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The Honourable Mélanie Joly, Minister of Canadian Heritage
House of Commons
Ottawa, Ontario
K1A 0A6

November 25, 2016

Dear Minister Joly:

Re.: Consultation on Canadian Content in a Digital World

We are writing on behalf of the National Campus and Community Radio Association/
l'Association nationale des radios étudiantes et communautaires ("NCRA/ANREC").

ABOUT OUR ORGANIZATION AND OUR SECTOR:

We are a not-for-profit national association working to recognize, support, and encourage volunteer-based, non-profit, public-access campus and community-based radio broadcasters in Canada. We provide advice and advocacy for individual campus and community ("c/c") stations and conduct lobbying and policy development initiatives for the sector 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 98 not-for-profit radio stations.

Our member stations share content on a variety of platforms. The majority broadcast via transmitter over the air, and also livestream and podcast, some broadcast only via the internet, and a few broadcast only over the air. They range from tiny stations in rural communities with no staff and less than \$5,000 in annual operating revenue, like CHCR-FM in Killaloe, ON; to medium-sized campus stations with a small staff, student levy funding and

institutional support, like CKDU-FM in Halifax, NS, to large urban stations with several staff and hundreds of volunteers, like CJSW-FM in Calgary, AB. Many of our stations are run entirely by volunteers. As a result, our members always have a range of opinions on most issues, though we are united in our desire to ensure that every station can survive and best serve its unique community.

OUR GOAL IN THIS SUBMISSION:

Our goals in writing this letter are to:

- provide a snapshot of the c/c sector in the context of the three questions posed in the consultation;
- share our vision of how we see the c/c sector evolving in response to today's rapid technological advances;
- ask that you consider the importance of the c/c sector in developing any policies or programs that result from the proceeding, and to
- suggest changes to the Federal cultural policy toolkit, which include increased funding options for our sector.

We sought feedback from our members and reached the following conclusions:

THREE QUESTIONS POSED IN THE CONSULTATION:

1. What does a cultural system that supports creators and respects citizen choice look like to you?

To us, a cultural system that supports creators and respects citizen choice looks like the c/c radio sector. Our stations already play an important role in enabling citizen choice, providing access to content, and supporting content creators.

Our stations do this by offering Canadians varied and innovative niche programming on a variety of platforms, including:

- programs about important local, regional, and national issues which are not receiving other media attention;
- programs created by and for people and communities that don't typically have free access to the airwaves (such as LGBTQ+, Indigenous people, people of colour, and people with disabilities);
- programs produced by children and students through summer camps and school collaborations;
- programs produced by and for seniors;
- locally-produced official language minority programming;
- locally produced third-language programming;

- high quality music programming, with a particular emphasis on local artists who would not receive support on other media platforms;
- unique live performance which capture and archives unheard, emerging and local artists;
- exposure to niche and underrepresented music genres such as experimental and avant-garde audio art and radio art;
- hyper-local news and public affairs coverage;
- opportunities and resources to create programming themselves or to cooperate with others to create programming in teams;
- technical and journalistic training opportunities;
- media literacy training opportunities;
- ... and more!

Community broadcasting is enshrined in the Broadcasting Act as one of the three pillars of the Canadian broadcasting system. C/c radio directly reflects community interests and needs in ways that commercial and public broadcasters like the CBC cannot due to geographical, population and resource challenges, as well as differences in mandate. Traditional media are deteriorating in part because of increasing consolidation and de-centring of local media and we strongly believe that the only media left to support coordinated and organized democratic local dialogue is community media.

The c/c sector has played a major role in shaping and developing the landscape of the broadcast and media sector in Canada for more than 40 years, but as this role has evolved it has not been fully recognised. **C/c stations across the country make an important contribution to the Canadian economy.** The sector employs approximately 600 full-time, 400 part time and 300 freelance staff; conduct an average of 350 training hours and 550 coaching hours (per station) annually; and airs about 900,000¹ hours of programming created by an estimated 10,000 programmers and an additional 5,000 volunteers each year².

While Canadians are increasingly turning to digital content for variety and convenience, radio continues to be important. According to the CRTC, Canadians still listen to about 17 hours of radio per week, and it's still one of the largest platforms used to consume media³.

The **Focusing the Conversation** consultation paper asks how we can leverage our diversity and recognize it as a competitive advantage, a source of innovation and a contributor to the cohesion of our society. We'd like to note that c/c radio stations have an excellent track record in this area as they reflect the communities they serve, big and small, all across the country, and already provide low-barrier support to underrepresented voices and viewpoints.

¹ Number based on 180 licensed stations, broadcasting a broadcast week of 120 hours, over 52 weeks.

