



2 September 2020

Claude Doucet
Secretary General
CRTC
Ottawa, ON K1A 0N2

Via GC Key

Dear Secretary General,

Re: Broadcasting Notices of Consultation CRTC [2019-379](#) (Ottawa, 25 November 2020), [2019-379-1](#) (Ottawa, 28 January 2020), [2019-379-2](#) (Ottawa, 8 April 2020) and [2019-379-3](#) (Ottawa, 22 June 2020) – Procedural request – broadcast notifications

- 1 The Forum is herewith requesting that the CRTC add material regarding CBC's broadcast notifications to the Forum's 20 February 2020 intervention in this proceeding.
- 2 The material consists of documentation submitted by CBC to the CRTC on 20 February 2020 concerning its broadcast of notices about the BNoC 2019-379 proceeding – CBC's cover letter, an appendix of the text of the notices broadcast on CBC's different services, and signed attestations of times and dates of each broadcast – as well as statistics about this documentation.
- 3 While CBC submitted its documentation about the notifications to the CRTC on 20 February 2020 the documentation only became available to the Forum on 21 August 2020 following its 23 July 2020 request for the documents under the *Access to Information Act*.¹
- 4 On [22 July 2020](#) the CRTC declined the Forum's 12 March 2020 procedural request² for the declarations to be added to the public record of Broadcasting Notice of Consultation CRTC 2019-379 for three reasons – that “[t]his type of information is not normally put on the record of a proceeding”, that the Forum “did not allege that the CBC/SRC had not broadcast the notices of consultation” and that the Forum did not “provide any evidence of non-compliance.”
- 5 The Forum respectfully submits that the material noted above in paragraph 1 should be added to the Forum's intervention as the material is relevant to the BNoC 2019-379 proceeding, as it is credible, and as it raises serious questions with respect to the proceeding.

¹ CRTC Access to Information Request File A-2020-00016 (Ottawa, 21 August 2020).

² See CRTC's 2019 closed broadcasting proceedings, “Procedural Requests” [zip file], document number DM#3893501 (“Procedural Request – FRPC – CBC broadcast notification.pdf”).

6 The material offers information that is relevant in that it goes to the issue of trust raised by and relied upon by CBC in its Fall 2019 applications to the CRTC, particularly with respect to CBC's strategic plan summary. The Forum raised the issue of trust at paragraph 137 of its intervention, as follows:

157. The Forum's concern is that CBC is in effect asking the CRTC and Canadians to be content with fewer hours of Canadian programming on its existing television services, and to trust that it will keep its promises to meet vague goals for its online programming services. It has not said why Canadians should accept less Canadian programming on CBC's conventional television services, and has not offered evidence to show why it is trustworthy. To the contrary: the Forum's analysis of the programming of its English- and French-language flagship conventional television stations found that since 2013 CBC has reduced overall Canadian content, reduced local television programming and not provided any programming for young people.

7 The CBC document on which the material is based is credible in that when the CRTC provided it to the Forum on 21 August 2020 the CRTC said CBC had provided the document to the Commission.³

8 Finally, the facts set out in CBC's document and summarized in the material raise serious questions about the degree to which Canadians may rely on and trust CBC's statements.

The Forum appreciates the CRTC's consideration of this procedural request. Should the CRTC or its staff have any questions, we would be pleased to respond.

We look forward to the Commission's response.

Sincerely yours,



Monica L. Auer, M.A., LL.M.
Executive Director
Forum for Research and Policy in Communications (FRPC)
Ottawa, Ontario

c. Ms. Bev Kirshenblatt regulatoryaffairs@cbc.ca; bev.kirshenblatt@cbc.ca
Executive Director Corporate & Regulatory Affairs, CBC/Radio Canada

³ CRTC, *Release Copy A-2020-00016*, Letter (Ottawa, 21 August 2020), at 1.

[The Forum's original intervention, paragraph 137:

- 137 The Forum's concern is that CBC is in effect asking the CRTC and Canadians to be content with fewer hours of Canadian programming on its existing television services, and to trust that it will keep its promises to meet vague goals for its online programming services. It has not said why Canadians should accept less Canadian programming on CBC's conventional television services, and has not offered evidence to show why it is trustworthy. To the contrary: the Forum's analysis of the programming of its English- and French-language flagship conventional television stations found that since 2013 CBC has reduced overall Canadian content, reduced local television programming and not provided any programming for young people.]

[Text that the Forum has asked the CRTC to add to the Forum's intervention:]

- 137 a BNoC 2019-379 required CBC to broadcast notifications about the CRTC notice of consultation, the intervention deadline and the matters the consultation would consider:

44. In accordance with section 35(1)(b) of the Rules of Procedure, the Commission directs the Corporation to give notice of this notice of consultation through broadcast over the Corporation's facilities. This notice must set out the following:

the nature of the matters to be considered,

the deadline for intervening in the proceeding, and

the date and time of the commencement of the hearing.

