



January 30, 2013

Mr. John Traversy
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario, K1A 0N2

Re: Broadcasting Notice of Consultation CRTC 2013-572

Call for comments on a targeted policy review for the commercial radio sector

Dear Mr. Traversy:

1. The Canadian Media Guild (CMG) is a union that represents 6,000 workers in the media sector. Our members work at private radio, CBC/Radio-Canada, Thomson Reuters, TFO, TVO, APTN, ZoomerMedia, Canadian Press and Shaw Media. CMG members work at CKOI Radio in Gatineau and MBS Radio in the Maritimes.
2. CMG has long made the case for diverse and quality programming on our public airwaves across all platforms.
3. We are pleased to respond to the call for comments on the Commission's targeted review of its policies for commercial radio as laid out in [Broadcasting Notice of Consultation 2013-572](#).
4. We note the good news about the financial performance of the Canadian commercial radio sector which the Commission reports is "in good financial health" with strong profitability across the country that ranges from 12% in small markets, 16% in medium markets and 21% in large markets, to 30% in major markets.
5. We also note that one of the areas on which the Commission is focused in the current commercial radio review is compliance by licensees.
6. *Commercial Radio Policy 2006* requires that: "In their local programming, 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."¹
7. The policy also highlights the importance that the *Broadcasting Act* places on the opportunity for Canadians to be exposed to a diversity of views – through the Canadian broadcasting system – on matters of public concern. The policy states that "The broadcast of news programming by commercial radio licensees, especially local news, is an essential aspect of their responsibility to ensure the provision of (this) diversity of views."²

¹ <http://www.crtc.gc.ca/eng/archive/2006/pb2006-158.htm> - *Commercial Radio Policy*



8. CMG believes that this is especially true in smaller communities that do not have a diversity of local television stations.
9. In an increasingly globalized world, we know – and participants in the Commission’s current review of television have confirmed – Canadians value a “broadcast system that is responsive to their needs as citizens including access to content to facilitate their participation in the democratic and cultural life of their country, region or city.”³ We believe all parts of our broadcast system must be robust enough to meet Canadians’ needs and preoccupations in this area.
10. Therefore we are in support of the Commission’s interest as part of the current consultation in a *“possible adoption of new compliance mechanisms to encourage licensees to comply at all times with regulatory requirements and their conditions of licence.”*⁴
11. As a union representing media workers, including those in private radio, CMG knows first-hand the detrimental effects of non-compliance with local programming conditions of licence by commercial radio owners.
12. As we stated in our submission to the Commission for MBS Licence Renewal Application – CRTC 2012-458⁵ for Saint John radio stations “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. 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

² *Commercial Radio Policy 2006*

³ Let’s talk TV: A report on comments received during Phase I

<http://www.crtc.gc.ca/broadcast/eng/hearings/2013/2013-563oc2.htm#b>

⁴ CRTC Notice of Consultation 2013-572

⁵ CMG submission – CRTC 2012-458

<http://www.cmg.ca/en/wp-content/uploads/2011/06/CRTCMBSLicenseRenewals2012.pdf>



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.”

13. We also noted at the time that “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.”

14. Based on the profit information highlighted above (from 12% profit in small markets to 30% in major markets), it’s clear that station owners still derive a significant benefit from the use of public airwaves. Without the requirement to be responsive to and invest in the communities in which they operate, our broadcast system is effectively creating a type of ATM for licence holders, who have also been using technology to cut back on jobs and wages.

15. Therefore CMG supports :

- the Commission’s proposal to impose on licensees a **requirement to complete a licence renewal application checklist** which should be robust and comprehensive enough to demonstrate investments in the communities
- the Commission’s proposed **requirement for licensees in non-compliance to file regular reports**, including reports that are transparent in relation to the licensee’s financial situation

16. The CMG also recommends :

- That the Commission revamp its conditions of licence for commercial radio to reflect and emphasize the increased importance of true local programming including local newsgathering resources across our broadcast system, including the commercial radio sector.

17. We request to appear at any public hearing that might be held to further explain our recommendations and to respond to any information that emerges in the meantime.

Respectfully submitted,



Canadian Media Guild

La Guilde canadienne des médias

CWA/SCA CANADA

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