



6 September 2024

Filed online

Marc Morin  
Secretary General  
CRTC  
Ottawa, ON K1A 0N2

Dear Secretary General,

**Re: *Call for comments on the Independent Local News Fund*, [Broadcasting Notice of Consultation CRTC 2024-164](#) (Ottawa, 23 July 2024)**

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 1991 *Broadcasting Act*.

The Forum's comments regarding the ILNF and Corus' application to become eligible for ILNF funding are attached.

Should the CRTC decide to hold an appearing public hearing in this matter the Forum respectfully asks to participate in that process.

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

[execdir@frpc.net](mailto:execdir@frpc.net)



***Call for comments on the Independent Local News Fund,***  
**Broadcasting Notice of Consultation CRTC 2024-164**  
**(Ottawa, 23 July 2024)**

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

Monica L. Auer  
Executive Director

6 September 2024

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## Executive Summary

- ES 1 The Forum for Research and Policy in Communications (FRPC) is a non-profit and non-partisan organization established in 2013. It undertakes research, legal analysis and quantitative research about regulated communications. FRPC believes that the public interest is served when the broadcasting system meets the objectives for the system set down by its *Broadcasting Policy for Canada* in section 3 of the Broadcasting Act. Compared to its 1991 predecessor statute, Parliament's *Broadcasting Policy for Canada* today sets out more specific requirements about the availability of local news.
- ES 2 Unfortunately, the absence of objective information in BNoC 2024-164 limits public-interest participants' ability to comment on the questions raised by the notice based on empirical evidence, particularly with respect to the impact of the ILNF on the availability of high-quality local news. FRPC therefore reviewed the program logs for 18 ILNF recipient TV stations for November 2001 (before the SMLPF began) and for November 2023 (while the ILNF continues to exist). We focussed on first-run local news on the theory that such programming is of the greatest benefit to audiences.
- ES 3 FRPC's analysis found that local first-run news hours increased by an average of 7 hours between November 2001 to November 2023 for five of the 18 stations whose logs the Forum reviewed. First-run locally produced news decreased by an average of 35.2 hours (64.7%) among the remaining 13 stations. The logs for 3 of these 13 stations did not describe any first-run, station-produced local news hours.
- ES 4 This analysis of the November 2001 and 2023 program logs of a majority of ILNF-recipient stations suggests that more evidence is needed before the CRTC decides to amend the ILNF to any significant degree.
- ES 5 FRPC does not oppose the eligibility of Corus for ILNF funding but argues that independent TV stations should only be eligible for the ILNF if they operate in non-urban centres where audiences (and consequently) advertising revenues are likely higher. This would mean that a number of Corus' stations would be ineligible for the ILNF.
- ES 6 FRPC also has concerns about the level of funding to be available from the ILNF going forward. Should the Commission determine that the funding now provided by BDU subscribers should increase, FRPC proposes that the increase flow from BDUs' basic-service revenues without altering the basic-service' current regulated rate. This would protect BDU subscribers – at a time of high inflation – from additional costs for their communications services, particularly low-income subscribers.
- ES 7 FRPC made several suggestions including with respect to the performance-evaluation data the CRTC should gather. Specifically, FRPC considers that the CRTC should establish a coherent framework to gather objective data about first-run local news broadcast by ILNF recipients under which each ILNF recipient should report

- Total hours of first-run local news broadcast in each community
- Total number of full-time or equivalent employees in each community who collect and report news
- Total expenditures of each ILNF recipient on first-run local news in each community.

ES 8 FRPC also recommended that

- the CRTC should initiate a second phase in this proceeding, publish all evidence it has regarding the ILNF and television new programming, and invite comments based on that evidence
- the CRTC should undertake and publish its own analysis of the hours of first-run news broadcast by stations that have – and have not – received SMLPF/ILNF funding over as many years as possible. (The CRTC has stated that it destroyed the logs it previously published from 1999 to 2014, making it therefore impossible to determine the before-and-after impact of the SMLPF/ILNF.), and that
- to ensure that BDU rates do not increase in general, the CRTC should consider requiring BDUs to remit payment to the ILNF not from their total gross broadcasting revenues, but from the revenues they obtain from their basic service, whose rate is regulated by the CRTC.

