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

October 16, 2009

Dear Secretary General:

Re: **Broadcasting Notice of Consultation CRTC 2009-418
Review of Campus and Community Radio**

Thank-you for accepting our input on the Campus and Community Radio Policy.

1. CiTR 101.9 FM is the broadcasting voice of the University of British Columbia and the surrounding community of Vancouver. Operated by The Student Radio Society of UBC, CiTR is a not-for-profit campus-based community radio station that trains students and community members in broadcasting and engages them in the creation of local programming.
2. We do not request the opportunity to present at the hearing.
3. We support the submission filed by the National Campus and Community Radio Association, and will outline our specific position in this document, addressing the individual questions posed by the Commission with some additional comments.

Sector Objectives:

Q.1 Campus and community radio stations are largely defined by their programming. Should this view and predominant defining characteristic be expanded? If so, how?

4. Yes, the definition should be expanded. We provide community access to media, and engage local communities in broadcasting. We provide a service (or a social service) rather than a product - we *pull* content from our locales instead of *pushing* prepared content on our listeners. We provide broadcast training to those in our communities (fulfilling an educational role), and create a focal point, or intersection point, for the many niche cultural and interest groups in our respective cities. Therefore, our role in the broadcast environment is not to provide programming defined by policy, but to engage communities in broadcasting in the creation of local programming.

Q.2 The objectives for campus radio stations are outlined in paragraphs 13 to 17 of Public Notice [2000-12](#) while the objectives for community radio stations are outlined in paragraphs 12 to 18 of Public Notice [2000-13](#). Should these objectives be revised? If so, how?

5. We believe community broadcasters should have the same accountability to the multicultural groups present in their respective locales as campus-based community stations.

Q.3 Presently, there are two main policies governing the campus and community radio sector. Is it still necessary to have two policies, or would the sector be better served by one policy? What would be the implications of combining both policies and regulatory approaches?

6. With some flexibility in programming requirements, one policy would be sufficient for both campus and community stations.

Q.5 For campus stations, the Commission makes a distinction between community-based and instructional stations. Is this distinction still relevant? Should these distinctions be limited and simplified or otherwise changed? If so, how?

7. Yes, this distinction is still relevant. The mandate an instructional station is quite different than a community radio station, aimed at broadcasting education not community engagement.

Q.6 Currently, the Commission licenses developmental campus and community radio stations as noted above. Is this licensing approach still relevant? Should it be changed and, if so, what changes should be made?

8. Provide frequency protection to developmental stations, and reserve a suitable protected frequency for them at the completion of the developmental period.

Q.7 At present, the Commission's record of the membership of the board of directors of each station is only updated on a seven year basis (i.e. at the time of renewal). This is problematic since the Commission remains unaware of changes to the composition of the board over the license term. How can the Commission be kept informed on a more frequent and routine basis?

9. We can submit a copy of our annual Society form (which requests an updated list of Directors) to the Commission annually.

Q.8 Applicants for campus and community stations are measured against the requirements of the policies by which they will be regulated to help determine whether they are to be licensed. Spectrum is increasingly scarce, which brings to light the possibility of competitive licensing scenarios involving applicants for campus and community radio stations and applicants for commercial and CBC stations. How should the Commission evaluate applications for campus and community radio stations in these competitive scenarios?

10. Reserve one frequency in each locale for a community (or campus-community) broadcaster. The approval of licenses should take into consideration the stations currently in that market. If the three sectors are vying for the same frequencies, priority should be given to the community broadcaster and the public broadcaster. Airwaves belong to the public, and the public should have access over the rights of companies to profit from advertising. The Commission should prioritize diversity over the replication of commercial radio formats. Decisions should be made in favour of a balanced broadcasting sector, valuing diversity in programming and service and access for the surrounding community.

Q.9 How can the Commission ensure that a greater diversity of voices is provided in the broadcasting system through the campus and community radio sector?

11. Provide operational funding. Our programming is limited by the ability of staff and volunteers to recruit and support on-air programmers that reflect the diversity present in our local communities.

