



Robert A. Morin, Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A 0N2

October 2, 2007

Re: Application # 2007-0891-9
Broadcasting Notice of Public Hearing CRTC 2007-12

NCRA/ANREC

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27th Annual NCRC - June 2008
hosted by CJAM FM Windsor

Dear Secretary General,

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 an application by Amherst Island Radio Broadcasting Inc. CJAI-FM ("CJAI") to obtain an English-language Type B licence to operate at 92.1MHz with a maximum of 250 watts. CJAI has held a low power developmental licence at 93.5MHz for the past 17 months, and has recently been displaced from that frequency by K Rock 1057 Inc., which received approval to operate at 93.7MHz in Broadcasting Decision CRTC 2007-334.
2. The 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 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.
3. Since its inception, the NCRA/ANREC has provided regular submissions to the CRTC in support of campus and community radio stations. These include letters of support for individual stations applying for licenses or renewals, submissions to the CRTC policy development process as it pertains to campus and community stations, and letters expressing concern about actions taken or contemplated by the Commission that may be detrimental to the campus and community broadcasting sector.
4. Our goals are to ensure stability and support for individual stations, and to promote the long-term growth and effectiveness of the sector. We believe that the CRTC has a commitment to public access community radio that supports these goals.
5. We have long been concerned about vulnerable community stations with unprotected low power frequencies and the potential consequences they face if commercial applicants apply to use their frequencies, or frequencies nearby causing signal interference. We believe that consideration should be given to the important role small, non-profit stations play in serving community needs and fulfilling the mandates of the *Broadcasting Act*, and that this role should warrant formal protection by the Commission so these stations can avoid costly licence amendments and technical upgrades.



6. CJAI is a developmental community radio broadcast undertaking serving Amherst Island (Stella), Ontario, a rural farming community located approximately 15km west of Kingston, Ontario. As the only dedicated media source on Amherst Island, it provides a wide range of programming, locally relevant news and information, and access to the airwaves not provided by any other local broadcaster. Nearly half of the population of Amherst Island is involved in the station as members or active volunteers. The station provides vital news and information to Amherst Island residents, and provides an important link to the world outside the island, with supporters and listeners in nearby villages on the mainland. It has reached an astounding 100% Canadian Content during its weekend daytime broadcasts, and provides 11 hours of specifically local music content each week during prime time hours. Further, it operates on a farm in a renovated milkhouse, which is a true sign of its grassroots community connection.
7. Over its short 13-month history, this low-power radio station has built a strong and dedicated audience and cultivated numerous opportunities for community involvement. Notably, it has achieved this remarkable success with no regular full time employees, and a negligible annual budget. It shows every indication of becoming a sustainable community resource.
8. In its most recent *Community Radio Policy* review, the Commission identified the important role community-based radio stations play in bringing local content and voices to Canadian airwaves and contributing to community development. CJAI has aptly demonstrated that it fulfills this role on Amherst Island.
9. The NCRA/ANREC supports CJAI's request to obtain a protected frequency and a permanent licence to ensure that the station is able to continue serving its community. CJAI was required to prepare and submit its application and raise funds to cover the costs of a Type B licence on very short notice, in response to the application by K Rock 1057 Inc. Further, K Rock's recent announcement that it will be ready to operate at the new frequency within weeks has placed CJAI at risk of going off the air while it waits for the Commission to review its Type B application. The NCRA/ANREC appreciates efforts made by the CRTC to assist CJAI in the interim through Application No. 2007-13447, which will amend its developmental licence by changing the frequency to 92.1MHz and allow it to continue broadcasting at low power.
10. We also note that the CRTC application process did not require K Rock to notify CJAI of its application (No. 2007-0211-9) to use the first adjacent frequency until quite late in the application process. In light of the stress this caused for CJAI, we also encourage the Commission to take steps to ensure that unprotected low power stations receive timely advance notice of applications that may interfere with their use of an unprotected frequency, so that they may have sufficient time to respond and prepare for the consequences.
11. It has taken CJAI and its supporters considerable effort to become a viable and recognized voice for Amherst Island, and the station has accomplished a great deal in a



very short time. In the spirit of the *Broadcasting Act*, their work should be recognized and supported so it may continue without the threat of future frequency issues. The upgrade to protected status will permanently remove the danger of interference or frequency appropriation by another commercial station pursuant to the Commission's *Low-Power Policy* and give CJAI the opportunity to focus on serving its community without further distractions.

12. CJAI has received generous offers of assistance from Corus, CHUM, and K Rock, as described and supported by the Commission in Broadcasting Decision CRTC 2007-334, to help complete the proposed transition to 92.1MHz and increase in power up to 250 watts. We appreciate these commitments, and we would appreciate the continued support of the CRTC to ensure that they are honoured. In particular, K Rock's offer to provide \$5,000 of financial assistance is particularly important given CJAI's low budget, and Amherst Island's small population from which to draw fundraising revenue.
13. The NCRA/ANREC respectfully requests the Commission approves CJAI's application for class B protected status at its earliest convenience.

Sincerely,

Freya Zaltz
Vice President, NCRA/ANREC

cc: Tom Richmond, CJAI-FM

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