



**National Campus and Community Radio Association/  
l'Association nationale des radios étudiantes et communautaires  
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**December 5, 2008**

**Canadian Broadcasting in New Media  
*Broadcasting Notice of Public Hearing CRTC 2008-11***

## Executive Summary

The NCRA/ANREC requests and recommends that:

- the CRTC adopt a technologically-neutral definition of new media which includes campus and community radio content
- ISPs provide free mandatory carriage of c/c radio content
- portions of CCD and any levy imposed on ISPs be directed to the sector through the Community Radio Fund of Canada
- the CRTC strongly encourage commercial and public broadcasters to provide public service announcements – both in traditional media and online media - notifying listeners of community-access, official minority language broadcasting services, and online offerings
- the Commission reserve at least one radio frequency in each community for community. In some communities with large official language minority communities, it may be important to reserve two frequencies – one for each official language.
  - the Commission create a priority system for low power FM radio stations so that communities do not risk the loss of their local community broadcaster in favour of a new commercial applicant
- that s. 22 of the BDU Regulations be retained requiring Broadcast Distribution Undertakings to continue to carry local community radio services even if it requires BDUs to translate analogue broadcast signals into digital cable signals

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 response to Public Notice 2008-11, Canadian broadcasting in new media. We request an opportunity to appear at the upcoming hearing on this topic.
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 stations, and conduct lobbying and policy development initiatives for the sector with a view to advancing the role and increasing the effectiveness of our sector. The NCRA/ANREC represents 58 Canadian campus and community (c/c) radio stations.

## Introduction

3. The NCRA/ANREC maintains a tempered view of the Internet and its potential consequences for traditional media. The Internet offers opportunities to democratize the voices heard in the Canadian broadcasting system. It also provides a relatively inexpensive solution to some of the technical problems c/c stations have faced. But without incentives or regulation, it may remain unaffordable to many, and a few major voices can still dominate. Dominating voices may be those of ISPs who control access, major search-engines who direct access, or large media corporations, both foreign and Canadian, who provide large amounts of content. We also believe that new media technology provides a valuable opportunity to reach new audiences, provided stations and their listeners have the resources to install and obtain broadband services. While Canadian broadcasters will likely blame the Internet for increased competition and decreased listenership, many have proven to be adaptable, effectively using convergence to find new audiences and develop new revenue streams.
4. The report “Canada’s Community and Campus Radio Broadcasting Sectors”, commissioned by Heritage Canada from Ekos recognizes the possibilities for c/c radio in harnessing new technology. The report states, “*There is the potential for community and campus stations to reap considerable benefits from new distribution technologies... once again, however, stations can only benefit from these technologies if they have the financial and human resources to access them.*”<sup>1</sup> Therefore, we would like to inform the commission about how our members are utilizing technology within their stations, the opportunities and challenges facing the sector, and how we hope the CRTC can help.

## Definitions

5. One of the factors affecting the definition of new media that pertains to the c/c sector is the way the Internet changes the typical consumer/producer relationship. Consumers of media products can now easily create music, podcasts, video and animated content and upload it to the Internet, becoming producers and distributors. This is a common characteristic of c/c radio, as our audiences always have the opportunity to get behind the microphone and become producers of programming. But user-generated content is not necessarily synonymous with c/c radio. This distinction could lead to confusion

between the two concepts. They share some similarities, but are ultimately different.

6. A 2007 study of online media found that part of the difference in content comes from the not-for-profit, community-based structure that is the foundation of c/c radio stations:

"Community sector organizations are socially-responsive and proactive in that they cater to groups who are not otherwise adequately represented and develop technologies to serve identifiable needs rather than market gaps. These organizations are professional and industry-like, with an emphasis on standards, training and ethical responsibility when it comes to information dissemination.

The rise of non-market media [for example, user-generated content] – such as social networking, content-sharing and open-source collaboration – has fundamentally changed the way we produce and share information. However, it has not changed the need for sustainable organizations, reliable income-generation for community enterprises or reward for labour. In a media environment increasingly characterized by non-market media use, production and participation, community media provides a structure and method which can take amateur media to the next level. It can impact on the media industries, respond to changing audience needs and maintain public connection."<sup>iii</sup>

