

SASKOMUSIC

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April 28, 2021

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

Re: Commercial Radio Policy Framework Review

SaskMusic is a member-based non-profit association representing the approximately 2000 musicians and music industry workers in the province of Saskatchewan. We stimulate growth and development in the commercial music industry of Saskatchewan through leadership, promotion, training, advocacy and partnership. We offer programming including artist consultations, workshops, marketing, export assistance, networking opportunities and more, and represent the four components of our industry: creative, interpretive, technical and administrative. Our artists and music professionals hail from across our province, and work in a wide spectrum of genres. We serve as a source of information and resources for both the public, and the music industry.

SaskMusic is proud to have participated in the Commercial Radio Policy Framework Review through a joint submission 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.

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 reiterate that it is critical that the commercial radio policy be updated in several areas.

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.

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This project has been made possible in part by the Government of Canada. Ce projet a été rendu possible en partie grâce au gouvernement du Canada.

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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.

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,



Michael Dawson

Executive Director, SaskMusic