



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

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**NCRA/ANREC**

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Re: Application # 2007-0051-9

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 Campus Radio Saint John Inc. CFMH-FM ("CFMH") to make technical amendments to their license. CFMH currently operates on a low power unprotected FM frequency, 92.5, in the city of Saint John, N.B. and intends to make changes consistent with obtaining class A protected status.
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 stations applying for licenses, amendments, or renewals, submissions to CRTC policy development processes, and letters commenting on actions taken or contemplated by the Commission that may affect 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. We have long been concerned about vulnerable community stations with unprotected low power frequencies, and the potential consequences to them if larger commercial broadcasters appropriate their frequencies or inhabit nearby frequencies causing signal interference. We believe 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 be given formal protection by the Commission without requiring costly licence amendments and technical upgrades.



6. CFMH is a community-based campus radio programming undertaking located at the University of New Brunswick, Saint John. As the only independent media source in Saint John, it contributes to local talent development, and provides a wide range of programming, locally relevant content, and access to the airwaves not provided by any other local broadcaster. It maintains a strong community presence and is seen as a significant resource by individuals, artists, and arts and service organizations.
7. Since receiving its licence in 2001, CFMH has built a strong and dedicated audience and cultivated opportunities for community involvement. In its first year, it became the first campus station to host the East Coast Music Awards broadcast and successfully organized a National Campus & Community Radio Conference. It garnered sufficient support to approve a student media levy from students at UNB, Saint John. It also fostered the development of a popular Francophone morning program that has since evolved into a separate station serving the local Francophone community. It regularly partners with the University to offer internships and course project opportunities to students. It has garnered significant support from both the University and the wider community and has attracted a diversity of multi-cultural and multi-lingual programmers and volunteers drawn from both populations.
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. CFMH has aptly demonstrated that it fulfills this role in Saint John.
9. The NCRA/ANREC supports CFMH's request to obtain a protected frequency to ensure improved signal quality, the opportunity to reach more listeners, and a continued presence on the Saint John radio dial. Currently the station's signal reaches only the core of Saint John, and listeners have described the signal quality as unsatisfactory. The proposed power increase will allow it to broadcast clearly to the entire greater Saint John area, reaching more than 100,000 listeners, including several nearby towns not currently served by a community broadcaster. The upgrade to protected status will also permanently remove the danger of continued interference or frequency appropriation by another commercial station pursuant to the Commission's *Low-Power Policy*.
10. CFMH has received a large funding contribution from CFRK-FM, the commercial station causing the signal interference, to help cover the costs of upgrade. They have begun raising the remaining funds required and have received a grant from the Greater Saint John Foundation.
11. The station has seen significant success in its efforts to become a viable and recognized voice for Saint John since its inception 6 years ago, and community members have demonstrated eager support for the proposed improvements. 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.



12. The NCRA/ANREC respectfully requests the Commission approves CFMH's request to amend its licence by increasing its Effective Radiated Power from 50 watts to 250 watts and relocating the transmitter. The approval of these amendments will enhance CFMH's ability to reflect and serve the local Saint John community.

Sincerely,

A handwritten signature in black ink, appearing to read "Chad Saunders". The signature is written in a cursive, flowing style.

Chad Saunders  
President, NCRA/ANREC

cc: Linda Pelletier, Staiton Manager, CFMH FM

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