

Diane Rheume
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario
K1A 0N2
procedure@crtc.gc.ca

Re: Application # 2006-0122-0

Dear Secretary General,

1. I am writing on behalf of the National Campus and Community Radio Association in support of an application by CHRY Community Radio Inc. ("CHRY") to obtain a technical amendment to their license. CHRY currently operates on a low power unprotected FM frequency, 105.5 MHz (channel 288) in the city of Toronto.
2. The National Campus and Community Radio Association was formed in 1981, and is a not-for-profit national association of radio stations and individuals committed to volunteer-based, community-oriented radio broadcasting. The NCRA is dedicated to advancing the role and increasing the effectiveness of campus and community radio in Canada. We provide advice and advocacy for individual stations, and work on lobbying and policy development for the sector as a whole.
3. Over the years, the NCRA has written regular submissions to the CRTC in support of campus and community radio stations. These submissions have been letters of support for individual radio stations applying for licenses or renewals, submissions to the campus or community radio policy development process, comments on policies relating to campus or community radio and letters expressing concern about any action taken or contemplated by the Commission that may be detrimental to campus stations.
4. Throughout, our goal has been to safeguard the stability and potential for individual stations, and to promote the long-term growth and effectiveness of the sector. We have intervened against applications by commercial stations that could cause reception problems for a campus station, and researched interference issues with private and public radio stations.
5. We have been very concerned about spectrum scarcity and the lack of frequencies in larger markets. We believe that consideration should be given to the intensely effective role of small, non-profit stations in serving community needs and fulfilling the mandates of the Broadcasting Act, and that this role should be given formal protection by the Commission.

6. We have also made submissions to the Commission indicating our concern for and vulnerability of stations that operate under an unprotected frequency.
7. CHRY is a community-based campus radio station located at York University. It plays an important role in the provision of broadcasting services in the Toronto and North York area by providing a wide range of programming and contributing to the development of Canadian talent.
8. Over its impressive history, this low-power (50 watt) radio station has built a strong and dedicated audience. CHRY has proven both that cultural and community-based programming has strong support in the Toronto area, and the importance of serving cultural communities in North York and Toronto.
9. We support CHRY's request to operate on a protected frequency in order to ensure the continued presence of its important radio service within the Greater Toronto regional broadcasting system. Its unprotected status leaves the station vulnerable to the loss of its current frequency pursuant to the Commission's Low-Power Policy.
10. CHRY has put considerable effort towards securing a stronger, protected frequency for the station, including financial analysis and commissioning technical reports. It has been a goal of the station almost since its inception to protect its frequency and increase its power; and has also been the request of many listeners over the years. Many years of research, planning, discussion and effort have gone into CHRY's power-increase application. As early as 1993 and prior, work was being done in preparation for the power-increase project.
11. The Commission in its Community Radio Policy review has identified the important role that community based radio stations play in bringing diversity to Canadian airwaves; as well as contributing to community development. CHRY has aptly demonstrated that it fulfills this role in the Toronto and North York area.
12. The NCRA respectfully requests the Commission approves CHRY's request to amend its licence from a low power unprotected service to a Class A1 service; and increase its Effective Radiated Power from 50 watts to 158 watts. The approval of these amendments would result in better service to listeners and ensure that CHRY enhances its role of serving communities in the Toronto and North York region.

Sincerely;

Lydia Masemola
President, NCRA