



28 November 2022

Claude Doucet
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Secretary General,

Re: Part 1 application 2022-0788-6 (amend condition of licence)

The Forum for Research and Policy in Communications (FRPC) is intervening in opposition to the above-noted Part 1 application's request that the CRTC amend the condition of licence of CHBN-FM Edmonton to permit it to reduce the level of Canadian content now required from the programming undertaking.

Rogers appears to be arguing that because Canadian radio programming services remain "negatively impacted by the COVID-19 pandemic", the appropriate remedy is to reduce the level of Canadian content broadcast by CHBN-FM.

What Rogers has failed to demonstrate is how reducing the level of Canadian content will improve CHBN-FM's performance, given Rogers has also said that one key cause of its station's financial performance is the global pandemic.

The terms under which Rogers sought the CHBN-FM licence included the requirement for the licensee to assist in the implementation of Parliament's broadcasting policy, as set out in the 1991 *Broadcasting Act*. Until and if that legislation is amended, reducing the level of Canadian content on the programming service in our view would run entirely counter to Parliament's broadcasting policy.

With regrets for the brevity of this intervention, I remain

Sincerely yours,

Monica L. Auer, M.A., LL.M.
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