- 137 b On 20 February 2020 CBC sent the CRTC material consisting of a covering letter, the text of two announcements it made on its licensed broadcasting services in January and February 2020 about the CRTC's hearing to consider CBC's applications, and 21 pages in which CBC representatives made declarations about 82 notifications of broadcasts of these announcements. The first announcement gave information about the 13 February 2020 intervention deadline; the second gave information about the changed intervention deadline of 20 February 2020. On 21 August 2020 the Forum obtained a copy of the material that had been sent by CBC to the CRTC six months earlier, on 20 February 2020. This material is set out below, and an analysis follows in paragraphs 137 c to h.



February 20, 2020

Filed via GCKey

Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

**Subject: Applications 2019-0280-0, 2019-0279-2, 2019-0282-5 and 2019-0281-7:
Broadcasting Notice of Consultation CRTC 2019-379**

Dear Mr. Doucet:

- 1 CBC/Radio-Canada is pleased to provide you with the requested information relating to the Broadcast Notices detailed in your letter dated November 25, 2019.
- 2 As per the Commission's instructions we have attached as Appendix A the text of the notices that were broadcast on our different services.
- 3 You will find in Appendix B the signed attestations of times and dates of each broadcast.
- 4 Please do not hesitate to contact me directly if you have any questions.

Yours truly,

A handwritten signature in black ink that reads "Bev Kirshenblatt".

Bev Kirshenblatt
Executive Director, Corporate & Regulatory Affairs

cc: Céline Legault, CRTC Senior Broadcasting Analyst
Tina-Louise Latourelle, CRTC Senior Broadcasting Analyst
Lynda Roy, CRTC Supervisor Public Hearings

Attachments

Appendix A
Script of Broadcast Notices

Text for the Broadcast messages - English services

Starting May 25th, the CRTC will hold a public hearing to renew the licences for CBC/Radio-Canada's broadcasting services.

For information and to express your opinion, please consult the "Public Proceeding" section of the CRTC's website at [CRTC.GC.CA](http://CRTC.gc.ca).

The deadline for comments to the CRTC is February 13th [for the first round of announcements and February 20th for the second round].

Text for the Broadcast messages - French services

À compter du 25 mai, le CRTC tiendra une audience publique afin de renouveler les licences de diffusion de CBC/Radio-Canada.

Faites connaître votre opinion sur le sujet d'ici le 13 février [pour le premier tour d'annonces et le 20 février pour le deuxième tour] dans la section INSTANCES PUBLIQUES du site [CRTC.GC.CA](http://CRTC.gc.ca).

Appendix B

Signed attestations and Schedules of broadcast Notices

DÉCLARATION ATTESTANT LA DIFFUSION

DE L'AVIS D'AUDIENCE

Société Radio-Canada

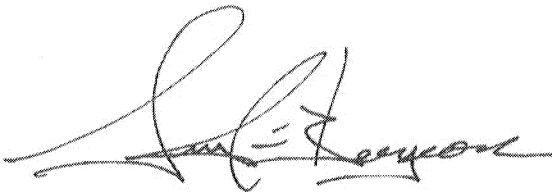
Je, Guylaine Bergeron, certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 31 janvier 2020, et plus spécifiquement :

Sur ICI RADIO-CANADA PREMIÈRE

| | |
|--|---------------|
| le (date de la première diffusion) : 27 janvier 2020 | heure : 14h59 |
| le (date de la deuxième diffusion) : 28 janvier 2020 | heure : 20h59 |
| le (date de la troisième diffusion) : 29 janvier 2020 | heure : 11h29 |
| le (date de la quatrième diffusion) : 30 janvier 2020 (dans l'émission du matin, <i>TOUT UN MATIN</i>) | heure : 6h59 |

Sur ICI MUSIQUE

| | |
|---|---------------|
| le (date de la première diffusion) : 27 janvier 2020 (dans l'émission du matin, <i>L'EFFET POGONAT</i>) | heure : 9h30 |
| le (date de la deuxième diffusion) : 28 janvier 2020 | heure : 13h30 |
| le (date de la troisième diffusion) : 29 janvier 2020 | heure : 17h30 |
| le (date de la quatrième diffusion) : 30 janvier 2020 | heure : 23h59 |



24 janvier 2020

.....
Guylaine Bergeron
Directrice Générale, Communications, Marketing et Marque

DÉCLARATION ATTESTANT LA DIFFUSION DE L'AVIS D'AUDIENCE

Je, Guylaine Bergeron, certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 20 février 2020, et plus spécifiquement :

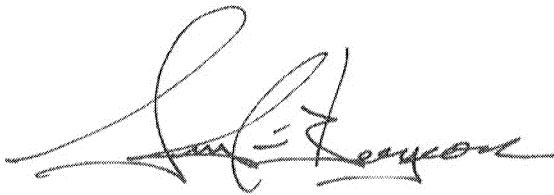
Sur ICI MUSIQUE

le (date de la première diffusion) : Mercredi 29 janvier 17h30

le (date de la deuxième diffusion) : Lundi 10 février 7h32

le (date de la troisième diffusion) : Mardi 11 février 16h30

le (date de la quatrième diffusion) : Mercredi 12 février 8h32

A handwritten signature in black ink, appearing to read 'Guylaine Bergeron', with a stylized, flowing script.