Q.12 Is the definition of experimental music proposed above appropriate? If not, how could it be improved?

12. Please refer to the NCRA submission on this topic.

Q.13 Under what circumstances should musical selections falling into the experimental category qualify as Canadian selections?

13. Following the MAPL standard, the work should count as Canadian when the artist and production categories are both fulfilled by a Canadian DJ.

Q.14 What are the challenges faced by OLM community broadcasters and program contributors in terms of access to the airwaves?

14. Our biggest challenge is recruiting programmers to represent these communities. For us, it's a numbers game. The francophone community in Vancouver is small in comparison to other cities. Gaps in our programming are prioritized, but it's difficult to find people committed to hosting a weekly show. Operational funding will enable increased staff hours for recruiting and nurturing new programmers.

Q.15 How can the Commission help ensure the presence of linguistic duality in the broadcasting system and the availability of content to OLM communities? In so doing, how can the Commission ensure that the needs and realities of OLM communities are reflected in programming?

15. Provide funding for programmers from OLM populations. Currently, it is difficult for us to access funding for developing official language and minority language programming. Provide operational funding for stations, so that staff have the time to spend on programmer recruitment.

Q.16-19

16. Please refer to the NCRA submission on this topic.

Q.20 What are the challenges that the campus and community radio sector currently experiences with respect to funding?

17. CiTR is ineligible to apply for grants from almost every funding body. Community broadcasters don't fit into programs designed for the arts or social services. Since we are located at UBC broadcaster (but receive no money from the university itself), we are ineligible to apply to foundations for funding. And, community broadcasters no longer fit within the definition of charitable activity, so we are ineligible for grants that require charitable status.
18. Project funding is difficult for us to apply for, since the bulk of our activity (producing programming) is produced for free by volunteers. What we are in need of is operational funding to fund staff positions, engineering studies and equipment, in order to provide the basic infrastructure needed to provide the programming and support our volunteers.
19. Even though the community radio sector accomplishes many of the goals of Heritage funding programs (supporting multicultural communities, supporting minority languages, civic and community engagement, building community capacity, training and education, providing information on local events and services, creating a gathering place for interest groups, providing a voice for diverse populations, providing a dedicated voice for local programming and engaging people in media), we do not fit well into any of the programs, and often have to design projects outside our main areas of operation to apply for funding.
20. We are in desperate need a funding program dedicated to community radio - the third sector of broadcasting. We are in essence the Canadian content of the broadcasting sector, and should receive a percentage of the CCD money required of Canadian private broadcasters.
21. We finally have the Community Radio Fund, however this radio fund is limited to the CCD money it can chase down, and to the funding priorities outlined by those private broadcasters. The fund has only been in operation for a year, and only passed out 80,000 this round, funding 16 small projects. So far, only project funding is available through the fund.
22. The Fund has only been in operation for a year, and only passed out 80,000 this round, funding 16 small projects. So far, only project funding is available through the fund, which doesn't serve our need for operational funding.
23. Our funding needs as a sector do not necessarily fit within the priorities of the broadcasters. CCD money is often allocated directly for programming - but this doesn't serve our sector at all, as our programming is developed by volunteers. Our desperate need is for support and admin staff, technical expertise and equipment. Even more critical is support for engineering briefs and CRTC applications. Some stations run on \$5,000 a year, and they need operational funding, not project funding.
24. Operational money will enable us to continue to provide (and improve) the authentic, locally-based Canadian content that we currently provide as community broadcasters.

Q.21 Are advertising limits for campus stations still relevant? Should they be maintained? What would be the impact if they were raised or lowered?

25. Yes, they should be maintained. Four minutes is enough to provide significant revenue (should we wish and are able to sell this quantity of ads). It's important that our airwaves are dedicated to community programming, and this four minute limit helps to maintain this balance, and provide a radio option that doesn't bombard our listeners with commercial interest. We do recommend enforcing an average of four minutes per hour throughout the day, rather than a strict hourly limit.

