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April 23, 2014

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

Secretary General,

**Re: Broadcasting Notice of Consultation CRTC 2014-128**

(Renewal of broadcasting license for CHSR Broadcasting Inc. ("CHSR-FM"), expiring August 31, 2014)

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 an application by CHSR-FM to renew their broadcasting license. CHSR-FM has been found in apparent non-compliance with section 9(2) of the Radio Regulations, 1986. 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 currently represent more than 85 members, including CHSR-FM.
3. CHSR-FM is a campus station associated with two cohabiting universities, the University of New Brunswick Fredericton ("UNB") and St Thomas University ("STU"). It broadcasts to the city of Fredericton and surrounding communities from a student union building shared by these universities.

CHSR-FM was the third campus radio station licensed in Canada, and in 2010 they celebrated 50 years of broadcasting. The city's current mayor, Brad Woodside, is a strong supporter of arts and culture, and was a one-time CHSR-FM volunteer.

4. As the Commission is aware, c/c stations play an important role in providing diverse programming that reflects their communities. While Fredericton is served by several commercial radio stations and a French community station, CHSR-FM is the city's only English-language community broadcaster. It also provides unique programming, including the following:

- Fredericton's only local third-language radio programming, including a popular Chinese show, and an Iranian program that recently won a local Barry Award for programming excellence as well as an NCRA/ANREC award for third-language programming in 2011;
- sportscasts of the UNB V-Reds Men's Hockey games;
- eight programs that feature music by local and east coast artists, including a show focusing on French language and Acadian music; and
- programs about comic books and comic culture, science and technology, wrestling, and the paranormal.

6. CHSR-FM also has a strong relationship with UNB and STU, and it offers training in a variety of areas useful to students who wish to add skills to their résumés, including radio production and technical skills. Students have told the station how valuable this training is in the region's very competitive job market. The station has also explored ways to partner with the STU Journalism program, which has resulted in a number of student-produced documentaries, and is currently seeking to develop partnerships with the UNB History department.

7. Due to its long history, CHSR-FM has collected a large archive of audio and other materials to preserve, in partnership with the Provincial Archives of New Brunswick. The station hopes to make much of this material publicly available in the future.

8. With respect to annual returns, CHSR-FM has informed us that the station experienced a difficult time corresponding with the period when the apparent non-compliance occurred. During this time, volunteer energy and community engagement were low and staff turnover resulted in a lack of continuity in the station's administration and information being lost. It took time for the station's new administration to become confident in their duties, but we are told that the new Station Manager contacted the Commission when informed of the apparent non-compliance, and, with help from Commission staff, filed the late return by the agreed-upon date. To the best of our knowledge, CHSR-FM's 2012/13 annual return was filed correctly and on time.

9. Based on our conversations with the current Station Manager, it appears that CHSR-FM is aware of its regulatory responsibilities and has already, or will shortly, make appropriate changes to policies and procedures to ensure that the station remains in compliance. They also plan to send a staff member to the National Campus and Community Radio Conference ("NCRC") in June 2014 in Victoria, BC. NCRC is an excellent opportunity for member stations to learn, share skills and best practices with other stations, and attend regulatory and governance workshops and sessions hosted by representatives from the Commission and Industry Canada.

9. As set out in its application, CHSR-FM has also made significant efforts in the last three years to improve functioning, outreach and governance, and intends to continue these efforts. We are told that during the past year they have improved their accounting systems, and attracted to their board of directors a retired accountant and other individuals with legal, financial and technical skills. They received a Community Radio Fund of Canada grant in 2012 to help them carry out this work for a project called "Integrating with the Community: Finding New Roots Back in the Community", which was intended to help the station improve volunteer recruitment and retention. In 2013, CHSR-FM received a grant from a different funder to continue this work.

13. Station staff have reported a significant increase in community support over the last three years due to these efforts. For example, when water damage from a recent flood rendered three of their four studios unusable, the station was able to raise \$5,500 within two weeks to replace damaged equipment and furniture.

14. As the Commission is aware, stations in our sector operate with very lean budgets, and rely extensively on the work of volunteers. In the c/c sector, wages tend to be low, staff and volunteer turnover is high, and institutional memory is easily lost. Although these factors cannot excuse non-compliance, they may contribute to the ongoing challenges stations face in understanding and fulfilling the regulatory requirements. CHSR-FM is a good example of how these issues can affect a station adversely, but we believe they have effectively assessed their situation and resources, and systematically made improvements to ensure compliance.

15. The NCRA/ANREC provides regulatory support to all of our member stations. We offer members general compliance resources like an email listserve, a bilingual Regulatory Support Guide, a "Sounds Cooperative" handbook (which details best practices for starting a c/c station), conference workshops on regulatory issues, and a web-based policy exchange, and intensive one-on-one support provided by the Regulatory Affairs Director and Executive Director. We will soon add a regulatory self-audit to our member resources.

16. Due to previous challenges faced by NCRA/ANREC member stations in meeting the requirements under s. 9(2) of the Regulations, we began an initiative in 2011 to contact members 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 has been to ensure that our members have accurate information and submit their annual returns correctly and on time. We continued this initiative in 2012 and 2013. We are pleased to say that, as a result of our campaign, all NCRA/ANREC members (to the best of our knowledge) filed their 2013 returns correctly and on time.

19. We have recommended to our members in general, and to CHSR-FM in particular, that they take the following steps to ensure ongoing compliance in future years:

- develop systems, procedures, policies and other safeguards to prevent non-compliance with the Regulations;

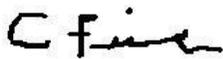
- develop policies and procedures regarding ongoing regulatory training, supervision, and oversight for staff and volunteers;
- create systems for confirming that regulatory deadlines are met, including adding regulatory compliance tasks to staff and volunteer job descriptions, creating calendars, and improving board training and resources; and
- make station policies and procedures clearer and more accessible.

20. It is clear that CHSR-FM plays an important role in its community and fulfills the mandate of a campus radio station. This includes providing public access to the airwaves, volunteer training, opportunities for participation in programming and the governance of the station, local news and information, and exposure for local and emerging artists.

21. The NCRA/ANREC therefore encourages the Commission to renew CHSR-FM's broadcasting license for the longest possible term. We note that the Commission has, in the past, renewed the licenses of stations found in non-compliance for terms shorter than seven years. We understand that this enables the Commission to check on stations' progress and confirm their compliance before the end of a full license term. However we note that shortened renewals, particularly those of two years or less, can significantly add to stations' administrative burden, particularly for smaller stations with few or no paid staff. Those stations often find the renewal process onerous; the time and effort required to complete and submit the necessary documents may detract from other work, like recruiting volunteers, fundraising for station operations, or improving internal station policies that underpin compliance.

22. Therefore, in order to balance the burden and necessity for oversight, we encourage the Commission to renew CHSR-FM's licence for a term of at least four years.

Sincerely,



Catherine Fisher  
NCRA/ANREC Regulatory Affairs Committee



Freya Zaltz  
NCRA/ANREC Regulatory Affairs Director

Cc:  
CHSR Broadcasting Inc. (CHSR-FM)

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