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

January 23, 2008

Re: Application # 2007-1423-9 and 2007-0363-8

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) to comment on applications by the Canadian Broadcasting Corporation ("CBC") to make use of three separate FM frequencies in the areas of Gabriola Island and Nanaimo, British Columbia.

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. 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.

3. Gabriola Co-op Radio (proposed CIUF-FM) is a member of the NCRA/ANREC. Over the last several years, the Gabriola Radio Society has generated significant community support and raised the funds necessary to purchase equipment and construct a building from which to broadcast. To illustrate the level of support enjoyed by the initiative, a recent fundraiser in the community of only 4500 residents netted over $4000. The Gabriola Radio Society also hosted a very successful NCRA/ANREC Pacific Regional Conference in 2003, attracting delegates from across the province.

4. The station's application for a broadcasting licence has been repeatedly delayed by difficulties related to the selection of an available frequency and antenna/tower site. In light of the challenges faced by campus and community stations with low power developmental licences when new applicants propose to use their unprotected frequencies, Gabriola Co-op Radio is attempting to find a suitable frequency and antenna location so that it can apply for class A protected status. The difficulties they have encountered may have increased in light of CBC's recent applications.

5. While in principle we do not object to the CBC obtaining permission from the CRTC to broadcast using the proposed frequencies in order to provide better coverage to residents in these areas, we are concerned that the use of three frequencies in an almost fully saturated area means that Gabriola Co-op Radio may be precluded from obtaining a broadcasting licence due to spectrum scarcity.

6. We believe that this problem can be averted if the CBC agrees to work in cooperation with Gabriola Co-op Radio to resolve issues of tower space and frequency selection. As we understand the situation, CBC requires the support of Gabriola residents in order to have an application approved to re-zone the proposed site for its new tower on Gabriola Island. The residents are understandably concerned about supporting the re-zoning application if the tower will be used to broadcast on one of the last remaining local frequencies without regard for the difficulties Gabriola Co-op Radio has faced in finding a frequency suitable for its use. The CBC could obtain support for its re-zoning application by offering assistance to Gabriola Co-op Radio, which could focus on two key areas:

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7. First, the CBC could provide space on its new tower for Gabriola Co-op Radio's antenna. Second, CBC could be amenable to making minor adjustments to the technical parameters of one of their signals if the only frequency available to Gabriola Co-op Radio is one that is first adjacent, in order to allow both frequencies to be used with minimal interference. We understand that representatives from Gabriola Co-op Radio and CBC have already communicated with each other about these and other ideas, and we hope they will continue to do so.

8. We recognize that these issues are not part of the normal licensing process, but we mention them here so that they will be on the public record. We ask for the Commission's support by acknowledging the importance of providing community radio service for Gabriola Island and encouraging the CBC to offer help and resources to enable this to occur.

9. Public and community broadcasters fulfill two of the three pillars of the Canadian broadcasting system, and the two services complement each other. Gabriola Island residents would be pleased to have access to both. Given the amount of effort that has gone into developing Gabriola Co-op Radio to date, we hope the station will be able to resolve its technical issues and obtain a broadcasting licence in the near future.

10. Finally, we urge the Commission to reconsider its policies relating to the allocation of broadcast licences in each market in the context of increasing spectrum scarcity. It is important for each community or market to have the opportunity to develop an independent not-for-profit community radio service, and we hope that a lack of suitable frequencies will not prevent this from occurring.

Sincerely,

Vice President, NCRA/ANREC

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