



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

Broadcasting notice of consultation no. 2011-216

April 28, 2011

Secretary General,

1. The Alliance des radios communautaires du Canada (ARC du Canada), the Association des radiodiffuseurs communautaires du Québec (ARCQ) and the National Campus and Community Radio Association (NCRA) support the proposed structural and operational plan of the Community Radio Fund of Canada (CRFC) as we believe it will help all campus and community stations provide better services to their local communities.
2. The three associations are not-for-profit groups committed to volunteer-driven, non-profit, community-oriented radio across Canada. Together we have more than 130 licenced members.
3. We have long argued that campus and community radio stations are hampered by shoestring budgets, and that increased funding would help them produce more and better local programming and increase their capacity to enable greater community outreach. It would also help ensure that stations achieve full regulatory compliance. These were the motivations behind our joint decision to found an independent fund dedicated to obtaining and distributing funding to the sector.
4. We appreciate the Commission's recognition and approval of the CRFC as an eligible Canadian Content Development (CCD) recipient, and particularly the Commission's decision to mandate that a percentage of CCD contributions be contributed to the CRFC. This has already made a positive difference to the sector.
5. In the last three years, more than 30 campus and community radio stations have received approximately \$320,000 from the CRFC. With additional funding this number will increase dramatically. Stations used this money to produce programming about a

local river treaty, people living under the poverty line and trained immigrant women in how to tell their own stories on the radio. Other stations ran internship programs for youth that, in one rural community, integrated station programming into the local high school curriculum. Another program in a major city offered youth interns from diverse ethno-cultural groups the opportunity to help produce an established morning show.

6. This work reflects the mandate of c/c stations as defined in the new campus and community radio policy, which states that a campus or community station “facilitates communication among members of the community...[and]...reflects the diversity of the communities served” and ensures that “local programming is produced, in part, by volunteers.” It also links this work with the aims of Canadian Content Development funding, to “support volunteers, programming and volunteer participation.”

7. Although stations' achievements supported by funding from the CRFC are noteworthy, this funding has been project-based, which is not ideal for the sector. The project-based structure required stations to create stand-alone work, like new programs or documentary series, that may have taken time and resources away from their core work. The proposed outcomes-based approach will instead focus on achieving the goals of CCD funding while allowing stations more ways to achieve those goals. For instance a station that wants to increase local programming could create a new program or series, or instead, hire a Program Director who would conduct volunteer outreach and provide training for current volunteers, which would thereby ensure the development of more local programming. This flexibility means that the CCD money achieves its intended effects while ensuring maximum benefit to stations.

8. We therefore believe that the CRFC's proposed outcomes-based approach will more effectively support stations in fulfilling their mandates, rather than requiring them to create special projects. This is particularly important for smaller and rural stations that don't always have the capacity to both run a station and create and implement additional projects.

9. In its three years of granting funds, the CRFC has been able to test and refine its application, adjudication and administration processes. As a result, we believe the application and reporting processes are manageable for stations while ensuring the Fund's transparency and accountability to the Commission and all other stakeholders.

10. We also believe the CRFC Board structure is representative of the sector while maintaining its independence. As non-voting members of the CRFC Board, the associations are able to advise the CRFC on sectoral realities without being a party to specific funding decisions or any other potential conflict of interest. In addition, we feel the proposed industry relations measures, such as an annual meeting with commercial broadcasters, quarterly reports, and the ongoing availability of the CRFC Executive Director to meet, provide for accountability and cooperation with stakeholders while ensuring the privacy of the CRFC's members and potential recipients.

11. In the matter of the proposed administrative funding, we recognize that to properly oversee the collection and distribution of CCD funding, while also pursuing other avenues of support for the sector, it is essential that the CRFC have at least two to three employees. In the short term we agree that the CRFC must focus on providing strong program support to stations by hiring a dedicated Program Officer, as well as ensuring ongoing strategic development and oversight through an Executive Director. As the CRFC grows we look forward to it obtaining more staff support for the benefit of both the CRFC and the sector that relies on it.

12. In light of all of the above, we encourage the Commission to approve the CRFC's structural and operational plan.

Sincerely,

Martin Bougie,  
Directeur general  
ARCQ

François Coté,  
Secrétaire general  
ARC du Canada

Shelley Robinson,  
Executive Director  
NCRA

cc: CRFC Executive Director Melissa Kaestner

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