



NCRA/ANREC
325 Dalhousie, Suite 230
Ottawa, Ontario, K1N 7G2

Feb 19, 2016,

Danielle May-Cuconato, Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario, K1A 0N2

Dear Secretary General:

RE: Broadcasting Notice of Consultation CRTC 2016-20, Stoke FM Radio Society,
Application 2015-1246-8.

1. The National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires ("NCRA") wishes to support an application by the Stoke FM Radio Society ("Stoke FM") for a broadcasting license to operate a very low power English language community radio programming undertaking in Revelstoke, B.C.
2. The NCRA 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 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 95 community radio stations, including Stoke FM.
3. Revelstoke is a small city of less than 8,000 people in the remote Rockies region of B.C. It is a historical hub of the Canadian Pacific Railway, and the CPR continues to play a significant role in the local economy. Other resource-based industries, like mining and forestry, also contribute to the local economy, as well as skiing, tourism and government services.

4. Revelstoke is not well-served by local media, and terrestrial radio listeners have few sources for local information. The NCRA therefore believes that Stoke FM has an important role to play in the community.

5. We recognize the efforts of Stoke FM volunteers over the last 5 years to establish a community radio service in Revelstoke, and we appreciate their stated commitment to support local artists and develop locally relevant spoken word content, including locally-produced French language programming. These commitments embody the spirit of community radio and illustrate the positive impact a station like Stoke FM can have on its local community.

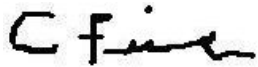
6. The regulatory, policy, and governance support the NCRA provides to our members can be especially valuable to small stations that are minimally staffed, or, in some cases, all volunteer. At small stations, like Stoke FM, the broad range of duties required to maintain a radio station are taken care of by highly-involved volunteers or part time staff, who often don't have training in governance best practices. Small stations are also disadvantaged in that they are rarely able to afford travel costs or registration fees to send delegates to the NCRA's national conference, the NCRC. Therefore, they miss out on that opportunity to meet regulators and funders, get a broad overview of the c/c sector and the regulatory and legal framework that c/c stations operate under, or network and learn from their peers at other stations.

7. We have spoken with representatives from Stoke FM about potential weaknesses in their bylaws and station governance practices, and they have expressed a desire to correct these things. Specifically, they have told us that they plan to make the following changes to their governance structure through bylaw revisions:

- a. **To better involve members in the governance and management of the station.** Stoke FM is aware that their current method of approving new board members, and their current practice, which allows only board members to vote, may not properly uphold the stated aims of Broadcasting Regulatory Policy CRTC 2010-499, *the campus and community radio policy*. As a result, they have agreed to revise their bylaws in order to specify that membership will be open to individuals only. They will then no longer have corporate members, and will instead recruit as members individuals from the community.
- b. **To create a mechanism to prevent all directors from leaving Stoke FM at the same time to ensure continuity.** This was suggested by the Commission and Stoke FM has told us that they agree this change will help them preserve institutional memory, and prevent board continuity issues like those described in their letter to the Commission filed and dated February 19th, 2016.

8. We therefore support Stoke FM's application for a broadcasting license, and will continue to offer them assistance and resources as they revise their bylaws and continue to serve their community with locally-relevant programming.

Sincerely,

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

Catherine Fisher
NCRA/ANREC Regulatory Affairs Committee

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

Freya Zaltz
NCRA/ANREC Regulatory Affairs Director

cc: Stoke FM Radio Society

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