



NCRA-ANREC  
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Ottawa, Ontario, K1N 7G2

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

March 15, 2010

Re: Application No. 2010-0023-1

Dear Secretary General,

1. The National Campus and Community Radio Association/l' Association nationale des radios etudiantes et communuataires (NCRA/ANREC) supports the application by the CKDU-FM Society ("CKDU") to make two related technical amendments to their license. The Society needs to change the location of their transmission site, and this necessitates an amendment to the station's authorized broadcast contours. 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 ("c/c") 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. CKDU is the only English-language campus community station broadcasting out of the City of Halifax. The station recently celebrated 25 years on the FM band.
4. We understand that CKDU is required to move their transmission site to a new location with little notice because their existing site has been deemed unsafe. An unexpected difficulty like this can cause considerable trouble for a campus or community ("c/c") station. Stations in our sector are traditionally underfunded, understaffed and under-resourced, and this situation could have resulted in the demise of CKDU if another transmission site could not be found. Fortunately, another site is available, and it is in a more convenient location, which will also potentially allow CKDU to make more efficient use of its transmission equipment.

5. We are told that because this proposed location sits much higher than the previous one, CKDU's signal coverage area and quality are both expected to improve. These secondary benefits will provide welcome solutions to CKDU'S existing technical problems.

6. We are also told that the signal quality in some residential areas within CKDU'S licensed broadcast range has been poor. If this proposed amendment improves reception in these areas, CKDU can expect greater participation from new listeners, volunteers and donors who will now be able to receive the station's signal. As a result, CKDU will be able to access individuals and groups it is not currently reaching, and this in turn will enrich and diversify CKDU'S local programming and outreach in furtherance of the Broadcasting Act.

7. The NCRA/ANREC supports any improvement to CKDU's signal range and quality as a secondary benefit to moving their transmission site for safety reasons. Assuming Industry Canada has no interference concerns in regard to adjacent stations, we believe these improvements will benefit both the Halifax community, which will receive improved community radio service, and CKDU, which will have access to a larger volunteer pool and revenue base.

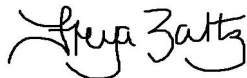
8. Industry Canada's January 1, 2011 changes to the domestic protection criteria (SMBR-003-08) may limit c/c broadcasters' ability to increase their broadcast range. The NCRA is encouraging its member stations to consider the potential impact of this deadline in their long term planning, as we are concerned that it may become more difficult for stations to increase their contours once this deadline passes. Thus, we are pleased that CKDU is taking this opportunity to increase their listener base while also addressing a safety concern related to their transmission site.

10. In conclusion, the NCRA/ANREC supports this application by the CKDU-FM Society, and we encourage the Commission to approve the changes to CKDU's licence as requested.

Sincerely,



Catherine Fisher  
Regulatory Affairs Committee  
NCRA/ANREC



Freya Zaltz  
Regulatory Affairs Director  
NCRA/ANREC

cc: CKDU-FM Society