Guylaine Bergeron

Directrice générale

Communications, Marketing, Recherche et Marque

Radio-Canada

DÉCLARATION ATTESTANT LA DIFFUSION DE L'AVIS D'AUDIENCE

Je, Guylaine Bergeron, certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 20 février 2020, et plus spécifiquement :

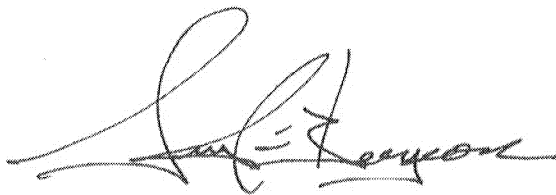
Sur ICI PREMIERE

le (date de la première diffusion) : Vendredi 7 février 7h59

le (date de la deuxième diffusion) : Lundi 10 février 16h59

le (date de la troisième diffusion) : Mardi 11 février 7h59

le (date de la quatrième diffusion) : Mercredi 12 février 17h59

A handwritten signature in black ink, appearing to read 'Guylaine Bergeron', with a stylized, flowing script.

Guylaine Bergeron
Directrice générale
Communications, Marketing, Recherche et Marque
Radio-Canada

DÉCLARATION ATTESTANT LA DIFFUSION
DE L'AVIS D'AUDIENCE

Société Radio-Canada

Je, Guylaine Bergeron, certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 31 janvier 2020, et plus spécifiquement :

Sur ICI RADIO-CANADA TÉLÉ

le (date de la première diffusion) : 20 janvier 2020 heure : 23h18

le (date de la deuxième diffusion) : 23 janvier 2020 heure : 21h25

le (date de la troisième diffusion) : 26 janvier 2020 heure : 11h06

le (date de la quatrième diffusion) : 29 janvier 2020 heure : 23h12



27 janvier 2020

Guylaine Bergeron

Directrice Générale, Communications, Marketing, Recherche et Marque

DÉCLARATION ATTESTANT LA DIFFUSION DE L'AVIS D'AUDIENCE

Je, Guylaine Bergeron, certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 20 février 2020, et plus spécifiquement :

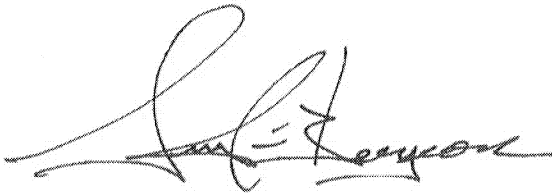
Sur ICI TÉLÉ

le (date de la première diffusion) : Jeudi 23 janvier 21h25

le (date de la deuxième diffusion) : Jeudi 6 février 21h13

le (date de la troisième diffusion) : Vendredi 7 février 22h30

le (date de la quatrième diffusion) : Samedi 8 février 22h20

A handwritten signature in black ink, appearing to read 'Guylaine Bergeron', with a stylized, flowing script.

Guylaine Bergeron

Directrice générale

Communications, Marketing, Recherche et Marque

Radio-Canada

DÉCLARATION ATTESTANT LA DIFFUSION

DE L'AVIS D'AUDIENCE

Demande de la part de Guylaine Bergeron

Je, Guylaine Bergeron, certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 31 janvier 2020, et plus spécifiquement :

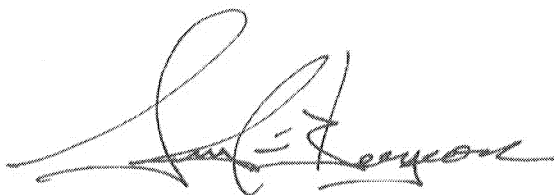
ICI EXPLORA

le (date de la première diffusion) : 28 janvier 2020 heure : 23h32

le (date de la deuxième diffusion) : 29 janvier 2020 heure : 7h27

le (date de la troisième diffusion) : 30 janvier 2020 heure : 20h28

le (date de la quatrième diffusion) : 31 janvier 2020 heure : 14h48



31 janvier 2020

Guylaine Bergeron
Directrice générale
Communications, Marketing, recherche et Marque

DÉCLARATION ATTESTANT LA DIFFUSION DE L'AVIS D'AUDIENCE

Je, Guylaine Bergeron, certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 20 février 2020, et plus spécifiquement :

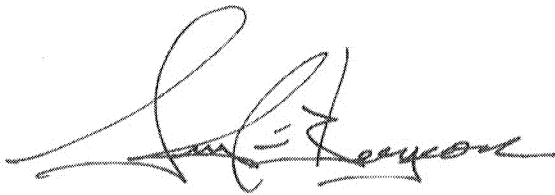
Sur ICI EXPLORA

le (date de la première diffusion) : Jeudi 30 janvier 20h28

le (date de la deuxième diffusion) : Jeudi 6 février 18h40

le (date de la troisième diffusion) : Vendredi 7 février 20h40

le (date de la quatrième diffusion) : Dimanche 9 février 19h44

A handwritten signature in black ink, appearing to read 'Guylaine Bergeron', with a stylized, flowing script.

