

August 5, 2022

***Filed via Intervention/Comment/Answer Form***

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

Dear Mr. Doucet:

***RE: Broadcasting Notice of Consultation CRTC 2022-182, Call for comments regarding the change to the treatment of stock footage costs as part of the Canadian program certification***

**Introduction**

1. The Canadian Media Producers Association (CMPA) is pleased to provide the following comments with respect to Broadcasting Notice of Consultation CRTC 2022-182, *Call for comments regarding the change to the treatment of stock footage costs as part of the Canadian program certification* (BNC 2022-182).
2. The CMPA has reviewed the public notice and consulted with our members.
3. In response to BNC 2022-182, the CMPA submits that:
  - We are fully supportive of the proposed changes; and
  - We have no concerns about the proposed implementation.
4. The CMPA supported the Canadian Audio-Visual Certification Office's (CAVCO) initiative to implement the same proposed modifications (Public Notice 2022-02).
5. In particular, the CMPA agrees with the CAVCO's conclusion at the end of that process. Producers have repeatedly argued that documentary productions are unfairly disadvantaged by the categorization of stock footage as "services" costs.

Documentaries, and some other types of productions, often need to use non-Canadian stock footage, either because of the subject of the production or because of the more limited availability of stock footage from Canadian sources.

6. The CMPA appreciates the opportunity to share these comments regarding the change to the treatment of stock footage costs as part of the process for Canadian program certification.
7. We look forward to communicating the change to members as soon as it comes into effect, and hope that it can be undertaken as quickly as possible.
8. Should the Commission require any additional information regarding this intervention, please do not hesitate to contact me directly.

Sincerely,

*[Filed Electronically]*

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