



23 June 2023

Filed online

Claude Doucet
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Secretary General,

Re: *Request for confirmation of eligibility for the Independent Local News Fund by Corus, Part 1 Application 2023-0300-9* (Ottawa, 6 October 2022)

The Forum for Research and Policy in Communications (FRPC) is a non-profit and non-partisan organization established in 2013 to undertake research and policy analysis about communications, including broadcasting. The Forum supports a strong Canadian communications system that serves the public interest as defined by Parliament in the *Broadcasting Act* to which Royal Assent was given on 27 April 2023. FRPC does not support Corus' application due to the lack of facts it provides, and asks to appear before the CRTC should it hold a public hearing regarding this application.

The Forum's intervention regarding Corus' application is attached

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c. Matt Thompson
VP and Associate General Counsel,
Regulatory, Privacy and Public Policy
Corus Entertainment Inc.



***Request for confirmation of eligibility for the
Independent Local News Fund by Corus,
Part 1 Application 2023-0300-9
(Ottawa, 6 October 2022)***

Comments of the Forum for Research and Policy in Communications (FRPC)
23 June 2023

Monica Auer, M.A., LL.M.
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I. Introduction

- 1 The Forum for Research and Policy in Communications (FRPC) is a non-profit and non-partisan organization established in 2013 to undertake research and policy analysis about communications, including telecommunications. FRPC participated in the CRTC proceeding that has led to this application: Broadcasting Notice of Consultation CRTC 2021-181 – Rogers’ purchase of Shaw’s broadcasting assets. (FRPC intervened in opposition to the application.)
- 2 Corus is asking the CRTC to confirm that its 15 conventional television stations are eligible for funding from the Independent Local News Fund (ILNF),¹ a mechanism devised by the CRTC through which subscribers to broadcasting distribution services help to pay for private broadcasters’ local television news.
- 3 Due to the absence of clear evidence and commitments regarding local news programming in Corus’ application, FRPC is unable to support it. FRPC begins by reviewing the law concerning local news and the CRTC’s decision to establish the ILNF. We then set out the arguments and facts submitted by Corus in support of its application, followed by FRPC’s arguments and facts. FRPC’ conclusions are followed by its recommendations.

A. *Legislation and regulation*

- 4 Parliament first set out its specific interest in the availability of broadcast information some forty years after broadcasting began in Canada. Its 1968 *Broadcasting Act* alluded to information in the context of “matters of public concern”:

... should be varied and comprehensive and should provide reasonable, balanced opportunity for the expression of differing views on matters of public concern ...

Broadcasting Act, 16&17 Eliz. 2, c. 25 (7 March 1968)

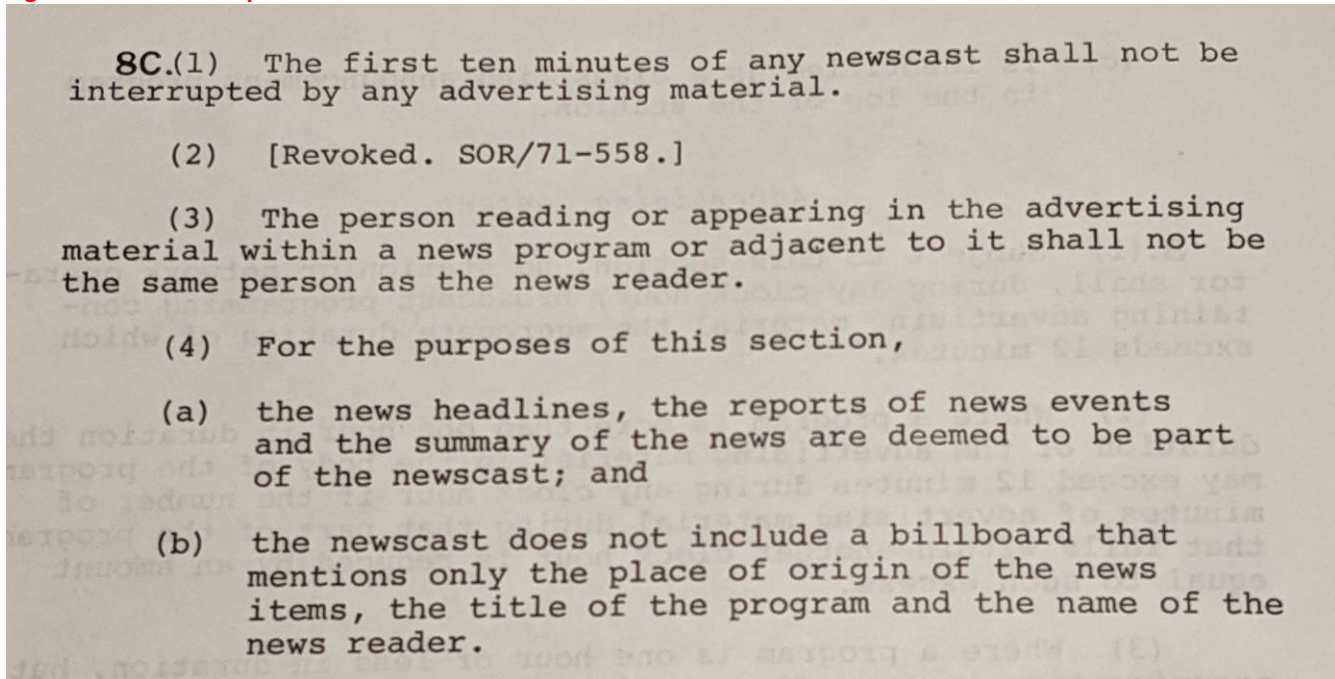
- 5 However vague the wording of its enabling statute, the CRTC followed on the heels of its predecessor, the Board of Broadcast Governors (BBG) by adopting the BBG’s prohibition of “any advertising content in the body of a news broadcast”² After TV stations complained about the workability of the CRTC’s regulations the Commission

