



NCRA/ANREC
180 Metcalfe St, Suite 608
Ottawa, Ontario,
K2P 1P5

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

Re: Application No. 2013-1090-4
(Technical amendment)

Sept 10, 2013

Secretary General,

1. The National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires ("NCRA/ANREC") supports this application by the University of Calgary Student Radio Society ("CJSW-FM") to make a technical amendment to their license. CJSW-FM seeks to increase their ERP to 18,000 watts in order to better serve their approved broadcasting area. If there is a hearing, we would like to appear.
2. The NCRA 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 radio") 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. Calgary is the largest city in Alberta, and the fifth most populous city in Canada. According to Statistics Canada, the population of the Calgary metropolitan area ("CMA") increased almost 12.6% from 2006 to 2011 (1,214,839 in 2011), with an annual growth rate of 2.8% (the national annual rate is 1%). According to a Financial Post markets projection, CMA's

population is expected increase 15.9% more by 2017. The population of nearby communities Chestermere, Airdrie and Okotoks is increasing even faster, with 40% to 50% growth between 2006 and 2011. Calgary is also home to one of the youngest urban populations in Canada.

4. Calgary is a culturally and linguistically diverse city. Currently, 13% of new Canadian immigrants each year settle in Alberta, and 58% of these in the CMA. Small nearby communities like High River have also seen rapidly growth of immigrant populations. According to Statistics Canada, Calgary's visible minority population (comprised of both immigrants and Canadian-born people), is expected to grow from 22% to 38% of the population between 2006 and 2031. In addition, 29% of Calgarians have a mother tongue other than English or French, and 63.5% of Calgary newcomers speak a third language at home.

5. CJSW-FM reflects the cultural diversity of the CMA in their programming and volunteer base. They broadcast volunteer-produced programs in 12 languages, and these programs are among those best-supported by listeners during the station's funding drives. In CRTC 2010-499, the Campus and Community Radio Policy, the Commission acknowledged "the significant role played by c/c stations in providing third-language programming to the ethnocultural communities resident within their service areas." Stations like CJSW-FM help fulfil the objectives of the Broadcasting Act by training and supporting volunteers from diverse cultural backgrounds to produce programming reflective of their communities, and providing opportunities for them to participate in the governance and organization of the station.

6. The Calgary radio market is currently served by 31 stations. As far as we know, only four of these (Ethnic-licensed CHKF-FM and CKYR-FM; CKAV-FM (Aboriginal Voices Radio) and CJSW-FM) provide programming in languages other than French or English, or programming by and for specific cultural groups. CJSW-FM therefore makes an important contribution in this area. CJSW-FM also broadcasts musical genres that are not often heard on other Calgary radio stations, and spoken word shows on specialized topics including architecture and design, food culture, and writers. They are also the only station producing programming by and for Calgary's LGBT communities, and they broadcast locally-produced programming on Aboriginal education, sport and culture.

7. The CJSW-FM show *Am I Right?* was nominated for the 2012 Canadian Comedy Awards. Readers of Calgary's newspaper *Fast Forward Weekly* have rated CJSW-FM "Calgary's Best Radio Station" for nine years in a row. CJSW-FM also participates in Alberta's Emergency Alert program, which was important in June 2013 when extreme flooding occurred.

8. CJSW-FM began in 1955, when a few students at the Calgary branch of the University of Alberta hosted a weekly 15-minute program called Varsity Vista, on commercially-licensed station CFAC-AM. The University of Calgary Radio Club, one of the earliest in Western Canada, was incorporated in 1960. They broadcast via closed circuit PA system, and then on AM low-power carrier-current, until they were granted an FM broadcasting license in 1984. They are still the only terrestrial c/c broadcaster in Calgary, and one of only a small number in Alberta.

9. With 200 active volunteers, CJSW-FM is recognised as one of the largest, and most stable c/c stations in Canada. They raise approximately \$200,000 annually during their funding drives. Station staff spend time each week sharing their knowledge by advising and mentoring staff and volunteers at other c/c stations in Canada. CJSW-FM also contributes considerable time, money and expertise to the NCRA/ANREC and to improving the c/c sector in general. They also produce several shows that are shared with other stations in the c/c sector for free.

10. Regarding CJSW-FM's apparent non-compliance with respect to section 9(2) of the Radio Regulations, 1986, the NCRA/ANREC has been in contact with CJSW-FM and our understanding is that annual returns for the 2007-2010 broadcast years were filed late due to a previous misunderstanding by the station about financial statements, and that the misunderstanding has been addressed. We note that since 2010 all returns have been filed on time, and it appears unlikely that future non-compliance will occur in this area.

11. CJSW-FM informs us that they have been experiencing signal interference from other stations in Calgary. In 2002, they increased their ERP to 4,000 watts, but new stations have entered the Calgary market in the intervening 11 years thereby affecting CJSW-FM's signal. We are told there are now a number of Calgary neighbourhoods where the signal is either poor quality or drops out entirely. Only a small number of the 16 commercially-licensed FM stations in the CMA broadcast at less than 100,000 watts ERP, making it difficult for CJSW-FM's 4,000 watts to be properly heard within their approved broadcasting area.

12. We are told that CJSW-FM has considered other solutions, like increasing their ERP by a smaller amount, or changing their antenna type or location, but they believe this proposed technical amendment is the best way to address their signal problems without affecting the signals of other stations in the market.

13. It is important for CJSW-FM to have a strong and consistent signal because financial support received from listeners during funding drives comprises about one-third of their annual budget, and an unreliable signal may deter listeners. We believe that CJSW-FM's increase will allow the station to solidify listener support within their broadcasting range.

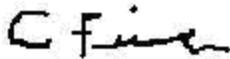
14. CJSW-FM also informs us that if the amendment is approved, their increased signal strength will not financially impact other stations in the market. This is because CJSW-FM's total annual advertising revenue is minimal; they limit ad sales to a small number of community and festival partners, and they do not intend to pursue additional advertising revenue beyond their current annual goal. According to the CRTC's Commercial Radio Financial Summaries, Calgary is the fifth-largest radio market in Canada. Total revenue has increased in the past 4 years, and was valued in 2012 at almost \$80,000,000. This supports their contention that any impact on existing broadcasters would be minimal.

15. This technical amendment will have the incidental effect of improving CJSW-FM's signal

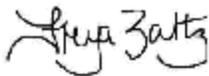
quality in the nearby communities of Okotoks, Airdrie, Cochrane, Strathmore, High River and Canmore. We are told that many people commute daily from these communities to Calgary for work and other purposes. None of these are currently served by a c/c station, therefore, CJSW-FM is the only "local" community service they can access terrestrially. However, we are told that CJSW-FM's primary goal is to improve their coverage in Calgary, and not to expand their broadcasting into these new areas.

16. We therefore support CJSW-FM's request for a technical amendment and believe it furthers the goals of the Broadcasting Act, and we encourage the Commission to approve it.

Sincerely,



Catherine Fisher
NCRA/ANREC
Regulatory Affairs Committee



Freya Zaltz
NCRA/ANREC
Regulatory Affairs Director

cc: CJSW-FM

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