



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

March 25, 2015

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

Secretary General,

Re: Broadcasting Notice of Consultation CRTC 2015-51

Renewal of broadcasting licences for campus and community radio programming undertakings expiring 31 August 2015

In support of the following applications:

1. Radio communautaire de Harrington Harbour ("CFTH-FM") Harrington Harbour, with transmitters in Mutton Bay and Kegaska, Quebec
2. Seaside Broadcasting Organization ("CFEP-FM") Eastern Passage, Nova Scotia
3. Tantramar Community Radio Society ("CFTA-FM") Amherst, Nova Scotia

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 the renewal of three radio programming undertaking licences. We currently represent 88 members, including these stations. 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 with a view to advancing the role and increasing the effectiveness of our sector.

3. CFTH-FM is located in Harrington Harbour, a remote community of about 300 people in the Quebec municipality of Côte-Nord-du-Golfe-du-Saint-Laurent, across from the western shore of Newfoundland. In summer, the community is accessible only by boat, and in the winter by snowmobile. The region's primary industry continues to be commercial fishing. CFTH-FM incorporated in 1985, and began broadcasting to Harrington Harbour in 1991. During the last three decades they have extended their broadcasting area to six communities (five predominantly English-speaking, one French-speaking), and they believe their broadcasting signal now reaches between 1,000 and 1,500 people.

4. CFTH-FM's programming features many local artists, and music from Newfoundland. We understand that they have built a strong relationship with their volunteers, illustrated by the fact that two programs that originated in 1991 are still on the air with a dedicated team of volunteers. They have also developed a strong relationship with the local community, illustrated by the numerous calls they receive from listeners to say that they enjoy the station's programming.

5. We are told that CFTH-FM also works with local government agencies and emergency services. During the summer the six communities they serve can only be reached by boat and helicopter. The operators of those services alert the station to travel disruptions and provide their schedules so the station can inform listeners, which is seen as a valuable service by community members.

6. The station recently partnered with two other stations to host a radiothon for the Lower North shore area, and together raised more than \$2200 in just two hours for an organization called UniAid, which provides funds for people who require medical care, but cannot afford to travel to treatment centers in Montreal or other parts of Quebec. CFTH-FM also holds a community bingo each week to raise funds for the station.

7. CFEP-FM is the only locally originating radio service in Eastern Passage, Nova Scotia, a fast-growing urban community located within the Halifax Regional Municipality. In addition to their staff they have many dedicated long term volunteers who contribute to all aspect of station operations, from administration to programming. They also employ co-op students throughout the year and hire students during the summer months. The station focuses its programming on past and present easy listening selections and local music from Atlantic Canada geared toward mature listeners.

8. CFEP-FM reports that it has developed a long-standing relationship with Mount Saint Vincent University, which has led to the station hiring a number of co-op students, some of whom are still involved with the station as show hosts. CFEP-FM is proud to have raised \$60,000 during their fundraising radiothon last year. The annual radiothon is currently underway so this year's totals are unknown, but the station reports that at least 30 volunteers are regularly in the station helping with this initiative.

9. In terms of community contributions, CFEP-FM produces public service announcements for local charities and not for profit groups. They work with local services to provide information in emergency situations, broadcast National Public Alerting System (NPAS) alerts, and provide regular local news. They also encourage listeners to call in with information about accidents and emergencies, which they broadcast.
10. CFTA-FM broadcasts to the Cumberland and Westmoreland Regions from Amherst, Nova Scotia, a historic town of 9,500 people positioned near the New Brunswick border. The settlement's location in the geographic centre of the Maritime provinces provides them an opportunity to broadcast to communities in both provinces.
11. Since their last licence renewal, CFTA-FM has built a recording studio for local artists to make demos and have played dozens of those tracks on their station. We are told that the station has a strong presence in the community, which it fosters by co-sponsoring local events.
12. CFTA-FM has held successful fundraising initiatives, including an auction of artwork donated to the station by the local art gallery. They have also received multiple grants from the local community and government, including employment grants, which have enabled them to provide employment for people with disabilities, including a staff member with cerebral palsy. We are told that one volunteer who had a severe stroke credited his speech recovery with being able to volunteer, and practice his articulation by being on air.
13. CFTA-FM is particularly proud of its work with the local Emergency Measures Organization (EMO). Through work with the EMO, grant funds of nearly \$50,000, and land donated for the station's tower, CFTA-FM now operates with a back-up generator at the station, and one at the tower. They have a dedicated phone line to the EMO, and provide live broadcasts by EMO officers during emergencies. Since their catchment area crosses three provinces, the station's emergency broadcast services involve working closely with multiple governments. Recently there was a serious fire in the downtown area of Amherst, and CFTA-FM stayed on air around the clock working with the EMO to keep the community informed. They have provided this service approximately once per year for the past five years. They also broadcast alerts through NPAS.
14. CFTH-FM, CFEP-FM and CFTA-FM all work hard to be invaluable parts of their communities. They provide public access to the airwaves, volunteer training, opportunities for participation in the station's programming and governance, exposure to local and emerging talents, and a range of other community services.
15. They also operate with relatively lean budgets, and rely extensively on the work of volunteers. In the c/c sector, small budgets can mean that a small number of paid staff are responsible for filling many roles. This can result in important work being