Q.22 How have their capacities for fund raising increased or decreased since the last review of this sector's policies?

26. Our capacity to fundraise has increased slightly due to the work of the NCRA in promoting our sector, lobbying on behalf of our sector, and arranging meetings with the CRTC and private broadcasters. The effects of many of these efforts have yet to be realized. Also, the NCRA is struggling for funding, and the NCRA provides an extremely valuable service to community broadcasters across Canada – by lobbying for funding, for lower copyright tariffs, representing our voice on issues like spectrum scarcity, providing a place for shared knowledge, bringing us together for a conference every year, and providing invaluable support to stations struggling with license applications and other crises.

Q.23 How has the CRFC affected the funding of this sector? How could it be improved?

27. Please refer to paragraphs 20 through 24.

Q. 24 What funding models for campus and community radio are viable in the short, medium and long term? From where should this funding originate and what form should it take? For instance, should the commercial radio sector be mandated to devote certain portions of its funding directed at CCD to the CRFC?

28. We need long-term, sustainable, operational funding. We barely have the staff to operate radio stations, let alone lobby government and private broadcasters for funding. Plus, we spend hours and hours trying to create projects that fill our needs and fit into current funding programs. After all this work, only a few applications are successful. The Community Radio Fund of Canada is a great way to disseminate funding throughout our sector, when not handcuffed by funding priorities determined by those outside our sector.

29. Yes, the commercial radio sector should be mandated to devote portions of its CCD contributions to the Community Radio Fund of Canada, allocated to programs developed and determined by the CRFC. Every other sector has a dedicated fund for Canadian content - the music industry (FACTOR), film (Telefilm), television (the Canadian Television Fund) - but community broadcasters have been left out. We are truly the authentic voice of our communities, and the Canadian content of the airwaves.

Q.25 Are there any accelerated processes that the Commission should implement when considering technical amendments for low-power radio stations in cases where such stations are at risk of losing the frequency on which they operate?

30. Please refer to the NCRA submission.

Q.26 What is the impact of the changes announced by the Department regarding the domestic protection regulations for FM stations?

31. We already have trouble supporting our operations. Most stations will not have the ability to pay for an engineering brief to increase in power. Even for an established campus station, scraping \$8,000 together is a multi-year process.

Q.27 How widespread are protection issues for low-power campus and community broadcasters?

32. Please refer to the NCRA submission.

Q.28 Some long term solutions to the FM frequency shortage problem could involve the reassignment of television spectrum (channels 5 and 6) to radio, and/or the adoption of a digital radio standard. What policies or measures could the Commission take in the event of these changes with respect to the campus and community radio sector?

33. The Commission should designate a section of the spectrum (TV or digital) to community or educational broadcasters. This was done initially on FM, and this section was not protected and sold off. It is ridiculous that the public airwaves were sold off to private broadcasters without creating space for the public to broadcast.

Q.29 Campus and community radio serves a function that is not necessarily provided by other components of the broadcasting system in terms of the programming provided and opportunities for community access. Is there a similar need in the new media environment?

34. There is always a need for local media - the web is just another platform for what we provide, another way to reach our audience. The training that we provide to our volunteers, our community engagement, and the fact that we are a hub for many interest groups makes us much more than another content site on the internet or a blogger from Vancouver.

Q.30 What are the benefits of a new media presence for campus and community radio stations? Do audiences expect such a presence?

35. Adding new platforms for our content enables our listeners to access us in many different ways. It increases access to our programming. People can now listen to CiTR on FM, on their computer (which is the best way of listening since our signal is spotty), and can download podcasts of their favourite show. Our listeners do expect to access us using new media, especially young people on campus who are getting their news and learning about music solely on the internet.

Q.31 What challenges do campus and community radio stations face with respect to participation in the new media environment?

36. For smaller stations, the purchase of equipment is difficult due to finances. For larger stations (our budget is \$250,000), our main challenge is technical knowledge - finding volunteers or staff with necessary knowledge. Our computers systems are maintained through student employment programs - we cannot afford to hire professionals, are dependent on volunteers with those skills, and face constant turnover. Keeping up with changes in technology is also a big challenge for us.

