



NCRA/ANREC
180 Metcalfe St,
Suite 608
Ottawa, ON, K2P 1P5

October 30, 2017

Scott Hutton
Acting Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, ON, K1A 0N2

Dear Secretary General:

Re: Broadcasting Application #2017-0887-7 (CIRR-FM), possible interference with CFBU-FM

1. I am writing on behalf of the National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires ("NCRA/ANREC") in support of Brock University Student Radio CFBU-FM, 103.7 FM in St. Catharines, ON regarding potential interference with their protected contours if the technical amendment application #2017-0887-7 by CIRR-FM is approved.
2. The NCRA/ANREC is a not-for-profit national association working to recognize, support, and encourage volunteer-based, non-profit, public-access campus and community-based broadcasters in Canada. We provide advice and advocacy for individual campus and community ("c/c") stations, and conduct lobbying and policy development initiatives with a view to advancing the role and increasing the effectiveness of our sector. Our goals are to ensure stability and support for individual stations, and to promote the long-term growth and effectiveness of the sector. We currently represent 108 not-for-profit member radio stations including CFBU-FM.

3. CFBU-FM is a campus-based community radio station located at Brock University in St. Catharines, ON. The station has been an important part of the region for 20 years. Its goals are:
 - a. *To operate a community-based campus radio station, committed to broadcasting intellectual, articulate and entertaining spoken word and music programming, which serves as a distinct alternative to commercial radio.*
 - b. *To provide an autonomous media source for news and information, free from government and corporate influence.*
 - c. *To provide a voice for under-represented groups from the Brock community as a whole, and from the community at large.*
 - d. *To encourage acceptance and understanding of ethnic diversity and marginalized groups..*
4. CFBU-FM is the only community radio station in St. Catharines and the surrounding region. Our understanding is that the application by CIRR-FM in Toronto for a power increase and change of frequency to 103.7FM which is short-spaced to co-channel with CFBU-FM, would cause interference with the protected contours of CFBU-FM without their permission. We do not know the extent of the potential interference and we are relying on CFBU-FM's own assessment of the likely impact of those applications on their signal. In our opinion, any technical amendment by another stations that would decrease the quality or range of CBFU-FM's signal would detract from CFBU-FM's ability to fulfill its campus/community mandate and serve the community at large.
5. We are told that CIRR-FM did not notify CFBU-FM as a respondent to its technical amendment application to the Commission, nor have they reached an agreement with CFBU-FM regarding the possible signal interference. CIRR-FM did provide notification to CFBU-FM on September 18, 2017 that comments could be submitted to Innovation, Science and Economic Development Canada (ISED). We are also told that CFBU-FM submitted an objection to ISED regarding CIRR-FM's application. Since CFBU-FM is a class A1 protected station broadcasting at 250 watts, our understanding is that their permission is needed before ISED can approve applications that will affect their protected contours.
6. We take no position on the merits of the application by CIRR-FM and our objection solely relates to any interference it may cause to CFBU-FM.
7. We encourage the CRTC to recognise and support the important work of the community radio sector, as the third pillar of the Canadian broadcasting sector, by denying the application unless it is clear that it will not affect CFBU-FM's protected contours.

Sincerely,



Barry Rooke
NCRA/ANREC External Policy Committee

cc: CFBU-FM, CIRRR-FM

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