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March 9, 2015

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

Secretary General,

**Re: Broadcasting Notice of Consultation CRTC 2015-45 – Application 2014-0635-6**

1. I am writing on behalf of the National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires ("NCRA/ANREC") in support of the application by the Nakusp Community Radio Society ("NCRS") to renew the broadcasting license for CJHQ-FM, which expires on 31 August 2015. 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 not-for-profit, volunteer-based, 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. Our goals are to ensure stability and support for individual stations, and to promote the long-term growth and effectiveness of the sector. We currently represent more than 85 members, including CJHQ-FM.
3. Nakusp is a small isolated community with a population of approximately 1,800 people located on the shores of Upper Arrow Lake in the West Kootenay region of British Columbia. Local media minimally serves residents of Nakusp and NCRS provides the only locally originating radio broadcast in the area. The community served by NCRS is one of the smallest of all NCRA/ANREC members, which creates unique challenges for the station in terms of fundraising, volunteer recruitment, and new program production. Although NCRS has struggled

in these areas from time to time, it appears to have a reliable group of volunteers who are dedicated to seeing the station succeed and who have put considerable time and energy into running it.

4. CJHQ-FM began broadcasting in 2005. In 2014 the Commission approved an application by NCRS for authority to acquire from Nakusp Roots Music Society the assets of the English-language community radio station CJHQ-FM Nakusp, and for a new broadcasting license to continue the operation of the undertaking. We understand that the transition between the two societies was a smooth one, as NCRS had already been involved in operating the station prior to the Commission's 2014 decision to approve the transfer.

5. NCRS currently operates out of the Arrow Lakes School District office and has ongoing support from the Columbia Basin Alliance for Literacy ("CBAL"). These partnerships illustrate the station's successful efforts to develop relationships with other local organizations. Most of NCRS's revenue is raised through advertising, grant money, and membership fees.

6. Despite its small size, NCRS provides a broad range of programming for local listeners. This includes music programs featuring blues, electronica, country, metal, hip-hop, punk, and jazz. It also includes programming drawn from other NCRA/ANREC member stations, and particularly those from rural BC whose spoken word programming covers topics that are relevant to residents of Nakusp.

7. In an effort to find new sources of locally-produced spoken word programming, NCRS recently identified two board members who are interested in producing new spoken word programs. Also, several years ago NCRS produced a 10-part documentary series about the Arrow Lakes and Columbia River Treaty with a grant from the Community Radio Fund of Canada ("CRFC"), which it plans to broadcast this year. These documentaries are highly relevant to the local community, which has been severely impacted by the Columbia River Treaty signed between Canada and the U.S. in 1964. The station was initially concerned about its ability to meet the 15 percent locally-produced spoken word requirement set out in CRTC 2010-499, but has found that it is now able to meet the requirement without difficulty using a combination of existing local live and pre-produced programs, new programs, and some repetition of programs each week.

8. Although NCRS was non-compliant with respect to its Annual Returns between 2007 and 2010, we understand that the station's compliance with regulatory requirements has improved, and we believe NCRS has been in full compliance with all regulatory requirements in recent years. We note that NCRS has filed its Annual Return on time for the past three years, and in fact it was one of the first NCRA/ANREC members to do so each year.

9. We understand that NCRS overhauled its bylaws in 2013, which illustrates the station's dedication to good governance. The NCRA/ANREC provided support during that process. NCRS continues to make improvements to its internal procedures, and recently informed us that compliance is now a standing agenda item for its Board of Directors, who review the content of the NCRA/ANREC's Regulatory Support Guide at every Board meeting. We are also told that NCRS has implemented procedures to ensure its Annual Returns will always be filed on time

even if the President or Secretary Treasurer are unavailable, illustrating the station's commitment to ensuring that standards and compliance are a top priority.

10. Importantly, NCRS has applied to the most recent round of CRFC for a grant to hire staff to help run the station. Based on our experience with other small member stations, we believe the transition from being fully volunteer-run to having paid staff will have a significant positive impact on the station's capacity for ongoing regulatory compliance, and will help NCRS develop new programming, particularly local spoken word content.

11. In conclusion, the NCRA/ANREC supports the application of NCRS for renewal of its broadcasting license and we encourage the Commission to approve it. We believe the station plays an important role in its community and fulfills the mandate of a c/c station as set out in the Campus and Community Radio Policy, CRTC 2010-499.

Sincerely,



Brady Holec  
NCRA/ANREC Regulatory Affairs Committee



Freya Zaltz  
NCRA/ANREC Regulatory Affairs Director

Cc: Nakusp Community Radio Society (CJHQ-FM)

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