
January 8, 2010

Robert A. Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

**Re: Broadcasting Notice of Consultation CRTC 2009-661
Notice of Hearing - 26 April 2010
Review of Community Television Policy Framework**

- 1) C.M.E.S. Community Media Education Society is pleased that the CRTC is reviewing Canada's community television policy framework: [Broadcasting Notice of Consultation CRTC 2009-661](#). C.M.E.S. would like to appear at the public hearing in Gatineau, because of our long history working for participatory public access community television.
- 2) Our main comments on the Notice are directed to Questions 7, 17, 20 and 26.
- 3) Sovereignty is the reason Canada has the *Broadcasting Act*. It was no accident when Clifford Lincoln, Chair of the Standing Committee on Canadian Heritage, chose *Our Cultural Sovereignty* as the title for Parliament's exhaustive study of Canada's media system.
- 4) Some of us fear that, in our modern world with multinational corporations, sovereignty is an outmoded concept. When companies become large enough, they behave like governments. We, as individuals, lose power. Any small investor knows that voting as a citizen is more effective than voting as a shareholder.
- 5) If we want democracy to mean anything, then we need to see that election issues are publicized widely. Municipal governments especially benefit when mayors, councillors and their opponents can set out ideas in full before a television audience. Voters recognize leaders they admire. Once again they feel that they themselves matter in the democratic process. During those long periods when community television encouraged volunteer participation it was a successful mass medium, preferred by those viewers who turn away from American television and its imitators, exactly the kind of viewers who identify strongly with Canada.
- 6) If we don't guard Canada's sovereignty, it could simply evaporate. There are two reasons this is a serious possibility. One is that American television continues to define the norm for a large and influential class in Canadian society. The other is that the Internet, by its technological structure, cannot be national. The metaphor of an information cloud is a good one.

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- 7) **Question 26:** Now that we have the Internet, do we still need community access to traditional television production? The answer has to be yes. Traditional audiences need more contact with Internet devotees who in turn need to get out and broaden their neighbourhood horizons. TV still has a better picture and a bigger audience.
 - 8) New media don't replace old ones; they transform them. Radio, then film and now television are all finding new roles after their days of dominance. In each case, public support spent for a social benefit gets fiscal leverage proportionate to the traditional popularity of each medium. As the Internet uses older media, it is shaped by them.
 - 9) It's no accident that C.M.E.S. focuses on community television as the mirror of Canada's identity. It's important to have individuals support leaders who can speak for them, but it's better when ordinary people can also speak to large audiences themselves.
 - 10) Community television exists not for its own sake but rather as the most effective method to communicate the goals or enthusiasms of local production teams. In the recent battle over fees between the TV broadcasters and the cable companies, both businesses have ignored the high technical quality, the creativity and audience loyalty that used to characterize the volunteer-produced community channel. If a nation can't hear local voices it's like a pyramid balancing on its point. In the days when community TV offices had thousands of volunteers, ideas had a way of bouncing off each other and averaging out. It was a stable relationship. Today, when the only TV producer who matters is a network owner, the entire industry veers recklessly between world conquest and collapse.
 - 11) **Question 7** asks why there has been such a modest uptake for the CRTC's offer to license community programming undertakings—only one licence since 2002. Here C.M.E.S. has firsthand experience.
 - 12) In 2007 we underwent a CRTC hearing to offer a community programming service in BC and Alberta when Telus said it had no plans for community TV. The CRTC recognized we had strong community support—interventions from the cities of Prince George and Medicine Hat, among many other groups and individuals. Nonetheless we were told we were producing locally but distributing from regional hubs and that was insufficiently local.
 - 13) We were also told that, if the BDU failed to meet revenue goals, we had to have the resources to fund the channel ourselves. Very few not-for-profits meet the test of matching BDU funding out of their own pockets.
 - 14) In **Question 17** the CRTC quotes the Dunbar-Leblanc report which took the general theme of maximizing revenue for the Canadian broadcasting system; thus they favour community channel advertising. There are two problems here.

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- 15) First, community TV ads take money away from commercial stations where two-thirds of revenue comes from national advertisers, and that income has dropped precipitously during the world economic downturn.
 - 16) Second it can be argued that, if not-for-profit access groups can sell ads, they don't need public money. The Prime Minister's Office, which appoints regulators directly, is always looking for a way to cut public spending. This is not the place. It may be that something like the public library system is necessary. Library boards are accountable to elected municipal councils. Library budgets are the same order of magnitude as community TV budgets. Commercializing public discussion misplaces accountability.
 - 17) **Question 20** asks whether \$116 million in annual BDU contributions should be directed to access programming. This has been our main goal since deregulation in 1997. We all know the answer is yes, and we've been saying so for a long time, in some cases since 1971.
 - 18) In those early days, Canada created a model much of the world has followed while here at home we hesitated. Community TV is a well-tested system. If we return to the principle that fiscal support must have a public purpose, then there's every reason to believe Canadian community television is finally ready to get it right. We can have public access, participation and independence from BDU gate-keeping. Maintaining funding levels along with accountable governance, traditional TV volunteers and added Internet distribution gives us a multimedia merger that answers all the questions raised in CRTC 2009-661.

Sincerely,

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

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