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Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario,  
K1A 0N2

July 8, 2013

**Re: Broadcasting Notice of Consultation CRTC 2013-279**

(Call for comments regarding the exemption of low-power radio programming undertakings that provide programming derived solely from houses of worship from licensing requirements and associated regulations)

Secretary General,

1. I am writing on behalf of the National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires ("NCRA/ ANREC"). We believe the Commission should maintain its existing requirements for licencing programming undertakings from houses of worship. We request an opportunity to appear at the hearing, if there is one.

2. The NCRA/ANREC is a not-for-profit group committed to volunteer-driven, non-profit, community-oriented radio across Canada. Our goals are to ensure stability and support for individual campus and community ("c/c") stations and the long-term growth and effectiveness of the sector. We currently represent more than 80 members.

3. We recognize the value of programming from houses of worship.

4. That said, in larger communities with few remaining frequencies (or in smaller communities that are close to urban congested areas, without being directly served by any of the urban stations,) exempt undertakings of programming solely from houses of worship may make it harder for proposed new c/c stations to find an available frequency, particularly as proposed c/c stations may only have the capacity to apply as a low-power service and therefore cannot apply for a protected FM frequency that could require the exempt service to relinquish its licence.

5. Community broadcasting is enshrined in the Broadcast Act. As such, we believe it is important to consider the barriers c/cstations may face in accessing frequencies. We believe this is particularly relevant in this case as c/c stations tend to be slower at

submitting their licence applications than other broadcasters, in large part because they are mandated to be not-for-profit, community-access and volunteer-driven. These elements are important hallmarks of our stations, but it means they are disadvantaged against other types of stations that do not share this mandate. In this case, this means undertakings providing programming solely derived from houses of worship can then move more quickly than c/c stations, either to start-up an exempt station or apply for a licence.

6. The current process, whereby undertakings providing programming solely derived from houses of worship must apply for a licence, offers some means of protection for community groups attempting to start a licenced c/c radio station in a spectrum-congested area as it provides a process by which the c/c group can intervene against the house of worship application. As far as we know, there is no such mechanism for exempt services. (In contrast, in communities with no spectrum pressure, house of worship stations can be seen as adding to the broadcasting services available in a community, rather than limiting options for direct community access to the airwaves by occupying one of few remaining frequencies that could be used for other purposes.)
7. Finally, regarding both the issue of advertising and spectrum pressure, we would like to suggest increased use of the internet. This would be a way houses or worship could stream and podcast relevant content that is already exempt from regulation, well-placed for niche programming for specific audiences without using valuable spectrum, and less expensive to start-up and operate.
8. Therefore, while we believe there are no existing c/c radio licencees whose ability to fulfill their regulatory requirements will be affected by the proposed change, we believe that the proposed changes could impact future c/c stations that have not yet been developed, thereby denying communities the opportunity to have a local c/c broadcaster. As such, we encourage the Commission to maintain its existing licencing framework for house of worship stations.

Thank you,

  
Shelley Robinson  
Executive Director  
NCRA/ANREC