



NCRA-ANREC
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June 12, 2013

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

Secretary General:

Re: Broadcasting Notice of Consultation CRTC 2013-222

(Renewal of broadcasting licences for campus and community radio programming undertakings expiring 31 August, 2013)

In support of the following applications:

1. UFV Campus and Community Radio Society (CIVL-FM)
2. Erin Community Radio (CHES-FM)

1. We are writing on behalf of the National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires ("NCRA/ ANREC") in support of two renewal applications for campus and community ("c/c") radio programming undertaking licences expiring August 2013. These two stations, CIVL-FM and CHES-FM, have been found in compliance and we note that the Commission intends to renew these licenses for a full seven-year term, subject to interventions. 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 both CIVL-FM and CHES-FM.

3. We are pleased that the Commission intends to renew these licenses for a full seven-year term, subject to interventions. We have spoken with staff at both stations. We believe that they understand the requirements of the Radio Regulations, including those set out in s. 9(2), and have taken steps to ensure ongoing compliance, particularly with respect to filing Annual Returns. The NCRA/ANREC also has resources in place to further assist and support member stations like CHES-FM and CIVL-FM with maintaining compliance. We will outline some of these resources in this letter.

4. CHES-FM broadcasts from Erin, Ontario, a rural municipal region comprised of two villages and various outlying hamlets. CHES-FM has been designated by its town council as Erin's official emergency broadcaster, and it is a key part of Erin's official emergency plan. With assistance from the community, CHES-FM has installed two generators so they can remain on-air in case of emergency.

5. Currently CHES-FM has an informal partnership with another nearby c/c station, CICW-FM in Centre Wellington, and receives administrative support from CICW-FM's Station Manager. We believe this arrangement has helped contribute to the station's compliance.

6. CHES-FM applied for a technical amendment in late 2012, seeking to improve coverage in their region. Much of the community is built upon the Niagara escarpment, the land is hilly, rolling terrain. This has created ongoing reception challenges. While CHES-FM's signal can be reliably received in some parts of their broadcast region, it can't be well received in others. CHES-FM estimated in their supplementary brief that approximately 40 percent of the population of the surrounding rural communities cannot adequately receive the station's signal. CHES-FM believes their ongoing inability to cover their entire broadcast region has had harmful effects on the station's ability to fund-raise and sustain itself.

7. CHES-FM hopes that they will be able to increase their broadcast area, and thus, their value to advertisers. They are also investigating other sources of funding, like the Community Radio Fund of Canada to enable them to hire their own staff. In the NCRA/ANREC's experience, many c/c stations are better able to ensure ongoing regulatory compliance when they have staff to coordinate their operations.

8. The NCRA/ANREC also notes that CHES-FM has implemented measures already, as noted in their response letter and license application, to maintain compliance within their current, largely volunteer-run structure.

9. CIVL-FM serves the University of the Fraser Valley ("UFV"), and the cities of Abbotsford and Mission, B.C. They won the NCRA/ANREC 2011 Community Development Award, which recognizes a station that has played an outstanding role in its community. CIVL-FM also received the Outreach Award at the 2011 Fraser Valley Cultural Diversity Awards. The station has developed ongoing relationships with local Chambers of Commerce, the Abbotsford Mayor's Office, and local Rotary Clubs, and regularly broadcasts UFV basketball games, which, we are told, is much appreciated by UFV.

10. Abbotsford is B.C.'s largest municipality by area, and fifth largest by population. The city has the third-highest proportion of visible minorities in Canada, and is home to a significant Punjabi-speaking population. Other local broadcasters play either a country music or lite hits format, therefore, we are told, CIVL-FM is the only Abbotsford broadcaster that plays third-language and alternative programming.

11. CIVL-FM has operated with one staff member over the past two years, and before that with a skeleton staff paid by honoraria. The station has always relied extensively on the work of volunteers for management as well as programming and has a well-defined set of policies to govern these activities. We also know that the staff and volunteers at CIVL-FM are very engaged in continually evaluating and improving the station's compliance and are in frequent communication with the NCRA/ANREC about these issues.

12. The NCRA/ANREC provides regulatory support to all our member stations. Last year, our Regulatory Affairs Director and Executive Director provided intensive one-on-one support to at least 35 member stations in addition to offering general compliance resources like a member listserv, our bilingual Regulatory Support Guide, a new handbook called "Sounds Cooperative" on best practices for starting a c/c station, conference workshops on regulatory issues, and a web-based policy exchange. The NCRA/ANREC also conducted regulatory audits for 10 member stations this past year, and this summer we will add a regulatory self-audit to the list of resources we provide our members.

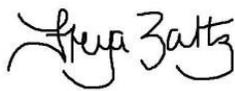
12. Due to previous challenges faced by NCRA/ANREC member stations in meeting the requirements under s. 9(2) of the Regulations, we conducted initiatives in 2011 and 2012 to contact member stations and confirm that they: (1) understand when to submit annual returns, (2) know how to obtain and submit renewal forms, and (3) understand that financial statements must cover the period of time specified by the Commission. Our goal is to help ensure that our members have accurate information and submit their annual returns correctly

and on time. In 2012, we calculate that 98 percent of NCRA/ANREC member stations filed their Annual Returns by the November 30th deadline.

13. We will continue to offer resources to our members, including CIVL-FM and CHES-FM, to assist them in maintaining regulatory compliance.

14. Again, the NCRA/ANREC appreciates that the Commission intends to renew these stations' licences for a full term, subject to interventions.

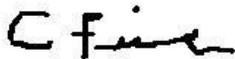
Sincerely,



Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC



Shelley Robinson
Executive Director
NCRA/ANREC



Catherine Fisher
Board of Directors
NCRA/ANREC

Cc:
UFV Campus and Community Radio Society (CIVL-FM)
Erin Community Radio (CHES-FM)

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