



NCRA-ANREC
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June 1, 2015

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

Secretary General:

**Re: Broadcasting Notice of Consultation 2015-115
Call for comments on proposed amendments to the *Canadian Radio-
television and Telecommunications Commission Rules of Practice and
Procedure* made under the *Broadcasting Act* and the *Telecommunications
Act***

1. I am writing on behalf of the National Campus and Community Radio Association/ l'Association nationale des radios étudiantes et communautaires (NCRA/ANREC) regarding the proposed amendments to the CRTC Rules of Practice and Procedure.
2. 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 not-for-profit member radio stations.

3. The NCRA/ANREC is in favour of streamlining processes and making procedures more convenient for applicants. Due to the funding issues experienced by our sector, our member stations tend to have limited capacities for administrative work and any means of reducing this burden is appreciated.

4. We also support the idea of simplifying the licence renewal process compared to the processes involved in issuing a new licence or transferring the ownership of an existing one, except where extraordinary renewal circumstances require publication of a notice of consultation. Most licence renewals for our members are routine administrative procedures without complications and a simplified procedure seems justified.

5. As an aside, we note that the changes announced in CRTC 2015-116 may cause some problems for our members, particularly those without staff or those with high staff turnover. Those stations have often relied on receiving direct communication from the Commission regarding their upcoming licence renewal and may not see the annual spring notices of consultation for calling for the submission of licence renewal applications. The NCRA/ANREC will endeavor to ensure that our members are aware of these notices when published by the Commission. Some of our members have also appreciated the opportunity to submit licence amendment and renewal paperwork at the same time rather than participating in two separate proceedings.

5. However, given the importance of making procedures more convenient for the majority of licencees, including our members, we support the Commission's proposal to remove the requirement to publish notices of consultation for licence renewal applications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Freya Zaltz', with a large, sweeping flourish underneath.

Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC Advisory Board

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