



12 March 2020

Claude Doucet
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Secretary General,

Re: Broadcasting Notice of Consultation CRTC 2019-379 and 2019-379-1 – Procedural request to add Strategic Plan approved by CBC's Board of Directors in March 2019 to public record

1. On 29 November 2019 Friends of Canadian Broadcasting (FCB) asked that the CRTC require CBC to disclose its complete strategic plan, on the basis that it constitutes a “roadmap” for CBC management.¹
2. On 28 January 2020 the CRTC denied FCB’s request, on the grounds that CBC had provided a significant amount of additional information, including financial information:

Commission staff has sent questions to the CBC/SRC in relation to its strategic plan. In response, the CBC/SRC has provided significant additional information on the public record of this proceeding. This information can be relied upon by any intervener in formulating its submissions. The Commission notes that other CBC/SRC financial information and corporate documents are available in the public domain and may be referenced by interveners in their submissions. In light of this, the Commission denies FRIENDS’ request for the disclosure of a full and complete three-year strategic plan.²

3. The Forum has intervened with respect to BNoC 2019-359. On 4 February 2020 the Forum wrote to CBC under the *Access to Information Act* to request a copy of the strategic plan that, according to its *2018-2019 Annual Report*, had been presented to³ and approved by⁴ CBC's Board of Directors in March 2019.

¹ DM#3761220 – Procedural Request – Friends of Canadian Broadcasting – FCB Procedural Request re CBC Renewal.pdf, (Toronto, 29 November 2019), at 1 – 2. See “Procedural Requests”, <https://services.crtc.gc.ca/pub/instances-proceedings/Default-Default.aspx?S=C&PA=B&PT=NC&PST=A>.

² CRTC, Broadcasting Commission Letter addressed to Daniel Bernhard (Friends of Canadian Broadcasting), (Ottawa, 28 January 2020), https://crtc.gc.ca/eng/archive/2020/lb200128.htm?_ga=2.249503431.1932118928.1583772757-1211976415.1582553073.

³ CBC, *2018-2019 Annual Report*, at 53: “We presented our three-year plan to the Board in March 2019.”

⁴ *Ibid.*, at 53: “the new strategic plan was approved by the Board in March 2019”.

4. CBC received the Forum’s access-to-information request on 7 February 2020, and emailed a redacted copy of the plan to the Forum on 9 March 2020.
5. The materials received by the Forum consist of a PDF cover letter and a 106-page PDF document, and are attached to this procedural request. CBC’s cover letter confirms that the 106-page PDF is the strategic plan approved by CBC’s Board of Directors in March 2019. The 106-page PDF consists of 53 pages in English and 53 pages in French, and appears to be a copy of an English-language and a French-language Powerpoint presentation made to CBC’s Board of Directors on 20 March 2020 (“53-page Strategic plan”).
6. The Forum has compared the 53-page Strategic plan with the two-page document posted on the CBC’s website, entitled “Your Stories, Taken to Heart”,⁵ and described by the CBC’s website as its “strategy”. The longer document contains information that is not provided in the 2-page PDF and which is relevant to CBC’s renewal application. Among other things the longer plan discusses six elements of a “Revenue strategy” described as one of seven conditions for the success of CBC’s strategic plan, and also states that CBC plans to “re-imagine” its “local/regional offerings across multiple platforms”. The “Revenue strategy” and the ‘re-imagining of CBC’s local/regional offerings across multiple platforms’ are not mentioned in CBC’s licence English-language audio-visual licence renewal application.
7. The Forum submits that apart from any other information contained in the 53-page Strategic plan, the conditions on which CBC’s strategy relies for the success of its plans going forward and the CBC’s ‘re-imagining’ of its local/regional services constitute evidence that is relevant to Canadians’ understanding of CBC’s application to renew its broadcasting licences and to maintain the current exemption from licensing of its online programming services.
8. The Forum respectfully requests that the Commission add CBC’s 53-page Strategic plan to the public file of CBC’s licence renewal proceeding, due to the plan’s relevance to the proceeding.

Sincerely yours,



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Attach (2): CBC cover letter of 9 March 2020
Your stories, taken to heart: Our strategic plan (20 March 2019)

⁵ See <https://cbc.radio-canada.ca/en/vision/strategy/your-stories-taken-to-heart>.