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June 28, 2017

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

Secretary General,

Re.: Telecom Notice of Consultation CRTC 2017-112
Development of the Commission's Broadband Funding Regime

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 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. We currently represent 101 not-for-profit radio stations.
2. Our comments reflect our interest in supporting stations in our sector, and we have therefore limited our comments to the topic of **Eligibility criteria**, specifically **Appendix 2, TNC CRTC 2017-112, Eligible geographic areas: Q 20: Should the Commission consider other criteria for identifying eligible/ineligible geographic areas?** In brief, we wish to provide the Commission with information about some specific challenges

faced by c/c stations located in OLM and indigenous communities and how improved broadband access could help to mitigate those challenges.

3. The NCRA/ANREC currently has seven Official Language Minority (OLM) and two bilingually-licensed members. These stations “provide spoken word programming that reflects the perspectives and concerns of diverse cultural groups, including official language minority communities” (2010-499 para. 18). They also serve their communities in a variety of other ways, including filling gaps in media availability in OLM locations, and providing educational and community-building opportunities. In addition to having limited OLM media options, many of the communities served by our OLM members also have limited access to broadband internet, which affects their abilities to fulfill their mandates as set out in the Broadcasting Act and the CRTC’s Campus and Community Radio Policy, and for the community itself to access local media sources.
4. Additionally, the NCRA/ANREC has member stations that serve primarily indigenous communities that have limited access to broadband Internet. Often indigenous stations provide a focal point for a community’s language revitalization efforts, educational and community-building strategies, and communication of local or regional stories. Improved access to broadband could help these stations better meet the needs of their communities and continue to adhere to the [CRTC Native Broadcasting Policy](#)¹.
5. The NCRA/ANREC believes that OLM and indigenous communities need access to broadband internet in order to access online resources that are otherwise not available . For example, many Canadian musicians now upload their content to websites such as SoundCloud instead of distributing it via physical formats, and access to reliable broadband is required to broadcast these artists. Access to online news sources, including audio and video files, can also be used as resources by OLM and indigenous stations in the development of their own local news and public affairs coverage. Access to broadband would also allow OLM and indigenous stations to ensure that their online streams are available for listeners who are nearby but outside their broadcast range, or who cannot receive the station’s signal due to interference issues.
6. Historically speaking, OLM communities face “major challenge[s] for health and social service agencies, educators, policy planners, and researchers” ([Li, et Al. 2001](#)²). We also note that section 41 of the Official Languages Act stipulates that every federal institution has a duty to enhance the vitality of the English and French linguistic minority communities in Canada, to support and assist their development and to foster the full

¹ <http://www.crtc.gc.ca/eng/archive/1990/Pb90-89.htm>

² Li RM, McCardle P, Clark RL, Kinsella K, and Berch D, eds.. *Diverse Voices - The Inclusion of Language-Minority Populations in National Studies: Challenges and Opportunities*. National Institute on Aging and National Institute of Child Health and Human Development 2001. https://www.nichd.nih.gov/publications/pubs/documents/Diverse_Voices.pdf

recognition and use of both English and French in Canadian society.

7. NCRA/ANREC staff attended [the Future of First Nations, Inuit, and Métis Broadcasting national conference](#)³ held in Ottawa June 15-17, 2017, and heard delegates discuss the role of indigenous radio and programming within the Canadian landscape, including: the [role of indigenous media](#)⁴, a perceived lack of support from Government, difficulties [individual broadcasters have in developing stories that are local and relevant](#)⁵ with scarce resources, and difficulty broadcasters have [accessing communication tools](#)⁶. Prioritizing access to broadband internet by indigenous communities, who are already greatly underserved by this resource, will aid in addressing some of the challenges identified by conference delegates.
8. An example of a OLM community station that could benefit from priority access to broadband internet is NCRA/ANREC member CFTH-FM in Harrington Harbour, PQ. The station broadcasts to a mostly (95%) English-speaking population within the municipality,, and their broadcasting signal also extends to five remote, fly-in only English-language speaking communities. Broadband access in these communities could allow their isolated populations to communicate more effectively with each other and serve as a unifying force in the community. For example, with broadband access the station could use Skype or other video services to foster discussions between members of different communities, provide live-to-air broadcasts of special events (currently cost prohibitive, as they require an ISDN line), and share audio files over distance, thereby allowing members of the five remote communities to produce audio to be broadcast by the station. Also, the cost of technology is greatly reduced by broadband access, which eliminates the need for a ISDN line, helping remote stations like CFTH-FM provide better service to their communities.
9. CHYF-FM is also an NCRA/ANREC member, and broadcasts from the Ojibwe Cultural Foundation in M'Chigeeng, Mnidoo Mnising (Manitoulin Island, ON) in Anishinaabemowin (Ojibwe/Odawa), located within the bay surrounded by the North Channel of Lake Huron. Within the six First Nation communities under the tribal council of United Chiefs and Councils of Mnidoo Mnising, there are only a handful of elders who speak the Anishinaabemowin language. Access to broadband will help develop the community's ability to teach remotely, archive language discussions, and support increased use of the language though sharing of information, files, and stories in digital format across geographical distances.

³ <http://www.indigenousradio.ca/>

⁴ Arce, Fernando. On The Role of Indigenous Media. Intercontinental Cry Website. November 7, 2016. <https://intercontinentalcry.org/role-indigenous-media/>

⁵ Hamilton, Wawmeesh. n First Nations, freedom of the press is unclear. December 1, 2016. <http://policyoptions.irpp.org/magazines/december-2016/in-first-nations-freedom-of-the-press-is-unclear/>

⁶ Sakolsky, Ron & Stephen Dunifer. Seizing the Airwaves. AKPress. 1998 https://monoskop.org/images/d/d2/Sakolsky_Ron_Dunifer_Stephen_edds_Seizing_the_Airwaves_A_Free_Radio_Handbook.pdf

10. When internet service providers (ISP's) apply to the broadband funding regime for funds to increase their broadband capacity, the NCRA/ANREC believes it is important for ISP's to take into account the specific challenges and context faced by OLM and indigenous communities. We therefore encourage the CRTC to direct the new broadband funding regime to include amongst its priorities funding in areas where OLM and indigenous communities are located. This would acknowledge the long-standing disadvantage of those communities, and to allow for enhanced access to information and telecommunication opportunities that strengthen education, news sharing and media awareness in underrepresented communities.

11. The NCRA/ANREC supports the efforts of CRTC to establish a broadband funding mechanism, and encourages the CRTC to make sure there are policy in place to aid in meeting the mandates of Broadcasting Act, the CRTC's Campus and Community Radio Policy, the CRTC's Native Broadcasting Policy and The Official Languages Act of Canada.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barry Rooke', with the year '2017' written below it.

Barry Rooke
Executive Director
NCRA/ANREC

A handwritten signature in black ink, appearing to read 'Catherine Fisher'.

Catherine Fisher
NCRA/ANREC External Policy Committee

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