



April 28, 2021

Mr. Claude Doucet
Secretary General

Canadian Radio-television and Telecommunications Commission (CRTC) Ottawa, Ontario
K1A 0N2

Dear Mr. Doucet,

Cultural Industries Ontario North is a not-for-profit organization that supports the advancement of the media arts industries of Northern Ontario. Since 2012, CION has provided direct promotional and development support to hundreds of music industry professionals and stakeholders (including performers, events, venues, vendors, and production/technical support businesses).

Cultural Industries Ontario North 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, 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.

As highlighted in our submission, for every dollar in royalties collected on commercial radio in 2020 by SOCAN, 36.7 cents goes to SOCAN's songwriter and composer members, the majority of whom are Canadian creators. Commercial radio is clearly important to all stakeholders in Canada's music industry, but most certainly, the situation is critical to Canada's songwriter and music publisher community. 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 from SOCAN by songwriters and music publishers.



Finally, there should be no reduction in Canadian content development obligations from commercial broadcasters. While we believe that there are some structural changes that could be made to discretionary allocations (as noted in our joint submission), we do not believe that reductions in CCD contributions from broadcasters are warranted at this time. Moreover, the current formula for calculating CCD already 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.

Thank you for your time and consideration.

Patrick O'Hearn

A handwritten signature in black ink, appearing to read "Po'rh".

Associate Managing Director
Cultural Industries Ontario North