Guylaine Bergeron

Directrice générale

Communications, Marketing, Recherche et Marque

Radio-Canada

DÉCLARATION ATTESTANT LA DIFFUSION DE L'AVIS D'AUDIENCE

Je, Guylaine Bergeron, certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 20 février 2020, et plus spécifiquement :

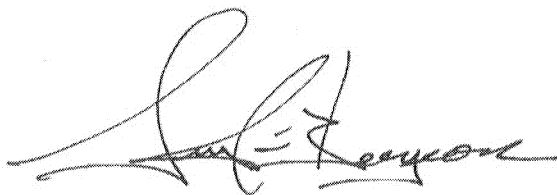
Sur ICI RDI

le (date de la première diffusion) : Samedi 18 janvier 19h05

le (date de la deuxième diffusion) : Jeudi 23 janvier 20h27

le (date de la troisième diffusion) : Mercredi 5 février 21h20

le (date de la quatrième diffusion) : Jeudi 6 février 20h45

A handwritten signature in black ink, appearing to read 'Guylaine Bergeron', with a stylized, flowing script.

Guylaine Bergeron

Directrice générale

Communications, Marketing, Recherche et Marque

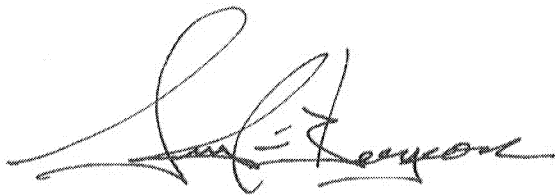
Radio-Canada

DÉCLARATION ATTESTANT LA DIFFUSION

DE L'AVIS D'AUDIENCE

Je, Guylaine Bergeron certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 31 janvier 2020, et plus spécifiquement : ICI ARTV

| | |
|--|---------------|
| le (date de la première diffusion) : ...21 janvier 2020 | heure : 14h51 |
| le (date de la deuxième diffusion) : ...23 janvier 2020 | heure : 19h24 |
| le (date de la troisième diffusion) : ...26 janvier 2020 | heure : 16h42 |
| le (date de la quatrième diffusion) : ...29 janvier 2020 | heure : 16h22 |



31 janvier 2020

Guylaine Bergeron
Directrice Générale
Communications, Marketing, Recherche et Marque

DÉCLARATION ATTESTANT LA DIFFUSION DE L'AVIS D'AUDIENCE

Je, Guylaine Bergeron, certifie que le texte ou l'enregistrement, joint à la présente, est celui qui a servi à la diffusion de l'avis d'audience, et que cette diffusion a été dûment réalisée au moins quatre fois au cours de la période commençant à la date de publication de l'avis de demande et se terminant le 20 février 2020, et plus spécifiquement :

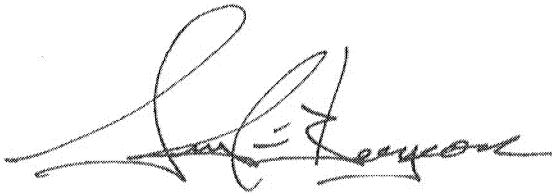
Sur ICI ARTV

le (date de la première diffusion) : Jeudi 23 janvier 19h24

le (date de la deuxième diffusion) : Vendredi 7 février 19h51

le (date de la troisième diffusion) : Samedi 8 février 18h52

le (date de la quatrième diffusion) : Dimanche 10 février 20h22

A handwritten signature in black ink, appearing to read 'Guylaine Bergeron', with a stylized flourish at the end.

Guylaine Bergeron

Directrice générale

Communications, Marketing, Recherche et Marque

Radio-Canada

DECLARATION AS TO THE BROADCAST
OF PUBLIC HEARING

In the matter of an application by CBC/Radio-Canada,

I, Bonnie Brownlee,

certify that the enclosed continuity, manuscript or reproduction is that of a Notice of Hearing required to be broadcasted and that it was duly broadcasted at least four times between the date of publication of the notice of application and 31 January 2020, in particular:

On Documentary:

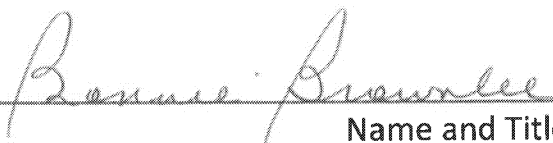
date of 1st broadcast: Sunday, January 5, 2020 time: 8 P.M.,
segment 7

date of 2nd broadcast: Sunday, January 10, 2020 time: 2 P.M.,
segment 2

date of 3rd broadcast: Tuesday, January 14, 2020 time: 11 A.M.,
segment 1

date of 4th broadcast: Thursday, January 16, 2020 time: 11 A.M.,
segment 2

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand & Research



Name and Title

DECLARATION AS TO THE BROADCAST

OF PUBLIC HEARING

In the matter of an application by CBC/Radio-Canada,

I, Bonnie Brownlee,

certify that the enclosed continuity, manuscript or reproduction is that of a Notice of Hearing required to be broadcasted and that it was duly broadcasted between the date of publication of the notice of application and 20 February 2020, in particular:

On Documentary:

Date of 1st broadcast: Wednesday, February 12, 2020
Segment 1

Time: 9 P.M.,

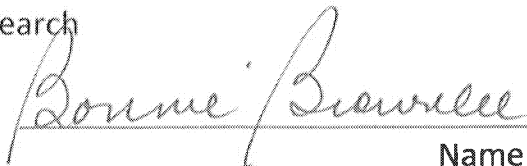
Date of 2nd broadcast: Saturday, February 15, 2020
Segment 3

Time: 6 P.M.,

Date of 3rd broadcast: Monday, February 17, 2020
Segment 2

Time: 8:30 P.M.,

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand & Research



Name and Title

DECLARATION AS TO THE BROADCAST
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On CBC Music:

date of 1st broadcast: Thursday, January 9, 2020 time: 12:04:30 P.M.

date of 2nd broadcast: Tuesday, January 14, 2020 time: 1:04:30 P.M.

date of 3rd broadcast: Wednesday, January 22, 2020 time: 4:29:00 P.M.

date of 4th broadcast: Monday, January 27, 2020 time: 7:59:30 A.M.

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand & Research



Name and Title

DECLARATION AS TO THE BROADCAST

OF PUBLIC HEARING

In the matter of an application by CBC/Radio-Canada,

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On CBC Music:

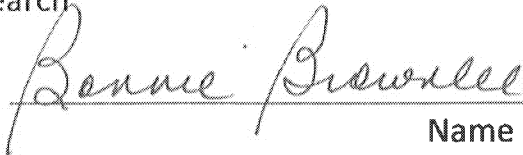
Date of 1st broadcast: Friday, February 14, 2020

Time: 5:29:00 P.M.

Date of 2nd broadcast: Tuesday, February 18, 2020

Time: 8:59:30 A.M.

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand & Research

A handwritten signature in cursive script, reading "Bonnie Brownlee", written over a horizontal line.

Name and Title

DECLARATION AS TO THE BROADCAST

OF PUBLIC HEARING

In the matter of an application by CBC/Radio-Canada,

I, Bonnie Brownlee,

certify that the enclosed continuity, manuscript or reproduction is that of a Notice of Hearing required to be broadcasted and that it was duly broadcasted at least four times between the date of publication of the notice of application and 31 January 2020, in particular:

On CBC Radio One:

date of 1st broadcast: Thursday, January 9, 2020 time: 10:59:10 A.M. /
11:29:10 A.M. NFLD / 11:59:10 A.M. Nunavik


date of 2nd broadcast: Tuesday, January 14, 2020 time: 9:59:10 A.M. /
10:29:10 A.M. NFLD

date of 3rd broadcast: Wednesday, January 22, 2020 time: 7:59:10 P.M.
/ 8:59:10 P.M. NFLD / 7:59:30 P.M. Nunavik

date of 4th broadcast: Monday, January 27, 2020 time: 7:59:10 A.M. /
08:29:10 A.M. NFLD (*did not run on NWT North and NWT South)

date of 5th broadcast: Tuesday, January 28, 2020 time: 7:10 A.M.,
NWT North and NWT South only

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand &
Research



Name and Title

DECLARATION AS TO THE BROADCAST

OF PUBLIC HEARING

In the matter of an application by CBC/Radio-Canada,

I, Bonnie Brownlee,

certify that the enclosed continuity, manuscript or reproduction is that of a Notice of Hearing required to be broadcasted and that it was duly broadcasted between the date of publication of the notice of application and 20 February 2020, in particular:

On CBC Radio One:

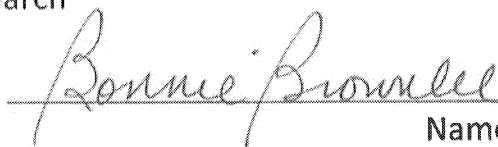
Date of 1st broadcast: Friday, February 14, 2020
P.M. NL / 5:59:30 P.M. Nunivak

Time: 5:59:10 P.M. / 4:29:10

Date of 2nd broadcast: Tuesday February 18, 2020
A.M. NL

Time: 07:59:10 A.M. / 08:29:10

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand & Research



Name and Title

DECLARATION AS TO THE BROADCAST

OF PUBLIC HEARING

In the matter of an application by CBC/Radio-Canada,

I, Bonnie Brownlee,

certify that the enclosed continuity, manuscript or reproduction is that of a Notice of Hearing required to be broadcasted and that it was duly broadcasted at least four times between the date of publication of the notice of application and 31 January 2020, in particular:

On CBC News Network:

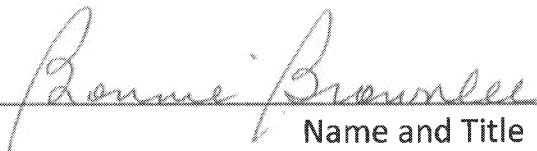
date of 1st broadcast: Saturday, January 4, 2020 time: 10 P.M. ,
segment 3

date of 2nd broadcast: Wednesday, January 8, 2020 time: 12 P.M.,
segment 2

date of 3rd broadcast: Thursday, January 12, 2020 time: 10 A.M.,
segment 2

date of 4th broadcast: Monday, January 20, 2020 time: 10 A.M.,
segment 4

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand & Research



Name and Title

DECLARATION AS TO THE BROADCAST

OF PUBLIC HEARING

In the matter of an application by CBC/Radio-Canada,

I, Bonnie Brownlee,

certify that the enclosed continuity, manuscript or reproduction is that of a Notice of Hearing required to be broadcasted and that it was duly broadcasted between the date of publication of the notice of application and 20 February 2020, in particular:

On CBC News Network:

Date of 1st broadcast: Wednesday, February 12, 2020
Segment 2

Time: 10 P.M.,

Date of 2nd broadcast: Saturday, February 15, 2020
Segment 4

Time: 7 P.M.,

Date of 3rd broadcast: Sunday, February 16, 2020
Segment 3

Time: 7 P.M.,

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand & Research



Name and Title

DECLARATION AS TO THE BROADCAST

OF PUBLIC HEARING

In the matter of an application by CBC/Radio-Canada,

I, Bonnie Brownlee,

certify that the enclosed continuity, manuscript or reproduction is that of a Notice of Hearing required to be broadcasted and that it was duly broadcasted at least four times between the date of publication of the notice of application and 31 January 2020, in particular:

On CBC Television:

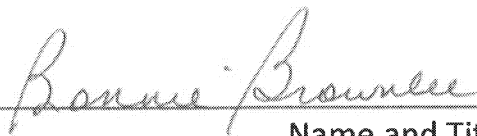
date of 1st broadcast: Friday, January 3, 2020 time: 8 P.M. ,
Segment 3

date of 2nd broadcast: Saturday, January 4, 2020 time: 1 P.M.,
Segment 3

date of 3rd broadcast: Thursday, January 9, 2020 time: 3 P.M.,
Segment 1

date of 4th broadcast: Friday, January 17, 2020 time: 4 P.M.,
Segment 4

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand & Research



Name and Title

DECLARATION AS TO THE BROADCAST
OF PUBLIC HEARING

In the matter of an application by CBC/Radio-Canada,

I, Bonnie Brownlee,

certify that the enclosed continuity, manuscript or reproduction is that of a Notice of Hearing required to be broadcasted and that it was duly broadcasted between the date of publication of the notice of application and 20 February 2020, in particular:

On CBC Television:

| | |
|---|--------------------------|
| Date of 1 st broadcast: Wednesday, February 12, 2020 | Time: 9 P.M., Segment 1 |
| Date of 2 nd broadcast: Thursday, February 13, 2020 | Time: 9 P.M., Segment 4 |
| Date of 3 rd broadcast: Tuesday, February 18, 2020 | Time: 10 P.M., Segment 4 |

Bonnie Brownlee, Executive Director, CBC Communications, Marketing, Brand & Research



Name and Title

*** End of document ***

137 c Reviewing each of the 82 notifications described in CBC's declarations reveals at least 44 errors, representing 54% of the total notifications that CBC reported as broadcast:

Two errors as to broadcast

- The 4 January 2020 broadcast at 19:24:00 by CBC's English-language television network does not appear in the log submitted by CBC for CBLT-DT (the network's flagship station)
- The 8 February 2020 broadcast at 22h20 by CBC's French-language television network does not appear in the log submitted by CBC for CBFT-DT (the network's flagship station)

Four errors due to prematurity

- The intervention deadline set for CBC's applications was 13 February 2020; on 28 January 2020 the CRTC extended the deadline to 20 February 2020 – three of CBC's broadcasts notifying audiences of the extended deadline were made before the CRTC announced the change in deadline:
 - ARTV broadcast the new deadline on 23 January 2020 at 19h24
 - Ici Télé broadcast the new deadline on 23 January 2020 at 21h25
 - RDI broadcast the new deadline on 18 January 2020 at 19h05
 - RDI broadcast the new deadline on 23 January 2020 at 20h27

Six errors from duplication

- The declarations provided by CBC stated that the broadcasts they listed had already been made; in 9 cases the broadcasts are shown as having been made after the date of the declarations:

| Service | Announcement | |
|-------------|----------------------------------|----------------------------------|
| | Re 13 February 2020 deadline | Re 20 February 2020 deadline |
| Ici Musique | 29 January 2020 at 17h30 (p. 4) | 29 January 17h30 (p. 5) |
| Ici Télé* | 23 January 2020 at 21h25 (p. 7) | 23 January 2020 at 21h25 (p. 8) |
| Ici Explora | 30 January 2020 at 20h28 (p. 9) | 30 January 2020 at 20h28 (p. 10) |
| Ici RDI | 18 January 2020 at 19h05 (p. 11) | 18 January 2020 at 19h05 (p. 12) |
| Ici RDI | 23 January 2020 at 20h27 (p. 11) | 23 January 2020 at 20h27 (p. 12) |
| Ici ARTV | 23 January 2020 at 19h24 (p. 13) | 23 January 2020 at 19h24 (p. 14) |

* The broadcast on 23 January 2020 announcing the extended deadline was also an example of 'prematurity' (in that it announced the extension five days before the CRTC announced the extension)

Nine errors from mistiming

- In 3 declarations certifying that the broadcasts listed had already been made, the dates beside the CBC's representatives' signatures *precede* the dates of nine of the broadcasts listed in these declarations:

| Date of declaration (page) | Service | Date of broadcast |
|----------------------------|-------------|------------------------|
| 24 January 2020 (p. 4) | Ici Musique | 27 January 2020 |
| | Ici Musique | 28 January 2020 |
| | Ici Musique | 29 January 2020, 23h59 |
| | Ici Musique | 29 January 2020, 17h30 |

| Date of declaration (page) | Service | Date of broadcast |
|----------------------------|--------------|-------------------|
| | Ici Première | 27 January 2020 |
| | Ici Première | 28 January 2020 |
| | Ici Première | 29 January 2020 |
| | Ici Première | 30 January 2020 |
| 27 January 2020 (p. 7) | Ici Télé | 29 January 2020 |

Twenty-three errors about times of broadcasts

- Comparing the statements about TV notifications with CBC's TV logs for the same services and months found that the broadcast times of 23 TV broadcasts were inaccurate by 10% - 6 minutes - or more:

| Service | Declaration Page | Certified | | Log time | Difference between certified and log times |
|--------------|------------------|-----------|----------|----------|--|
| | | Date | Time | | |
| Documentary | 15 | 05-Jan-20 | 20:00:00 | 20:28:16 | 00:28:16 |
| Documentary | 15 | 10-Jan-20 | 14:00:00 | 14:33:20 | 00:33:20 |
| Documentary | 15 | 14-Jan-20 | 11:00:00 | 11:10:24 | 00:10:24 |
| Documentary | 15 | 16-Jan-20 | 11:00:00 | 11:29:31 | 00:29:31 |
| Documentary | 16 | 12-Feb-20 | 21:00:00 | 21:09:16 | 00:09:16 |
| Documentary | 16 | 15-Feb-20 | 18:00:00 | 18:43:41 | 00:43:41 |
| Documentary | 16 | 17-Feb-20 | 20:30:00 | 20:49:17 | 00:19:17 |
| ETV | 23 | 03-Jan-20 | 20:00:00 | 20:32:17 | 00:32:17 |
| ETV | 23 | 09-Jan-20 | 15:00:00 | 15:13:28 | 00:13:28 |
| ETV | 23 | 17-Jan-20 | 16:00:00 | 16:46:56 | 00:46:56 |
| ETV | 24 | 12-Feb-20 | 21:00:00 | 21:18:40 | 00:18:40 |
| ETV | 24 | 13-Feb-20 | 21:00:00 | 21:46:11 | 00:46:11 |
| ETV | 24 | 18-Feb-20 | 22:00:00 | 22:19:55 | 00:19:55 |
| FTV | 7 | 26-Jan-20 | 11:06:00 | 11:16:22 | 00:10:22 |
| FTV * | 7 | 29-Jan-20 | 23:12:00 | 00:51:13 | 01:39:13 |
| FTV | 8 | 07-Feb-20 | 22:30:00 | 22:40:08 | 00:10:08 |
| News Network | 21 | 04-Jan-20 | 22:00:00 | 22:44:33 | 00:44:33 |
| News Network | 21 | 08-Jan-20 | 12:00:00 | 12:33:53 | 00:33:53 |
| News Network | 21 | 12-Jan-20 | 10:00:00 | 10:28:56 | 00:28:56 |
| News Network | 21 | 20-Jan-20 | 10:00:00 | 10:45:25 | 00:45:25 |
| News Network | 22 | 12-Feb-20 | 22:00:00 | 22:22:04 | 00:22:04 |
| News Network | 22 | 15-Feb-20 | 19:00:00 | 19:55:58 | 00:55:58 |
| News Network | 22 | 16-Feb-20 | 19:00:00 | 19:47:40 | 00:47:40 |
| RDI | 12 | 05-Feb-20 | 21:20:00 | 21:27:34 | 00:07:34 |

Total: 24

* Excluded from total count in this table as already listed under errors related to mistiming (broadcast after declaration signed)

- 137 d To summarize, the 82 broadcast notifications certified in the declarations sent by CBC to the CRTC on 20 February 2020 appear to show five classes of error:

| Type of error | Number | Affected services |
|---|--------|---|
| Logs do not confirm broadcast | 2 | CBLT-DT (English-language TV network) CBFT-DT (French-language TV network) |
| Prematurity – extension of deadline broadcast before CRTC announced extension | 4 | ARTV RDI (2) |


| Type of error | Number | Affected services |
|--|--------|--|
| | | Ici Télé |
| Duplication – 6 instances when the same service on the same date and at the same time apparently broadcast two different announcements | 6 | Ici Musique Ici Télé Ici RDI (2) Ici ARTV Explora |
| Mistiming – certifications that broadcasts had been made, apparently signed before the broadcasts were made | 9 | Ici Musique (4) Ici Première (4) Ici Télé (1) |
| Apparent errors in stated times | 23 | Documentary (7) News Network (7) English television network (6) Ici Télé (3) RDI |
| Total, six types of error | 44 | 9 of 11 services (excludes Radio One and Two) |

- 137 e The figures summarized above may underestimate the actual numbers of errors with respect to the broadcast notifications as information about CBC's radio broadcasts cannot be confirmed against CBC's radio logs since the CRTC does not post these logs.
- 137 f The CRTC has required broadcasters to make these notifications for decades. Their purpose is simple, and goes to the heart of procedural fairness in quasi-judicial proceedings: to ensure that all parties with an interest in their outcome are informed of and have the opportunity to participate and to express their views and recommendations. The notifications are part of a larger operational approach that enables the public to participate in its proceedings and hold broadcasters to account.
- 137 g CBC's application referred dozens of times to the importance of trust.⁴ Its two-page strategic plan Strategy said it wants to “earn” the public’s trust and “be a beacon for truth and trust”, and that trust is its “most precious asset”:

[remainder of page left intentionally blank]

⁴ See e.g. CBC's 9 October 2019 answers to the CRTC (DM#3733727), at pages 34, 56, 66, 67, 90, 132 and 136, among others.

Your Stories, Taken to Heart



Putting Audiences First

Your Stories, Taken to Heart is our new three-year strategy. It builds on the success of our existing services and aims to increase and deepen audience engagement. Most importantly, it's all about you, our audience!

The more we can get to know you, the better we can serve you.

And, you deserve our best. Our best means taking your stories to heart. Doing so with creativity and integrity. And striving for inclusiveness and relevance every day in the stories we tell and share.

Our promise is to put you, our audiences, first; to prioritize our role as Canada's most trusted media brand; to earn your trust and work hard to keep it every day; and to build lifelong relationships with as many Canadians as we can. We're inspired to grow our lifelong engagement with you.

We are also going to address the financial challenges that everyone in our industry is facing. We will find new, innovative ways to increase the revenue we earn so that we counter the decline in revenue and ensure the stability of jobs and services in the future.

A Champion of Canadian Culture

Given the growing dominance of global digital companies that threaten to drown out the country's stories, as well as its news and information, we are committed to ensuring that Canadian culture thrives in the future:

- We will be a champion for Canadian voices and stories in a world where the proliferation of foreign content could all too easily drown these out.
- We will be a beacon for truth and trust against "fake news" and algorithms that put democracy and the respect for different perspectives at risk.
- We will offer solutions to the rising dominance of digital global players. We will implement a plan to help make Canadian culture a strong, global business.
- We will continue to call for policy changes so that digital companies — both foreign and domestic — that are profiting from Canadians' love of content, contribute to the creation of Canadian culture, as traditional broadcasting companies already do.

Each and every decision we make over the life of this strategy will be made through the following principles:

Putting audiences, individuals and communities first

More than ever we will create audience-centric, audience-driven, tailored content and relevant experiences that connect Canadians to their communities, their country and the rest of the world.

Building a lifelong relationship with Canadians

We are going to strengthen our commitment to Canadians of all ages. That starts with more content for children that reflects their experiences and perspectives; that ignites and fuels their dreams and aspirations. It also means strengthening our services in local communities and to traditionally under-represented groups.

Strengthening our role as Canada's most trusted brand

Today we are the most trusted media brand in Canada. That trust is our most precious asset. We're going to build on that trust and use it to support better-informed communities and enlightened exchanges of ideas and perspectives.

Our priorities to better serve Canadians

Customized digital services

We will create the personal, relevant, and engaging experiences that Canadians expect. Our goal is to make sure all Canadians see themselves reflected in our digital services while connecting them to the many communities and voices that make our country great.

Engaging with young audiences

We will become a leader in bringing the best content to our children and youth with the goal of enriching their lives and engaging them with their country.

Prioritizing our local connections

This is the heart of our connection with Canadians. We will strengthen this connection with significant local and regional content that is relevant to people in their communities, and bring those communities to the rest of the country.

Reflecting contemporary Canada

We will reflect the range and richness of this country's diversity, celebrating our different perspectives and all the things that bring us together. We will do this in our staffing, as well as our content choices.

Taking Canada to the world

Anyone who watches Netflix or uses iTunes knows that today we live in a global market. If Canadian culture is going to be strong, it needs to be part of the global market from which Canadians now consume more content. We will ensure our country and Canadian creators are seen and heard the world over.

Values

Relevance Creativity
Integrity Inclusiveness

Source: <https://site-cbc.radio-canada.ca/documents/vision/strategy/2019-strategic-plan-en.pdf>

137 h If CBC is unable to follow the straightforward steps established by the CRTC to ensure that Canadians are aware of their participatory rights, it is surely fair to ask if it can be trusted to implement the programming commitments it has proposed using the strategy it has developed.