7. We submit that c/c online content is a level above user-generated content. This is not only because of the sector's not-for-profit and community-oriented structure, but also due to the training and workshops provided to volunteers, the federal regulatory oversight of radio broadcasting content that forms the basis of c/c online content, and the sector's explicit efforts to give voice to marginalized and disadvantaged communities.
8. We also note that the professional vs. non-professional distinction suggested by the Commission in defining new media content is unclear. While c/c radio would not claim to be professional, many people from c/c stations have moved on to careers with professional commercial or public broadcasters based on volunteer or employment experience in the c/c sector, without any formal education beyond what they have learned in the c/c sector. There are also volunteers in the c/c sector who are formally and professionally trained in radio broadcasting, sound editing, music, journalism, and other related fields who bring considerable expertise to c/c radio programming. So while the c/c sector does not claim to be professional, it certainly encompasses a *degree* of professionalism.
9. We recognize the difficulty in developing an appropriate definition of new media. We feel strongly that the definition selected should take into consideration the characteristics of campus and community radio.

### **Significance / Impact**

10. We note that the increased advertising competition created by the Internet has caused changes in the radio business and in the advertising industry. According to IAB Canada, the projected total for 2008 Online Advertising Revenue in Canada is estimated to be \$1.5 billion. This is 25% percent more than the 2007 actuals of \$1.2 billion.<sup>iii</sup>
11. Listening hours in radio have decreased. Nationally, average weekly hours per capita have declined by 2% annually from 19.5 hours in 2003 to 18.3 hours in 2007. On a per listener basis, average weekly hours also declined but at a slower rate, decreasing 1% annually from 21.0 hours in 2003 to 20.2 hours in 2007.<sup>iv</sup>
12. The Internet reaches more 18-24 and 25-34 year olds each week than radio. These numbers affect the c/c sector and particularly campus stations, as their listeners and volunteers tend to be drawn from a younger demographic.<sup>v</sup> Despite these changes, it appears that commercial radio revenues have not suffered (as detailed in the CRTC's Communications Monitoring Report).
13. We believe that commercial radio revenues and profits cannot be considered in isolation from many commercial broadcasting corporations' other divisions. Convergence allows companies to tie together advertising packages across multiple market segments - from radio, TV, and the Internet to non-CRTC regulated areas such as print and outdoor advertising. So while radio listening might be down, commercial radio can create advertising packages to take advantage of new audience numbers on the Internet.
14. The situation is different for the c/c sector. Most campus stations operate on less than \$200,000; most community stations operate on less than \$100,000. At most c/c stations staff are poorly paid, facilities are in disrepair, and equipment is outdated. The sector is chronically under-funded and therefore it cannot accommodate significant investment in new technologies. Most stations simply attempt to maintain operations, without resources to strategically re-vision their services based on existing and future new media technologies. As the Ekos Report notes, the c/c sector's financial "results do not necessarily indicate stable funding of any kind" and "there is no clear indication that new funding sources for community and campus stations are emerging."
15. Although the sector lacks sufficient finances to create a comprehensive technological plan, c/c stations are using new technologies to the best of their abilities, including many variations of internet technology for promotion and distribution of existing broadcast content. This includes websites, blogs, social media sites such as MySpace and Facebook, webstreaming, podcasting, Youtube, online searchable music databases, audio archives, and torrents. Some stations also offer additional web-only content that is not broadcast over-the-air. This is provided in a variety of formats, including webstreaming, podcasts, and video.
16. Webstreaming is a relatively popular means of distributing c/c programming. One campus station reported that its webstream is accessed 700,000 times per year, while another community station found that the primary purpose of 70% of visitors to its website is to access its webstream. However, it is important to note that many c/c stations

still lack the resources to offer a webstream at all. Many that can webstream content rely on donated equipment, free software, and limited bandwidth internet connections. This means that while campus stations with larger budgets and institutional support are able to take advantage of this broadcasting method, many small stations have intermittent webstreams, or can only accept a handful of online listeners at one time. Without more financial resources, most c/c stations are unable to realize the full potential of webstreaming technology.