² Community Radio Fund of Canada 2014/15 Annual Report, released November 27, 2015, p.10, Retrieved from http://www.crfccrc.ca/images/documents/CRFC_Annual_Report_1415.pdf

³ <http://www.crtc.gc.ca/eng/publications/reports/policymonitoring/2015/cmr4.htm#a41>

We believe that c/c radio can be the truest lens on communities where stations exist. If Canadian Culture is meant to reflect the diversity of the country, then c/c stations are a crucial part of this reflection. Increasingly, commercial media organizations focus on news and culture stories in major cities: Toronto, Vancouver, Montreal, Calgary. This results in a homogenized view of Canadian culture that leaves out many voices. C/c radio exists to serve and elevate voices that are left out of traditional media, and this means it has a critical role to play in bringing together a Canadian identity that is not based in a major urban centre. C/c radio is also driven by a mandate to provide low-barrier access, openness and equality of participation in the communities it serves, and this sort of access is not possible through most public or private media sources or through many social media/digital sources. C/c radio gives Canadians a platform for voices and individuals who have few other spaces in the media landscape.

Across the country, our members serve more than 60 linguistic and cultural communities, providing training and opportunities for community members to produce news and entertainment programming in their own languages, and feature music that celebrates and reflects their cultures. For example, a Spanish-language program at CFUV-FM in Victoria, BC recently produced and aired a Christmas radio play entirely in Spanish.

C/c radio also amplifies Canadian talent through charting the airplay of music across the country. Specifically, the !earshot charts (a collaborative initiative of NCRA/ANREC member stations) compiles the top played artists across more than forty participating stations to compile a weekly national chart of records. These charts help to elevate the profile of Canadian talent and to differentiate the Canadian music community from that of the United States. For example, on the !earshot charts for the week ending November 15, 2016 all of the top 15 spots were filled by Canadian artists, as were 40 of the 50 top spots. Many artists who appear on this chart are able to use this recognition to grow their brand, secure grant funding and receive further support for their endeavours. This is just one of the ways in which the c/c sector supports Canadian musical talent as a breeding ground for success.

C/c radio is a hub for community forums and hyper-local news, which have become more and more rare in our current media landscape. For example, many of our members do remote broadcasts live from community events such as town council meetings, local sporting matches, festivals, parades, and rallies. Even if other stations in the region broadcast these same events, it is often the case that c/c stations are the only media outlet broadcasting these events in full. During municipal and regional elections, some stations organize Q&As in which listeners have the opportunity to pose questions to the candidates. In this way, c/c radio fosters civic engagement and creates a platform where community discussion can thrive.

Many other stations provide similarly unique local news services. For example:

- CJRU-FM in Toronto, ON has programming aimed specifically at new Canadians.
- CHMR-FM in St. John's, NFLD has a program produced by the local refugee and immigrant advisory council, and broadcasts live coverage of student elections at Memorial

University, hosted by students.

- CFTA-FM in Amherst, NS provided the only live local election coverage in town, including reporting from the successful candidate's headquarters.
- CJNU-FM in Winnipeg, MB has no studio and instead broadcasts live from locations around the city like hospitals and charities, thereby connecting listeners with local services.
- The MLA serving CJMP-FM in Powell River, BC asked if he could appear on a local public affairs show because it's one of the only ways he can communicate with his constituents.
- CKUW-FM in Winnipeg, MB provided provincial election coverage focusing on issues that other media didn't cover, like child welfare, disability issues, poverty, Indigenous rights, and climate change.
- CFUZ-FM in Penticton, BC and CFAD-FM in Salmo, BC provide live coverage of city council meetings, and many other stations broadcast commentary on such meetings.
- CJSW-FM in Calgary, AB, hired summer students to create a news program featuring small sub-communities in Calgary, including LGBTQ groups, artist communities, and more.

The c/c sector has longstanding success in providing media training for personal and professional development. Our member stations provide a physical location, and in almost all cases, staff and/or dedicated training opportunities for people of all ages and technological levels. Additionally, we support both media and digital literacy development, including providing opportunities for listeners to learn from the content that is broadcast by the sector and attending the training programs that are provided by member stations.

2. How do we support Canada's artists, content creators and cultural entrepreneurs in order to create a cultural ecosystem in which they thrive?

C/c radio reflects Canada's incredible diversity in the content that we produce and supports the production of news information and local content that is credible and reliable. But it does so with limited resources, and could do more with more.

While we as a sector recognize the growing importance of new media, we strongly believe that FM/AM services continue to play an integral role in today's cultural ecosystem. More Canadians listen to radio online and on mobile devices every year, but two-thirds of radio listening in Canada still happens via terrestrial radio.⁴ That is to say, Canadians don't prefer to only listen online - they want to have a choice to listen on a variety of platforms. It should also be noted that not everyone is able to listen to the radio online: one in six Canadians does not own a cellphone or have a home Internet connection. Moreover, we have observed that there is a certain legitimacy associated with CRTC-licensed FM broadcasting that internet radio does not afford.

For more than a decade, c/c stations have recognized that in order to have a large impact, their content must reach beyond the terrestrial broadcast. As a result, most c/c stations are

⁴ Media Technology Monitor World Radio Day Infographic Feb 2016* refers to commercial radio . Retrieved from

adopting new media as a way of broadening their reach and making their content more accessible. This trend is reflected in the growing phenomenon of podcasting. Stations in the c/c sector are increasingly podcasting on-demand and streaming live radio online because their listeners want to have as many listening options as possible. For example, CJSW in Calgary, AB podcasts all of their FM programs, and offers some additional podcasts that are not part of their FM broadcast. CJSW is also experimenting with other forms of new media to enhance how they interact with their listeners: one of their programmers recently simulcasted a Facebook Live video event during his regular FM broadcast for a special funding drive episode.

