

April 28, 2021

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

Re: Commercial radio policy framework review: ensuring Canadian creators not at risk of losing their livelihoods

Manitoba Music is a member-based, not-for-profit industry association based in Winnipeg, representing 700 members in all facets of the music industry. Through our programs and services, we nurture, develop and promote the growth and sustainability of the Manitoba music industry. Over the past 33 years, we have provided professional development and training for musicians and music companies, led export missions to markets around the world, promoted the local music scene at home, and provided unique Francophone and Indigenous music development programming.

The Manitoba music industry is comprised of artist entrepreneurs and SME music companies. Over the past two decades, the Manitoba music industry has evolved into a well-established local sector, with the growing entrepreneurial base contributing an increasingly significant portion of the industry's economic impact. Manitoba artists and companies are doing business across the globe and are recognized at home and abroad for their musical excellence, cultural diversity, and business savvy.

Manitoba Music is proud to have participated in the Commercial radio policy framework review through a joint submission along with our key industry stakeholders at Advance, Canadian Council of Music Industry Associations (including Alberta Music, Cultural Industries Ontario North, Manitoba Music, Music BC, Music Nova Scotia, Music NWT, Music PEI, Music Yukon, Music/Musique NB, MusicNL, MusicOntario, SaskMusic), Canadian Independent Music Association (CIMA), Indigenous Music Alliance, Music Managers Forum Canada, and the Songwriters Association of Canada. We also applaud submissions made by colleagues from across the music industry reflecting their unique perspectives, including submissions from Music Canada and ADISQ.

Commercial radio is clearly important to all stakeholders in Canada's music industry, including songwriters, publishers, artists, labels, and the teams around them. We wish to reiterate that it is critical that the commercial radio policy be updated in a number of ways.

First, as suggested in our joint proposal (CIMA et al.), a modernized version of MAPL to better reflect modern songwriting is necessary to better meet the goals of the Broadcasting Act. We believe that the proposal put forth in our initial joint submission with our music industry colleagues is a stronger solution.

Second, we vehemently disagree with CAB's assertion that fewer regulatory obligations for radio will result in better outcomes. Maintaining the 35% Canadian content exhibition requirement is critical and any reduction in exhibition requirements would have a significant (and direct) negative impact on the royalties received by songwriters and music publishers and on the discoverability of Canadian songs and artists by the public.

Third, we believe that listeners deserve to hear a diversity of voices on Canadian radio, and that Canada talent should be able to be discoverable through radio play. We support the programming of emerging artists, regional artists, and artists from equity seeking groups.

Finally, there should be no reduction in Canadian content development obligations from commercial broadcasters. While we believe that there are changes that should be made to discretionary allocations (as noted in our joint submission), CCD funding has and can continue to make a significant contribution to the development of Canadian artists. We do not believe that reductions in CCD contributions from broadcasters are warranted at this time and that the current formula for calculating CCD allows for sufficient flexibility to account for financial fluctuations.

As the Commission considers the submissions received throughout this process, we urge the Commission to consider the key role that radio plays for Canada's music industry, including its creator community and MPC members. If there is an opportunity to appear before the CRTC to elaborate on parts of our submission, we would appreciate the opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sean', with a long horizontal flourish extending to the right.

Sean McManus
Executive Director