



NCRA-ANREC
325 Dalhousie, Suite 230
Ottawa, Ontario, K1N 7G2

April 27, 2010

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

Dear Secretary General,

**Re: Broadcasting Notice of Consultation CRTC 2010-97
Call for comments on the reporting requirements for new media broadcasting
undertakings**

1. The National Campus and Community Radio Association/l'Association nationale des radios etudiantes et communautaires (NCRA/Anrec) is a not-for-profit group of organizations and individuals committed to non-profit, volunteer-driven, community-oriented radio across Canada. Our goals are to ensure stability and support for individual stations and to promote the long-term growth and effectiveness of the sector.
2. The NCRA/Anrec wishes to comment on the Commission's call for comments on the reporting requirements for new media broadcasting undertakings, as outlined in CRTC 2010-97.
3. We assume for purposes of the comments below that "new media broadcasting undertakings" may refer to existing holders of radio broadcasting licences that, in addition to their radio broadcasting activities, also broadcast content over the internet that differs from the content of their radio broadcast. We assume that "new media

broadcasting undertakings” may also refer to internet-only broadcasters that do not hold a radio broadcasting licence. The NCRA/Anrec has both types of new media broadcasting undertakings amongst our membership.

4. Generally, the NCRA/Anrec supports the CRTC’s interest in collecting data in order to understand trends in Canadian broadcasting and new media. We believe that there is much to learn about the new media broadcasting landscape, including the characteristics described in Question 4 of the Notice of Consultation, and the content that broadcasters prioritize when they are not bound by geographical limitations or regulatory burdens.
5. As community-based and public-access broadcasters, we would like to know whether new media broadcasters are making efforts to:
 - create ties to their local communities;
 - seek local listeners;
 - provide access and training to community members and organizations;
 - serve and involve those under-represented in mainstream media;
 - provide local news and information; and
 - promote local artists.

Having this information will shed light on the services our members currently provide, the services they will develop in future, and the relative strengths and weaknesses of our efforts in these areas.

6. We also support the collection of information like the governance and structure of owners and operators of new media broadcasting undertakings – i.e. whether these entities are for-profit or not-for-profit, sole proprietorships, corporations, whether they have affiliations with institutions or businesses, etc.
7. We believe that learning more about new media broadcasting undertakings may enable the Commission to implement some of the recommendations we provided in our submission of December 5, 2008 in the context of CRTC 2008-11 (Canadian Broadcasting in New Media). Those recommendations included the development of CRTC incentives and proactive measures to ensure: a full range of Canadian new media broadcasting services; investment in new media technologies; sufficient and accessible Canadian content in this environment; and the inclusion of minority and diverse voices.
8. We are pleased that the Commission acknowledges the administrative burden of requiring new media broadcasting undertakings to report information in paragraph 6 of the Notice of Consultation. We believe the Commission is well aware of how difficult it can be for not-for-profit volunteer-driven community broadcasters to keep up with collection of data and reporting requirements, and our members would appreciate the Commission taking their particular circumstances into account.

9. We are not in a position to comment on most of the Commission's questions in CRTC 2010-97 regarding data, frequency of reporting, confidentiality, or the criteria used to define the subset of reporting broadcasters. However we note that the maxim "what gets measured, matters" may apply in this context, and therefore we support the collection of a wide variety of data from a wide variety of broadcasting entities.
10. We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Freya Zaltz". The signature is written in a cursive, flowing style.

Freya Zaltz
NCRA/ANREC
Regulatory Affairs Director