



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

Re: Application No. 2009-1542-3

March 13, 2010

Dear Secretary General,

1. The National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires (NCRA/ANREC) supports the request of UCFV Campus and Community Radio Society ("CIVL-FM") for an extension of the time limit to implement the new English-language community-based campus FM radio station in Abbotsford, B.C. The NCRA does not wish to appear at the hearing.
2. The NCRA/ANREC is a not-for profit National Association working to recognize, support and encourage not-for profit, volunteer-based, public access campus and community-based broadcasters in Canada. We provide advice and advocacy for individual stations, and conduct lobbying and policy development initiatives with a view to advancing the role and increasing the effectiveness of our sector.
3. The Broadcasting notice of Consultation states that "the Commission's standard practice is to grant a maximum of two extensions for a total of up to 24 months." and that in this instance, "the applicant is requesting an extension of 30 months in total". CIVL has indicated that this request will allow them sufficient time to address issues of unacceptable interference with the CBC.
4. The NCRA/ANREC supports UCFV's request for an additional extension of time. In this era of spectrum scarcity, it is not unusual for new stations to encounter a multitude of spectrum and interference-related problems that can take extra time for a volunteer-based community group to address. The requested extension of six months is a relatively short period of time considering the many years required to establish most community radio stations. We ask the Commission to be mindful of the barriers faced by not-for profit community groups in this regard.
5. The costs and volunteer time associated with preparing a new broadcasting application are

prohibitive. A refusal of their request for an extension at this point would likely lead to the loss of several years of organizational and technical development and investment that UCFV has contributed in order to create a station to serve their community. Further, if the UCFV is not able to secure an extension to address these issues, the community of Abbotsford will lose the opportunity to have a community broadcaster, at least for the time being.

6. It is clear that UCFV has been working to resolve the outstanding issues, and that these issues were not anticipated prior to the approval of their broadcasting application. We believe that UCFV has every intention of implementing thier station. Providing additional time to ensure that implementation can be achieved is in the best interests of the community of Abbotsford and fulfills the objectives of the Broadcasting Act.

4. We support the efforts of UCFV to establish a service in Abbotsford, and therefore ask that the Commission favorably consider the organization's request for a further extension.

Sincerely,



Catherine Fisher
Regulatory Affairs Committee
NCRA/ANREC



Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC