



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

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

April 16, 2012

Dear Secretary General;

Re: Technical Amendment Application #2012-0312-4 – CJAM Student Media Corporation

1. The National Campus and Community Radio Association/l'Association nationale des radios etudiantes et communuataires (NCRA/ANREC) supports CJAM Student Media Corporation ("CJAM") in their application for a technical amendment. We would like to speak if there is an opportunity to appear at a public 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. CJAM broadcast to the cities of Windsor, Ontario and Detroit, Michigan. They began broadcasting via closed-circuit to the University of Windsor Campus in 1952, moved to AM in 1974 as CSRW, were re-assigned the call letters CJAM in 1977, and have been serving the Windsor-Detroit community on FM since 1983. CJAM have been a member of the NCRA/ANREC for many years and the station has made significant contributions to the c/c sector in Canada, including hosting our organization's national conference in 2008.
4. In 2009, CJAM successfully obtained frequency protection, after broadcasting on an unprotected FM frequency since 1983. Their now-protected frequency, 99.1 MHz, is shared co-channel with Five Amigos Broadcasting Incorporated's station CKXS-FM ("CKXS"), located in Wallaceburg, Ontario.
5. It is our understanding that, at the onset of their co-channel status, CJAM and CKXS both intended to apply for their own power increases, and agreed to work co-

operatively on future plans in this regard. An agreement in principle between CKXS and CJAM was reached that if one of the two stations increased power, the other station also had the right to increase its own power by a commensurate amount, in order to minimize interference with either station's signal.

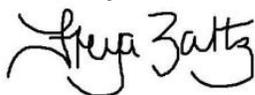
6. In 2011, CKXS applied for a technical amendment that would increase their interference towards CJAM by 6.6 dB. CJAM were not prepared to submit their own technical amendment application at that point because they required more time to research technical options, costs, and fundraising opportunities. CJAM and the NCRA/ANREC both filed interventions in that proceeding conditionally opposing CKXS's application on the grounds that CJAM's signal would be negatively impacted by the approval of CKXS's application. Both interventions requested that the Commission wait to approve CKXS's application until CJAM was in a position to submit their own technical amendment application.

7. Since that time, CJAM have completed the research, analysis, and planning required to enable their own power increase, devised a creative technical approach to ensure that the project is affordable, and applied to the Commission to increase their signal level by 6.6 dB towards CKXS. If approved, we believe that CJAM's application would prevent increased interference caused by CKXS's technical amendment application. It would also be beneficial to CJAM's listening audience, as it would improve the signal quality in the station's primary coverage area.

8. We have read CJAM's letter to the Commission dated April 12, 2012, and we are told that animosity exists between the stations. CJAM have advised us that they have attempted to maintain open lines of communication with CKXS about both stations' power increase plans, but the response from CKXS has not been positive. We understand that CKXS are eager to implement their proposed power increase, and they are frustrated by delays caused by CJAM. We note that CJAM is a not-for-profit broadcaster, and the challenges of operating in the not-for-profit environment can mean that longer timeframes are required for implementing new projects. We believe that, under the circumstances, CJAM have acted quickly and diligently to move forward with their own application, and we hope their efforts will facilitate both stations achieving their goals.

9. We therefore ask the Commission to approve CJAM's application, and to approve CKXS's application simultaneously, to ensure that neither station is negatively impacted by interference from the other.

Sincerely,



Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC

cc: CJAM Student Media Corporation
Five Amigos Broadcasting Incorporated

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