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September 21, 2015

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

Secretary General,

Re: Broadcasting Notice of Consultation CRTC 2015-0836-8

**Association d'Églises baptistes réformées du Québec: Extension of time -
Implementation date or exemption to the distribution of emergency alert messages**

1. We are writing on behalf of the National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires ("NCRA/ANREC") to comment on an application by the Association d'Églises baptistes réformées du Québec (CFOI-FM) for an extension of time or exemption to the requirement to participate in 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 89 not-for-profit member radio stations.

4. As the Commission stated in Decision CRTC 2014-444, various regulations currently allow licensees to apply, on a case-by-case basis, for a condition of licence granting them relief from regulatory measures. Although we take no position on the application by CFOI-FM, we think relief from the requirement to participate in the NPAS may be warranted in some cases. Like CFOI-FM, some of our members have confirmed that they will have difficulty meeting the requirement for financial reasons, and they would likely be suitable candidates for such an exemption or extension.

5. We are in the process of determining some possible criteria to propose to the Commission for consideration that could apply to campus and community radio stations, and more broadly to all radio broadcasting licensees. Although we have not yet settled on a comprehensive list, we would provide one in a letter of support if/when one or more of our member stations applies for relief.

6. The criteria we would propose would likely include some or all of the following:

- substantiated financial hardship (e.g. revenue that is too low to permit additional expenses beyond basic operating costs, unsuccessful efforts to raise funds through grant applications and other forms of fundraising, 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)

6. In the process of drafting our comments on this application, and with this in mind, we contacted our members to find out:

- If they had purchased the necessary emergency broadcasting equipment to participate in the NPAS,
- If they had money to do so in the near future, and,
- If they did not, where they had tried to find funding.

7. At the time this letter is being written, we have not yet heard back from all of our members. However, those stations that responded informed us that funding opportunities differ depending on where they are located. Some provinces like Alberta, Quebec, Nova Scotia, and New Brunswick (partial) have funding available for capital purchases for emergency preparedness purposes. In other provinces, there is currently no provincial funding available. We understand that some sources of funding are available to French stations that may not be

available to English ones, which is why this does not apply uniformly across the country. English campus and community stations have a limited number of potential funders they can approach for this type of expenditure, as most grants do not cover capital purchases. We are told that the Community Radio Fund of Canada (“CRFC”) does not provide funding for this purpose.

8. Several NCRA/ANREC members that we contacted said that, if forced to implement the NPAS and if ineligible for an exemption or extension, they may be unable to continue broadcasting due to the financial hardship that purchasing the equipment would cause. Those stations include the following:

7. A tiny station in southeastern B.C. has an annual budget of approximately \$1000. Most of this money goes to SOCAN fees, web streaming fees, and a telephone. This station has difficulty paying for other incidentals, such as office supplies. They broadcast to a small community of 5,000 people, have no staff and a small volunteer base. In 2013, a commercial station was licensed to serve this community, which they believe has negatively affected their economic viability.

8. Another station in the same region broadcasts at 2.5 watts to a community of about 1,500 people. Most years they have practically no budget; sometimes their annual expenses have totalled approximately \$150. They have arranged in-kind deals with a few local businesses to provide for some of their station’s needs, including cable internet and accounting. Most importantly, their rent is covered by a local charity. They struggle to pay their SOCAN fees and NCRA/ANREC member fees. They cannot afford a telephone. This year, they received funding from the CRFC to hire their first part time employees.

9. A third station in the same area, in a community of 500 people, recently received a CRFC grant, and was able to hire a staff person for the first time in the station’s history. Normally the station’s income and expenses break even, but having staff has enabled the station to raise an unusual surplus of \$600-\$700, which is well below the amount needed to purchase a Last Mile Distributor. Last year their annual budget totalled \$4,870, and about 40% of this was spent on their telephone, 50% on hydro and equipment maintenance, and 10% on office and administrative costs.

10. A station in Interior B.C. operates on an annual budget of \$15,000. This station is located in an area of the province where there are frequent forest fires, and they currently work with their regional district and the B.C. Wildfire Service to broadcast emergency announcements as needed. They say they do not have the funding to purchase, install and maintain a Last Mile Distributor, nor could they purchase a back-up generator for their broadcast signal, which would be essential to ensure that emergency alert messages can be broadcast during power outages. They would find the cost of purchasing this equipment beyond their means.

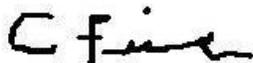
12. A station in southeastern Ontario has an annual income of approximately \$4,200, and spends 50% of that on their rent including utilities. The remaining 50% of their income goes to telephone, operating expenses, SOCAN fees, and NCRA/ANREC membership fees. They currently have no money in their bank account. They report that their regular monthly fundraising event may in fact cost more than the amount they raise.

13. As the Commission is aware, most stations in the c/c sector operate on shoestring budgets, but many, nonetheless, operate with some margin of stability that might allow them to set aside funds for equipment purchases. The stations described here are some of our smallest member stations, and their finances do not permit any leeway with respect to expenses.

13. Some of our members are exploring potential funding opportunities to implement the NPAS, and we are providing support to those stations as best we can. However, we are concerned that in the absence of a guaranteed funding mechanism, some of our members do not have the capacity to purchase the necessary equipment and will have no choice but to be in non-compliance as of 31 March 2016.

13. In conclusion, CFOI-FM has raised issues in their application that may be similar to issues our smaller member stations face with respect to their ability to comply with CRTC 2014-444. Our members provide essential services to their communities. Many already provide some form of emergency announcements voluntarily, and most or all want to comply with the Commission's requirement to participate in the NPAS. We believe that most will find a way to comply with the NPAS requirement. However, there are likely to be some small NCRA/ANREC member stations that, like CFOI-FM, will seek relief in order to continue broadcasting, and we look forward to engaging with the Commission further on this subject at that time.

Sincerely,



Catherine Fisher
NCRA/ANREC External Policy Committee



Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC Advisory Board



Barry Rooke
Executive Director

C/c Association d'Églises baptistes réformées du Québec (CFOI-FM)

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