



NCRA-ANREC  
325 Dalhousie, Suite 230  
Ottawa, Ontario, K1N 7G2

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

Re: Application No. 2009-1738-8

March 30, 2010

Dear Secretary General,

1. The National Campus and Community Radio Association/l'Association nationale des radios etudiantes et communuataires (NCRA/ANREC) supports the application of the Hornby Community Radio Society ("HCRS") for a broadcasting licence to operate an English-language FM developmental community radio programming undertaking at Hornby Island, British Columbia. 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 NCRA/ANREC is aware that two previous applications by HCRS for a broadcasting license have received the approval of the Commission. In both of these cases, the Society was unable to make necessary arrangements to commence broadcasting within the 24-month window set out by the Commission in Public Notice 2000-13.

4. In our experience, small volunteer-based organizations like the HCRS often encounter delays which can slow progress. These delays are frequently caused by lack of volunteer continuity, difficulty obtaining equipment, shortage of funds, insufficient training and regulatory expertise, and the economic realities of living in a rural community. Failure to implement in most cases is not due to lack of interest in developing a local radio service, nor due to a deliberate disregard for CRTC regulatory procedures.

5. Hornby Island is one of the Northern Gulf Islands off the B.C. Coast. It is located in the Strait of Georgia, across the water from Vancouver Island's Comox Valley. The year-round population of the community is approximately 1,200 people, although in the summer months the population can increase five-fold. In many rural communities heavily dependent on seasonal tourism, affordable housing and full-time or adequate part-time year-round jobs are inadequate for local residents, who tend to rely on low-paying service industry jobs for sustenance. It is worth noting, as well, that the minimum wage in British Columbia is the lowest in Canada. Residents of Hornby Island, which is accessible only by boat, have also been adversely affected by a sharp increase in ferry costs, and property values in the region are considered to be far out of line with the average wage.

6. The HCRS was formed in 2001, and the organization began construction of a building to house the station's proposed studios in 2004. They have relied on volunteer labour and donated building materials. Not surprisingly, the project took more time than anticipated, and the interior was completed just this past winter. This delay and others were related to the economic challenges faced by Hornby residents as described above, which caused several key HCRS volunteers to move away in search of better employment prospects elsewhere. This loss of volunteer continuity and institutional memory contributed to HCRS's failure to implement within the timeframe specified in the Commission's previous developmental licensing decision, and to HCRS's failure to apply for an extension prior to the deadline imposed in that same decision.

7. The HCRS has overcome these challenges and has regrouped with a strong team of dedicated volunteers who would like to build on previous efforts to develop a station to serve Hornby Island. The society believes that the appetite for community radio in the region is currently huge. Over time they have received letters of support from many key Island institutions, including the Emergency Social Services Director, who oversees the community's Emergency Evacuation Plan, B.C. Ferries, and the Island Trust.

8. In the NCRA/ANREC's recent submission to the CRTC Campus and Community Radio Policy Review, we requested that the Commission consider extending the developmental licensing period from three to five years. This would allow stations time to gain momentum and experience, and to complete necessary infrastructural development before being required to apply for a regular community radio license. In rural areas, where small populations mean that developing stations must draw from a relatively small pool of potential volunteers, lack of access to technical and other resources, and a variety of economic challenges, this extra time may be especially

important.

9. We encourage the Commission to be flexible and patient in its approach to licensing of new developmental stations. In our experience, very few community stations close once they are up and running, although some may take many years to become fully functional, sustainable and self-sufficient. We therefore support providing additional extensions of time to stations that are having difficulty implementing, or that are not yet able to submit a regular community radio license application.

10. We ask the Commission to recognize the considerable volunteer time and effort that has gone into constructing a building to house HCRS's broadcasting studios, and to developing an organization capable of handling the responsibilities of an officially licensed broadcaster. It is also important to note that for reasons of remoteness, emergency services, and local politics, art and culture, Hornby residents would benefit from having their own broadcasting service. Therefore, we ask the Commission to provide another opportunity to HCRS to provide this service on Hornby Island.

Sincerely,

A handwritten signature in black ink, appearing to read "C Fisher". The letters are cursive and somewhat stylized.

Catherine Fisher  
Regulatory Affairs Committee  
NCRA/ANREC

A handwritten signature in black ink, appearing to read "Freya Zaltz". The signature is highly stylized and cursive.

Freya Zaltz  
Regulatory Affairs Director  
NCRA/ANREC

cc: Hornby Community Radio Society

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