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Robert A. Morin,
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario, K1A 0N2

July 5, 2011

Re: Broadcasting and Telecom Notice of Consultation CRTC 2011-344

Secretary General,

1. On behalf of the National Campus and Community Radio Association/l'Association nationale des radios étudiantes et communautaires (NCRA/ANREC), we are writing to comment on 'over-the-top' broadcasting and how it affects campus and community radio stations. If a hearing is held, we would like the opportunity to appear.
2. The NCRA/ANREC is committed to volunteer-driven, non-profit, community-oriented radio across Canada. 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 80 member stations, of which 72 are licensed and five are internet-only.
3. Our members are themselves broadcasting over-the-top. Almost all livestream the same content as their terrestrial signal and many are also offering downloadable podcasts of shows or interactive audio-on-demand. They use these services to reach people who couldn't otherwise receive the station signal, which can be a significant number of the local population as many c/c stations broadcast between 5-1000 Watts. They can also reach people who increasingly prefer to listen online or through mobile devices. Given that youth are a major target audience of campus and community stations, this is significant.
4. That being said, as small non-profit organizations, many c/c stations can only afford limited bandwidth, which restricts the number of people who can listen online. For instance CFRC-FM in Kingston, ON has capacity for about 100 listeners at any one time. And CKUW-FM in Winnipeg, found that they couldn't register their station for an iTunes "College/University Radio" aggregator channel because they could only host 12 listeners on their stream at any one time — iTunes required capacity for at least 300.

5. This means that access to local community media is restricted at the same time that commercial and public media are able to offer nearly limitless access on multiple platforms. The end of mandatory cable carriage for c/c stations this September only exacerbates this situation. For instance, Shaw, Videotron and Rogers all offer the Galaxie music service over their terrestrial cable services and also offer online and mobile access to their subscribers. Bell, Telus, Sasktel and MTS offer Galaxie through their IPTV services.

6. Community broadcasters are also not structurally able to compete with vertically integrated firms that may give preferential treatment to their own programming. For instance, programming offered to subscribers through a BDU online portal might not count towards a user's data plan whereas programming from other sources could. This could lead to a less competitive and diverse atmosphere within the Canadian broadcasting system, particularly disadvantaging small non-profit broadcasters.

7. We are facing a situation where people will have to go out of their way to listen to local community programming produced by their neighbours. And for stations that rely on listener donations and advertising, this all but ensures a vicious cycle of declining revenues reinforcing their inability to reach out to listeners on new platforms.

8. The Broadcasting Act enshrines private, public and community radio as three elements of a diverse Canadian broadcasting system. We believe that protecting the policy objectives of the Act requires comprehensive public access to all three of these sectors and taking steps to ensure their survival.

9. To that end, we ask that the Commission consider re-instating mandatory carriage for campus and community radio stations by all BDUs on their terrestrial and online offerings at the next opportunity. And, while still uncertain about the forms that emerging platforms will take, we ask that the Commission consider how community media be made accessible through these new platforms.

10. We also recognize that, given the challenges of regulating new media, there may be a need to discover additional ways to fund Canadian content development.

11. Thank you for considering our comments

Sincerely,



Shelley Robinson

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