



Ms. Diane Rhéaume,
Secretary-General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A 0N2

April 5, 2007

NCRA/ANREC

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Re: Broadcasting Notice of Public Hearing CRTC 2007-3
CTVglobemedia Inc. (CTVgm) (formerly Bell Globemedia Inc.), on behalf of
CHUM Limited (CHUM)
Application No. 2006-1667-5

Dear Ms. Rhéaume:

1. The National Campus and Community Radio Association (NCRA/ANREC) is a non-profit national association of organizations and individuals committed to volunteer-based, community-oriented radio broadcasting in Canada. NCRA/ANREC is dedicated to advancing the role and increasing the effectiveness of campus and community radio. We work closely with other regional and international community-oriented radio organizations to provide developmental materials and networking services to members, represent the interests of the sector to government and other agencies, and promoting public awareness and appreciation for community-oriented radio in Canada.

2. It would not be appropriate in this case for NCRA/ANREC to either support or oppose the acquisition of CHUM by CTVgm. However, we ask the Commission to consider several issues arising from this proposed merger.

3. NCRA/ANREC recognizes that there are may be sound business reasons for the merger of CTVgm and CHUM. Increased amalgamation of this type may be necessary for Canadian media companies to compete against other large media businesses in a global environment. This and similar mergers may also lead to reduced costs of operations as a result of consolidation of some functions. In fact, future mergers may be deemed necessary for reasons of survival of Canadian commercial media, and that without consolidated efforts, Canadian media companies may not be able to continue to deliver Canadian content to their audiences.

4. Community radio stations cannot gain similar advantages by merging business operations. In fact, it is not reasonable to imagine that a group of community and campus stations – say, in the Maritime provinces – with their complex financial, social and political relationships with universities, local municipalities and community organizations, could consolidate their unique radio broadcast operations to become more competitive, either in the commercial marketplace, or in the marketplace of ideas.

5. At the same time, as these sorts of mergers proceed, community radio stations are being asked by their communities to take an increased role and provide a higher level of local service. For very many communities – including rural communities underserved by commercial media, new Canadians, minority language communities, cultural communities, the economically disadvantaged, and youth – community radio is the primary provider of local news, information, and cultural content. Community radio serves a much different niche in a much different way than does commercial radio.



6. If commercial media mergers are both necessary and, perhaps, inevitable, we suggest to the Commission that the role of the community radio sector requires examination, with the objective of strengthening non-commercial alternatives to large, concentrated media businesses.

7. We believe there are sound economic reasons to support a strong, non-commercial media sector. As Paul Ormerod argues in his 2005 book "Why Things Fail", while cooperation between companies within a single industry (such as broadcasting) may be necessary for the health of the industry as a whole, the industry also benefits from an external environment which is competitive. Non-commercial broadcasting contributes to such an environment by driving creative innovation and identifying new potential markets. We believe that commercial radio is stronger if the community radio sector is also strong.

8. The community radio sector faces a significant on-going challenge in finding an appropriate mechanism to garner support from commercial media as a result of mergers and acquisitions. Over the past few years, NCRA/ANREC has worked with Corus Entertainment Inc. to establish and maintain an association national office and run a successful Canadian Talent Development initiative called Dig Your Roots. Unfortunately, there has not been another opportunity to engage with the commercial broadcast sector in a similar partnership, despite our efforts, including a funding proposal to CTVgm for this specific application.

9. Given the community radio sector's many economic challenges, we believe that an effective financial support mechanism for the sector should be established. Towards that end, NCRA/ANREC, working closely with l'Alliance des radios communautaires du Canada (ARC du Canada) and l'Association des radiodiffuseurs communautaires du Québec (ARCQ), is establishing an arms-length Community Radio Fund of Canada. It is our hope that working cooperatively with the commercial media sector, the Commission, and government departments and agencies, we can create a sustainable funding regime that is appropriate for situations such as corporate mergers.

10. Further, the NCRA/ANREC would ask that the Commission encourage commercial broadcasters to consider the means by which they may be able to support campus and community radio stations at the local, provincial, and national levels.

11. We encourage the Commission to consider these issues before further mergers are approved. We believe that a policy review of media concentration in Canada is necessary if the issues that we have raised are to be properly addressed and resolved by the Commission and Competition Bureau.

12. If the Commission has any questions concerning this submission, we would be pleased to appear at the upcoming hearing, or to discuss these issues in a more informal setting.

Sincerely,

Chad Saunders, President

cc: CTVgm, dspodek@ctv.ca

Melissa Kaestner

From: Melissa Kaestner [melissa@ncra.ca]
Sent: April 5, 2007 5:01 PM
To: dspodek@ctv.ca
Cc: Chad Saunders
Subject: NCRA/ANREC comments Application 2006-1667-5



NCRA comments
Application 2006...

To whom it may concern:

Please find attached the comments of the NCRA/ANREC in regards to Broadcasting Notice of Public Hearing CRTC 2007-3 (Application No. 2006-1667-5). If you have any problems with the attachment, please contact Melissa at (613) 321-1440.

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National Campus and Community Radio Association
Association nationale des radios étudiantes et communautaires
<http://www.ncra.ca>
Celebrating 25 years -- NCRC 2006: The Evolution of Radio
<http://www.ncra.ca/conference>
the national campus and community radio report
<http://www.earshot-online.com>
Women's Hands And Voices
<http://www.ncra.ca/women>
Dig Your Roots. Discover Your Culture. Grow A Consciousness.
<http://www.DigYourRoots.ca>



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Is this information correct?

Observation ou commentaire / Intervention or comment

Date Reque / Date Arrived: 05/04/2007

Numéro de processus public / Public Process Number : 2007-3

Demande(s) / Application(s) : 200616675

Comparution à l'audience demandée/Request to appear at the hearing: Oui/Yes

Raisons pour la comparution/Reasons for requesting appearance:

We will appear if the Commissions deems it appropriate to discuss the community radio sector in regards to this application.

Pièce jointe/Attachment(s): Non/No

Nom / Name: Ms. Melissa Kaestner

Titre / Title : National Coordinator

Compagnie / Company : NCRA/ANREC

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