



CRTC
Diane Rhéaume, Secretary General of the Commission
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August 25, 2005

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RE: Broadcasting Public Notice CRTC 2005-74
Call for comments on a request by the Canadian Cable Telecommunications Association to repeal section 22 of the *Broadcasting Distribution Regulations*

Dear Secretary General,

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Coordonatrice nationale
Melissa Kaestner

Board of Directors
Conseil d'administration

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1. The National Campus and Community Radio Association (“NCRA/ANREC”) is pleased to respond to the call for comments contained within Public Notice CRTC 2005-74. These comments were developed through consultations with campus and community broadcasters across the country, including both small and large market stations.
2. The NCRA/ANREC is the not-for-profit national association of organizations and individuals committed to volunteer-based, community-oriented radio broadcasting. We are dedicated to advancing the role and increasing the effectiveness of campus and community radio in Canada. We work closely with other regional, national, and international radio organizations to: provide developmental materials and networking services to our members, represent the interests of the sector to government and other agencies, and promote public awareness and appreciation for community-oriented radio in Canada.
3. The NCRA/ANREC respectfully requests that the Commission maintain section 22 of the *Broadcasting Distribution Regulations* in its current form, and reject the Canadian Cable Telecommunications Association (CCTA)’s proposal to repeal this section.
4. The elimination of local radio broadcasters from cable FM will have an adverse affect on campus, community, Native, French-language, developmental and instructional radio stations. Should the request of the CCTA be approved, some stations would cease to broadcast. While many of these stations broadcast on both over-the-air FM and on cable FM, there a number of stations broadcasting **only** on cable FM (please see Appendix I for a detailed list).
5. The Commission has stated:
“Nobody wants to lose a station. That’s not why we are here. We are here to keep everybody healthy and wealthy and wise, if we can . . . We all know the box you are in. Nobody wants to shut you down and no wants you to be in any way marginalized. So we have heard you.”
Commissioner J. Stuart Langford, Broadcast Public Hearing 2003-12 – Transcript of Proceedings
March 9, 2004, Volume 7, Lines 9746-9749



6. Campus and community radio stations are dealing with serious issues of rising costs and increased competition to gain access to appropriate tower locations on limited budgets. Some of these stations operate with annual budgets of as little as \$20,000. Cable radio is the most viable option for many local radio broadcasters, especially for those with extremely limited resources, or those that exist in markets with spectrum scarcity issues. It is an affordable and effective medium for campus and community radio stations to broadcast to listeners in their communities.
7. Broadcasting on a BDU cable service helps many radio stations gain access to new listeners and untapped fundraising opportunities, as well as maintain a presence on the telecommunication network. In fact, some low power stations reach more people via cable than any other means of broadcasting, so they would be severely impacted in terms of listenership and fundraising if they lost their cable access.
8. It should also be noted that stations operating in rural mountainous locations, such as the BC interior, are limited by geography in terms of how far their signal can be carried. If they are carried on cable, they can reach many more listeners without having to install repeaters.
9. Campus and community radio stations also struggle to keep up with changes in broadcast technology as well as opportunities associated with these advances. Many communities have limited access to quality Internet providers – as they are restricted by the high cost of securing reliable Internet bandwidth, lack of access to Internet providers, etc. – and lack the necessary expertise to explore web-based broadcasts.
10. The CCTA argues that a survey has shown that “only 4% of subscribers to Class 1 or Class 2 broadcasting distribution undertakings (BDUs) make use of the audio services distributed under this requirement”. The NCRA/ANREC would like to suggest that whatever percentage actually use this service, a significant number are listeners of campus and community radio stations. For example, the latest BBM survey taken of the Toronto radio market found that 10 of the 21 radio stations surveyed had less than 4% of the listening audience (David Bray - Broadcaster magazine- 8/11/2005). Unlike cable providers and commercial radio broadcasters, many campus and community radio stations do not have the financial opportunity to research their listener support base via formal listener surveys. Campus and community listener statistics are, at best, estimates. They are often compiled by accessing student research projects at universities and colleges, using funding supporter numbers, and other internally based research methods. It would be safe to say that most campus and community radio stations would be happy to know that they have access to 4% of the listening market.
11. The CCTA has noted that it would use the freed up capacity to “permit(ing) the distribution of as many as 30 additional standard definition or six new high definition digital television services”. There is no mention of what types of programming will be offered, nor is there an indication that these new services could be easily accessed by basic cable subscribers. In fact, the CCTA’s request to remove local radio stations from cable BDUs will eliminate access for many “unserved or underserved listeners” of campus and community radio.
12. The proposed removal of cable operators responsibility to carry local radio would place them in contravention to the *Broadcasting Act* in terms of the fulfilling a mandate to



carrying local programming. Section 3(1)(t)(i) of the *Broadcasting Act* states “distribution undertakings should give priority to the carriage of Canadian programming services and, in particular, to the carriage of local Canadian stations”. Campus, community, Native, French-language, developmental and instructional radio stations embody the scope of “local” in that virtually all programming at these stations is produced by local-area staff and volunteers, and truly reflects the community. No other radio broadcast sector emulates the role of local broadcasting.

