



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. 2013-0986-5
(Technical amendment)

Aug 12, 2013

Secretary General,

1. The National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communuataires ("NCRA/ANREC") supports this application by Seaside Broadcasting Organization ("CFEP-FM") to make a technical amendment to their license. CFEP-FM wishes to relocate their transmitter and increase their ERP to 2,500 watts. 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. CFEP-FM is a community licensed NCRA/ANREC member station. They are the only locally originating radio service in Eastern Passage, Nova Scotia, which is a fast-growing urban community of about 12,000 people located within the Halifax Regional Municipality ("HRM"). The HRM as a whole has a population close to 400,000 people. CFEP-FM operates with no paid staff, but they have dedicated long term volunteers who work hours equivalent to paid staff. They also employ co-op students and hire students during the summer months.

4. Like most community-licensed stations, CFEP-FM supports its operations through a combination of community fundraising, business sponsorship and small grants. They recently completed their most successful 9-day "Radiothon" fundraiser yet: they received \$15,000 in prizes donated by local businesses (including teddy bears, which listeners could buy to donate to the local children's hospital and retirement homes), and raised \$52,000 for station operations. CFEP-FM has also recently published a fundraising community cookbook called "Cooking with Seaside", filled with recipes contributed by volunteers and station listeners.
5. CFEP-FM broadcasts live from local community events every weekend in the summer. So far in August they have broadcast live from Halifax's Natal Day Parade and from the Eastern Passage Carnival Days.
6. Regarding their regulatory compliance, we are told that CFEP-FM has submitted their annual returns on time for the 2010/11 and 2011/12 years. They also received a NCRA/ANREC regulatory audit in 2012.
7. Seaside Broadcasting Organization first began broadcasting in 1998 through a special events exemption order for the Eastern Passage/Cow Bay Summer Carnival. In 2002, CFEP-FM was licensed as a low-power community radio station, broadcasting at 50 watts. In 2008, they applied for a power increase and received approval to broadcast 1340 watts. This would have permitted them to reach all of Eastern Passage and a segment of the HRM. Unfortunately, their actual power output is restricted to a maximum of 741 watts by their current tower operator, Rogers Communications Ltd. This restriction means they are unable to serve a significant portion of their approved broadcast area. Poor reception and signal interference have been reported in the HRM neighbourhoods of Clayton Park, Bedford, South End, West End and North Dartmouth.
8. In 2011, in an attempt to address these reception problems, CFEP-FM received approval from the Commission to increase their ERP to 1680 watts, and move their transmitter. Unfortunately, they have concluded that this move is not feasible because the estimated cost of \$180,000 is beyond their means. Instead, they have submitted this latest application, which proposes a power increase and a space-sharing arrangement with the Canadian Broadcasting Corporation at the Geizer Hill transmission site. CFEP-FM believes this new arrangement is affordable will allow the station to reach most of the HRM, with an added benefit of reducing or eliminating fourth adjacency interference currently experienced.
9. Although this increase in coverage will allow CFEP-FM to reach more listeners, and may increase their advertising value to local businesses, we do not believe it will have significant adverse effects on other broadcasters in the Halifax market for the following reasons:
 - As CFEP-FM states in their application, their programming goal is to reach listeners over 50 years of age. This is in contrast to the majority of other local broadcasters in the HRM, which they believe target younger listeners who are perceived as more active consumers of goods.
 - Businesses advertising on stations in the c/c sector tend to be small and locally-owned, and often cater to niche interests. It is our understanding that small, businesses generally spend

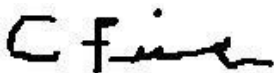
less on advertising, and although some do advertise on commercial radio services, commercial broadcasters tend to rely on them less than larger and more profitable advertisers.

-As the Commission is aware, English-language c/c radio stations' annual advertising revenues are substantially lower than the average commercial radio stations in their market. We believe that increasing the broadcasting range of a station like CFEP-FM is unlikely to divert much revenue from existing commercial services in the Halifax radio market. Furthermore, we note that the Halifax radio market appears healthy and has shown stable commercial revenues during the last four years (CRTC Halifax Radio Market Financial Summaries, 2012), and when the Atlantic region as a whole is considered, commercial operating revenues in radio markets have increased (Statistics Canada).

-The Commission has previously approved technical amendment applications for CFEP- FM that would have similar effects on the Halifax Market, and we do not expect this application to have substantially greater impact.

10. CFEP-FM has made considerable effort during the last several years to secure a stronger frequency that will reach its entire community. This has been a goal of the station since its inception, and has been requested by many listeners and potential listeners over the years. The NCRA/ANREC supports CFEP-FM's proposed technical amendment and encourages the Commission to approve the application.

Sincerely,



Catherine Fisher
Regulatory Affairs Committee
NCRA/ANREC



Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC

cc: CFEP-FM

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