



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

November 5, 2015

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

Re.: Broadcasting Notice of Consultation CRTC 2015-421

A review of the policy framework for local and community television programming

Dear Secretary General,

1. We are writing on behalf of the National Campus and Community Radio Association/L'Association nationale des radios étudiantes et communautaires ("NCRA/ANREC"), which is a not-for-profit national association working to recognize, support and encourage not-for profit, volunteer-based, public access campus and community-based ("c/c radio") broadcasters in Canada. We provide advice and advocacy for individual stations, and conduct lobbying and policy development initiatives with a view to advancing the role and increasing the effectiveness of our sector.
2. It is our understanding that the mandates of community television and community radio broadcasters are similar in that:

- both engage community members broadly in the governance, operations, and programming of a media service
- the institutional structure of community media organizations allows for programming and services that are not possible in a private-sector context
- broadcast content is based on interaction with the audience as well as the needs, values and goals of the community
- both are by nature and structure oriented toward the public interest, diversity, unique local content, and accountability to their stakeholders and communities

3. With that in mind, we wish to comment on nine of the questions posed in the notice as our experience with community media may help shed light on issues raised in the current proceeding.

Q1. How should local programming be defined? How should local news be defined?

4. In the community radio sector, we consider “local” to be anything that is directly relevant to the people within signal range. This is complicated by the development of new media, whereby stations’ programming can be accessed by anyone in the world, not just within signal range. However, our members continue to treat the audience within AM or FM signal range as their target audience, and to develop programming that is locally relevant to those listeners. We believe there is great value in this approach, as it is an effective means of bringing people together and encouraging dialogue and community building in the signal’s location.

Q3. What role should the community element play in providing local programming?

5. We believe best practices in community media (community radio, community TV, and community-oriented new media) involve participation and control by community members in all aspects, including ownership, facilities, and content. In particular, we believe it is important for community members to develop local programming rather than having paid staff complete this task. This makes the content both meaningful to, and reflective of, its community. We would be pleased to contribute information about some of those practices if it would assist.

Q5. Is a physical local presence still needed in the digital age? In considering this question, are studio facilities and local staff required to provide meaningful locally reflective and locally relevant programming? If so, what financial resources, infrastructure and staff are necessary?

6. This is an important question. Although digital tools make it possible for individuals and groups to increase their media participation in a variety of creative ways, we believe a physical local presence continues to be important for community broadcasters because community media provides a focal point for community interaction.

7. The physical access and support for programmers that studio facilities and local staff provide are also important. Not all individuals in a community have access to equipment, knowledge and resources that would allow them to produce content without the extra training or the physical support of a studio and staff. Those that do have access to digital equipment, knowledge and resources still benefit from a central hub and staff to provide support and consolidate their efforts into a coherent

whole. While successful community media may be operated without staff, stations in the community radio sector that are completely volunteer-run face many challenges that can often be alleviated when they acquire sufficient funds to hire even a single staff person. Many also describe the community building that occurs informally in their studio location when community members from different walks of life come together to discuss local issues.

8. With respect to financial resources, we note that some form of stable operational funding is important to ensuring the continued growth and effectiveness of all Canadian community media, including both community radio and community television.

Q6. Is regulatory intervention needed to foster local programming by both the private and community elements of the broadcasting system and to ensure the presence of local programming?

9. In our experience, regulatory intervention can assist in fostering local programming. Although some broadcasters may see regulation as a burden, it also emphasizes the importance of local programming and motivates some c/c stations to create more high quality local programming than they would if no minimum requirement was imposed. Although most c/c radio stations focus on local programming, some find it more difficult than others and would likely fall back on more programming syndicated from stations in other parts of the country (or in other countries) if the local programming requirements did not exist. As long as the regulatory intervention preserves stations' independence to determine what the content of the programming will be and only stipulates that a minimum percentage must be locally produced, we believe regulatory intervention can be helpful.

