



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

July 9, 2007

NCRA/ANREC

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Re: Broadcasting Notice of Public Hearing CRTC 2007-5
Diversity of Voices Proceeding

Dear Mr. Morin:

1. We are writing on behalf of the National Campus and Community Radio Association / l'Association nationale des radios étudiantes et communautaires (NCRA/ANREC) with regard to the Diversity of Voices Proceeding described in Broadcasting Notice of Public Hearing CRTC 2007-5 (PN 2007-5).
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.
3. We emphasize that it is important for the Commission to consider the diversity of the broadcasting system as a whole, during this and future processes. The Commission has, indeed, mandated commercial broadcasters to include "groups that have been traditionally under-represented in broadcasting: ethnocultural minorities, Aboriginal peoples, as well as persons with disabilities" (PN 2006-158, 129). We believe it is important that the Commission include and consider these groups and all citizens in its evaluation of media diversity.
4. The level of diversity in the campus and community broadcasting sector can be considered a standard to which other broadcasters should be held, and a working structure in which they should invest. Nevertheless, this third sector of the broadcasting system, by all accounts, has been omitted from Commission's scope as presented in PN 2007-5. We believe that the Commission must take the campus and community sector fully into account when determining a) the definition of diversity of editorial voices and ownership and, b) mechanisms for assuring such diversity.
5. Diversity of editorial voices and of media ownership are issues that touch many Canadians on a personal and community level. We request to appear at the public hearing in order to provide the Commission with a clear picture of the incredible variety of communities which are not only served by our sector, but

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actively participate in the campus and community broadcasting sector. These communities, under-served by the commercial sector, include but are not limited to: First Nations, Inuit, Métis, Spanish-speaking, Chinese, GLBT (Gay, Lesbian, Bi-sexual, Transgendered), youth, elderly, the poor, homeless, Filipino, Croatian, Indian, Hungarian, Middle Eastern, Assyrian, Eritrean, Pakistan, German, Vietnamese, Italian, Romanian, Ukrainian, Afro-Canadian, West Indian, Bangladeshi, Korean.

6. Diversity in media means a willingness and ability to serve diverse musical communities. This pertains to musical genres. The formulas of commercial media permit a minimum of risk, making the provision of diverse creative product a practical impossibility. The campus and community broadcasting sector provides, but is not limited to, programming related to the following musical genres underrepresented in commercial radio: jazz, hip hop, avant-garde, ska, reggae, dancehall, soca, indie rock, garage rock, country, roots, blues, punk, metal, funk, soul, world beat, classical, electronic, industrial, noise, EBM, rockabilly, gospel, dub, Celtic, aboriginal, Latin and freeform.
7. Diversity of editorial voices and ownership means news and current affairs content that is locally produced and locally focused. Our member stations produce thousands of hours of such local programming per week. The campus and community broadcasting sector, as a whole, produces approximately 6,200 different radio programs per week in more than 40 languages. Local spoken word programming coming from NCRA/ANREC member stations include topics as they are relevant to listening communities. These topics include, but are not limited to: social housing, community gardening, single parenthood, racial profiling, empowered sexuality, immigrant community issues, feminism, municipal politics, police brutality, prison issues, cooking, alternative energy, dance, theatre, visual arts, labour issues, religious community issues, community health, volunteerism, and land claim issues.
8. Canada is one of very few industrialized nations with no limitations on concentration of media property ownership or cross-ownership. This has inevitably led to a centralization of both production and distribution channels and a successive homogenization of content, a situation that undermines diversity in content and in ownership, and decreases the production of local content. It is a situation that has been repeatedly determined, through governmental and independent studies, to be harmful to the maintenance of a well-informed and freely communicating Canadian citizenry. (Please see the *Lincoln Report*¹ and the ongoing work of the Centre d'études sur les médias at l'Université Laval).

¹ "Our Cultural Sovereignty: The Second Century of Canadian Broadcasting", Standing Committee on Canadian Heritage, Clifford Lincoln, M.P., Chair, June 2003 .



9. Recent mergers in the communications industry have further advanced this sad state of affairs. Rather than consider such actions on a case-by-case basis, the Commission must assure that consumers have access to a multitude of media voices and must institute limitations on media property concentration and cross-ownership to assure such access. We recommend limitations on common ownership of television, radio, print and new media, with limitations to be determined in accordance with the maintenance of diversity in editorial voices and ownership rather than commercial gain and market dynamics.
10. We believe that the commercial broadcasting Benefits Policy, in its current form, does not adequately support the development of a richly diverse and innovative Canadian cultural sector. We call upon the Commission to re-examine the Benefits Policy in full, assuring that it contributes to the development of Canadian content as a cultural, rather than commercial, product. We submit that while mandated contributions to the Radio Starmaker Fund and FACTOR may indeed aid in the production of Canadian product, these contributions do little to encourage diverse local content production.
11. We ask that the Commission mandate commercial broadcasters to contribute a minimum 1% of Canadian Content Benefits (CCD) to the Community Radio Fund of Canada (CRFC) as previously submitted during the Commercial Radio Policy Review of 2006. This act will demonstrate the Commission's commitment to maintaining diversity in the broadcasting system as a whole and its further support for the campus and community broadcasting sector.
12. We request the opportunity to appear at the hearing, commencing Monday 17 September 2007, to further discuss these important matters.

Sincerely,

Evan Light
NCRA/ANREC Board of Directors

Joanne Penhale
NCRA/ANREC Board of Directors

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