



July 12, 2007

Mr. Robert A. Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

Re: Application by Astral Media Radio Inc. No. 2007-0769-8: Acquisition of broadcasting assets of Standard Radio Inc.

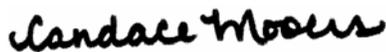
Dear Mr. Morin:

1. Canada's three community radio associations — the National Campus and Community Radio Association (NCRA/ANREC), the Alliance des radios communautaires du Canada (ARC du Canada) and the Association des radiodiffuseurs communautaires du Québec (ARCQ) — represent over 140 not-for-profit community and campus radio stations across Canada. While Astral and Standard may have sound business reasons for their merger, we oppose the application in its current form, and respectfully suggest that the tangible benefits package as proposed is insufficient in its reflection of the Commission's objectives concerning Canadian content development (CCD) as contained in the Commercial Radio Policy 2006.
2. Astral's proposed benefits package contains positive components. However, the Commercial Radio Policy 2006 states that
In order to make the most effective use of these financial contributions [to Canadian content development], the Commission considers that such contributions should be used to fund initiatives that lead to the creation and promotion of audio content for broadcast using Canadian resources.
3. We would suggest that the single most effective vehicle for advancing these goals is through a mechanism that supports all of Canada's 140 community radio stations: the Community Radio Fund of Canada. Support for the Fund, with its clear focus on providing essential media services to Canada's diverse and marginalized communities, will positively impact not-for-profit radio stations in all regions of Canada.
4. The Community Radio Fund of Canada will provide the community broadcasting sector with the resources needed to continue providing local programming and community access, as well as for the development and enrichment of this vital component of the Canadian broadcasting system.

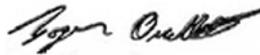
The activities of the Fund reflect the commitment of the community radio sector to principles of localism and citizen access, respect for and promotion of the official languages of Canada, diversity and multiculturalism, high quality programming, and innovation.

5. We note that tangible benefits from the two most recent media mergers, the largest in this country's history, will total over \$169 million. Many of these benefits will flow to worthy recipients. However, the broadcasting industry is missing a historic opportunity to make a significant contribution to the entirety of Canada's non-commercial radio, and the communities that depend on it. A system of voluntary support from commercial broadcasters for community broadcasting may not be sufficient to sustain and develop non-profit community radio in Canada.
6. We request the opportunity to appear at the hearing beginning 27 August 2007 to further discuss this matter.

Sincerely,



Candace Mooers
President, NCRA/ANREC



Roger Ouellette
Président, ARC du Canada



Charles-Eugène Cyr
Président, ARCQ

CC: Astral Media Radio Inc.
Mr. Konrad von Finckenstein, Chairman, CRTC

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