



NCRA/ANREC  
608-180 Metcalfe St.  
Ottawa, ON  
K2P 1P5

August 22, 2014

John Traversy,  
Secretary General  
CRTC Ottawa, ON  
K1A 0N2

Secretary General,

**Re: Broadcasting Notice of Consultation CRTC 2014-0149-7**

**Application by Radio Ryerson Inc. for a broadcasting licence to operate a low-power, English-language community-based campus AM radio station in Toronto**

1. We are writing in support of an application by Radio Ryerson Inc. ("RRI") to operate an English-language AM campus radio undertaking in Toronto.
2. Founded in 1986, the National Campus and Community Radio Association/Association nationale des radios étudiantes et communautaires (NCRA/ANREC) is a not-for-profit group working to recognize, support, and encourage volunteer-driven, non-profit, public-access campus and community-based radio broadcasters across Canada. Our goals are to ensure stability and support for individual stations and the long-term growth and effectiveness of the sector. We currently represent more than 85 members, including RRI.
3. We have supported the development of this application, both as part of RRI's 2011 FM application and again as they have begun developing their "artisanal" AM approach. This support included outreach to other campus and community ("c/c") radio stations to gather information regarding best practices related to governance structures, fundraising and advertising projections, processes to become and remain in compliance with broadcasting regulations and policies, volunteer management, and ideas to encourage campus and community participation in every element of station programming and management.

## Quality of the application

4. RRI's application has been developed in consultation with stakeholders and participants who embody the mandate of c/c radio to its fullest extent. It has commitments of support from the university administration, the student union (and the students, as expressed in a referendum where more than 80 percent of students who voted were in favour of pursuing a licence and providing a student levy to support the station), key Ryerson departments like Radio Television Arts, Journalism, and Ryerson Athletics, as well as numerous on-campus cultural, advocacy, athletic, and special interest groups.
5. Additionally, RRI has developed relationships with a diverse array of off-campus community and media organizations, foundations, resource and education centres, and service providers, including those serving cultural and linguistic groups, children and youth, people with disabilities, new Canadians, women, LGBTQ communities, and others. Its bylaws demonstrate a concerted commitment to ensure broad representation from all facets of the community and the campus, as required by CRTC 2010-499.
6. We feel this mix of participation reflects the Commission's intent for c/c radio, bringing campus and community together in the ownership, governance, management and programming of the station. This mix also limits the possibilities of future governance issues arising, and ensures that more stakeholders are invested in maintaining high quality programming and regulatory compliance.
7. We believe everything RRI has proposed in their application is achievable, in service to their existing and potential volunteers and listeners, and the best use of the available frequency. We also believe it will bring together the campus and community, make a positive economic contribution to the local market without negatively affecting any existing broadcasters, and contribute to the Canadian broadcasting system as a whole.
8. With respect to its proposed programming, RRI has committed to exceeding the requirements set out in CRTC 2010-499 for Canadian content and spoken word programming, and to broadcast substantial new music. These commitments are drawn from a number of sources, including the uniqueness of the Ryerson campus, which serves more than 25,000 students, many of whom are studying journalism, broadcasting and communications; the downtown community, which is diverse in terms of ethnicity, sexual orientation, languages spoken, and range of opinions and lived experiences; and a location and service area in downtown Toronto that is at the heart of a thriving music scene that includes almost every genre imaginable.
9. As a result of this preparatory work, we believe RRI has illustrated its plans to ensure appropriate staff capacity to train and monitor volunteers in meeting and even exceeding their regulatory requirements and conditions of licence; produce high quality programming; facilitate diverse community access to the airwaves; and include meaningful participation of the campus and the larger community in all elements of the station's governance, programming and operations.
10. RRI has also proposed plans for a c/c station that will be at the forefront of our sector's

participation in the digital media environment, effectively integrating AM broadcasting and digital delivery. Their level of knowledge and planning in this area is unique amongst many other new c/c applicants and will set an example for existing stations that are starting to experiment in this area. We believe their plans are appropriate in terms of ensuring the continued relevance of the station in a digital media environment.

11. We also note that, since the station has been broadcasting online since 2013, RRI has had the opportunity to test, practice and refine many of these ideas. For example, in that time RRI has:
  - launched a multi-media website to feature original content and other station information;
  - hired four part-time staff people to recruit and train over 100 prospective volunteers, including two student interns with disabilities who worked with the station as part of a community-driven career education program;
  - held regular quarterly Board meetings;
  - organized two radio camps for youth, aged 8-12 and 12-15;
  - sent a delegate to the NCRA's annual conference;
  - produced spoken word programming on a range of issues including a program about a queer history photography exhibit during the recent World Pride week and a series of interviews about local Fringe Festival plays by independent theatre artists;
  - organized a number of training events, including a two-day workshop for volunteers RRI co-hosted with CHHA-FM, a nearby Spanish-language community licenced station, which included a session on regulatory compliance presented by NCRA staff;
  - participated in the NCRA's "Resonating Reconciliation" project to recruit and train local Aboriginal producers to create a 30-minute documentary about the legacy of Indian Residential Schools in their community (RRI's documentary was called "From Ryerson to Shingwauk").
  
12. Finally, we believe RRI's lived experience of running a station, albeit online, has positively influenced this application and speaks to their ability to continue that work, if licenced. This includes recruiting and working with diverse volunteers, an accountable governance structure, and broadcasting high quality locally-reflective programming, as well as their work to train their programmers to follow CRTC regulations and policies, even though not currently required to do so. This work extends to them using a CRTC compliant log and playlist template designed by CFRU-FM, verified by Commission staff, and circulated to all NCRA members.