¹ *Request for confirmation of eligibility for the Independent Local News Fund by Corus*, Part 1 Application 2023-0300-9 (Ottawa, 6 October 2022).

² *TV Regulations*, 1968, SOR/68-175, *Canada Gazette*, Part II (22 May 1968) at 533, s. 5(1)(h).

offered them flexibility, allowing ads in all but the first ten minutes of newscasts:³
Figure 1.⁴

Figure 1 CRTC's 1971 prohibition on ads in first 10 minutes of TV newscasts



6 The CRTC also expressed its concerns about the availability of broadcast news in its licensing decisions. In 1973, for example, the Commission granted a new radio network licence that, it said,

... should lead to the improvement of the national and international news service of the ... stations involved. The Commission notes the applicant's undertaking to maintain in each station ... the news staff required [wording in the original] ensure an adequate local and regional news service

Decision CRTC 73-54 (Ottawa, 26 January 1973)

7 The next year the CRTC renewed that licence, commenting that it expected

... each of the affiliated stations to maintain in its service the number of reporters required to provide an adequate and regional news service and an effective contribution to the information network. The Commission will observe the

³ By revoking what was then subsection (2), which had previously stated "The news portion of any news program shall not be interrupted by any advertising material."

⁴ *Television Broadcasting Regulations, SOR/73-219, as am. by SOR/71-558, Canada Gazette Part II, (10 November 1971) at 1858.*

implementation of this policy and expects the applicant to submit periodical reports on the activities of the network.

The Commission considers that CKAC, the master station in this information network, should secure the active services of a national news agency.

These factors will serve as criteria for evaluating the news and public affairs programming of each of the affiliated stations.

Public Announcement, Decision CRTC 74-71 (Ottawa, 29 March 1974)

- 8 By the mid-1970s the CRTC was linking broadcasters' solicitation of advertising revenues from advertisers in the communities the broadcasters served, to the provision of local programming. In 1975, for example, the Commission said

The Commission believes that the establishment of broadcasting services in a community should, wherever possible, be a reciprocal matter. Where an applicant proposes to seek local commercial revenue from a community, he should also be prepared to provide some service to the community in the way of locally-produced, locally-oriented programming.⁵

- 9 From time to time the Commission also addressed broadcasters' need to employ people to provide adequate levels of local and regional news coverage.⁶ When it renewed CHLT-TV Sherbrooke in 1975, for instance, it said that

[t]he programming outlined by the applicant is in accordance with one of the Commission's most important objectives, which is the establishment and development of local and regional television stations. **The policies and decisions of the Commission have always been directed at strengthening the resources of local stations, including a sufficient number of qualified staff, to enable them to produce an adequate number of quality programs to meet the needs and aspirations of the population. ...**⁷
[bold font added]

- 10 Since the 1980s, of courses, the CRTC has largely abandoned its expectation that broadcasters will voluntarily devote resources to programming that delivers insufficient profits. It yielded continuously to broadcasters' entreaties for regulatory flexibility, including the treatment of co-productions between broadcasters in different

⁵ *Philippe de Gaspé Beaubien, representing a company to be incorporated, Decision CRTC 75-522 (Ottawa, 28 October 1975)*

