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November 20, 2014

John Traversy
Secretary General
Canadian Radio-television
and Telecommunications Commission
Ottawa, Ontario, K1A 0N2

Secretary General:

**Re: Broadcasting Notice of Consultation 2014-541
Peach City Community Radio Society, Application #2014-0800-8**

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 the application by the Peach City Community Radio Society (PCCRS) for a broadcasting licence to operate a low-power English-language community FM radio station in Penticton, British Columbia.

2. 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 for the sector 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 more than 85 not-for-profit member radio stations.

3. Penticton is a vibrant city of approximately 32,000 people, located in the Okanagan Valley in the Southern Interior of British Columbia between Okanagan and Skaha Lakes, about 65km from Kelowna. There are approximately 49,000 people living in the greater Penticton area who benefit from the city's services and activities. Penticton is a popular outdoor recreation destination, featuring opportunities for skiing, boating, fishing, cycling, hiking, amongst other sports, as well as wine tourism with 88 nearby wineries. It has an active arts community, and is home to numerous parks, trails, and public spaces, as well as a junior "A"

ice hockey team. It is also the location of a popular annual triathlon called Challenge Penticton (formerly Ironman).

4. If PCCRS's application is approved by the Commission, Penticton would be the first city in the Okanagan Valley, home to approximately 340,000 people, to have a licenced campus or community radio station. It would also be the first new station licenced to serve Penticton since 1981, despite the city's 40 percent population growth during that period. We think the service proposed by PCCRS would make a valuable contribution to Penticton, and set a positive example for other communities in the Okanagan Valley that may be interested in establishing their own community radio stations.

5. Since its inception in 2010, PCCRS has put considerable effort into its organizational development, and has created a wide range of policies, procedures and committees through which volunteers can participate in decision-making. For example, PCCRS has active community support, finance, programming, promotions, and technical committees. Much of this development work has been done with input on best practices from other NCRA/ANREC member stations. From our perspective, this work creates a solid base that will enable the station to fulfill its mandate once it begins FM broadcasting.

6. PCCRS has also been very diligent in developing relationships and consulting with a broad range of community members and organizations, and developing transparent decision-making processes. When drafting its constitution in 2010, PCCRS held open public meetings with input from more than 50 people. It has been steadily developing awareness in the community by partnering with local organizations, setting up tables at local events and festivals, producing a weekly newsletter, issuing news releases, and advertising regular training sessions.

7. Through this work, the station has generated significant support from local individuals, with hundreds expressing interest in joining the society and producing programming. PCCRS has also received strong support from community leaders and organizations, including the Downtown Penticton Association and Chamber of Commerce, as well as Penticton's Mayor and Member of Parliament who agree that the station will make a valuable contribution to the community. Mayor Garry Litke expressed his appreciation for PCCRS's intention to "bring...Penticton area residents a deeper awareness of local events and issues while valuating the diversities within our communities by providing strong community coverage and promotion of our businesses, groups and organizations that help build a vibrant community." MP Dan Albas observed that the station is "productive, inclusive and organized."

8. We believe PCCRS has set reasonable goals with respect to generating revenue from a variety of sources, including advertising, fundraising, grants, and membership sales. It has successfully developed a donor incentive program whereby donors receive a Friends of Peach City Radio card that provides discounts to at least 19 local businesses. For the past three years, PCCRS has also been organizing the Annual Okanagan Vinyl Fest, where vendors from across the province sell new and used music, with all proceeds allocated to establishing the station.

9. PCCRS has successfully completed two temporary broadcast periods, and has been broadcasting and podcasting on the internet since September 2013. Its internet broadcast can be heard 24 hours per day, 7 days per week and includes content produced by PCCRS volunteers and syndicated from other NCRA/ANREC member stations. All on-air volunteers receive training that includes information about CRTC policies and regulatory requirements,

and PCCRS has produced a Radio 101 guide that is required reading for all current and future programmers. The guide includes an overview of the relationship between community radio stations in Canada, and the sector's relationship with the Commission. The content is based on resources provided by the NCRA/ANREC, as well as programming guides that PCCRS obtained from other successful NCRA/ANREC member stations.

10. The station's programming currently features local live music (both in-studio and in local performance venues), unique recorded music written by local artists, local authors and speakers, radio dramas, and documentaries about local issues. The station's high quality programming has already been recognized by the campus and community radio sector through honourable mentions in two categories at the 2013 NCRA/ANREC programming awards. If its licence application is approved, PCCRS intends to continue and expand on the programming it currently offers. This includes developing programming to serve the 700 francophone speakers in Penticton (according to 2011 census data).

11. There are two additional areas in which we are told that PCCRS has future plans to develop programming. The first area is programming to serve the Syilx First Nation and the Penticton Indian Reserve, including speakers of the Nsyilxcen language. This population comprises 3.2 percent of the total in Penticton and surrounding area (based on 2011 census data), and it is not currently served by any other broadcaster. Since the station's proposed contours will reach most or all of the Penticton Indian Reserve, PCCRS has recognized that fostering a relationship with these community members is very important. PCCRS has begun the process by producing the first program in a series with members of the Syilx nation. This initiative was part of the NCRA's Resonating Reconciliation program, which used community radio as a tool to explore the legacy of Indian Residential Schools. PCCRS hopes to continue this work in future.

12. The second area is programming to serve local residents who speak third languages like German, Punjabi, Portuguese, and Spanish, including Penticton's visible minority population of 6% (according to 2006 census data). To that end, the station has already developed a latino program that features Spanish music by Canadian artists, and hopes to connect with others in these communities as people become more aware of the opportunities the station will offer.

13. We believe citizens, businesses, and organizations in Penticton have confirmed their support for a community radio station that will feature their voices and reflect their interests and perspectives. The work done by PCCRS has laid the foundation for a community station that will fulfill the mandate set out in CRTC 2010-499, and we encourage the Commission to approve the application.

Sincerely,



Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC Advisory Board

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