### **Diversity of voices**

13. The Commission has acknowledged our sector's important contributions to diversity of editorial voices in the Canadian broadcasting system in numerous external reports, studies and CRTC decisions. We believe RRI would make a significant contribution to the diversity of voices, particularly in the downtown Toronto market, by providing volunteer-driven, diverse, and locally-relevant content. A station with the level of capacity, institutional support, and financial support that is being proposed for RRI would also contribute to the diversity of voices across the country, by providing high quality programming produced and hosted by diverse volunteers that could be shared with other Canadian c/c stations.

14. We also note that almost every other university in Canada of a similar size to Ryerson currently has an affiliated c/c station that serves students, faculty, and local community. These stations are known for the diversity of their content, from music to spoken word programming, as well as the range and number of people who volunteer. In particular we note the success of CJLO-AM based at Concordia University in Montreal. We believe Ryerson deserves a similar opportunity.
15. Currently only one English campus-licensed station, CIUT-FM, has a signal that adequately serves the downtown area of Toronto. Its programming is different from that proposed by RRI. We also note that given the volunteer-driven nature of c/c radio, each c/c station is limited in the amount of on-air programming its volunteers can produce, because it has limited amounts of air-time, as well as limited training and supervision capacity.
16. So just as the city can accommodate multiple universities, we feel the same is true of c/c radio — adding another station to the market will strengthen opportunities for volunteers from downtown and across the city, and from the Ryerson campus community, to obtain direct access to the airwaves. This theory has proved to be true in Vancouver, Winnipeg, Montreal and Ottawa, and we believe it can also be true in Toronto.

### **The market impact of the application**

17. RRI is proposing a service based on a range of programming not heard anywhere else, funded in large part by a student levy and community fundraising, supplemented by potential grants from the Community Radio Fund of Canada (CRFC) and other funders, and by advertising that RRI will approach as an extension of service to the community.
18. For example, much of the advertising c/c stations do carry (and that RRI proposes), is as distinct as their programming. Many smaller local businesses and festival organizers (particularly those from other not-for-profit organizations, ethnic communities or youth-run businesses or events) are not able to afford any advertising on commercial radio. C/c radio gives them a way to reach out, often in the context of programming produced by and relevant to their target community, while supporting ongoing public access to the airwaves. In this way, RRI would not significantly compete with commercial broadcasters while still making a positive contribution to the market.
19. Similarly, although RRI is a not-for-profit organization with an annual budget many times smaller than commercial radio stations, we believe there are economic impacts of its work that go unrecorded. For instance, what is the economic value of the hands-on training RRI will provide to its hundreds of volunteers each year? Of the local information and perspectives it will provide that would not otherwise be broadcast? Of the countless free Public Service Announcements it has committed to produce and broadcast? Or the promotional value in playing new, mostly local, music from emerging musicians as well as featuring the work of other cultural producers?
20. Our sector does not yet have firm numbers to quantify the value of these contributions, in part because stations must prioritize available resources for daily operations. But drawing from similar studies of the economic value of the arts and cultural sectors<sup>i</sup> and the not-for-profit sector<sup>ii</sup> more broadly, we are confident that RRI will provide a significant net economic benefit to the downtown Toronto market.

21. As a result of not being a major economic player due to a relatively small market share and low revenue, there may sometimes be a perception that a c/c station is not the best economic use of a frequency. Instead, given the number of commercial stations relative to the number of c/c stations, and the fact that c/c stations can be seen to have both positive social and economic benefits, we encourage the Commission to consider a c/c applicant as the highest and best use for any remaining spectrum in a market if there is a demonstrated community desire for such a service.

### **Conclusion**

22. We believe RRI's application stands apart for its commitment to public access, community ownership, sustainable financial plans, inclusive governance model, and services to underserved portions of the community. We also believe that downtown Toronto would benefit from another c/c broadcasting service, and in a market already saturated with commercial radio stations, we believe this would be the highest and best use for this frequency.

23. We also believe the station's perseverance to get licenced is admirable and speaks to its commitment to c/c radio. After not succeeding with its application for an FM licence at 88.1 FM in 2012, it has embraced LPAM as a way to reach and serve its intended community.

24. For all these reasons, we strongly encourage the Commission to approve RRI's application for an AM campus radio undertaking.

Thank you,



Shelley Robinson  
Executive Director  
NCRA/ANREC

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<sup>i</sup> In 2007 the Conference Board of Canada estimated that the arts and culture sector had a direct economic impact of \$46B to Canada's Gross Domestic Product for that year, which constituted 3.8 percent of Canada's real Gross Domestic Product and directly employed more than 662,000 Canadians. <http://www.conferenceboard.ca/e-Library/abstract.aspx?did=2671>

<sup>ii</sup> In 2006, the Canadian Council on Social Development and Imagine Canada calculated that the total economic impact of the not-for-profit sector in Ontario alone was nearly \$50 billion, representing more than 7.1 percent of that province's GDP, a figure greater than the automobile and construction industries combined. [http://www.imaginecanada.ca/files/www/en/nsnvo/d\\_ontario\\_sector\\_report.pdf](http://www.imaginecanada.ca/files/www/en/nsnvo/d_ontario_sector_report.pdf)

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