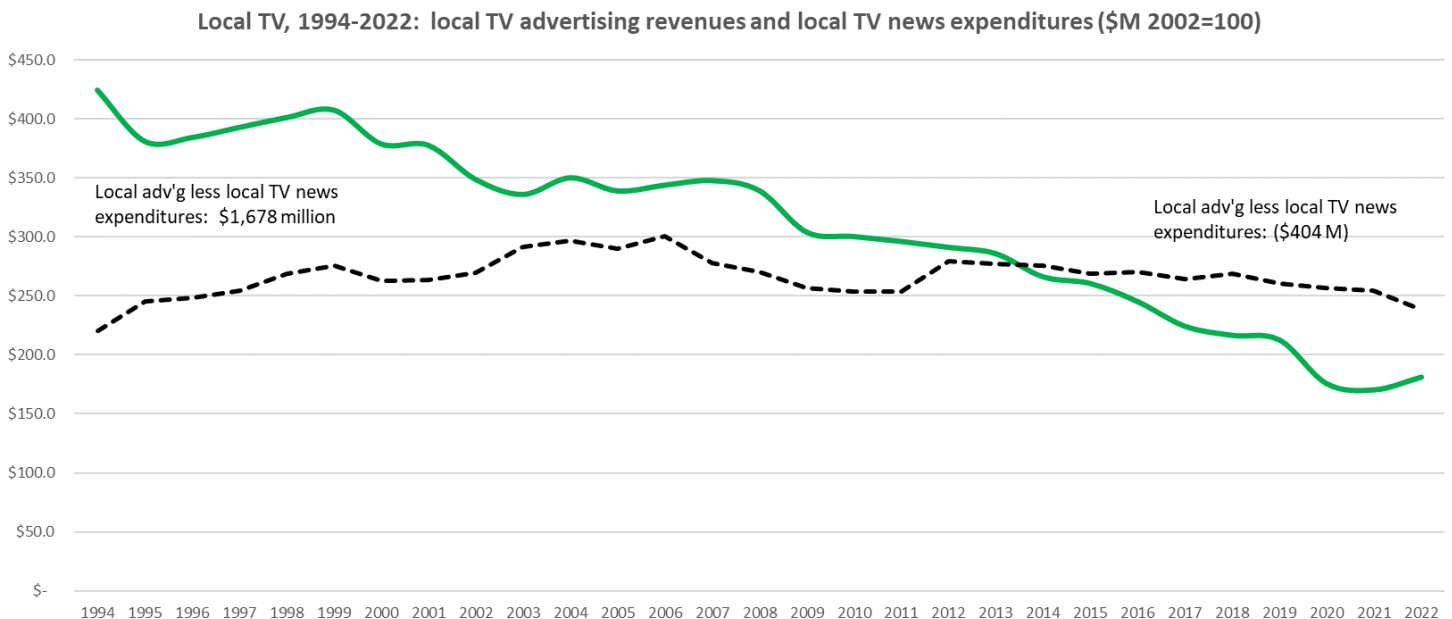
⁶ In 1973, for example, the CRTC granted a radio network licence for CKAC, to improve the national and international news of four connected radio stations: Decision CRTC 73-54 (Ottawa, 26 January 1973). The Commission wrote that

[t]he creation of this new network should lead to the improvement of the national and international news service of the four stations involved. The Commission noted the applicant's undertaking to maintain in each station, especially in the case of CKCH, the news staff required to ensure an adequate local and regional news service. The Commission will be especially interested in the carrying out of this undertaking.

⁷ Decision CRTC 75-323 (Ottawa, 25 July 1975) renewed the licence held by CHLT-TÉLÉ 7 Ltée.

communities as ‘local programming’.⁸ It capitulated to their pleas for more opportunities to increase advertising by erasing the prohibition on advertising in news from its 1987 *Television Broadcasting Regulations*.

11 The willingness of the CRTC to bend more often than it not may have been due in part to Parliament’s passage of the 1991 *Broadcasting Act* that, among other things, urged the CRTC to regulate and supervise broadcasters “in a flexible manner”⁹ and to be “sensitive” to the burden that regulation and supervision allegedly imposed on broadcasters.¹⁰ It became clear by the mid 2010s that serious thinking about local TV news was needed – as the table below shows, local advertising revenues fell below local news expenditures in 2014:



Source: CRTC statistical and financial summaries & Statistics Canada CPI deflator

⁸ *Introducing Flexibility into the Content of Local Television Programming Ottawa*, Public Notice CRTC 1985-58 (Ottawa, 20 March 1985):

....
 With a view to providing more flexibility in the concept of what may qualify as a local program, the Commission announces that, effective immediately, it will consider as "local" any program that is produced, such a co-operative basis, provided the program responds to the needs and interests of the audiences the communities or regions served by the co-operating licensees. Each participating station will be permitted to count as local any program that is produced on this co-operative basis, and to apply that program against its Promise of Performance commitment.

