



NCRA-ANREC
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May 25, 2015

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

Secretary General:

**Re: Broadcasting Notice of Consultation CRTC 2015-0363-1
Technical Amendment, Erin Community Radio (CHES-FM)**

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 a technical amendment by Erin Community Radio ("CHES-FM") We do not request an opportunity to appear.

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 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. CHES-FM has applied for a change of frequency and modification of their contours, which, as they state in their application, are not optimized towards their primary market of Erin, ON. In their application, CHES-FM states that many Erin residents and businesses can't receive their signal, which prevents them from earning sufficient advertising revenue to fund the station and from reaching listeners in their primary market. As a small rural station near a large urban centre, improving this situation would help CHES-FM become more sustainable.

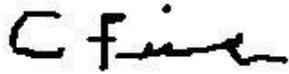
4. CHES-FM is a member of the NCRA/ANREC. We understand that CHES-FM has submitted previous applications to the Commission in order to address the reception problems in its primary market, and we are aware that the station has been struggling financially. Although we have not been able to discuss the application in detail with CHES-FM, we support this application in principle as we believe it would assist the station to achieve greater financial stability and ultimately hire staff, who would help ensure regulatory compliance.

5. According to the application, CHES-FM has negotiated an agreement with Rock 95 Broadcasting ("CIND-FM") that will improve CHES-FM's coverage while decreasing co-channel interference by changing their frequency to 91.7 MHz. They have obtained permission from the operators of Rise Radio ("CKPC-FM") to use this frequency, which cannot be used in other markets. Thus, if this application is approved, CHES-FM would make efficient use of available radio spectrum in the crowded Greater Toronto Area. CIND-FM has also agreed to pay for the necessary technical upgrades, and provide financial assistance to CHES-FM

6. We understand that CHES-FM was previously in non-compliance due to late filing of annual returns during their most recent licensing term, but they have improved their oversight procedures, and filed their returns on time for the past three years. The NCRA/ANREC provides regulatory support to member stations, and CHES-FM is entitled to this support.

7. We therefore encourage the Commission to approve CHES-FM's technical amendment application.

Sincerely,

A handwritten signature in black ink, appearing to read "C Fisher".

Catherine Fisher
NCRA/ANREC External Policy Committee

A handwritten signature in black ink, appearing to read "Freya Zaltz".

Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC Advisory Board

cc: Erin Community Radio (CHES-FM)

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