Q.32 Is there a role for Internet-only community or campus radio stations? In particular, given their primary objective to train students to be professional broadcasters, could instructional stations fulfill their mandate via an Internet-only model?

37. Yes, there is a role for internet-only stations, however internet-broadcasting cannot replace value of FM broadcasting for the community radio sector. As instructional stations do not fill a community mandate, they can fulfill their instructional purposes via the internet - the content and training is the same, only the platform is different.

Q.33 How can the Internet provide an opportunity for the reflection of official language minority communities?

38. If the CRTC plans on regulating the internet, the CRTC could require French content. Otherwise, the internet offers the option of accessing our programming at any time of the day, not just when the program is aired live – access is increased.

Q.34 What impact will mobile devices have on the campus and community radio sector? What opportunities do mobile devices present?

39. Mobile devices will enable listeners to access our stations in yet another way. CBC and WFMU have just launched iPhone applications. If we had funding, perhaps we could too.

Q.35 Is the approach that the Commission has taken for small commercial radio operators concerning cultural diversity appropriate for the campus and community radio sector? If not, why not? If it is not, please propose an alternative approach. Please consult the appendix to Broadcasting Public Notice [2007-122](#) when considering your comments.

40. Please refer to the NCRA submission.

Additional comments:

41. We are dissatisfied with the decision to not require cable companies to carry community broadcasters. Many of our listeners use cable - with spectrum scarcity, it is more important that community broadcasters are carried by cable. Also, we do not have the resources to rent space for our tower in a location that would provide us a clear signal throughout Vancouver (nor do we have the resources for a funding brief to increase in power without huge fundraising efforts). So, in many places in Vancouver, people cannot get a clear signal without a cable hook up. It costs the private broadcasters a pittance to broadcast our content on cable - it's very important that this decision be reconsidered. = insert the cable decision reference number.
42. Secondly, we recently changed our bylaws and had to considerably alter them to comply with the CRTC's interpretation of the *Direction to the CRTC (Ineligibility of non-Canadians)*. Under our old bylaws, 100% of our Board of Directors and 80% of our membership had to be Canadian. The CRTC requested the following additions to our bylaws:
- Quorum at annual general meetings and special general meetings must have a Canadian majority.
 - The Station Manager and Program Coordinator must be Canadian.
 - 80% of our Student Executive must be Canadian.
 - There was also a request that our Student Executive President be Canadian.

43. Our station is governed by a Board of Directors, with a student executive that governs the day-to-day operations of the station with assistance from staff, and presents policy for approval by the board. The Board of Directors is ultimately responsible for the organization, and the Station Manager is ultimately responsible for all staff.
44. Although we agree with the principles of the *Direction to the CRTC (Ineligibility of non-Canadians)*, the application of this regulation for not-for-profit organizations is unnecessarily complicated, difficult to enforce and apply. Instead of requiring our senior staff person (the Station Manager) and the Board of Directors to be 80-100% Canadian (the two bodies that oversee and make decisions on behalf of the organization), we now have several other levels of Canadian control that make our administrative burden greater, and will not substantively change the operation or programming of our station in any way. The CEO of a for-profit company has greater control over his/her company than a not-for-profit society, where control is balanced by committees, a strong mandate and community accountability.
45. In addition, applying the rule so strictly does in fact counter our mandate – to serve the student population of UBC (which includes a high percentage of international students) and to reflect the community of Vancouver in our programming and serve under-represented populations. We exist to provide offer local communities access to the media to provide local, community-based programming, which is in essence, the most authentically Canadian programming that exists.
46. Thirdly, community broadcasting as a sector has stronger community roots and greater financial support in other countries. It is in our best interest to take advantage of expertise from other countries, learn their best practices and apply them to our station to promote our Canadian voices. Denying an international student from a leadership role on our Student Executive is not in the best interest of Canadian radio.

Thank-you for your time and consideration.

Sincerely,

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