⁹ 1991 *Broadcasting Act*, s. 5(2).

¹⁰ *Ibid.*, s. 5(2)(g).

- 12 Along with the support the CRTC required BDUs to provide to Canadian programming (by directing a percentage of their broadcasting revenues to the Canadian Media Fund, for instance) it also began to require BDUs to provide financial support to local programming services¹¹ by directing a percentage of BDU subscribers' payments to such services.
- 13 Despite regular pronouncements about the importance of news to Canadians and democracy, the CRTC by 2015 sanctified the cancellation of all news broadcast by the OMNI television services just before a federal election – saying merely that a new policy it had not yet completed “may” affect local TV stations' broadcast of local news.¹²
- 14 The CRTC subsequently issued this policy in mid-2016. Having allowed Rogers to cancel local ethnic television news before and during a national election, the Commission once more re-affirmed the importance of local news.

... local news, information and analysis produced and distributed through the broadcasting system are of central importance to meeting the objectives of the Broadcasting Act, and remain important today.

- 15 Part of this policy involved a new funding mechanism through which the subscribers to Canadian broadcasting distribution undertakings – cable and satellite distribution services – would, in addition to helping to finance Canadian program production and local expression, also help to pay for local television news.

B. Independent Local News Fund

- 16 The CRTC decided to create an Independent Local News Fund (ILNF) by replacing another fund designed to compensate small TV stations for the fact that their services were not being distributed by direct-to-home (DTH) BDUs – the Small Market Local Production Fund. The CRTC explained the change by saying that “much has changed” since that Fund's creation.¹³
- 17 The CRTC required BDUs to direct 0.3% of their previous year's broadcast revenues to the ILNF, yielding a pool of \$20 million/year,¹⁴ adding that the new “ILNF will be

¹¹ In 1997 it required Look Communications to direct 2% of its gross annual BDU revenues to 'local expression': Broadcasting Decision CRTC 97-370 (6 August 1997).

¹² Requests that Rogers Media Inc. reinstate local third-language newscasts on its OMNI stations, Broadcasting Decision CRTC 2016-8 (Ottawa, 12 January 2016).

¹³ *Policy framework for local and community television*, Broadcasting Regulatory Policy CRTC 2016-224 (Ottawa, 15 June 2016), at ¶196.

¹⁴ *Ibid.*, ¶199.

evaluated after five years.”¹⁵ Unfortunately, a global pandemic intervened in early 2020, which presumably led the Commission to decide not to undertaking the review that otherwise would have been made in 2021. The CRTC did, however, revise the manner in which the ILNF’s funds are allocated – increasing the maximum available to any station or group of stations operated by the same licensee in a given location, in any year, from 10% to 12%.¹⁶

18 In the absence of a comprehensive CRTC review it is difficult to know what the ILNF has objectively achieved. The annual reports filed by the Canadian Association of Broadcasters (CAB) that administers the ILNF have described some of the qualitative effects of the fund. Four years ago (2018/19) it described the ILNF’s helping to increase hours of local news, staffing, coverage and equipment:

11. Following are highlights of some of the qualitative changes that the ILNF fund permitted the recipients to accomplish:

- Increase the number of hours and/or segments of local news programming being delivered, including weekend coverage.
- Increase staffing levels for reporters, editors, and producers, permitting broadcasters to deliver more in-depth programming of local stories.
- Provide ancillary financial resources that allows news reporters to cover travel-related stories in communities across their full coverage area.
- Improve election and other local stories and event coverage.
- Purchase additional ENG equipment, including digital cameras, servers, computers etc.
- Addition or expansion of news sets and other news infrastructure.¹⁷

19 Overall, the CAB’s reports show that from 17 to 24 stations have benefitted from its existence, with 19 receiving financial support from the ILNF in 2022: Table 1.

Table 1

Private TV stations receiving ILNF funding, 2017-22									
Stations	2017	2018	2019	2020	2021	2022	Total	Average, 2017-22	% of total
Alberta	4	4	4	4	4	4	24	4.0	18.8%
British Columbia	3	3	3	3	3	3	18	3.0	14.1%
Newfoundland	1	1	1	1	1	1	6	1.0	4.7%
Ontario	2	3	3	3	3	3	17	2.8	13.3%
Quebec	7	14	13	13	8	8	63	10.5	49.2%
Total	17	25	24	24	19	19	128	21.3	100.0%

¹⁵ *Ibid.*, Appendix 1 to Broadcasting Regulatory Policy CRTC 2016-224, “Evaluation”.