## 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 broadcasting and telecommunications. The Forum supports a strong Canadian communications system that serves the public interest as defined by Parliament in its communications-related statutes, in part by providing the transparency and accountability necessary to ensure that policy outcomes serve the public interest.
- 2 In April 2023 Parliament reaffirmed that the availability of local news is one of the objectives of its *Broadcasting Policy for Canada*: Table 1.

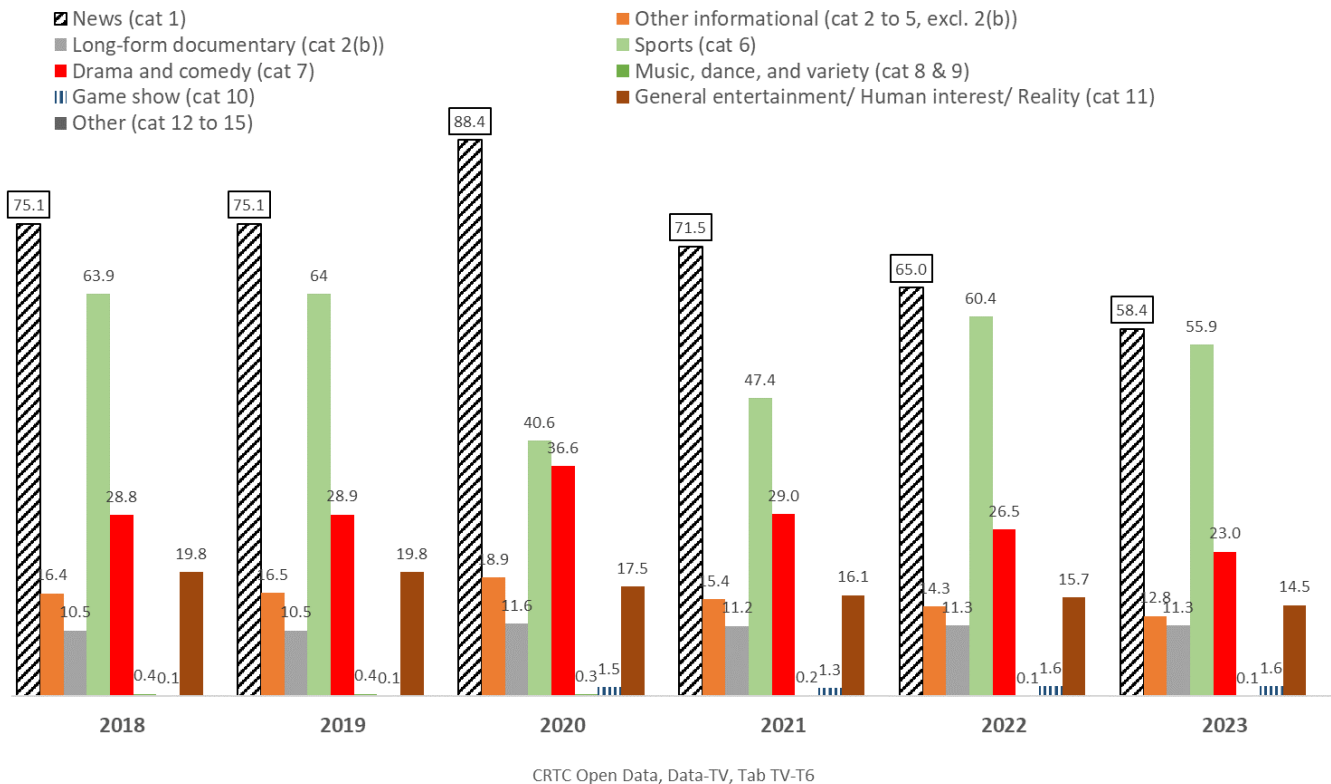
**Table 1 Former and current *Broadcasting Policy for Canada* and role of news**

