

84 Second Avenue
Ottawa, Ontario K1S 2H5

Ms. Diane Rhéaume
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario K1A 0N2

September 15th 2004

Re: Broadcasting Public Notice CRTC 2004-6

Dear Ms. Rhéaume:

1. I am pleased to make this submission to the Commission on behalf of Caroline Côté, Iain Cook, and myself in response to Broadcasting Notice of Public Hearing CRTC 2004-6. We are long-time campus and community radio volunteers, staff, and supporters, who possess a deep concern about the impact satellite radio will have on our sector.
 - a) Caroline Côté has been involved in campus/community radio for more than a decade. She is a past president of the National Campus and Community Radio Association and has worked at both CHUO-FM Ottawa and CKUT-FM Montreal.
 - b) Iain Cook is a musician, multimedia producer, and university lecturer. He has been a community radio music programmer for almost twenty years, producing programming at CKUT-FM Montreal and CKDU-FM Halifax. He is currently an instructor at Concordia University's Communications Studies Department.
 - c) John Harris Stevenson is a past president of the National Campus and Community Radio Association. He has produced jazz and public affairs programming at CKDU-FM Halifax, and served as station manager at CFRU-FM Guelph. He is currently a Ph.D. candidate at the University of Toronto's Knowledge Media Design Institute.
2. **We strongly oppose the applications.** We believe that satellite radio may represent the single greatest threat to the relevance and vitality of campus and community radio since the creation of the sector some thirty years ago. Not only will the proposed services, if accepted, have a negative economic impact on campus and community radio in Canada, they fail to incorporate any aspect of community media, and their approach to Canadian Content runs contrary to thirty years of Canadian radio policy.
3. We object to the satellite radio applicants' commitment, or lack thereof, to Canadian Content in music programming. The applicants argue that unless Canadian satellite radio services piggyback on American services there will not be any legal satellite radio available to Canadians, who may turn to an illegal "gray market" of American receivers. In order for satellite radio to exist in any form in Canada, the applicants argue, normal considerations concerning Canadian Content must

be put aside. The applications propose supplementing overwhelmingly American satellite radio services with either two or four “Canadian” channels that will present close to 100% Canadian content. The satellite radio applicants make no meaningful Canadian Content commitments for the remaining music channels available through their services.

4. We reject this approach. The Canadian programming services proposed by the two satellite radio applicants are dangerously lacking in ambition, taking us back to the days of segregated and limited Canadian Content. The success of Canadian Content on radio has depended on Canadian music being an integral part of all music programming on Canadian radio. Canadian programming should not be relegated to two or four specialty choices among more than 100 American music channels.
5. Of particular concern is the approach of CSR/XM, which proposes placing all Canadian Content on two channels, creating a “dog’s breakfast” of spoken word, news, and music programming in which the whole is less than the sum of its parts.
6. For example, XM currently carries a channel of New Age music called *Audio Visions*. This channel is available twenty-four hours a day, with no commercials, and XM listeners can instantly tune to this channel to hear various genres of New Age music. The applicant has made no specific commitment to Canadian Content on this channel. Instead, the English-language Canadian channel, *Northern Lights*, will broadcast one hour a week of Canadian New Age music, scheduled for 2 am on Wednesday nights. The notion that a New Age fan, Canadian or American, would tune to *Northern Lights* to listen to this lone hour of Canadian New Age is farfetched, given the easy availability of *Audio Visions*. Yet this approach to Canadian Content is key to the CSR/XM’s application.
7. While we believe that Canadians are being poorly served by the limited choices available through current commercial radio offerings, new satellite specialty channels will draw listeners, and hence supporters, away from similar programming on community stations. Community radio has always depended on a mosaic of programming and services to garner support from the community. Satellite radio, with its twenty-four hours of commercial-free jazz, reggae, world music, folk, and genres that community radio cannot even cover, will have a significant negative impact on listenership and therefore fundraising.
8. The applicants have also ignored the existence and importance of community broadcasting as a source of programming. The *Broadcasting Act* states that the broadcast system is made up of public, private, and community elements, yet none of the applicants have proposed any channels of community radio programming in their proposals.
9. We are also concerned that the CBC, in its partnership with Sirius, plans to roll out its Radio 3 service among its four Canadian channels. CBC Radio 3 targets the very same demographic that is currently served by campus and community radio, with similar program offerings. We encourage the Corporation to work directly with the campus/community sector, rather than trying to compete with it using public funds.
10. The negative impact of these new services will be such that any successful applicant must make provisions to both support campus/community radio and disseminate its programming.

11. We propose that all applicants include one or more channels of campus and community radio programming as part of their Canadian services. XM recently launched the *XM Public Radio* channel, presenting a variety of public radio programming from a number of independent American producers and radio stations. This model would work well for Canadian campus and community broadcasters, presenting the best of community spoken word and music programming from across the country.
12. A community radio channel would benefit the Canadian community radio sector in many ways, most importantly by raising the profile of the sector and disseminating its programming to a nation-wide audience.
13. We believe strongly that campus and community radio can and must have strong future in Canada. If approved, satellite radio will have a significant and possibly fatal economic impact on the sector. The successful applicants should be required to contribute to a Canadian Community Radio Development Fund, which will have the following components:
 - a) A “matching grant” component, wherein funds raised from local listener/supporters and students will be matched, in whole or in part, by the Fund to support regular station operations,
 - b) A “healthy station” component, which will allow experienced community broadcasters to work directly with stations to advise on financial planning, station development, community participation, train new managers, facilitate conflict issues, assist with long-term planning, improve programming, and assist with other matters, and,
 - c) Support for the National Campus and Community Radio Association’s continuing efforts to develop Canadian musical talent.
14. We are pleased to contribute to and support the submission of the National Campus and Community Radio Association, and to support the submission of radio station CKUA-FM.
15. We would welcome an opportunity to appear before the Commission to answer questions regarding this submission.

Sincerely,

John Harris Stevenson

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