¹⁶ *The Independent Local News Fund – Revision to the allocation method*, Broadcasting Decision CRTC 2021-203 (Ottawa, 15 June 2021).

¹⁷ CAB, *Re: 2018-2019 - Canadian Association of Broadcasters - Independent Local News Fund (ILNF)*, (Ottawa, 30 November 2019), at 3, ¶11, “Highlights of qualitative changes made by recipients as a result of the fund.”

20 From 2017 to 2022 the ILNF dispersed just over \$110 million to local TV broadcasters: Table 2. The largest amount granted to a broadcaster in 2022 was directed towards Télé Inter-Rives ltée in 2022 - \$2.76 million.

Table 2

Province	GROUP	2017	2018	2019	2020	2021	2022	Total
Alberta	Jim Pattison Industries Ltd.	\$ 0.985	\$-	\$ 1.258	\$ 1.329	\$ 1.503	\$ 1.209	\$ 6.284
	Miracle Channel	\$ 0.386	\$ 1.142	\$ 0.999	\$ 0.896	\$ 0.853	\$ 0.814	\$ 5.091
	NewCap Inc.	\$ 1.005	\$ 2.423					\$ 3.429
	Stingray			\$ 1.049	\$ 0.983	\$ 1.121	\$ 0.824	\$ 3.976
	<i>Alberta Total</i>	<i>\$ 2.377</i>	<i>\$ 3.566</i>	<i>\$ 3.307</i>	<i>\$ 3.208</i>	<i>\$ 3.477</i>	<i>\$ 2.846</i>	<i>\$ 18.780</i>
British Columbia	Jim Pattison Industries Ltd.	\$ 1.102	\$ 2.380	\$ 2.437	\$ 2.694	\$ 3.335	\$ 2.744	\$ 14.693
	0859291 BC Ltd.			\$ 2.122	\$ 2.092	\$ 1.997	\$ 2.306	\$ 8.516
	CHEK Media	\$ 0.766	\$ 2.167					\$ 2.933
	<i>BC Total</i>	<i>\$ 1.868</i>	<i>\$ 4.547</i>	<i>\$ 4.559</i>	<i>\$ 4.786</i>	<i>\$ 5.331</i>	<i>\$ 5.050</i>	<i>\$ 26.142</i>
Newfoundland	Newfoundland Broadcasting	\$ 0.591	\$ 2.147	\$ 2.122	\$ 2.092	\$ 1.997	\$ 2.306	\$ 11.254
Ontario	Thunder Bay Electronics	\$ 0.851	\$ 1.892	\$ 0.869	\$ 0.896	\$ 1.997	\$ 1.950	\$ 8.454
	Channel Zero		\$ 2.167	\$ 2.122	\$ 2.092	\$ 1.997	\$ 2.306	\$ 10.683
	Tele Inter-Rives ltee			\$ 1.046	\$ 1.038			\$ 2.084
	<i>Ontario Total</i>	<i>\$ 0.851</i>	<i>\$ 4.059</i>	<i>\$ 4.036</i>	<i>\$ 4.026</i>	<i>\$ 3.993</i>	<i>\$ 4.256</i>	<i>\$ 21.221</i>
Quebec	RNC Media Inc.	\$ 0.906	\$ 1.871	\$ 1.779	\$ 1.907	\$ 2.344	\$ 1.999	\$ 10.806
	Tele Inter-Rives ltee	\$ 1.228	\$ 2.357	\$ 2.440	\$ 2.631	\$ 2.823	\$ 2.760	\$ 14.239
	V Interactions		\$ 3.124	\$ 2.975	\$ 2.270			\$ 8.368
	<i>Quebec Total</i>	<i>\$ 2.135</i>	<i>\$ 7.352</i>	<i>\$ 7.193</i>	<i>\$ 6.808</i>	<i>\$ 5.167</i>	<i>\$ 4.759</i>	<i>\$ 33.413</i>
Total		\$ 7.822	\$ 21.671	\$ 21.216	\$ 20.920	\$ 19.965	\$ 19.216	\$110.810

C. Corus

21 In addition to the 15 TV station licences that it currently holds, the CRTC has granted Corus licences for 39 radio stations and 33 discretionary television programming services: Table 3.