Section 3 <i>Broadcasting Policy for Canada</i>	
1991 <i>Broadcasting Act</i>	Current <i>Broadcasting Act</i> (as amended by the <i>Online Streaming Act</i> )
<p>3. (1) It is hereby declared as the broadcasting policy for Canada that</p> <p>...</p> <p>(d) the Canadian broadcasting system should</p> <p>(i) serve to safeguard, enrich and strengthen the cultural, political, social and economic fabric of Canada,</p> <p>(ii) encourage the development of Canadian expression by ... by offering information and analysis concerning Canada and other countries from a Canadian point of view,</p> <p>...</p> <p>(i) the programming provided by the Canadian broadcasting system should</p> <p>(i) be varied and comprehensive, providing a balance of information, enlightenment and entertainment for men, women and children of all ages, interests and tastes,</p> <p>(ii) be drawn from local, regional, national and international sources,</p> <p>...</p> <p>(iv) provide a reasonable opportunity for the public to be exposed to the expression of differing views on matters of public concern, ....</p>	<p>(1) It is hereby declared as the broadcasting policy for Canada that</p> <p>...</p> <p>(b) the Canadian broadcasting system, operating primarily in the English and French languages and comprising public, private and community elements, makes use of radio frequencies that are public property and provides, through its programming, a public service essential to the maintenance and enhancement of national identity and cultural sovereignty;</p> <p>...</p> <p>(d) the Canadian broadcasting system should</p> <p>...</p> <p>(i) serve to safeguard, enrich and strengthen the cultural, political, social and economic fabric of Canada,</p> <p>(i) the programming provided by the Canadian broadcasting system should</p> <p>(i) be varied and comprehensive, providing a balance of information, enlightenment and entertainment for people of all ages, interests and tastes,</p> <p>...</p> <p>(ii) be drawn from local, regional, national and international sources, including, at the local level, from community broadcasters who, through collaboration with local organizations and community members, are in the unique position of being able to provide varied programming to meet the needs of specific audiences,</p> <p>...</p> <p>(iv) provide a reasonable opportunity for the public to be exposed to the expression of differing views on matters of public concern and to directly participate in public dialogue on those matters including through the community element ....</p>

- 3 The Forum therefore welcomes the opportunity provided by BNoC 2024-164 to submit comments on the Independent Local News Fund (ILNF), the 2017<sup>1</sup> successor to the Small Market Local Programming Fund (SMLPF) established in 2003.<sup>2</sup>
- 4 News is the most popular type of Canadian programming in English-language Canada (Figure 1, and the first or second-most popular type of Canadian programming in Quebec (Figure 2).

**Figure 1 Weekly viewing hours of English-language Canadian programming, 2018-2023**

Average weekly viewing hours of Canadian programming on English-language and ethnic TV services in Canada, outside of Quebec, 2018-2023



