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**Re: Broadcasting notice of consultation CRTC 2010-623
Contributions by broadcasting distribution undertakings to local
expression**

30 September, 2010

Secretary General,

1. The National Campus and Community Radio Association/l' Association nationale des radios étudiantes et communautaires is a not-for-profit group of organizations and individuals committed to volunteer-driven, non-profit, community-oriented radio across Canada. Our goals are to ensure stability and support for individual stations and the long-term growth and effectiveness of the sector. We represent more than 75 members across the country.
2. Our members' mandates include providing public access to community media and producing local content, which is similar in many respects to the mandate of community television.
3. We cannot comment on the first two questions about the most effective way of maintaining total contributions to community programming by BDUs at current levels or if the reversion to the percentage of revenues formula should be applied on an undertaking or group basis.
4. However, we believe that based on the number of organizations committed to producing public-access local content and the precarious nature of funding for not-for-profit community media, it seems the most appropriate use of the resulting difference would be to provide funding to community-based organizations that produce local community television and video content. The Community Radio Fund of Canada is a good model for this type of fund.
5. Additionally, in a converged multimedia landscape, work once considered to fall within the exclusive domain of television or video increasingly overlaps with radio. One of our members, RCM Media in Mississquoi, Quebec runs a community radio station and produces two community television programs from the same location. Much of the content from one medium is aired on the other. Other members stream video from their studios or have made video music charts they distributed on Youtube, and produce video recordings of live music shows and other audio content. This kind of overlap between formats will likely only increase.

National Campus and Community Radio Association
L'Association nationale des radios étudiantes et communautaires

6. To that end, we further ask that any funding for community-based organizations to produce television and video content be open to a range of different organizations, including community radio.

7. Should there be a public hearing as part of this proceeding we feel these comments adequately reflect our position and do not request to appear.

Respectfully submitted,

Shelley Robinson
Executive Director