Table 3 Corus' licensed undertakings

TV stations	Radio stations		Discretionary
CHAN-DT Vancouver	CFOX-FM Vancouver	CFMI-FM New Westminster	BC 1
CHBC-DT Kelowna	CKGO-AM Vancouver	CKNW-AM New Westminster	Lifestyle
CICT-DT Calgary	CFGQ-FM Calgary	CHED-AM Edmonton	Cooking Channel
CITV-DT Edmonton	CHQR-AM Calgary	CHQT-AM Edmonton	DTour
	CKRY-FM Calgary	CISN-FM Edmonton	Food Network

TV stations	Radio stations		Discretionary
		CKNG-FM Edmonton	HGTV
CISA-DT Lethbridge			Magnolia Network
CFRE-DT Regina			Oprah Winfrey Network
CFSK-DT Saskatoon			Slice
CKND-DT Winnipeg	CFIG-FM Winnipeg CJKR-FM Winnipeg CJOB-AM Winnipeg		ABC Spark
			Adult Swim
			CMT
CIII-DT-41 Toronto	CFIQ-AM Toronto CILQ-FM North York		DejaView
			History
CHEX-DT Peterborough	CKRU-FM Peterborough CKWF-FM Peterborough		History2
			Lifetime
CKWS-TV Kingston	CFMK-FM Kingston CKWS-FM Kingston		MovieTime
			National Geographic
CKWS-DT-1 Brighton			National Geographic Wild
CHEX-TV-2 Oshawa			Showcase
	CHAY-FM Barrie CJOB-FM Barrie	CFPL-AM London CFPL-FM London	W Network
	CFNY-FM Brampton	CHML-AM Hamilton	Boomerang
	CJXY-FM Burlington	CING-FM Hamilton	Cartoon Network
	CJDV-FM Cambridge	CKBT-FM Kitchener-Waterloo	Disney Channel
	CKCB-FM Collingwood	CJOT-FM Ottawa/Gatineau	Disney Junior
	CFLG-FM Cornwall	CKQB-FM Ottawa	Disney XD Disney
	CJSS-FM Cornwall	CFHK-FM St. Thomas	Nickelodeon
	CIMJ-FM Guelph	CKDK-FM Woodstock	Treehouse
	CJOY-AM Guelph		YTV
			La Chaîne Disney
			Historia
			SériesPlus
			Télétoon
			Télétoon la nuit
CKMI-DT-1 Montréal			
CHNB-DT Saint John			
CIHF-DT Halifax			
Source: CRTC ownership charts 032			

II. Corus: arguments and facts

22 Corus says that its proposal “will best serve regulatory policy” and is “the fairest solution” (¶13). It argues that

- a. Local TV news expenditures can no longer be supported by TV advertising income (¶15)
- b. The CRTC created the ILNF to support private local news production (¶12)

- c. The CRTC’s approval of Rogers’ purchase of Shaw’s broadcasting assets now enables Rogers to direct the funding previously directed by Shaw to Corus, to Rogers’ own stations – this would amount to \$13 million per year (¶18)
- d. The Corus stations are the only private conventional news broadcasters that do not have access to ILNF (¶12), leaving them at an undue competitive disadvantage (¶11) particularly with respect to the CBC (¶13).
- e. The Corus stations have no alternative but to obtain ILNF funding (¶12)

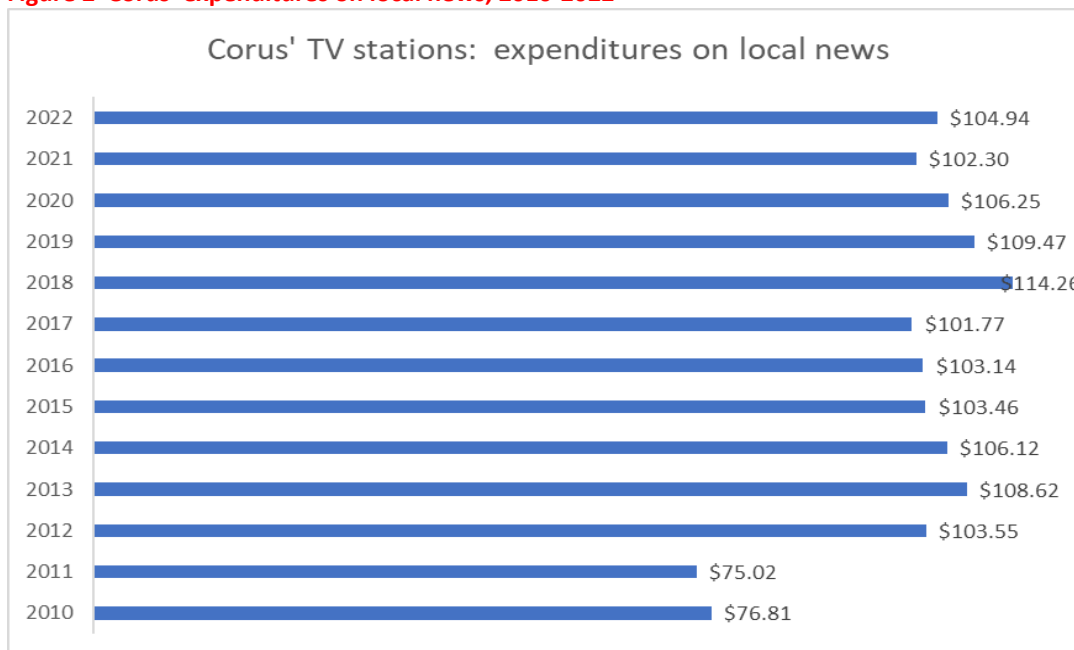
23 Corus appears to seek expedited treatment of its application, as it says that delaying its request “would undermine regulatory policy”(¶12).

