



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

Feb 24, 2016

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

Dear Secretary General:

Re: Various applications requesting exemptions or extensions of time to implement the National Public Alerting System (NPAS)

1. Radio Waterloo Inc. ("CKMS-FM") 2016-0081-7
2. Radio CFXU Club ("CFXU-FM") 2016-0085-9
3. Nakusp Community Radio Society ("CJHQ-FM") 2016-0079-2
4. KCVI Educational Radio Station Incorporated ("CKVI-FM") 2016-0095-8
5. WhiStle Community Radio ("CIWS-FM") 2016-0102-1
6. Cowichan Valley Community Radio Society ("CICV-FM") 2016-0103-9
7. Homegrown Community Radio ("CHCR-FM") 2016-0106-3
8. Radio Malaspina Society ("CHLY-FM") 2016-0110-5

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 these eight applications requesting exemptions or extensions of time to implement the National Public Alerting System ("NPAS").

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 95 not-for-profit member radio stations, including the eight stations mentioned here.

3. As the Commission stated in Broadcasting Decision CRTC 2014-444 (Mandatory distribution of emergency alert messages), various regulations currently allow licensees to apply, on a case-by-case basis, for a condition of licence granting them relief from regulatory measures. The eight stations listed here told us in December 2015 that they may have difficulty complying with the NPAS requirement by 31 March 2016. We advised them to apply to the Commission for relief or temporary relief, rather than allowing themselves to be found in non-compliance.

4. In our comments last year on Broadcasting Application CRTC 2015-0836-8 (Association d'Églises baptistes réformées du Québec), we said that we would propose criteria the Commission could consider when determining the appropriateness of relief or temporary relief from the implementation of the NPAS. At that time, we suggested that such criteria might include:

- **substantiated financial hardship** (e.g. revenue that is too low to permit additional expenses beyond basic operating costs, prior debts which make additional fundraising difficult, unsuccessful efforts to raise funds through grant applications and other forms of fundraising, and unsuccessful efforts to purchase and implement the least expensive Last Mile Distributor available)
- **lack of benefit** (e.g. other local emergency alert providers exist to which the station could refer its listeners in case of emergency)
- **alternate process in place for providing emergency alert messages** (e.g. the station has an existing relationship with local emergency services and can provide alerts to listeners even if they cannot implement the NPAS)

5. We have reviewed these possible criteria and discussed them with our members over the last several months. We think that they strike a good balance between furthering the objectives of the Broadcasting Act by recognising the financial vulnerability that exists in our sector, and protecting the public good by ensuring communities continue to be made aware of imminent and unfolding dangers. We therefore believe these criteria may prove useful to the Commission as it considers these requests for relief or temporary relief.

6. In Broadcasting Decision CRTC 2015-576 (Association d'Églises baptistes réformées du Québec) the Commission reminded licensees that they “*must take the time to investigate*

funding, technology, and compliance options prior to requesting specific exemptions to the emergency alerting requirements,” and that “(s)uch applications should include compelling and detailed rationale, as well as evidence of any concrete actions taken to become compliant with these requirements.”

7. We have spoken with representatives from these eight stations, assisted them in drafting their applications, and read through their supporting materials. We are told that each station has considered and investigated funding and technology options, provided reasonable evidence of hardship, and worked to provide the Commission with detailed evidence of actions taken to become compliant. We believe that, in the case of CKMS-FM, CFXU-FM, CIWS-FM, CICV-FM, CHCR-FM, CHLY-FM, and CJHQ-FM, the proposed one year extension should allow enough time for each of these stations to become compliant. Since their applications were submitted to the Commission, some of these stations have even found promising funding avenues that might help them become compliant with the NPAS regulation sooner.

8. We believe that CKVI-FM’s request for an exemption, rather than an extension, is reasonable for two reasons. First, as the only licensed high school-based radio station in Canada, they face significant, unique, and ongoing financial and staffing limitations that impede their ability to fundraise in ways similar to other c/c stations. Second, because they only broadcast Monday to Friday 8am to 6pm, listeners may be unlikely to rely on their station for urgent or timely emergency information, especially since a number of other Kingston-area broadcasters can fulfill this function.

9. The eight members mentioned here provide essential services to their communities. For example:

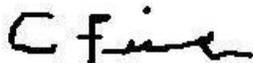
10. CKMS-FM in Waterloo, ON is an enthusiastic promoter of local and Canadian music artists, and regularly broadcasts live musical performances. They are also proud of a talk show about agriculture that serves the local farming community, as well as a variety program featuring Dominican music and news.

11. CFXU-FM plays a key role in the Antigonish, N.S. music scene. Not only do they offer on-air opportunities for local musicians, but for the past few years, they have been producing an annual fundraising CD called *The Sound the Fox Makes* that promotes local artists, including many students at St. Francis Xavier University.

12. CKVI-FM was the first radio station in Canada run out of a high school. Located in Kingston, ON, they work with students who are enrolled in the radio broadcasting focus program, as well as community members at large. CKVI-FM enjoys a partnership with their school board’s “School to Community” program, which supports students with disabilities to find success in school and in the job market.

13. CIWS-FM has helped strengthen the live music scene and provided support and recognition to the arts in Stouffville, ON. The award-winning entertainment program *Night Out* is presented live from a local venue and spotlights musicians from the community.
14. CICV-FM in Lake Cowichan, BC was originally started by a local ham radio operator who dreamed of creating a community radio station. Last month, they started broadcasting on their new frequency of 97.5 FM and currently operate the station out of the old band room at the local high school. The community is presently experiencing a water boil advisory, and the station has been broadcasting alerts as well as updates throughout the emergency.
15. CHCR-FM broadcasts from the tiny town of Killaloe, ON to the Bonnechere, Upper Ottawa, and Madawaska Valleys. Last year, with help from a Community Radio Fund of Canada grant, they were able to hire a youth to launch the *Rural Radio Review*, a program designed for outreach into the rural community.
16. CHLY-FM is the only station providing live original Indigenous programming to the Nanaimo, B.C. region. The program *Si'em' nu Ts'lhwhulmuhw*, which serves Snuneymuxw First Nation, was recognized by the NCRA/ANREC Community Radio Awards last year.
17. CJHQ-FM is located in the small mountain village of Nakusp, B.C. One of the station's primary focuses is promoting civic engagement by establishing a daily news program comprised of a weekly interview with the mayor, a community events calendar, and a 15-minute health spot. The station also records town council meetings, which they rebroadcast twice a week.
18. In conclusion, these eight stations have sought our advice, and requested relief or temporary relief from the requirement to implement the NPAS. We believe it would further the objectives of the Broadcasting Act if the Commission granted such relief.

Sincerely,



Catherine Fisher
NCRA/ANREC External Policy Committee



Ophira Horwitz
NCRA/ANREC External Policy Committee
NCRA/ANREC Board of Directors

c/c

Radio Waterloo Inc.

Radio CFXU Club

Nakusp Community Radio Society

KCVI Educational Radio Station Incorporated

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