



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

October 2, 2012

John Traversy  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario, K1A 0N2

Dear Secretary General:

**Re: Broadcasting Notice of Consultation CRTC 2012-460** (Renewal of broadcasting licences for campus and community radio programming undertakings expiring 31 December 2012)

In support of the following applications:

1. Haliburton County Community Radio Association (CKHA-FM)
2. Radio Communautaire Missisquoi (CIDI-FM)
3. Creston Community Radio Society (CIDO-FM)
4. LU Campus Radio Inc. (CILU-FM)
5. Student Media, University of Windsor (CJAM-FM)
6. University of Guelph Radio – Radio Gryphon (CFRU-FM)
7. CKXU Radio Society (CKXU-FM)
8. The Kamloops Campus/Community Radio Society (CFBX-FM)

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 eight renewal applications for radio programming undertaking licences expiring in December, 2012. These eight stations are campus/community ("c/c") radio licencees. All have been found in apparent non-compliance with section 9(2) of the Radio Regulations, 1986, which pertains to the provision of annual reports. We request an opportunity to appear if there is a hearing.

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 campus and community (“c/c”) 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 have more than 80 members, including the eight stations addressed in this letter.

3. CKHA-FM, the voice of Haliburton County, ON, started in 2003 and serves a population primarily comprised of retirees and cottagers. At their first community meeting to start a station, ten families each contributed \$100 towards that goal.

4. CIDI-FM is in Knowlton, QC, part of the Eastern Townships. Their studio includes a recital hall with a donated grand piano, where they broadcast local piano recitals.

5. CIDO-FM, located near the small farming community of Creston, BC, was founded in 2001 and licenced in 2005, after the area’s only commercial radio station discontinued its local broadcasting.

6. CILU-FM serves students at Lakehead University and the community of Thunder Bay, ON. The station hosts the city's only locally-produced classical, jazz and blues radio programs.

7. CJAM-FM, located at the University of Windsor, offers diverse local music and spoken word programming in 14 languages to the Windsor-Detroit community. The station was founded in 1977 and recently moved to a new frequency at 99.1FM.

8. CFRU-FM, located at the University of Guelph, was started in 1939 at the Ontario Agricultural College, and has been broadcasting on its current frequency since 1980. They hosted the annual National Campus and Community Radio Conference in 2005.

9. CKXU-FM, at the University of Lethbridge, is southern Alberta’s only campus-community radio station and has been serving the Lethbridge community on the FM band since 2004.

10. CFBX-FM, located at Thompson Rivers University in Kamloops, BC, was licenced in 2001, and it was the first BC interior station to receive an FM campus community radio licence.

11. These stations have each worked hard to become viable and recognized voices for their communities. They provide public access to the airwaves, volunteer training, opportunities for participation in programming and the governance of the station, local news and information, and exposure for local and emerging artists.

12. All of them operate with insufficient funding, and rely extensively on the work of volunteers. In the c/c sector, wages tend to be low, staff and volunteer turnover is high, and institutional memory is easily lost. Although these factors cannot excuse non-compliance, they may contribute to the ongoing challenges stations face in understanding and fulfilling the regulatory requirements.

13. Based on our conversations with these stations, we believe they now fully understand the requirements set out in s. 9(2) of the Regulations, and they have taken steps both to address any issues that may have contributed to the apparent non-

compliance in the past, and to ensure that they remain in full compliance in future, including making provisions for ongoing compliance despite the common challenges that c/c stations face.

13. The NCRA/ANREC provides regulatory support to member stations upon request. Last year, our Regulatory Affairs Director and Executive Director provided intensive one-on-one support to at least 32 member stations. This is in addition to the resources we provide all members including a member listserv, bilingual regulatory support guide, new handbook on best practices for starting a c/c station, conference workshops on regulatory issues, and web-based policy exchange.

14. Due to previous challenges faced by NCRA/ANREC member stations in meeting the requirements under s. 9(2) of the Regulations, we also began an initiative in 2011 to contact member stations and confirm that they: (1) understood when to submit annual returns, (2) knew how to obtain and submit renewal forms, and (3) understood that financial statements must cover the period of time specified by the Commission. Our goal was to help ensure that our members had accurate information and submitted their annual returns correctly and on time. We believe these efforts have assisted our members in understanding their regulatory responsibilities.

14. Overall, it appears that our member stations are becoming better informed, particularly with respect to s. 9(2) of the Regulations. Of the eight stations described in this letter, it appears that none were found in non-compliance with s. 9(2) in 2011, and several submitted returns in 2011 that were in arrears from previous years. We will continue to offer resources to our members, including these eight stations, to assist them in maintaining continued regulatory compliance.

15. We have recommended to our members, including the eight stations described in this letter, that they develop systems, procedures, policies and other safeguards to prevent all instances of non-compliance with the Regulations. In particular, we have recommended that they develop policies and procedures regarding ongoing regulatory training, supervision, and oversight for staff and volunteers. We have also recommended that they create systems for confirming that deadlines are met, add regulatory compliance tasks into staff job descriptions, improve board training and director resources, and make station policies and procedures clearer and more accessible.

16. The NCRA/ANREC strongly encourages the Commission to renew the licenses of these eight stations. We note that the Commission has, in the past, sometimes renewed the licences of stations found in non-compliance for terms shorter than seven years. We understand that this step enables the Commission to check on stations' progress and confirm their compliance before the end of a full licence term. However we also know that shortened renewals of two years or less can significantly add to stations' administrative burden, particularly for smaller stations with few or no paid staff. Those stations often find the renewal process onerous; the time and effort required to complete and submit the necessary documents may detract from other work, like recruiting volunteers, fundraising for station operations, or improving internal station policies that underpin compliance.

17. In order to balance the burden and the necessity for oversight, we encourage the Commission, if considering reduced licence terms for any of these stations, to renew them for at least four-year terms.

Sincerely,



Freya Zaltz  
Regulatory Affairs Director  
NCRA/ANREC Advisory Board

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