Q9. How should funding for locally relevant and locally reflective programming be allocated from the various existing funding sources to ensure the continued presence of this programming in the Canadian broadcasting system as a whole?

10. We believe it is extremely important that funding in all community sectors be allocated in a fair and generous way to ensure that locally relevant and locally reflective programming is available and that it is high quality. The precise allocation is beyond our expertise, but we note that it is very challenging to create locally relevant and reflective community programming without stable and adequate funding sources. The Community Radio Fund of Canada ("CRFC") has been of enormous assistance to our members, and many c/c stations have been able to achieve local programming goals that they could never have met without the funding provided by the CRFC.

Q10. How should the Commission and Canadians measure the success of proposed approaches?

11. In our experience, useful measures of success in community broadcasting may not be the same as those used to evaluate commercial broadcasting. One of the fundamental ethos of community broadcasting is to create space for underrepresented voices within the media, and market share or viewership measures may not reflect the value of this contribution to the broadcasting system

adequately. Quantitative measures should take into account the fact that communities served may not be captured by standard measures, and qualitative measures may also be important.

Q11. How should access programming be defined?

12. In the c/c radio sector, access is a central feature of both our organizations and our programming. At its best, our members hold that programming should be created by, and for various communities themselves, in a representational and non-tokenistic way. This requires c/c stations to provide training, mentorship and supervision to individuals within their communities, opportunities to apply the knowledge gained in the training, and airtime to broadcast the results of their efforts. Community members should be directly involved in determining what the content of the programming will be and how it should be presented, and in producing and presenting it to the listening audience.

Q18. What measures should be taken to ensure that programming from diverse linguistic groups including OLMCs and ethnic groups as well as Aboriginal groups is made available and is reflective of the communities BDUs serve?

13. We believe that including programs from diverse linguistic and ethnic groups in community broadcasting is very important, and it would strengthen community television programming if BDUs were motivated to meet or exceed a threshold of diverse voices and content. However, since regulation in this area has the potential to impact stations' programming content, we believe it is important to ensure that any measures taken preserved their autonomy to make programming choices, as each community is comprised of a different mix of people, and what may be easy to achieve in one community could be extremely difficult in another.

14. Capacity-building is essential if we are to continue to increase the diversity of voices and languages heard on community media. In the case of community radio, CRFC grants have helped many of our members train staff and volunteers, conduct more effective community recruitment and awareness campaigns, and, increasingly, avoid tokenism in our approach to increasing diversity.

15. We also suggest that, as a best practice, community broadcasters should have policies that allow for equitable access by all residents in their geographic area, including OLMCs, ethnic groups, and Aboriginal groups, as well as procedures for reaching out to these groups to encourage them to take advantage of the opportunities available.

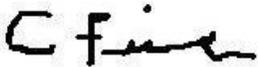
Q19. How should funding for community access programming be allocated from the various existing funding sources to ensure the continued presence of this programming in the Canadian broadcasting system as a whole?

14. We believe funding through the CRFC is successfully helping our member stations improve their outreach and community engagement processes, which, in turn, has increased the diversity of voices on community airwaves. We believe funding community media is important to ensure effective community access.

Conclusion

15. As an association that represents 89 not-for-profit community media broadcasters we appreciate the opportunity to comment on these questions. Since broadcasting technologies are evolving and converging, particularly with the introduction of new media broadcasting technologies, the initiatives and services of community TV and community radio are increasingly connected. Changes to the policies affecting one sector are likely to have a significant impact on the other. Therefore, we believe it is important to participate in this proceeding, and we wish to appear at the hearing to elaborate on our comments, and address any new issues and developments that may arise in the course of the proceeding.

Thank you,



Catherine Fisher
NCRA/ANREC External Policy Committee



Freya Zaltz
Regulatory Affairs Director
NCRA/ANREC Advisory Board



Barry Rooke
Executive Director
NCRA/ANREC

* * * End of document * * *