



NCRA-ANREC
180 Metcalfe St,
Suite 608
Ottawa, Ontario,
K2P 1P5

January 19, 2015

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

Secretary General,

Re: Broadcasting Notice of Consultation CRTC 2014-621 - Application 2014-0845-1

1. I am writing on behalf of the National Campus and Community Radio Association/ l'Association nationale des radios étudiantes et communautaires ("NCRA/ANREC") in support of the application by Caper Radio Incorporated ("CRI") for a broadcast license to operate an English-language developmental campus FM radio station in Sydney, Nova Scotia, operating from Cape Breton University.
2. The NCRA/ANREC is a not-for-profit national association that works to support, recognize and encourage non-profit, public-access, volunteer-based campus and community broadcasters in Canada. We provide advice and advocacy to our member stations, and also conduct lobbying and policy developing initiatives throughout the sector with the intent of progressing the role, growth and effectiveness of the campus and community radio sector. The NCRA/ANREC's goals include ensuring stability and support for member stations, and to promote long-term growth and effectiveness within the sector. We currently represent more than 85 members, including Caper Radio.
3. Our understanding is that CRI hopes to serve the Cape Breton community near Sydney, Nova Scotia. The region has a year-round population of approximately 97,000 people. In addition to being a university community, Cape Breton has a strong tourist industry. The University attracts students from the Nova Scotia area as well as internationally.

4. CRI began broadcasting from Cape Breton University by carrier current in 1992 and was one of the first campus stations to broadcast online beginning in 2000. The station serves Cape Breton by emphasizing local and independent music in a vibrant arts community. They currently has 15 volunteers, which is double the number they had in previous years. Their volunteer base is drawn primarily from the student population at Cape Breton University, but we are told that they are also actively seeking volunteers from the community and anyone is welcome to volunteer. In order to recruit, they broadcast recruitment advertisements and also promote volunteering on social media. In the future, they also intend to give talks at local high schools, among other recruitment activities.

5. Cape Breton is currently not served by any other campus radio station, so CRI hopes to provide alternative programming and local and independent music to their community. We are told that they also plan to introduce more world and multicultural programming as a representation of their growing community. CRI is well connected with the international community at Cape Breton University; the head of the International Student Society is a member of CRI's Board of Directors. The station also has made commitments to broadcast Arabic and Mandarin programming and currently they have both an Arabic-language program ("Ajwa") and a Mandarin-language program ("Movie Soundtrack") on their schedule.

7. The station is dedicated to supporting local music and currently produces a regular bi-weekly program called "Live at Caper Radio" where local bands perform live in studio and are interviewed. In addition to audio recording and broadcasting these performances, CRI has developed a video series showcasing their local talent online. CRI has also supported the local music community through the creation and continuation of a music festival called Gobblefest, which just celebrated its 20th anniversary. The festival showcases independent and local music and also includes all-ages events to allow greater accessibility.

8. With respect to sources of revenue, CRI currently receives funding through a student levy from Cape Breton University amounting to approximately \$20-30,000 per year depending on enrolment, as well as fundraising revenue through Gobblefest and a recent capital fundraising campaign. They intend to further increase their revenue and diversify their sources by developing an annual pledge drive, applying for grants, and hosting additional fundraising events. If licensed, we are told that they they plan to sell advertising with a focus on businesses that serve students, many of whom do not currently advertise on other local stations. CRI has already invested in developing their station with the purchase of an FM transmitter that is capable of broadcasting at a variety of power levels.

9. Although they are currently only broadcasting online and closed-circuit on the Cape Breton University campus, CRI trains their programmers in relevant broadcasting regulatory requirements, especially Canadian Content requirements. They regularly monitor programmers' playlists and intend to work with the NCRA/ANREC to become fully compliant by the time they start broadcasting terrestrially. They have also already developed manuals to guide volunteers and staff. This work is currently carried out at CRI by three staff members. If licensed, they have informed us that they intend to add additional training sessions specifically about regulatory

compliance and programmers' responsibilities, and apply to the Community Radio Fund of Canada to help increase their staff capacity to carry out this work and complete other special projects.

10. If licensed, CRI plans to appoint a Board member as a compliance officer and include compliance as a standing agenda item for review at their monthly board meetings. In addition to establishing a calendar of important dates for the station, including the filing of Annual Returns, they intend to work through the NCRA/ANREC resources regarding relevant regulations and policies. They have also recently changed their bylaws to reflect the CRTC's requirements for campus-licensed stations, including a balance of representation from campus representatives (students, student union and faculty) and community members (at least two of whom must have a history of volunteering with the station).

11. The NCRA/ANREC believes that receiving a broadcast license will allow CRI to continue their work supporting their community and will provide an opportunity for growth of the sector in this region. We hope that the Commission will approve CRI's application for a developmental broadcast license.

Thank you,

A handwritten signature in black ink, appearing to read 'Johnnie Regalado', written in a cursive style.

Johnnie Regalado
Vice President
NCRA/ANREC Board of Directors