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

Secretary General,

**Application CRTC 2013-0433-6**

June 21, 2013

Secretary General,

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 the application by the Lillooet Camelsfoot T.V. and Radio Association ("Camelsfoot") for authority to acquire from Radio Lillooet Society ("RLS") the assets of the English-language low-power community radio programming undertaking CHLS-FM, Lillooet, British Columbia, known as Radio Lillooet, under the same terms and conditions as those in effect for the current licence. We note that RLS may have been in non-compliance with section 9(2) of the Radio Regulations with respect to filing annual returns during their license term. Should the hearing be an appearing hearing, we would like the opportunity to appear at it.

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. Lillooet is a small community located on the Fraser River in British Columbia. The population of the District of Lillooet in the 2011 Census was approximately 2,300. The reserve lands of three large bands of the St'at'imc Nation abut the town. Lillooet is minimally served by local media. Radio Lillooet, which serves the communities of Lillooet, Lytton, Seton Portage, Bralorne and Goldridge, provides the only locally originating radio broadcast in the area.

4. The RLS began organizing in 1999, and was approved for the first broadcasting licence for a developmental English-language FM community radio programming undertaking in 2001. They started broadcasting at Lillooet Secondary School with a 5 watt transmitter and a budget of \$4,000. They won the NCRA/ANREC Standard Community Radio Award for Best Small Station in 2001, and the 2004 NCRA/ANREC award for Community Involvement for their program "Kids Corner".

5. RLS advertises broadcasting opportunities to community members on air and in print media. They hold at least 2 open houses a year, and try to arrange them to coincide with other large community events. They also maintain contact with and encourage members of local organizations to consider getting involved. However, as is common in small towns, much of their recruitment is done on a personal basis by volunteers and board members among their friends and acquaintances.

6. Lillooet Secondary School offers a grade 11/12 "Broadcast Media" class. When the class is running, students host a weekday radio show, which has been an important component of Radio Lillooet since its inception. Many student broadcasters have returned as volunteers after graduation, and several students who took the class have pursued post-secondary studies in radio or journalism.

7. As far as we know, RLS is the first (and only) radio station to offer programming in St'at'imcets, the language of the region's First People. St'at'imcets is considered an endangered language with only about 300 speakers listed in the last Canadian Census.

8. Lillooet has a dry climate with hot summers, and (along with Lytton and Chinook Cove) it holds the record for the hottest temperature ever recorded in British Columbia, 44.4°C. Lillooet is therefore extremely vulnerable to wildfires, and has incurred damage from fires over the last decade. RLS has been designated by the District of Lillooet as the region's emergency broadcaster.

9. The 2003/2004 fire seasons were particularly catastrophic; due to an extended drought in southern BC, forest firefighters faced conditions never seen before in Canada. RLS played a key role in the response to the fires, providing the community with frequent updates, news bulletins from the District of Lillooet and the Squamish Lillooet Regional District ("SLRD"), and live interviews with fire information officers. We are told the station's popularity soared and many new volunteers were inspired to get involved during and after this experience. Similarly in 2009, three huge fires led to evacuations and a state of emergency. As the only local radio

broadcaster, RLS again played an important role in keeping residents informed and safe.

10. In the request for information document sent by the Commission to RLS, the Commission notes that the requirement to obtain prior Commission approval for changes in ownership or control of a broadcasting undertaking has not been complied with.

11. We are informed that in 2003, two societies voted to merge to become the LCTVRA (the "R" added to denote radio), or Camelsfoot, in order to make funding from Camelsfoot available to RLS. This merger was inadvertently recorded with the B.C. Registrar of Societies as a name change from LCTVA to LCTVRA, rather than a merger.

12. We are told by RLS that "from early on in RLS's existence, Camelsfoot offered to provide technical expertise and support" to the new station, and that, at the time of the merger, members of the RLS, who were younger and more eager intended to take over positions on the new Camelsfoot board as their older members stepped down, thereby infusing the organization with new energy.

13. We are also told that all those involved intend to continue providing community members and organizations with opportunities to participate in the station, and provide the community with information about local events and issues. This includes continuing their role as an emergency broadcaster of Lillooet.

14. At present, virtually all of the station's funding comes from an annual grant received from the SLRD. Camelsfoot must apply to the SLRD for this funding each year, and is in competition with many other organizations. To date, the SLRD has continued to fund the station, although, we are told that it usually does not receive the full amount requested in the grant application. As RLS has noted in their supplementary brief, the SLRD does not have a member on Camelsfoot's board of directors and have never made any attempt to control the programming or content of the station.

15. With respect to RLS's possible non-compliance with respect to filing annual returns in 2003/04, 2004/05, 2006/07, 2007/08 and 2008/09, we note that, to the best of our knowledge, 2009/10, 2010/11, and 2011/12 years annual returns have been filed on time and correctly. This suggests that the new station manager, who has been in his position since 2009, has made changes at the station, and systems are now in place to ensure compliance in this area.

16. In particular, we are informed that they have developing a compliance calendar, which will facilitate the introduction of new board members (and possibly a new station manager in future) to the broadcast year and its deadlines and obligations. He also mentions that the Board of Directors plans to shift the regularly scheduled date of its annual general meeting to September so that the fiscal year will match with the CRTC's broadcast year. RLS has also appointed a board member as compliance officer, and she has been working with the station manager to put good

regulatory practices into place. We are told that, as a result of this CRTC process, RLS has learned a great deal about the importance of developing good systems to ensure regulatory compliance, and they are serious about doing the necessary work to ensure compliance going forward.

17. The NCRA/ANREC provides regulatory support to member stations, and for the past two years we have run a campaign to contact member stations and confirm that they fully understand the requirements of s. 9(2) and fulfill those requirements by the November 30 deadline. We believe that our focused efforts in this area have assisted our members to understand their regulatory responsibilities. We will continue to provide this assistance to member stations, including LRS.

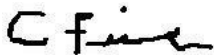
28. The NCRA/ANREC was not aware of RLS's possible non-compliance until this public notice was posted, but we have since contacted them and offered assistance. In addition to this, RLS, as an NCRA/ANREC member, has access to all of the compliance resources produced by the association.

29. The NCRA/ANREC supports this proposed transfer, and we believe it is in the best interests of maintaining a community radio station in Lillooet. We believe that RLS has the ability to ably fulfill all the requirements of the Broadcasting Act and the Radio Regulations, and continue to provide local residents with an opportunity to enjoy and participate in local community radio. We hope that the Commission will permit this transfer under the same terms and conditions as those in effect under the current licence.

Sincerely,



Freya Zaltz  
Regulatory Affairs Director  
NCRA/ANREC



Catherine Fisher  
Regulatory Affairs Committee  
NCRA/ANREC

Cc: Lillooet Community Radio Society

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