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Secretary General  
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Telecommunications Commission  
Ottawa, Ontario  
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September 15, 2004

**Re: Broadcasting Notice of Public Hearing CRTC 2004-6**

1. The National Campus and Community Radio Association (NCRA) is pleased to respond to the call for comments concerning Public Hearing CRTC 2004-6. The NCRA would like to appear at the public hearing to express our concerns in person and oppose all three applications.
2. The NCRA has serious concerns regarding satellite radio and we would like to offer a range of comments regarding our sector (non-profit campus and community radio) and those areas that the commission invited commentary on. First however we want to draw attention to the fact that none of the applicants have included provision for community access services on any of the proposed satellite systems.
3. The Broadcasting Act recognizes that the Canadian broadcasting system is made up of three elements (public, private and community 3(1(b))) and so the Act expects community access broadcasters to be represented along side public and private systems. In the past the commission has used its power to reserve frequencies for community broadcasters, the commission has compelled cable television distributors to carry local radio and there have been efforts to ensure that community broadcasters have access to the proposed Canadian Digital audio broadcasting system.
4. The NCRA requests that any satellite broadcaster licensed in Canada makes provision for community broadcasting on its service. This access could be provided through reserved channels that showcase the diversity of Canadian community programming or through the inclusion of community access programming as an integral part of the service. We believe that the inclusion of community programming would be in the best interest of Canadians and work towards fulfilling the Broadcasting Acts goals of diversity, balance, education and contribution from the Canadian independent production sector.

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The National Campus and Community Radio Association  
l'Association nationale des radios étudiantes et communautaires

5. Our membership is also concerned with the competition of satellite radio in the area of specialty programming. One of the strengths of community radio has always been the freedom and mandate to run specialty programming including Jazz, Classical and other under represented types of music. Although satellite services will increase the diversity of programming (if not the Canadian content) they will almost certainly draw away portions of the audience that currently listens to specialty programming on community stations.

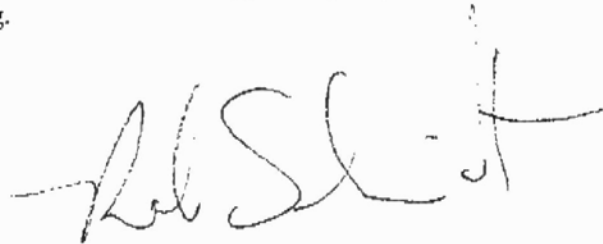
6. We are concerned that the goals of Canadian content regulation will not be preserved with these services. We believe that without Canadian content regulation, these new services will create an unfair economic environment for all terrestrial radios and ultimately hurt Canadian musicians.

7. We propose that if approved each applicant should (in addition to carrying community broadcasting) be required to contribute to a Canadian Community Radio Fund which could comprise of:

- Operating grants to increase funding of non-profit campus and community radio stations
- A 'healthy station' component which would fund training, information sharing, professional development and foster growth in our sector
- Support for the NCRA's continuing efforts to develop Canadian talent.

8. The NCRA would like to work with the applicants and the CRTC to find a compromise which will satisfy the Broadcasting Act and our members concerns. We look forward to an opportunity to present these concerns in the public hearing.

Sincerely;



--Rob Schmidt

VP External, NCRA.