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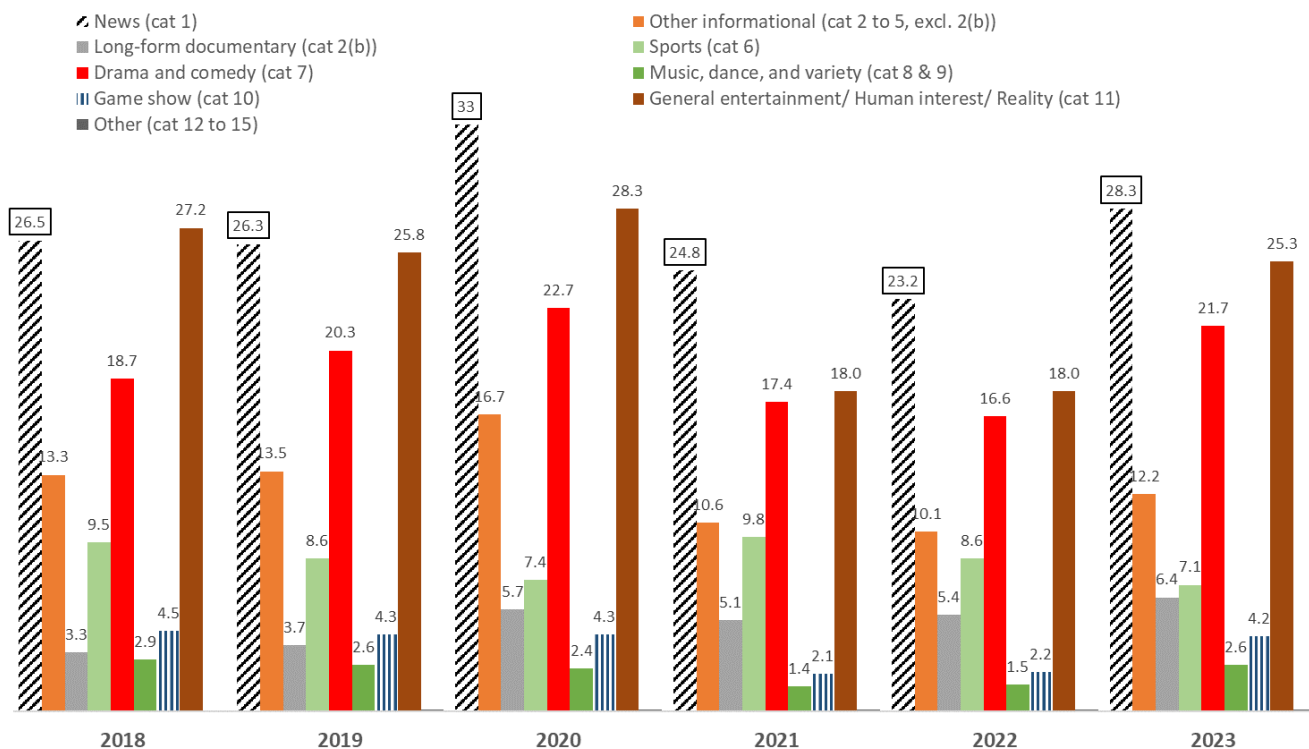
<sup>1</sup> Policy framework for local and community television, [Broadcasting Regulatory Policy CRTC 2016-224](#) (Ottawa, 15 June 2016), at ¶196.

<sup>2</sup> Licence amendment for ExpressVu - relief from requirements for simultaneous and non-simultaneous program deletion, [Broadcasting Decision CRTC 2003-257](#) (Ottawa, 16 July 2003), at ¶10; Licence amendment for Star Choice - relief from requirements for simultaneous and non-simultaneous program deletion, [Broadcasting Decision CRTC 2003-258](#) (Ottawa, 16 July 2003), at ¶10.



**Figure 2 Weekly viewing hours of French-language Canadian programming, 2018-2023**

Average weekly viewing hours of Canadian programming on French-language TV services in Quebec market, 2018-2023



CRTC Open Data, Data-TV, Tab TV-T6

- 5 FRPC comments on issues raised by BNoC 2024-164 in Part II. We respond to BNoC 2024-164's ten questions – 19 when set out one by one in Part III. Our conclusions and a summary of FRPC's recommendations follow. The remainder of this section addresses the CRTC's growing interest in the availability of news and the scope of BNoC 2024-164.

