

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

February 2, 2005

Re: Broadcasting Notice of Public Hearing CRTC 2004-11

1. With this letter, the National Campus / Community Radio Association is filing an intervention opposing the application of Evanov Radio Group Inc. (Application 2004-1039-0).
2. The NCRA represents campus and community radio stations across Canada. The organization works to recognize, support and encourage non-profit, public access campus and community-based broadcasters in Canada. We have been approached by CFBX 92.5 FM in Kamloops British Columbia to intervene on their behalf.
3. The Evanov Radio Group Inc. has applied to create a station in Kamloops at 92.5 FM. CFBX is a small station with 'unprotected' status and would be knocked off the air if the Evanov application is successful. There are a number of reasons for the NCRA to be concerned about this situation but primarily we do not want to see one of our member stations dismantled.
4. CFBX is a true success story in regards to current community radio regulations. Started with a 90% in favour student referendum in 1997, it launched on FM in early 2001 thanks to the new category of 'Developmental Licence'. This route was taken as it provides a very fast, low cost option for a community to establish a radio station. As one of the first developmental licencees CFBX set an example for communities across Canada and offered a blueprint of how a community could create a viable radio station under the new streamlined process.
5. Since its launch in 2001 CFBX has been granted a full licence and has continued planning to move to a high-power, protected status. The station currently has more than ninety active volunteers and a good deal of community support. The move to a class A licence however requires more than just volunteer effort and due to the expense it can take a long time for a community station to realize this goal. CFBX specifically was preparing to apply for a class A licence within the next two years.

6. We know that the CRTC has a commitment to public access community radio and on-air diversity and the NCRA feels very strongly that station who offer this access and create diversity (especially those incorporated as non-profit) need to be protected by the CRTC especially if they cannot afford to become licensed as class A stations. The Evanov application is for a commercial station and does not appear to offer any form of public access.
7. We also must point out that The Broadcasting Act recognizes that the Canadian broadcasting system is made up of three elements (public, private and community 3(1(b))) and so the Act expects community access broadcasters to be represented along side public and private systems. We feel very strongly that it would be a grave mistake for the CRTC to jeopardize a community station in favour of a commercial applicant especially in a market already served by multiple commercial stations.
8. If the CRTC approves the application by Evanov radio we are additionally concerned that many other low power stations across the country will be put into immediate peril.
9. In closing the NCRA believes that approving the Evanov application for 92.5 FM would represent a great step backwards for community radio and deal a blow to the innovation that the CRTC has show in simplifying applications for non-profit broadcasters. We urge the CRTC to reject the application or deliver an alternate decision which will preserve CFBX 92.5 FM and satisfy the needs of Evanov Radio Group Inc. and the community of Kamloops.

Sincerely;

Robert Schmidt

Vice President - National Campus/ Community Radio Association