



Canadian Media Guild

La Guilde canadienne des médias

CWA/SCA CANADA

October 2, 2012
Secretary General
CRTC
Ottawa, Ontario
Canada K1A 0N2

Submitted electronically

Re: MBS Licence Renewal Application – CRTC 2012-458

1. The Canadian Media Guild (CMG) is a national union with 6,000 members across the country, including employees of CJYC-FM (Big John) and CFBC in Saint John, owned by Maritime Broadcasting System Limited (MBS) Radio. We are pleased to have the opportunity to participate in this proceeding and request to appear at the public hearing.
2. MBS Radio owns 24 stations in three provinces, including three stations in Saint John at which our members work. This proceeding is dealing with two of the three Saint John stations.
3. **Our members have significant concerns about MBS Radio's commitment to the community of Saint John. We believe that Halifax-based MBS Radio does not make an adequate contribution to or investment in the local community, a situation that has now worsened during the conflict it is experiencing with employees, advertisers and listeners.**
4. CMG is urging the CRTC to impose conditions of licence on MBS Radio to improve the quality of local programming and establish local newsgathering resources in Saint John.
5. The three stations in Saint John employ a total of seven people, excluding the sales team. There is one administrative assistant, one production manager and five DJs: one DJ does the only local show for CFBC; there are local morning and afternoon DJs for each of the FM stations, CJYC and K-100. On June 25 of this year, these employees went on strike after efforts to negotiate a first collective agreement failed. The small local team is committed to quality local radio serving the people of Saint John. We believe that conditions at the stations, both before and more so during the strike, are not conducive to providing quality local radio.

6. According to the *Commercial Radio Policy 2006*, MBS Radio is expected, during this licence proceeding to demonstrate how their service “meets the particular needs and interests of their local communities.” In their licence application, the CMG submits that MBS Radio has failed to do so accurately.
7. The policy states: “licensees must incorporate spoken word material of direct and particular relevance to the community served. This must include local news, weather, sports coverage, and the promotion of local events and activities.” Furthermore, the Broadcasting Act states that the system must “provide a reasonable opportunity for the public to be exposed to the expression of differing views on matters of public concern.” The radio policy indicates that local radio is an important source of local news. The CMG submits that this is especially true in smaller communities such as Saint John that do not have a diversity of local TV stations.
8. MBS has not had local newsgathering resources in Saint John for approximately four years. That means the local programming offering has changed fundamentally since the last licence application. All of the regular “local” news and information programming aired on MBS stations is produced in a small newsroom in Halifax. There are no local reporters to cover local or provincial government, or the issues and events taking place in Saint John. As a result, MBS provides absolutely nothing to enhance the local diversity of editorial voices.
9. Furthermore:
 - The morning newscast aired on the stations is produced and recorded in Halifax before 6 a.m. on weekdays and plays through the morning news run. There is no way that it can reflect breaking local news through the all-important morning drive time.
 - The same happens during afternoon drive. DJs have been asked in the past to pass along information to the Halifax newsroom if something happens. Only one of the three stations is broadcasting live after noon hour, therefore, there is no breaking news coverage during afternoon casts. There is no formal mechanism to pass information along to Halifax and DJs are not newsgatherers.
 - From 6 p.m. to midnight on CJYC-FM and from 12 noon to midnight on CFBC as well as on weekends on both stations, programming is generally voice-tracked. The weekend weather forecasts are done on Fridays, one to two days before they air, which causes inaccuracies.
 - On CJYC, the morning show rarely has traffic reports and there are no traffic reports in the afternoon currently because the shift is voice-tracked from out of market.
 - On CFBC, the morning show is currently being voice-tracked out of market. That means there are no traffic reports; weather forecasts only run to noon and are at times vague.
 - MBS claims there are 125.5 hours of local programming per week on CFBC and is required by condition of licence to play at least 42 hours; CMG is not convinced that even the base requirement is being met.
 - Contrary to the claim made by MBS, CFBC does not have a website and does not stream its broadcasts.

10. Based on what we know of local airtime sales up to this summer, MBS takes more than \$1 million in revenue back to Halifax each year from the Saint John stations, in part by keeping the number of local employees and their salaries low and demanding free work from employees, and in part by taking advantage of a lack of true competition for local advertising. The stations and the company should be required to do much more to improve local programming quality and service to the local community.
11. The MBS side of the bargain for the use of the public airwaves is rich. The public side of the bargain is poor, with money being taken out of the local economy in exchange for very little public benefit.
- 12. CMG therefore urges the CRTC to impose conditions of licence on MBS Radio to improve the quality of local programming and establish local newsgathering resources in Saint John.**

Sincerely,

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