17. The Internet can also impact stations' revenue. For instance, in a recent funding drive, one large community station reported receiving online donations from twelve different countries. But for the most part, stations' online presence is too small for it to make a significant impact on their revenue. Selling banner ads or other advertisement placements online is not feasible at this point due to the low volume of traffic to c/c station websites. Most stations, particularly those in small communities, have found that local businesses would rather support stations' local radio presence than their internet presence for this reason.
18. At the same time, we anticipate the use of internet technologies having a detrimental effect on many stations' financial positions. The number of proposed copyright tariffs that apply to various forms of internet-related technology is increasing. C/c stations anticipate eventually being charged separate tariffs for webstreaming, podcasting, and video. The fact that use of these technologies is not coupled with increased revenue means that they may have to cease using them once the tariffs become more than they can bear.
19. One major national online initiative is proving to be a useful resource for local stations. The NCRA/ANREC maintains a website called the Program Exchange, where c/c radio producers can upload their programs for broadcast by other c/c radio stations. Since 2006, over 700 programs have been exchanged in a variety of languages, such as English, French, Spanish, Farsi, Serbo-Croatian, Azerbaijani, and Bengali. Some stations in small rural communities where racial and ethnic diversity is low report relying on content from this site to ensure diversity of voices and expose listeners to new perspectives. Access to shared content also helps small community stations develop the capacity to produce and broadcast high quality programming. However c/c stations in the most remote locations (e.g. Cambridge Bay, Nunavut) are unable to access this site due to lack of broadband access, while others are limited in the amount of content they can upload and download due to bandwidth limitations. Financial support for stations to obtain computer equipment and high bandwidth broadband services would increase their use of new media while also increasing their capacities as terrestrial broadcasters.
20. We believe the technological development of the sector is crucial, and we recognize that a portion of our audience is looking for c/c radio content on the internet. In order to effectively serve Canadians and provide a community element to Canada's broadcast system, the c/c radio sector must find ways to effectively transition to the use of new media while maintaining and improving our ability to continue broadcasting terrestrially.

21. As online broadcast options increase, c/c radio stations must also be flexible in their offerings, allowing audiences to obtain the programs they want, when they want. As c/c radio tends to target very specific audiences, its programs are highly specialized. The Internet can allow specific audiences to access specific programs without scheduling restrictions. This means that instead of ‘pushing’ content onto an audience (as is traditionally done with radio, TV and arguably webstreaming), the audience is increasingly ‘pulling’ content at their own convenience. On the internet, the commercial music content that can be pulled is becoming increasingly specific or “granular”, so listeners can purchase or pull increasingly small unit sizes. For example, consumers can purchase and download individual songs, rather than entire albums, and thereby customize their online experiences.
22. To compete with this, commercial and c/c broadcasters must adapt and permit access to their content in as specific a form as possible. This shift can be very labour and resource intensive, relying on computer software of increasing complexity, larger digital storage capacities, increased bandwidth, increased staff or volunteer time to break down and upload content into small chunks, and increased tariffs to cover long-term digital storage and listener downloading of music. This will be a significant challenge for the c/c sector.
23. For the reasons outlined above, the NCRA/ANREC believes it is crucial for the CRTC to continue supporting terrestrial broadcasting while also supporting the development of new media. The c/c sector will explore and increase its use of new media technology, and we would appreciate the Commission’s support in doing so. However, we will also continue to rely on terrestrial broadcasting in the foreseeable future, particularly in rural areas where broadband internet and new media technology is not uniformly accessible, and for the benefit of our urban listeners who encounter barriers to internet access.

## **Incentives**

24. The Broadcasting Act states:

3. 1. (e) each element of the Canadian broadcasting system shall contribute in an appropriate manner to the creation and presentation of Canadian programming;
  - (i) the programming provided by the Canadian broadcasting system should be varied and comprehensive, providing a balance of information, enlightenment and entertainment for men, women and children of all ages, interests and tastes,
  - (ii) be drawn from local, regional, national and international sources,
  - (iii) include educational and community programs,
- 3.1. (k) a range of broadcasting services in English and in French shall be extended to all Canadians as resources become available;

25. Accordingly, we encourage the CRTC to enact measures to assist the c/c radio sector to bring its programming into the new media environment so Canadians are provided with a complete range of services that reflect the spirit of the Broadcasting Act. In general,

the NCRA/ANREC supports incentives in this regard, rather than regulation.

