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January 28, 2014

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

Re: Broadcasting Notice of Consultation CRTC 2013-1714-9
Technical Amendment. Erin Community Radio (CHES-FM)

1. We are writing on behalf of the National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires ("NCRA/ ANREC") in support of a technical amendment by Erin Community Radio ("CHES-FM") We request an opportunity to appear if there is a hearing.
2. The NCRA/ANREC is a not-for-profit national association working to recognize, support, and encourage volunteer-based, non-profit, public-access campus and community-based broadcasters in Canada. We provide advice and advocacy for individual campus and community ("c/c") stations, and conduct lobbying and policy development initiatives with a view to advancing the role and increasing the effectiveness of our sector. CHES-FM is a member of the NCRA/ANREC.
3. CHES-FM has applied to add a rebroadcasting transmitter in Orangeville, Ontario, in order to improve their signal quality in a portion of the Hills of Headwaters area ("HOHA"), which they are mandated to serve. CHES-FM hopes that this will address a technical need, triple or quadruple their potential revenue, and allow them to better serve listeners in Orangeville. Orangeville is a major town and shopping hub in the HOHA, and it is not currently served by another community radio station. CHES-FM's broadcast content already includes coverage of Orangeville events and local issues, and features residents of Orangeville despite their inability to receive the signal.
4. CHES-FM broadcasts from Erin, Ontario, a rural town in the HOHA comprised of two amalgamated former villages and various outlying hamlets. CHES-FM has been designated by its town council as Erin's official emergency broadcaster, and it is a key part of Erin's official emergency plan. With assistance from the community, CHES-FM has installed two generators so they can remain on-air in case of emergency.
5. Much of CHES-FM's broadcasting area is on the Niagara escarpment. The terrain is hilly and this has created ongoing reception challenges for the station, thereby limiting their reception to a small portion of the HOHA. CHES-FM applied for a technical amendment in 2012 in order to improve their reception in some parts of the HOHA, but their reception in Orangeville is still inadequate.

6. CHES-FM believes their ongoing inability to cover a larger portion of the HOHA has had harmful effects on the station's ability to fundraise and sustain itself. The town of Erin is home to just 11,000 people, most of whom work in Brampton, Mississauga, Guelph and Toronto. We are told that Erin's proximity to the Greater Toronto Area ("GTA") makes it an expensive place to live and do business. Many people living in Erin go to Orangeville and the GTA for larger purchases. As a result Erin has few of its own businesses, and most are small, with small advertising budgets.

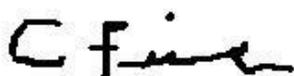
7. We are told that the station has made significant efforts to raise revenue and cut expenses as much as possible. Still, their annual revenue, drawn mainly from businesses and individuals in Erin, is less than \$25,000 per year, and this is not enough to cover their rent. This situation is unsustainable and they need to generate more revenue in order to continue broadcasting. In almost eight years of broadcasting and fundraising, CHES-FM has never been able to adequately fund the station, and board members have frequently donated substantial personal funds to help the station meet its expenses.

8. CHES-FM hopes that they will be able to increase their effective broadcasting area, and thus, their value to advertisers, with this proposed amendment. As stated in their Supplementary Brief, CHES-FM has been told by businesses in Orangeville that they will support the station if reception in Orangeville is improved. We are told that many individuals and community organizations in Orangeville already support CHES-FM, and this will also increase with improved reception.

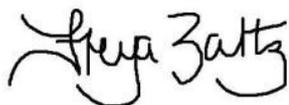
9. CHES-FM is also investigating other sources of funding, like the Community Radio Fund of Canada, to enable them to hire staff, improve operations, and increase their capacity to serve the population of the HOHA. Although they have numerous volunteers, they have found it difficult to pursue additional funding opportunities without paid staff, as station volunteers are fully occupied with station operations. If their revenue increases sufficiently, CHES-FM plans to hire a station manager. In the NCRA/ANREC's experience, many c/c stations are able to improve their regulatory compliance and stabilize their finances when they have staff to coordinate their operations.

10. We therefore hope that the Commission will approve this application for a technical amendment in order to allow CHES-FM to strengthen their financial position, and better serve listeners in Orangeville.

Sincerely,



Catherine Fisher
NCRA External Policy Committee



Freya Zaltz
Regulatory Affairs Director
NCRA Advisory Board

cc: Erin Community Radio (CHES-FM)

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