24 Corus has provided few facts to assist Canadians in commenting on this application and, more importantly, has now clearly explained what it would use any new money from the ILNF for. Will it, for instance, commit to maintain its local TV newscasts?

III. FRPC: arguments and facts

25 FRPC has three concerns about this application. First, Corus has not clearly explained how the loss of \$13 million amounts to “an undue, financial disadvantage” compared to other large broadcasting groups (¶11). According to its aggregated financial returns, Corus spent \$105 million on local news in 2022: Figure 2. The \$13 million mentioned by Corus amounts to 12% of this amount.

Figure 2 Corus’ expenditures on local news, 2010-2022



Second, Corus has not clearly explained why it may only rely on the ILNF to fill the \$13 million gap in its local-TV funding. While its aggregated financial summaries support Corus’ argument that its local TV services are operating in the red, they also show that its discretionary and radio programming services are well in the black – generating more than \$280 million in 2021/22: Table 4. Granted that Corus prefers to keep the revenue it makes – but should BDU subscribers subsidize programming services when their owners continue to profit from their other broadcasting services?

Table 4

2021/22 broadcast year	Revenue	Operating income
Discretionary (English & French)	\$718.71	270.577
Radio	\$79.06	12.958
TV	\$324.90	-113.333
Total	\$ 1,122.67	170.202

26 Third, Corus has offered no clear commitments about the impact of this funding. It has not committed to strengthen its local news by, for example, reducing the degree to which it now repeats its newscasts. FRPC analyzed Corus’ November 2022 program log for CISA-DT Lethbridge. Based on the overall coding, the station appeared to broadcast 262 hours of station-produced or local news: Table 5.

Table 5

CISA-DT Lethbridge, November 2022 program log – analysis of station-produced news				Average hours per day (30 days)	Avg/hrs per day, excl’g repeats
Programs	Original 1st run & live	Repeat	Total		
PGR (Program)	225.35	17.00	242.35	8.08	7.51
PFS (Program first segment)	6.42		6.42	0.21	0.21
SEG (Program second & subsequent segment(s))	13.58		13.58	0.45	0.45
Subtotal, programs	245.35	17.00	262.35	8.74	8.18
Non-program content					
COM (commercial)	52.34	3.85	56.19	1.87	
ID (licensee identification)			0.00		
NRN (Public service announcement)	0.07		0.07	0.002	
PRC (Promotion for Canadian program)	4.28	0.58	4.86	0.16	
PRO (Promotion for non-Canadian program)	0.19	0.09	0.28	0.01	
Subtotal, non-program content	56.87	4.52	61.40	2.05	
Non-program content as % of news	23.2%	26.6%	23.4%	23.4%	
Total: programs less non-program content	188.47	12.48	200.95	6.70	6.28