26. The c/c radio sector is mandated to serve its local communities and provide public exposure to marginalized Canadian voices, including speakers of official languages in minority language communities, third languages, and Aboriginal languages, people with disabilities, and seniors. These voices tend to receive limited exposure in mainstream media, and also on the internet. We hope that the CRTC considers implementing incentives that will help ensure those voices are heard in the new media environment.
27. The c/c radio sector is also a key element in delivering local information. Local information has been proven to be extremely important to Canadians. A Decima report commissioned by Heritage Canada in 2005 entitled “Local Content and Its Sources” found that of international, national, or local information, local information garnered the highest interest with 8 in 10 Canadians assigning a score of at least 7 on the 10-point interest scale. The report also found that 34% of Canadians **increased** their use of their local radio stations as a source of local information.
28. The report concluded that **Canadians agree that the federal government needs to play an active role in ensuring that communities receive high quality local information.**
29. We believe this extends to the CRTC, which can help to ensure that Canadians can access local information via both terrestrial broadcasting and the Internet. The federal government has already done much to support the telecommunications sector. As of 2007, provincial governments had invested \$545.9 million dollars in broadband initiatives and the federal government an additional 302.8 million dollars. This resulted in a total taxpayer supported subsidy of \$848.7 million dollars.<sup>vi</sup> This is a significant investment in a large and profitable telecommunications industry. In light of this, we believe that some consideration must be paid to smaller players in the broadcast sector.
30. The CBC has been very successful in bringing its radio content to an online audience due to a large investment of taxpayer funds. Likewise, the commercial sector with its substantial financial resources has also been successful. C/c radio remains the only sector facing significant challenges to its efforts to bring content into an online broadcasting environment.

### **Funding and Assistance**

31. The NCRA/ANREC is aware that ACTRA is advocating for a 2.5% levy on ISPs to fund new media Canadian content incentive programs. We understand that ACTRA established this rate by estimating that 50% of online activities are broadcasting activities and then applying the current general guideline that BDUs should be taxed at a rate of 5%. This would generate between \$70-80 million per year in revenue. While ACTRA states that this need not significantly affect ISPs’ healthy profits, we would not be surprised to see ISPs pass this charge on to consumers.
32. We hesitate to endorse this levy because we believe that increased fees for subscribers

are not in the public interest, as it could contribute to the digital divide and restrict new media access by those who are economically disadvantaged. However, if this levy is put in place, we believe it would be prudent for 15% of the total levy to be allocated for c/c new media initiatives. This would help ensure that the c/c sector can access and participate in new media initiatives, and remain a vital element of the Canadian broadcast system.

33. Our preferred funding mechanism would be an allocation of funds to the Community Radio Fund of Canada. Federal broadcast regulators in other countries have seen fit to fund community media's transition to new media (including development of web-based technologies and to help transition from analogue to digital). We note that Australia's community media funding programs, and in particular their program for technological initiatives, is innovative and thorough. We attach an outline of their granting programs in our appendices for reference by the Commission.
34. As we discussed above, new technologies provide new ways for stations to reach beyond limited broadcasting footprints and are becoming essential to allow c/c stations to reach their listeners. Therefore, we would also like to see free mandatory carriage of c/c radio content by ISPs, similar to the mandatory carriage by BDUs. Bandwidth can be a considerable expense for stations. We believe that ISPs, given the large public subsidies they receive to help develop their networks, should support the distribution of c/c content at no charge to stations.
35. Another major challenge for the c/c sector is reaching out to local communities and their members to ensure that they are aware of the community access opportunities available to them. Due to limited budgets and staff, c/c stations are restricted in the resources they can allocate to advertise opportunities for community members to receive and participate in local community radio programming. As such, the NCRA/ANREC requests that the CRTC strongly encourage commercial and public broadcasters to provide public service announcements – both in traditional and online media environments - notifying listeners of community-access and official minority language broadcasting, and of online and terrestrial services and opportunities.

## **Access**

36. One major element of accessing Canadian content online is finding it. Unfortunately, there is no Canadian equivalent to Google. Although there are several Canadian portal versions of Google, Yahoo, and other search engines, these are U.S.-owned and controlled. We believe there is an opportunity to create a Canadian search portal that would showcase Canadian sites and content, and we encourage the CRTC to support and participate in the development of such a portal.<sup>vii</sup>
37. The NCRA/ANREC is also concerned about network neutrality. Without net neutrality, the broadcast offerings of our stations could be unfairly disadvantaged. Network management does not need to involve unfair bias. The Electronic Frontier Foundation has found that it is possible to manage a network without discrimination with respect to

content or application. We encourage the Commission to consider this Foundation's research in devising regulatory policies for network management.