delegated to volunteers who may not understand its importance, or being inadvertently put off by staff when other pressing operational issues arise. In a situation where each staff member is responsible for implementing numerous policies and procedures in a variety of areas at once, they may also encounter difficulty keeping the details straight. The NCRA/ANREC acknowledges that these factors cannot excuse non-compliance, but they do contribute to the ongoing challenges that stations may face in understanding and fulfilling regulatory requirements.

16. We have been in contact with each of these stations about their apparent non-compliance. In all three cases we understand that the stations have filed any missing financials statements related to past annual returns, and they have filed their annual returns on time for the last several years.

17. Each station also consulted with NCRA/ANREC staff and confirmed that they will be instituting a variety of measures to ensure future regulatory compliance. This includes: designating a regulatory compliance officer on the Board of Directors; implementing a standing agenda item at all Board meetings on regulatory compliance which will include the compliance officer leading the board through relevant CRTC policies and regulations; and establishing a station calendar for Board and staff that will include three different dates related to ensuring that annual returns are complete and filed on time.

18. Based on these conversations, we believe they fully understand the requirements set out in s. 9(2) of the Regulations, and have taken steps to address any issues that may have contributed to the apparent noncompliance in the past. We believe they have also taken appropriate steps to ensure that they remain in full compliance in future, regardless of financial and other challenges.

19. The NCRA/ANREC also provides ongoing regulatory support to member stations. For the last three years, our staff have successfully led campaigns to ensure that all licenced NCRA/ANREC member stations submitted their annual returns on time. In addition, our Regulatory Affairs Director and Executive Director provide one-on-one support to member stations in addition to offering general compliance resources, which includes: a guide to the best practices for starting a c/c station, a bilingual Regulatory Support Guide, national conference workshops on regulatory issues, and a policy exchange. The NCRA/ANREC has also conducted regulatory audits of member stations in person and by phone, and has recently developed a regulatory self-audit for stations to assess their compliance with suggestions for how to address any problems.

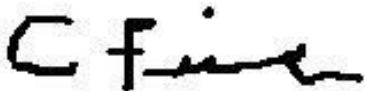
20. For these reasons the NCRA/ANREC strongly encourages the Commission to renew the licences of these three NCRA/ANREC member stations for the longest possible terms. We recognize that pursuant to the revised approach to non-compliance by radio stations (CRTC 2011-347), the Commission has sometimes renewed the licences of other stations found in non-compliance for terms shorter than seven years. We

understand that this allows the Commission to check on stations' progress and confirm their compliance before the end of a full licence term. We also recognize that the Commission has sometimes renewed stations found in non-compliance relating to annual returns for the full seven-year term.

21. We have found that shortened renewal periods can significantly increase the administrative burden on stations, detracting from work related to volunteer recruitment and training, seeking diverse additional sources of funding for station operations, and effectively improving internal policies that enable future compliance. This is especially the case for small stations with few paid staff.

22. Given that all three stations have addressed the non-compliance and have committed to implementing appropriate new procedures to ensure it does not happen again in future, we encourage the Commission, if considering reduced licence terms for any of our member stations, to renew them for terms of at least five years.

Thank you,



Catherine Fisher
NCRA/ANREC External Policy Committee



Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC Advisory Board



Shelley Robinson
Executive Director
NCRA/ANREC

C/c:

Radio communautaire de Harrington Harbour, CFTH-FM
Seaside Broadcasting Organization, CFEP-FM
Tantramar Community Radio Society, CFTA-FM

*** END OF DOCUMENT ***