



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

April 30, 2007

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**NCRA/ANREC**

325 Dalhousie, Suite 230  
Ottawa, Ontario K1N 7G2  
(613) 321-1440, office@ncra.ca  
www.ncra.ca

National Coordinator  
Coordonnatrice nationale  
**Melissa Kaestner**

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Re: Broadcasting Public Notice CRTC 2007-31 (PN 2007-31)  
Renewals for radio programming undertaking licences due to expire in 2007

In support of the following applications:

3. 2006-1458-8: Trent Radio (Trent)
4. 2006-1500-0: The First Alberta Campus Radio Association (CJSR)

Dear Secretary General,

1. The National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires (NCRA/ANREC) is in support of the above two renewals for radio programming undertaking licences due to expire in 2007, as outlined in PN 2007-31. We would also like to address the class of licence for these applications.
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-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. As with other community-based stations that we have recently supported, both Trent and CJSR have and will continue to endeavour to be strong and relevant voices for their communities. Furthermore, throughout their respective histories, each station has undertaken groundbreaking initiatives in community-oriented broadcasting, such as with CJSR's program "Youth Menace" – the world's only radio program for youth in conflict with the law.



6. Each station has and continues to serve not only the community at large but their university communities as well. From airing university sports to student-oriented news and music programming to airing PSAs announcing university events and activities, the overall programming of each station is relevant to students. This is largely due to the fact that while community members do participate in producing and hosting shows, students also program a variety of shows – from new music to current affairs, these stations reflect a student perspective.
7. These two stations receive funding from many different sources, including student levies. A number of campus-based stations receive referendum based levies that are subject to review by Student Unions. Referendum votes are regularly held to create, increase, decrease or eliminate levies for radio stations in accordance to governing bylaws. Campus-based stations actively promote their activities to both students and University administrators to illustrate the importance of student funding in the operation of their stations.
8. Therefore, in regards to the issue of a community versus a campus licence, the NCRA/ANREC would like the Commission to consider the following. We recognize the need for a balanced board of directors for a station, and support this notion fully. As outlined in the current campus radio policy, there is to be representation from the university, students, volunteers, and community. Indeed, it is in the best interest of a campus station to have this kind of balance to ensure good governance, especially considering that individual people can come and go every single year. This balance helps provide continuity in a changing environment.
9. But the Commission should also note that the policy can allow for flexibility in this regard on a case-by-case basis. As noted in the last sentence of paragraph 57 of the campus radio policy (Public Notice CRTC 2000-12): “Alternatively, they will be asked to explain why the new policy should not apply to them.”
10. While stations should endeavor for board balance, the NCRA/ANREC encourages the Commission to recognize that in a few cases, there needs to be this room for flexibility, especially when looking at current governance trends involving universities and media. These relationships and structures are in flux due to the fact that universities are becoming more risk adverse and wanting to remove their association with the radio station for reasons of legal liability and insurance.
11. This does not mean that the station is not affiliated with the university or serving the needs of the student community. In fact, in some cases, it may make the station more relevant to the student community. We think that the Commission should look at other factors besides board representation when considering whether a station should fall under the campus policy or the community policy.
12. The ramifications of the stations suddenly being licenced as community radio stations could seriously jeopardize the funding of these stations. While it may not seem obvious why a class of licence should have this kind of power, the problem lies in the perception that university administrators and student unions have of a station that is no longer licenced as a campus radio station. Should a station be no longer considered a campus station by the CRTC, some universities and student unions could



interpret that as a sign that they should no longer be funding its station, as it would not longer be “its station”.

13. Until there is stable funding for stations in our sector, we as an association and as individual stations must use what resources and opportunities we have. Taking away that campus connection on paper is taking away the largest, and in some cases, only resource those stations have.
14. The NCRA/ANREC would like to suggest that this issue be further examined during the upcoming campus and community radio policy reviews. Between now and then, we will discuss the issue of board governance with our stations as well as university and student representatives.
15. In the meantime, we encourage the Commission to accept the applications under the category of licence the stations deem most appropriate for their situation and to consider their renewals on their merits in all other respects. Both stations have shown themselves to be excellent broadcasters and organizations. Should the Commission wish to discuss this issue further in the context of a hearing, we would be pleased to offer our insight and support in person at that time.

Sincerely,

Melissa Kaestner  
National Coordinator

CC:

The First Alberta Campus Radio Association, [admin@cjsr.com](mailto:admin@cjsr.com)  
Trent Radio, [info@trentradio.ca](mailto:info@trentradio.ca)

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