



NCRA-ANREC  
325 Dalhousie, Suite 230  
Ottawa, Ontario, K1N 7G2

May 19, 2010

Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, ON K1A 0N2

Dear Mr. Morin:

**Re: CRTC 2009-661 Review of community television policy framework**

1. I am writing on behalf of the National Campus and Community Radio Association/ l'Association nationale des radios étudiantes et communautaires (NCRA/Anrec). We are a not-for-profit group of organizations and individuals committed to volunteer-driven, non-profit community-oriented radio across Canada. Our goals are to ensure stability and support for individual stations and to promote the long-term growth and effectiveness of the sector. We represent 77 not-for-profit member radio stations in nine provinces and three territories.
2. First, we would like to address the Canadian Broadcast Standards Council proposal that all community broadcasters should fall under the existing CBSC standards.
3. Although we cannot speak for community television, we wish to reiterate that pursuant to PN CRTC 1988-159: *The Canadian Broadcast Standards Council*, the CBSC was developed by and for CAB members, with CAB members in mind, and their procedures and codes were intended specifically to serve the commercial radio industry. On this basis, we believe it would be unreasonable to presume that the CBSC serves the needs and interests of the community radio or community television sectors well enough to be granted sole responsibility for the development, administration, adjudication, and enforcement of standards to which those sectors are subject.

4. The campus-community radio sector, and possibly also the community television sector, may agree that standards similar to those of the CBSC are appropriate in certain areas. However, we believe it is vital to allow each sector to develop their own standards and assume greater responsibility for their own operations according to the guidelines provided in PN CRTC 1988-13: *Guidelines for Developing Industry-Administered Standards*. Even if the standards each sector develops are similar, the process of developing those standards based on each sector's own values, interests and goals is of utmost importance in terms of ensuring sector-wide accountability, ownership, and voluntary adherence.
5. We refer the Commission to our January 18, 2010 submission entitled "NCRA/ANREC Code of Practice: Supplementary Brief" for more detail on this issue.
6. Second, and further to our previous written and verbal comments in this proceeding, we would like to remind the Commission that some form of stable operational funding is important to ensuring the continued growth and effectiveness of all Canadian community media, including both community radio and community television.
7. Third, we have noted on many occasions that the media landscape is one in which broadcasting technologies are evolving and converging. As a result of this and the introduction of new media broadcasting technologies, the initiatives and services of community television and community radio are increasingly connected. Changes to the policies affecting one sector are likely to have a significant impact on the other. Therefore, we request that the Commission include the NCRA/Anrec in all discussions of these issues going forward.
8. Thank you for your attention to our concerns.

Sincerely,

A handwritten signature in black ink that reads "Freya Zaltz". The signature is written in a cursive, flowing style.

Freya Zaltz  
Regulatory Affairs Director  
NCRA/ANREC