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Robert A. Morin,  
Secretary General  
Canadian Radio-television and Telecommunications  
Commission  
Ottawa, Ontario, K1A 0N2

February 9, 2011

Re: Appendix to Broadcasting Notice of Consultation CRTC  
2011-14

Secretary General,

1. On behalf of the National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires (NCRA/ANREC), we are writing to comment on the proposed amendments to the Radio Regulations and how they affect campus and community radio stations. If a hearing is held, we would like the opportunity to appear.
2. The NCRA/ANREC is committed to volunteer-driven, non-profit, community-oriented radio across Canada. 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 more than 75 member stations.
3. In the proposed amendment to Paragraph 3(d) regarding false news, we appreciate the addition of the licensee's knowledge and intent in determining when the regulation applies. Most campus and community stations broadcast programming created by volunteers using diverse sources of information, including first-hand accounts, social media, and other alternative news organizations. These kinds of grassroots sources are important to help our members present stories under-represented in the mainstream media but their content can be difficult to verify, particularly with limited resources.
4. The proposed amendment would reassure our members that they are taking sufficient responsibility for this content if they identify the type of source used and believe what they are reporting to be true and in context. We believe it is important for stations to correct any unintentional false or misleading news upon its discovery, but the proposed amendment would alleviate the concern that they could be deemed in non-compliance with the regulations for inadvertent errors.

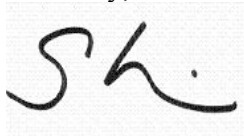
5. That said, we believe it is also vitally important for broadcasters to make best efforts to research and present accurate and contextualized news in all cases, not just those where it is likely to endanger the lives, health or safety of the public. We believe this particularly applies to broadcasters that have the resources necessary to carefully check the veracity of facts and information they present to their audience. As broadcasters who focus on serving community needs, we believe it is in the public interest for all broadcasters to ensure to the greatest extent possible that news content is not false or misleading.

6. The proposed addition of section 3.2, which clarifies what constitutes obscene and profane language, is reflected in the policies of our members, who aim to challenge discrimination of all kinds. However, many of our members also broadcast unusual spoken word and music programming intended for specialty audiences. Some of this programming is created to satirize or critique important societal issues, but it may contain content that could be considered profane or obscene as described by the proposed amendments if it is taken out of context. To that end we suggest that context be taken into account in determining whether particular content constitutes non-compliance with this provision. We would expect stations broadcasting content of this nature to schedule it at appropriate times of day when children are unlikely to be listening, and to provide clear warning announcements to listeners.

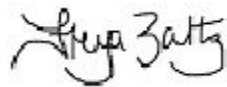
7. Finally, in the proposed amendment to subsection 9(4), as public-access broadcasters our members do aim to answer all requests for information from the Commission as well as members of their communities. However, as noted above, our members have limited financial and human resources. Their status as democratic community organizations representing diverse and controversial perspectives also means that their programming and operations can come under intense scrutiny from those who hold different beliefs. So while we believe it is imperative for stations to respond to all Commission requests, we also ask that the Commission consider a station's capacity when determining the time frame within which a response is expected.

8. We appreciate the Commission's consideration of our comments.

Sincerely,



Shelley Robinson  
Executive Director



Freya Zaltz  
Regulatory Affairs Director

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