38. In particular, net neutrality can affect marginalized content, such as non-commercial and minority language content. Dr. Leslie Regan Shade, Associate Professor in Communications at Concordia University has stated, "*Traffic shaping and throttling by large ISPs who single out specific kinds of data to treat differently erodes this principle of net neutrality... A discriminatory Internet, e.g. an Internet without net neutrality, would tend to privilege commercial content... It would put at risk a lot of the non-commercial, educational, certain political and independent content. **I think it would put at risk Canadian content, particularly French language and minority language content.***" Her statement demonstrates the need for net neutrality and its benefit for minority language communities and those producing non-commercial content, such as the c/c sector.
39. Access is also impeded by the digital divide in Canada. This divide unjustly affects access by minorities, rural populations, immigrants, women, aboriginal peoples, seniors, and those with low levels of education or income in contravention of the Broadcasting Act. The expense of broadband itself can prohibit access. It should be noted that the digital divide does not just refer to access issues, but larger macro, socioeconomic and systemic factors that can prevent people from effectively using the Internet. We therefore support initiatives and incentives that will support bridging the digital divide by bringing computer and internet technology - and by extension Canadian new media content - to people who are affected by barriers to access.

### **Convergence and Diversity of Voices**

40. Internet technology and new media have also proven important in ensuring that diverse broadcast content is available to the public in both official languages in majority and minority language communities. At the same time, it must be recognized that without regulation, a few major companies will come to dominate Internet media content. This is already starting to occur. A study of the most popular websites in Canada by Alexa as of Nov. 9, 2008 included four websites owned by Google (google.ca, google.com, youtube.com, and blogger.com) and three owned by Microsoft (live.ca, msn.com, msn.ca) in the top 10. Only one of the 20 most popular websites in Canada was actually Canadian. Incentives must be created to help Canadian content produced by a variety of sources thrive in the new media environment.
41. In Canada, major commercial and public media sources currently dominate the top 100 Canadian website rankings, with the CBC ranked as the 25th most popular website in Canada, Rogers at 30, Canoe.ca at 31, the Weather Network at 33, Canada.com at 40, CTV at 53, CBC Radio-Canada at 94, and Canoe (French language) at 95 (according to Alexa ratings as of November 8, 2008). Part of the rationale for the success of traditional media online can be found in the CRTC's own Diversity of Voices report: "While the Commission recognizes that the new - largely unregulated - media constitute increasingly important sources of both professional and non-professional editorial

voices, the evidence indicates that most Canadians still view traditional media as more trustworthy and credible. These are the voices that still have the greatest resonance."<sup>viii</sup>

42. Corporate convergence provides large commercial and public broadcasters with a distinct advantage. A TVB Canada study found that 70% of viewers under 34 surf the Internet while watching TV and 13% of the sites they view are **related to the TV show they are watching**.<sup>ix</sup> With the limitless possibilities of the Internet, large broadcast companies are managing to reinforce interest in their own products upon multiple platforms. This reinforcement and visibility creates a heightened perception of trustworthiness and credibility that may not be linked to the actual quality or local relevance of the content to the audience.
43. In addition, major Canadian corporate media have been forming strategic partnerships with major American Internet companies in order to increase their visibility and/or market share. Examples include the Rogers-Yahoo! Internet portal as well as a partnership between Bell Sympatico and MSN (sympatico.msn.ca). But a report from Canadian Heritage suggests caution "when there is convergence of telecommunications and the media. When there is control over infrastructure services, the diversity of content is threatened."<sup>x</sup>
44. Therefore, we believe the CRTC can increase the diversity of voices and perceived credibility of these voices by supporting the development and increased visibility of non-traditional Canadian media and new media, including c/c radio.

### **Spectrum Scarcity**

45. One of the major difficulties in ensuring that the public, private and community elements are all available to Canadians lies in the growing problem of spectrum scarcity. As more stations apply for licenses, fewer frequencies become available to non-commercial applicants. An increasing number of markets in Canada are heavily saturated with few or no frequencies remaining. Spectrum scarcity means that webstreaming is an increasingly important way for radio stations to reach their communities in areas where frequencies are scarce.
46. New media technologies can also provide an easier and more cost effective way to reach listeners compared with the large capital investment needed to produce technical briefs, purchase antennas and transmitters, and invest in transmitter upgrades to allow for broadcast at protected power levels. This technology is also making it easier and less expensive for stations in rural and geographically challenging locations to re-broadcast their signals to reach more listeners, or to develop their capacity as local broadcasters prior to obtaining a CRTC radio licence.
47. Further, many existing low power c/c stations wish to achieve frequency protection, and many stations with protected power levels are dissatisfied with the coverage provided by their current technical parameters and wish to further increase their power. Some c/c stations in these situations operate in markets where geography or spectrum scarcity

makes power increases impossible. The Internet may offer the only cost efficient opportunity for these stations to reach their desired audiences.