Other c/c stations are also experimenting with online videos. Every Friday, CFUV in Victoria, BC presents a live performance as part of their ongoing Basement Closet Sessions. This program features live music of diverse genres, with an emphasis on local artists. In an ongoing effort to catalogue and archive their live performances, they film most of the performances and upload them to Vimeo. On Saturday nights, CJSF in Burnaby, BC broadcasts Dope Haus, an underground hip hop and electronic music program. The program creator also publishes a blog with supplementary content, including videos of the FM broadcast, album reviews, and interviews with artists. New media heightens the exposure that c/c stations are able to provide to Canada's artists and presents new opportunities for everyday Canadians to become content creators.

C/c radio stations almost always have less funding than other broadcasters, in large part because they are mandated to be not-for-profit, community-access, and volunteer-driven. These elements are important hallmarks of our stations, but it means they are disadvantaged against other types of stations that do not share this mandate. Some of our smallest stations do not have a web stream or even a web site because they cannot afford the necessary equipment or technical assistance to create and maintain one. **As we discuss in our answer to question three, the single most important way that the Department of Canadian Heritage could support our sector is through increased funding opportunities.**

3. How can we meet the challenge of promoting Canada's creativity in the digital world?

Increased funding opportunities will help c/c radio stations meet the challenge of promoting Canada's creativity in the digital world.

Even our largest members experience financial difficulty. Many generate revenue by selling advertising or rely on donations, sponsorships, grants, or student fee levies. Those with the highest budgets exist in the largest urban centres and therefore also have the highest costs, in terms of providing training and supervision to large numbers of volunteers, which requires additional staff, equipment, and studio space. Many of our smallest stations have no staff at all and function solely on volunteer labour. In this current landscape, c/c stations have access to some revenue sources, though most or all are unpredictable and short term, and this makes it

difficult to develop long term strategies to fulfil their mandates. The difficulty for radio stations to obtain charitable status also limits funding opportunities for our stations.

To the best of our knowledge, Canada is the only English speaking Western country in the world that does not have a government mechanism to provide core operational funding to community radio. There is funding available for Francophone community stations both inside and outside of Quebec through Official Language Minorities funding, but this funding pool is not available to campus stations or English-language community stations. The three national community radio associations — the NCRA/ANREC, l'Alliance des radios communautaires du Canada ("ARCC"), and l'Association des radiodiffuseurs communautaires du Québec ("ARCQ") — set up the Community Radio Fund of Canada (CRFC) in 2007 to build and improve campus and community radio for all Canadians through funding and collaborations. In 2010, the CRTC approved the CRFC as a recipient of Canadian Content Development funds (i.e. funds that commercial broadcasters pay as a condition of their licences and as proceeds from transactions). While stations in our sector are very grateful for the CRFC and many have received assistance from it to carry out innovative projects, it is not ideal for all stations because its funding is project-based, intermittent, and cannot be used for ongoing operational expenses. Of our 98 member stations, approximately half are consistently struggling to find funding to remain financially solvent and over one quarter have less than \$12,000 in revenue each year (which means they have no paid staff to run the station).

Governments in a number of countries, including Australia, France, Netherlands, the UK, and New Zealand have developed a structural approach to funding their c/c radio stations. Stations in these and other countries fulfill mandates very similar to those of the Canadian c/c sector but benefit enormously from government support unlike Canadian c/c stations. A 2009 report on International Approaches to Funding Community & Campus Radio⁵ describes the Canadian system of c/c radio as "very robust, with many licensees and a strong regulatory framework, but with a lack of core funding that can create structural weakness and challenge community radio's goal of sustainability." The report also states that "in the Canadian case, were a model of core funding from government sources to emerge, it would likely reside with the **Department of Canadian Heritage** rather than the CRTC." We would welcome an opportunity to approach the Department with more information about our sector's current funding challenges and ideas we have to better fund our sector, and we believe that more predictable, operational funding would assist stations in our sector to meet the challenges ahead.

CONCLUSION

In conclusion, we hope that you will consider the importance of our sector in developing any policies or programs that result from the proceedings, particularly in the area of ongoing funding

⁵ CONNECTUS Consulting Inc. International Approaches to Funding Community & Campus Radio: Final Report, March 31, 2009. Retrieved from <http://www.crtc.gc.ca/eng/publications/reports/radio/connectus0903.htm>

for operational costs. We hope that we have demonstrated some of the current and potential value of c/c radio in promoting Canada's creativity through a variety of platforms, and offering Canadians low-barrier, supported opportunities to "be the media" and explore new ideas, new music, and new expression. We would love to continue to participate in an ongoing discussion about the role of the broadcasting sector in the new media landscape, and we would be happy to answer any questions you have related to the points in this letter or any other issues pertaining to the c/c radio sector.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Rooke". The signature is stylized and cursive.

Barry Rooke
NCRA/ANREC Executive Director

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