

April 29, 2010

Konrad von Finckenstein  
Chairman  
CRTC  
Ottawa, ON K1A 0N2

**Re: Broadcasting Notice of Consultation CRTC 2009-661  
Thursday, 29 April 2010 Hearing - Presenter #36 Comment #48  
Review of Community Television Policy Framework**

Mr Chairman, Members of the Commission:

- 1) My name is Richard Ward and I'm a Director of C.M.E.S. Community Media Education Society, formed from the Vancouver East Neighbourhood TV Office after the shutdown by Rogers in 1996. Since then we've intervened several times in support of participatory public access community television. In 2002 I appeared, along with other C.M.E.S. members, before Parliament's Standing Committee on Canadian Heritage and we were quoted several times in their report, *Our Cultural Sovereignty*, often referred to as the Lincoln Report.
- 2) Our submission here emphasizes the importance of community television to our system of government, a neighbourhood platform where all candidates get a chance to speak to voters. Unless we accept that elections are going to be bought by the biggest TV advertising budget, we need to keep a not-for-profit platform where our government policies can be fully explained and examined.
- 3) We're pleased to see Metro Vancouver taking a strong role in these proceedings. If there's one time when the community channel tops the ratings, it's during a municipal election.

- 4) Some speakers assume that community television attracts insignificant audiences. I believe I saw a BBM rating of 0.1% printed; but when I was a producer in Kitsilano our dozen Vancouver-area neighbourhood offices had 1,200 volunteers which simple arithmetic shows is 0.1% of the entire population, and I'm sure we had more people watching than just our own volunteers. Today Shaw claims a daily reach of 300,000. In Vancouver we always assumed shows averaged around 30,000 viewers, judging by how often our guests and hosts were recognized on the street, which is a pretty good intuitive test of the importance of community TV to the neighbourhood.
- 5) We believe the community channel is an important public institution. That's why it's included in Canada's Broadcasting Act. It's a mistake to allow any business to claim ownership or political control over what must be a participatory medium. We believe community channels should be licensed in order to make this perfectly clear.
- 6) We can see this imbalance when the Heritage Committee in the Lincoln Report states its dismay that no accounting of community channel spending exists, and then is simply ignored. The Lincoln Report becomes one of the most under-reported stories of 2003. Here you can see the power of concentrated media ownership.
- 7) BDUs say that no one complains about their stewardship but that's simply not true. Just one current example is Campbell River, BC, where C.M.E.S intervened against the Shaw takeover last fall. Recent newspaper coverage points out that the Shaw purchase there, with CRTC approval predicated on preserving the same level of community access TV, has within months led to an idle studio and the studio foyer turned into a business office.
- 8) Gathered within comment #3002 are 2080 letters opposed to the BDU model which, if you read the PDFs, are actually quite diverse, as diverse as most of the individual letters posted on the CRTC website. Comment #3003 has a further 430 letters opposing the BDU model. Some of Canada's largest creative organizations, public service associations and municipalities have decided to support CACTUS.

- 9) That said, you as Commissioners have inherited a system where BDU operation of Canada's community channel has become an accepted business practice. You're going to have to disappoint someone. For more than a decade this dispute has been growing. Finding a resolution will be challenging.
- 10) Many letters on the CRTC website show widespread fear that the purpose of these hearings is to shut down community television in Canada. When we look a little deeper at all the letters, it's evident that people writing in are looking for the kind of things that any adequately-funded service provider, not-for-profit or corporate, should be able to provide.
- 11) The largest category, 617 comments, simply wants a local channel. Access, 315; local information, 213. 231 letters describe volunteering as reporters or technicians, or interns from school and university media programs. 219 charities are grateful for community TV. Arts, sports, youth, multicultural and small business promotion add a further 516 comments. Of course many letters touch on several topics and choosing the main one is subjective, so these figures can all be seen as minimums.
- 12) Council meetings are central for 98 writers. Revenue — how the channel should be funded — is the main theme for 77 comments. 130 writers say the community channel is important for access to government generally. Within these three categories, 107 letters are from city officials, 9 from MPs and 39 from representatives at the provincial level.
- 13) BDUs say they'll shut down their channels if they lose the levy money, but what they're producing right now should be financed out of their advertising budgets, and we don't believe BDUs are going to stop advertising. C.M.E.S. believes the CRTC should create a separate licence for cable-branded channels and encourage them to continue operating as promotional vehicles for their parent companies.

- 14) In its submission Rogers says it owns the community channel, and programming certainly reflects that opinion, particularly in light of the CRTC audits from 2002 to 2005. C.M.E.S. regards ownership as central to understanding the community channel and believes that ownership vests in the Crown. Otherwise the levy to support Canadian programming, currently 5% of cable revenue, would be voluntary. In fact what we have here is businesses using their taxes to have virtually total control over a public service. Licensing the community channel is the only way to make ownership crystal-clear.
  
- 15) Of course BDU channels aren't community channels. They never were. Fear of government manipulation, combined with regulatory encouragement for cable companies as national corporate champions, created a bad compromise in the formative days of participatory access TV. Now today we see our elections trivialized, our economies unbalanced and our neighbourhoods overlooked.
  
- 16) C.M.E.S. believes the 2% community channel levy share, recently estimated at \$116 million annually in Canada, should go to a Community Access Media Fund.
  
- 17) While C.M.E.S. doesn't think the Internet can be a replacement for community television, we do believe that media centres, like libraries, will be able to provide access for people who are unable to afford high speed Internet service from their BDUs. It's important to have a physical place for people to come together in their neighbourhoods. DTH operators will be able to contribute funding without aiding their competitors. You have an excellent proposal in front of you for multimedia centres that will retain traditional media, often centred in municipal buildings, along with open access to new media, with active involvement from established community organizations.

- 18) Groups who've written comments supporting CACTUS include ACTRA; the Directors' Guild; CTV; Canwest; the Communications, Energy and Paperworkers Union; the Canadian Conference for the Arts; the Independent Media Arts Alliance; the National Community Radio Association; and NUTV in Calgary. Multimedia centres are supported by the City of Burnaby, Metro Vancouver, the Canadian Media Guild, the Documentary Organization of Canada, OpenMedia, Friends of Canadian Broadcasting and the Canadian Library Association.
  
- 19) C.M.E.S. supports the CACTUS vision for multimedia centres. Community television, rather than competing for consumers, should let us hear the wisdom of Canadian citizens.
  
- 20) Thank you.

Sincerely,

Richard Ward, Director  
C.M.E.S. Community Media Education Society