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Feb 21, 2016

Danielle May-Cuconato, Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario, K1A 0N2

Re.: Broadcasting Notice of Consultation CRTC 2015-421-4

A review of the policy framework for local and community television programming: final observations

Dear Secretary General,

1. We are writing on behalf of the National Campus and Community Radio Association/L'Association nationale des radios étudiantes et communautaires ("NCRA/ANREC"), which is a not for profit national association working to recognize, support and encourage not for profit, volunteer based, public access campus and community based ("c/c radio") broadcasters in Canada. We currently represent 95 not-for-profit member radio stations. We provide advice and advocacy for individual stations, and conduct lobbying and policy development initiatives with a view to advancing the role and increasing the effectiveness of our sector.
2. At the recent Community TV hearings, the Commission asked us how we define effectiveness in our sector, as well as for examples of best practices and trends for community media. We want elaborate on these answers here, and link back to some

ongoing research happening in our sector that the CRTC might find useful as it considers how best to fund the Community TV sector.

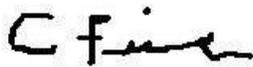
3. First of all, the Community Radio Fund of Canada (“CRFC”) has completed an extensive research study on community radio in Canada, using both quantitative and qualitative methods to gather information (“Study on Campus and Community Radio in Canada: Trends, Perspective, Impacts and Contribution of the Industry 2014-2015”). If the Commission does not have access to the report, we recommend asking the CRFC for it. It provides detailed statistical research including insight into the impact and number of people who participate in news production in c/c radio.
4. Additionally, University of Ottawa researcher [Dr. Genevieve Bonin](#) is in the process of looking at funding and how it impacts community radio. Her study may be relevant to information around funding sources and non-profit management of stations. Although incomplete as of February 2016, her expertise may be beneficial.
5. Finally, the Commission may find useful the community media recommendations contained in the International Seminar on Community Media Sustainability: Strengthening Policies and Funding Report, found below, http://www.unesco.org/new/fileadmin/MULTIMEDIA/HQ/CI/CI/pdf/news/community_media_sustainability_recommendations_en.pdf.
6. Expanding on the question of qualitative research on station success, the NCRA/ANREC uses a combination of surveys, in-person meetings at our annual conference and feedback forms to determine the success of specific projects or parts of the sector. Historically, much of the research used to assess success is academic research: stations typically do not attempt to gather information in this fashion unless they are assessing a specific portion of the work they are doing. For example a member station may poll the local community to see who is listening, send out surveys to its members and listeners asking for feedback about broadcast programming and practices, and follow-up with organizations which the station has worked with for various local projects or events to gather feedback which the board of directors or sub-committees of the board would use to assess success.
7. Relating to governance, c/c radio stations are all community owned, self-governing organizations (not-for-profit incorporated corporations, co-operatives, or societies). We recognize the challenges for television due to the additional training, technical requirements and production time needed in order to produce content and why historically there have been “community” television licences held and produced for by for-profit corporations. However, we believe that our sector’s success in self-governance (with the support of strong association networks and funding bodies) suggest that television stations can be successful as independent community owned organizations as well. Statistically speaking, there are 170,000 non-profits or charities in Canada which

employ over 2 million Canadians (or close to 10% of the total work force), producing 8.1 % of Canada's GDP ([SectorSource.ca](#)). The c/c radio sector has approximately 15,000 volunteers, which makes up 90% of human resources (CRFC). The fact that [CRTC Statistics](#) show an annual growth of c/c radio stations of around 5% demonstrates that a non-profit model can be successful at the community media level when financial support is available.

8. With respect to news broadcasting, we note that local news is sourced at multiple levels and mediums within the Canadian sector. There are often circumstances where communities only have access to one of the three local news sourcing systems (television, radio and print). The CRFC report states that 675 people (55 Freelancers, 60 full-time, 30 part-time and 530 volunteers) make up the news mobilization at the c/c radio level. Any pooled funding must take into account the ability of a community to serve its listeners based on size and media outlets available. We recognise that the Commission does not regulate print, but we encourage the Commission to explore opportunities to support radio and television news at a community level to serve the communities they represent without being forced to dedicate Canadian Content Development funding from the CRFC to news gathering if individuals stations confirm the need for local news programming is required.
9. With respect to the comments made about access funding and local viewership regions, the NCRA/ANREC notes that c/c stations in many small communities don't have the resources to produce important, locally relevant content on all topics themselves, and sometimes source content from other c/c stations through our Community Program Exchange. This includes social justice, political coverage, and sports broadcasting content (such as coverage of away games). For example, WINGS: Women's International News Gathering Service, is one of many programs that features special programming that is produced and distributed at a national/international level which would not have the funding or programming opportunities if it was done at a local level. We believe this points to a broader need in community media for shared platforms of this sort, and that an association or organization whose goal to provide out of market but still "locally relevant" programming may be an important key to serving underrepresented communities of television viewers as it is in c/c radio.
10. Finally, NCRA has monitored the discussion around the potential for a community television/media funding proposal in support of sustainably provide support for the production and delivery of local news to the Canadian public. To this end, should the Commission decide to establish such a funding mechanism or, as a first step, wishes to set up a pilot project to assess the funding mechanism feasibility, NCRA recommends that the Commission uses the CRFC as the best vehicle to collect, administer and redirect the funding to the eligible entities of such funding.

11. As an now established fund recognized both by the CRTC and community sector, the CRFC is in strong position to assist the CRTC in a trial of any potential funding setup around the 2015-421 reviews. The CRFC has been an important benefit to community radio, managing 3 million dollars this year in grants to non-profit organizations. The fund runs out of a central location in Ottawa (which is accessible) and can accommodate additional staff in the office. The organization has experience in community work. Accordingly, the CRFC has the credibility, the ability and the knowhow and is therefore well positioned to facilitate a pilot project of this nature. Additional administrative expenses would be required to higher staff dedicated to the Community Television and/or Local News funding, in order to make sure there is no cross over and expertise in the system is utilized. That said, such an approach would be more cost efficient than having to set up a new community television/media fund. This in turn would ensure maximizing limited funding resources towards local news content creation and distribution to the benefit of the Canadian public, thus serving the public interest.
12. We hope our comments and additional resources here assist the Commission in making decisions regarding the Community Television Policy and news broadcasting.

Sincerely,



Catherine Fisher
NCRA/ANREC External Policy Committee



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Regulatory Affairs Director
NCRA/ANREC Advisory Board



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