



325 Dalhousie, Suite 230
Ottawa, Ontario K1N 7G2
(613) 321-1440

www.ncra.ca

*Executive Director/Directrice
Général*
Shelley Robinson

BOARD OF DIRECTORS
CONSEIL D'ADMINISTRATION

President/Présidente
Catherine Fisher,
CJLY-FM Nelson, BC

Treasurer/Trésorier
Brenda Grunau,
CITR-FM Vancouver, BC

Secretary/Secrétaire
Keith Colhoun,
CJTR-FM Regina, SK

*Regulatory Affairs/Affaires de
Contrôle*
Freya Zaltz,
CFRO-FM Vancouver, BC

*Aboriginal Representative
autochtones*
Lisa Abel,
CHUO-FM Ottawa, ON

Robin Eriksson,
CKUW-FM Winnipeg, MB

Stephanie Kepman,
CHUO-FM Ottawa, ON

Gianna Lauren Lalonde,
CKDU-FM Halifax, NS

Laith Marouf,
CKUT-FM Montreal, QC

Tara Michelle Ziniuk
CFRU-FM Guelph, ON

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

April 11, 2011

Secretary General,

Re: CRTC Notice of Consultation 2011-173

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 70 licensed member stations.

3. We appreciate the proposed amendment to remove the distinction between Type A and Type B stations. As we stated in the context of the recent campus and community Radio policy review hearing, we believe these stations have much in common and the distinction is no longer relevant.

4. We further appreciate the Commission's inclusion of experimental music as a subcategory of category 3 music. This will help our stations fulfill their regulatory responsibilities in this category while reinforcing their commitment to provide exposure to new and diverse music, particularly music that is not normally broadcast on commercial and public radio.

5. Though we will be submitting more detailed contents about the proposed increase to Canadian content requirements in response to CRTC Notice of Consultation 2011-174, we note that in general, our members are concerned about the potential consequences of such an increase.

6. Many of our members regularly exceed their Canadian content requirements as part of their commitment

to their communities, particularly by playing local music that is under-represented in other broadcast media.

7. That being said, volunteer-driven stations find it difficult to ensure that every volunteer programmer always meets the minimum level of Canadian content and properly records the Canadian selections from their program. This difficulty occurs particularly when volunteer programmers focus on alternative music genres where there is less Canadian content available, when volunteers are learning to use logging systems, or when temporary changes must be made to the volunteer schedule.

8. We do not mean to suggest that station employees are not vigilant in the training and supervision of volunteers, or that employees and volunteers do not make good faith efforts to ensure that the current Canadian content requirements are consistently met or exceeded. Rather, we acknowledge that people make mistakes, particularly those without professional broadcasting training, and the risk of mistakes increases as the number of individuals helping to produce a station's programming increases.

9. As monitoring by the Commission is assessed on a weekly basis, it only requires a few small errors to cause a station to dip below the required level for that week, despite a longer term pattern of compliance and even over-performance. Since a finding by the Commission of non-compliance can lead to shortened renewal periods or other more dire consequences, particularly for stations that already struggle with limited staff capacity, they are understandably concerned that raising the minimum level of Canadian content only increases these risks.

10. We therefore suggest that the Commission retain the current levels of required Canadian content, with the understanding that c/c broadcasters are already committed to meeting and exceeding this requirement by virtue of their mandate to serve their local communities. We also recommend that if stations are found to be in non-compliance with this section of the Regulations within one broadcast week, that the Commission broaden the assessment period to four broadcast weeks. We believe this longer assessment period would more accurately represent stations' compliance performance.

11. Finally, we are very pleased with the inclusion of the Community Radio Fund of Canada as a mandated beneficiary of basic Canadian content development contributions, and we believe this funding will assist the c/c sector. However, we note that this funding is not, in itself, sufficient to fund the operations of the sector, and that most volunteer-driven not-for-profit stations will continue to face the same challenges that we have frequently noted in the past.

Sincerely,



Freya Zaltz,
Regulatory Affairs Director

Shelley Robinson,
Executive Director