Source: CRTC program log for CISA-DT Lethbridge for November 2022	
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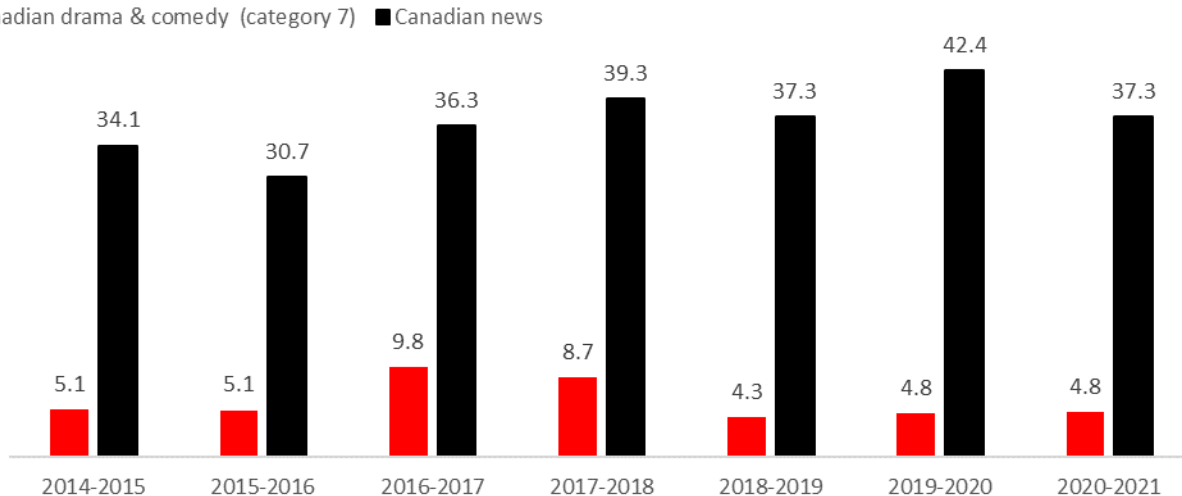
- 27 A basic problem with the CRTC’s logs has always been that programs ‘include’ advertising. In other words, the time shown for news automatically includes all non-news content. FRPC manually coded all non-news content appearing with all of Corus’ news programs in November 2022, and also distinguished between the recorded but first-run, its live and its repeat news. Deducting the time devoted in the newscasts to advertising and promos, as well as the repeat newscasts shows that CISA-DT did not broadcast 262.3 hours of news in November 2022 – but 201 hours of first-run or live news (without advertising or any other non-news content).
- 28 Our point is not that Corus is advertising too little – but rather than any estimates that are being provided about the amount of news its stations broadcast may overestimate the actual amount of first-run or live news that the communities it serves actually receive.

IV. FRPC conclusion and recommendations

- 29 News matters not just because Parliament says it matters, but because people want to watch it. According to the CRTC, people watched nearly eight times more hours of Canadian news than Canadian drama: Figure 3.

Figure 3

Hours tuned (millions) to Canadian drama and news, 2015 - 2021



Source: Canada, Open Data, Data - TV, TV-T28: "Average weekly viewing hours for Canadian programs broadcast by private conventional [TV] services, by language market, program origin, and program category, 2014-2021", <https://crtc.gc.ca/eng/publications/>

- 30** That said, one may appreciate how well the CRTC’s policy is working by the fact that this month Bell Media (a subsidiary of BCE Inc.) eliminated 1,300 positions, leaving its two radio stations in Rimouski to be covered by one journalist,¹⁸ and by the fact that the CRTC today posted Bell’s Part 1 application that invites the CRTC to delete all requirements for its English-language and French-language TV stations’ expenditures on and the exhibition of local news, to enable it to “better manage” its regulatory obligations.¹⁹
- 31** The central problem with this application is that BDU subscribers are being asked to fund the proverbial ‘pig in a poke’: what will communities literally see if Corus receives the funds it is seeking?

¹⁸ Steve Faguy, [“Bell Media managing the decline of AM radio”](#) *Fagstein* (22 June 2023):

...
 AM radio wasn’t the only place where employees faced the chopping block at Bell Media. Cuts were made across the country, including several big names at CTV National News (Joyce Napier, Tom Walters, Daniele Hamamdjian, Glen McGregor, Paul Workman and executive producer Rosa Hwang) and cuts to smaller newsrooms like Rimouski, where Bell Media’s two radio stations can now rely on only a single journalist covering the region. In Victoria, CTV2 will now be simulcasting the Vancouver news at 5, sandwiched between Victoria local newscasts that are now half an hour in length. Unifor says it expects 100 union jobs to be cut nationwide.

¹⁹ Bell Media, Part 1 Application 230614 (23 June 2023), DM#4387912, Supplementary Brief, paragraph 2.

- 32 Moreover, will the sudden call on the ILNF of \$13 million – if that is what it is seeking – lead to news reductions by stations that now already rely on the ILNF?
- 33 A short-term solution might be for the CRTC to increase the percentage of BDU gross broadcasting revenues that must be directed to the ILNF. While attractive on its face, if granted this solution would have been made in a proceeding that may have attracted relatively little attention from the public. Supposing that BDUs subsequently raised the rates they charge for discretionary services, subscribers may protest.
- 34 The Forum’s position, then, is that if the CRTC believes that it must revise the funding for the ILNF, it should launch (yet) another public proceeding – this time with a notice of consultation.
- 35 FRPC has previously set out its concerns about the haste with which the CRTC is proceeding – adding to its challenges by granting Corus’ application serves neither the CRTC’s interests, nor those of the public.

* * * End of document * * *