48. While the Internet can help solve some of these problems and allow c/c stations to reach listeners outside the range of their existing signals, it is not the entire solution for reasons noted above. Therefore, the NCRA/ANREC recommends that the Commission reserve at least one radio frequency in each community for community access in order to fulfill the requirements of the Broadcasting Act. Without such a reservation system, some markets may become fully saturated without preserving the ability of the public to access the airwaves in those areas. In some communities with large official language minority communities, it may be important to reserve two frequencies – one for each official language.
49. Spectrum scarcity poses an additional threat to established c/c stations. We have often stated our concern about the vulnerability of community stations with unprotected low power frequencies, and the potential consequences if larger commercial broadcasters appropriate their frequencies or inhabit nearby frequencies causing signal interference. Most developmental and low power licensees do not intend to remain temporary or low power, and pursue these license classes simply because they are the most accessible for small volunteer-run community groups. We believe consideration should be given to the important role that small, not-for-profit stations play in serving community needs and fulfilling the mandates of the Broadcasting Act, particularly if they are established with the intention of continuing to serve their communities beyond the initial developmental license term. We also believe that consideration should be given to the notable shortage of financial and technical resources available to small community stations.
50. Therefore, we continue to recommend that the Commission create a priority system for frequency use by low power FM radio stations so communities do not risk the loss of their local community broadcaster in favour of a new commercial applicant.

### **Cable Carriage**

51. In addition, the NCRA/ANREC believes it is vitally important that Broadcast Distribution Undertakings continue to carry local community radio services even if it requires BDUs to translate analogue broadcast signals into digital cable signals. The NCRA/ANREC inadvertently missed an opportunity in the context of Broadcasting Public Notice CRTC 2008-100 (Regulatory frameworks for broadcasting distribution undertakings and discretionary programming services) to comment on the importance of retaining section 22 of the Broadcast Distribution Undertaking Regulations beyond 2011. We intend to make the case for this during the upcoming c/c policy review proceedings in 2009. Continued cable carriage for c/c stations is particularly important in mountainous and rural areas where stations' broadcast parameters may not allow them to reach listeners living outside city centres, some of whom do not yet have high speed Internet access.

## Issues beyond the Commission's Jurisdiction

52. Finally, there are two additional issues beyond the purview of the Commission that the NCRA/ANREC would like to address. We mention them here because we believe they have broad policy implications that are relevant to the Commission's deliberations on new media.
53. First, copyright is a contentious issue in Canada. The c/c sector is concerned because proposed amendments to the *Copyright Act* do not include exemptions for legitimate, non-commercial uses of copyrighted material that are necessary for the day-to-day operation of our stations. Also, as we discussed above, the proliferation of copyright tariffs is becoming burdensome for our sector. We anticipate the burden to increase as copyright collectives propose new tariffs that apply to various forms of new media. New copyright legislation must take the needs of the c/c sector into consideration to ensure that it remains a vital part of the Canadian broadcast system. To this end, we are ready to consult with Heritage Canada, Industry Canada, and any necessary legislative committees to ensure that this occurs. We encourage the Commission to support our efforts in this regard.
54. Second, the federal government has yet to announce how it will use the over \$4 billion in revenues generated from the spectrum auction. A significant investment in the Community Radio Fund of Canada could be used as an endowment fund to ensure the viability (both technical and otherwise) of campus and community media for years to come. We intend to pursue this with the relevant government departments and officials.
55. The NCRA/ANREC believes that new media broadcasting offers great opportunities for both the c/c sector and the Canadian public it serves, but incentives and support mechanisms are required in order to take full advantage of the technology.

Sincerely,



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ii [http://www.cbonline.org.au/3cmedia/3c\\_issue3/BarryERennie.pdf](http://www.cbonline.org.au/3cmedia/3c_issue3/BarryERennie.pdf)

iii IAB Canada report in Broadcaster

iv ??

v IAB Canada report in Broadcaster

vi <http://www.crtc.gc.ca/ENG/publications/reports/PolicyMonitoring/2007/tmr2007.htm>

vii Discussion about the creation of an Australian portal is available at:  
<http://www.austlii.edu.au/au/journals/UMelbLRS/2007/3.html>

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ix Smith, Nancy. "Forecasting the Future". *Broadcast Dialogue*. November 2008.

x Canadian Heritage. Media Cross-Ownership in Canada. [http://www.pch.gc.ca/progs/ac-ca/progs/esm-ms/crois5\\_e.cfm#h2](http://www.pch.gc.ca/progs/ac-ca/progs/esm-ms/crois5_e.cfm#h2)