13. The NCRA/ANREC requests that the Commission deny the CCTA’s request or conduct a public hearing to examine these issues further. Should the Commission feel a public hearing is necessary, the NCRA/ANREC requests the opportunity to make a presentation, where the voices of threatened individual broadcasters could be heard by the Commission directly.
14. Thank you for this opportunity to comment and for your attention. Should you wish to further information or clarification, please contact Melissa Kaestner, NCRA/ANREC National Coordinator, at (613) 321-1440 or melissa@ncra.ca.

Sincerely,

Melissa Kaestner, NCRA/ANREC National Coordinator
Chad Saunders, NCRA/ANREC Board of Directors
Freya Zaltz, NCRA/ANREC Board of Directors

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CC: Canadian Cable Telecommunications Association, Fax: (613) 232-2137
Each station listed in Appendix I

Appended: Local Broadcasters on Cable



Local Broadcasters on Cable

The following list represents various Community-based Campus, Community Types A & B, Campus Instructional, Developmental, Ethnic, and French-language stations that broadcast on cable. These should be considered only a sampling, as there may be additional FM stations that also broadcast on cable or non-FM stations that only broadcast on cable.

Stations that broadcast on cable only

14 stations, 12 different communities

CBFM - George Brown College Toronto, ON	CLCC – Lethbridge Community College Lethbridge, AB	CSDR – Cegep de Granby Granby, QC
CFLI – Concordia University Montreal, QC	CRFM – Canadore College North Bay, ON	CSKY – John Abbott College Ste Anne de Bellevue, QC
CFML – British Columbia Institute of Technology Burnaby, BC	CRNC – Niagara College Welland, ON	KCR – Korean Community Radio Toronto, ON
CHIR – Greek Radio Toronto Toronto, ON	CRSL – St. Lawrence College Kingston, ON	Radio communautaire Prescott-Russell Alfred, ON
CHNR – Northern Alberta Institute of Technology Edmonton, AB	CSCR – University of Toronto-Scarborough Campus Scarborough, ON	

Stations that broadcast on fm and cable

53 stations, 42 different communities

CFAK – Université de Sherbrooke Sherbrooke, QC	CFMH – University of New Brunswick–Saint John Saint John, NB	CFUV – University of Victoria Victoria, BC
CFBU – Brock University St. Catharines, ON	CFMU – McMaster University Hamilton, ON	CHCR – Humber College of Applied Arts & Technology Killaloe, ON
CFBX – University College of the Cariboo Kamloops, BC	CFRC – Queen’s University Kingston, ON	CHIN Community Radio Toronto, ON
CFCR Community Radio Saskatoon, SK	CFRM – Canadore College Little Current, ON	CHLY – Malaspina College Nanaimo, BC
CFFF – Trent University Peterborough, ON	CFRO – Vancouver Cooperative Radio Vancouver, BC	CHMR – Memorial University of Newfoundland St. Johns, NL
CFIN – Radio Bellchase Lac Etchemin, QC	CFRU – University of Guelph Guelph, ON	CHRW – University of Western Ontario London, ON
CFLX – Radio Communautaire de l’Estrie Sherbrooke, QC	CFUR – University of Northern British Columbia Prince George, BC	CHRY – York University North York, ON

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CHSR – University of New Brunswick & St. Thomas University
Fredericton, NB

CHUO – University of Ottawa
Ottawa, ON

CILE Community Radio
Havre-Saint-Pierre, QC

CIOI – Mohawk College
Hamilton, ON

CIRV Community Radio
Toronto, ON

CiTR – University of British Columbia
Vancouver, BC

CJAM – University of Windsor
Windsor, ON

CJLX – Loyalist College
Belleville, ON

CJMP – Powell River Model Community Project for Persons with Disabilities
Powell River, BC

CJMQ – Bishop's University
Lennoxville, QC

CJRE / CJRG Radios communautaires
Gaspé, QC

CJSF – Simon Fraser University
Burnaby, BC

CJSR – University of Alberta
Edmonton, AB

CJSW – University of Calgary
Calgary, AB

CKCU – Carleton University
Ottawa, ON

CKDU – Dalhousie University
Halifax, NS

CKHC – Humber College
Etobicoke, ON

CKIA Radio communautaire
Quebec City, QC

CKLN – Ryerson Polytechnical Institute
Toronto, ON

CKLU – Laurentian University
Sudbury, ON

CKMS – University of Waterloo
Waterloo, ON

CKRL Radio communautaire
Quebec City, QC

CKUM – Université de Moncton
Moncton, NB

CKUT – McGill University
Montreal, QC

CKUW – University of Winnipeg
Winnipeg, MB

CKVI Community Radio
Kingston, ON

CKWR Community Radio
Waterloo, ON

CKXU – University of Lethbridge
Lethbridge, AB

CLCR – Augustana University College
Camrose, AB

CMRC – Mount Royal College
Calgary, AB

CRSG – Concordia University
Montreal, QC

CTSR – Southern Alberta Institute of Technology
Calgary, AB

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