to look past stereotypes about Indigenous audiences and hip hop audiences and they were forced to switch formats after a little more than 4 years on the air.
64. Especially when compared to commercial radio at-large, Indigenous radio stations are under resourced. For example, Indigenous radio stations don’t have strong digital and/or social media teams, which makes it hard for them to compete for advertising clients.
65. It is also important to recognize how vital Indigenous radio stations are to the overall health of the Indigenous-owned music industry ecosystem, including artists. In many ways, these radio stations serve as catalysts for the further professionalization of Indigenous music, and can especially serve as a launchpad for emerging Indigenous talent. For example, an initiative like the long-running NCI Jam has served as a springboard for Indigenous talents like Leonard Sumner and the Indigenous Music Countdown, a chart now recognized by FACTOR, makes applications from Indigenous artists more competitive.
66. As the CRTC recently heard in its Phase 1 consultations on the co-development of an Indigenous Broadcasting Policy, Indigenous radio stations are often a springboard for success not just within the Indigenous community, but around the world.<sup>34</sup>
67. Indigenous radio stations, in many ways, are also often the first point of contact for Indigenous talent, and are more accessible because of their position of trusted voices of

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<sup>33</sup> CRTC, “What You Said Report: CRTC Early Engagement Sessions, Phase One of the Co-Development of a New Indigenous Broadcasting Policy”, <https://crtc.gc.ca/eng/publications/reports/radp1/radp1.htm>

<sup>34</sup> *ibid*

the community. With this in mind, we wish to recognize their role in the development and incubation of both creative talent and administrative talent within the Indigenous-owned music industry.

68. With this in mind, we also ask that the Commission consider greater support for Indigenous broadcasters.

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