



c/o  
NCRA/ANREC  
180 Metcalfe, Suite 608  
Ottawa, Ontario, K2P 1P5

January 16, 2014

John Traversy,  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario, K1A 0N2

Secretary General,

**Re: Call for comments on the Commission's approach to tangible benefits and determining the value of the transaction**

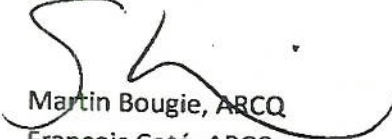
1. The Association des radiodiffuseurs communautaires du Québec (ARCQ), l'Alliance des radios communautaires du Canada (ARCC), and the National Campus and Community Radio Association/Association nationale des radios étudiantes et communautaires (NCRA/ANREC) are writing in support of tangible benefits for radio broadcasting. If there is a public hearing, we would like to appear.
2. Together, our associations represent more than 140 campus and community radio stations across Canada. As founding members of the Community Radio Fund of Canada (CRFC), we agree with the Commission that the current tangible benefits guidelines are clear, and have been successful in yielding meaningful and complementary benefits to the campus and community ("c/c") sector, as well as the wider Canadian broadcasting system.
3. That said, we share the Commission's concern about exemptions for certain transactions. The Commission states that the requirement to provide tangible benefits is a key component in the determination of whether a proposed transaction is in the public interest. We would go further. In our view, this requirement is the cornerstone of the entire tangible benefits system.

4. We believe that absent tangible benefits, it is difficult to measure the benefits of transactions for Canadians as citizens and creators, as well as consumers. Thus we believe there should be no exemptions of this kind, including those based on market size — like transactions involving unprofitable stations, we believe stations in smaller or more competitive markets would only be purchased if the purchaser considers that it can ultimately profit from the acquisition.
5. We also believe that intangible benefits may not be sufficient to satisfy the public interest, particularly when measured against the value tangible benefits provide, through the CRFC, to campus and community radio stations, as well as to the other beneficiaries of tangible benefits.
6. We do believe there may be instances where the type of station could be a factor in determining an exemption or partial exemption from tangible benefits, though we would suggest that these exemptions be measured against the value of tangible benefits to the Canadian public.
7. Since its creation, the CRFC has relied exclusively on contributions from private broadcasters, including tangible benefits. However, the CRFC is working on new avenues for funding, including the Government of Canada and private foundations. As such, though the c/c radio sector needs more financial support to become sustainable, we believe the current allocation of tangible benefits between the recipient organizations is sufficient.
8. Since obtaining CRTC approval to receive tangible benefit-based contributions in 2011, the CRFC has awarded approximately \$3-million to support 239 projects by 96 campus and community radio stations in nine provinces and all three territories. These projects provide strong and measurable results for Canadian communities.
9. For example, CKVL-FM in LaSalle, QC was able to hire two interns to broadcast live on-location from across their community and to produce interviews about the local cultural and political scene for the station's *Escouade Connexion* program.
10. CFRG-FM in Gravelbourg, SK undertook their "Micro en Main" project to deepen their connections with, and coverage of, the Fransaskois community, locally and across the province. This included additional station staff to train new volunteers.
11. And CJMP-FM in Powell River, BC improved their remote broadcasting capabilities, including live coverage of town council meetings, and summer festivals, but particularly to reach out to people in the community who had disabilities and couldn't come to the

station themselves, and to allow the local Indigenous Sliammon people to broadcast from their own territory.

12. Campus and community radio employs more than 800 Canadians and is supported by 10,000 volunteers from all walks of life. Together, they produce more than one-million hours of local programming each year. In addition to the CRFC, stations are financially supported by a diverse range of sources including students, community fundraising, government grants, and lottery and gaming opportunities. Annual operating budgets range from stations with less than \$5000, to a few large stations with more than \$1-Million dollars.
13. We believe this valuable work would not be possible without the CRFC and its direct support from tangible benefits.

Thank you,



Martin Bougie, ARCC

Francois Côté, ARCC

Shelley Robinson, NCRA/ANREC