#### A. *CRTC's interest in news welcome*

- 6 FRPC notes that in May 2023 the CRTC published its *Regulatory Plan to modernize Canada's broadcasting framework*. It announced the CRTC's intention beginning in fall 2023 to

... look at how we could tailor our expectations of and requirements for different broadcasting services, including:

...  
Supports for news and local programming;

....<sup>3</sup>

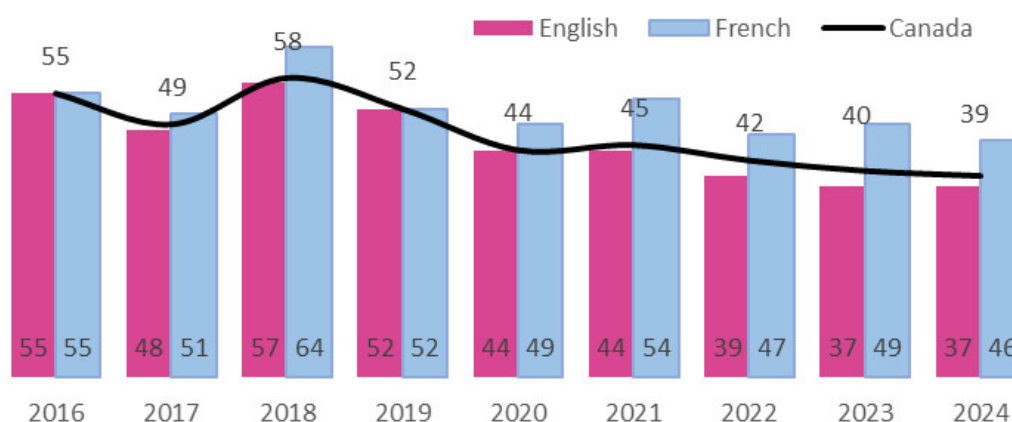
- 7 The CRTC updated its *Regulatory Plan* on 6 May 2024, and stated that in Spring 2025 it will hold a "[c]onsultation on news programming" and on "how to ensure everyone has access to strong, high quality and diverse local and national news programming on TV, radio and online in Canada".

<sup>3</sup> CRTC, *Regulatory Plan to modernize Canada's broadcasting system* (8 May 2023).

- 8 As of 29 August 2024 the CRTC changed its [Regulatory plan to modernize Canada's broadcasting framework](#) to include the ILNF consultation in Summer 2024 as well as a consultation in Fall 2024 "on a fund to "support local news production by commercial radio".
- 9 FRPC's welcomes the CRTC's decision to evaluate the ILNF.
- 10 Apart from the well-worn adage that news is the foundation of democracy, mistrust in news can be contagious. Mistrust can spread to encompass institutions and governments at all levels. Recent data show that in Canada trust in news overall has been declining for nearly a decade, to the point that six in ten people in Canada do not appear to trust the news they access: Figure 3.

**Figure 3: Trust in news overall, Canada – 2016-2024<sup>4</sup>**

Trust in news overall: Canada, 2016-2024



Colette Brin and Sebastien Charlon, "Canada" in Reuters Institute for the Study of Journalism and University of Oxford, *Digital News Report 2024* (17 June 2024), <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/canada>

- 11 As the Reuters published trust data do not set out levels of trust by medium – such as for over-the-air television - it is not known what people in Canada think about the news they receive from private television stations.

<sup>4</sup> The question that appears to be the basis of the data in Figure 1 is as follows:  
Q6\_2016\_1. Thinking about news in general, do you agree or disagree with the following statements?  
I think you can trust most news most of the time. Base: Total sample in each market 2000.  
Reuters, *Digital News Report 2024*, at p. 25.

12 FRPC's point is that a decision by the CRTC to begin strengthening local news programming in the conventional television station may have an indirect and positive impact on levels of trust in news overall. To state the obvious, much will depend on the record of this proceeding.

**B. *Absence of evidence about local news unfair to public***

13 Given the importance of news to democracy and trust, FRPC is concerned that the absence from the CRTC's website and BNoC 2024-164 of comparative, objective evidence about broadcast news does little to promote trust in this proceeding or the CRTC's processes.

14 The 1991 *Broadcasting Act* constrained the CRTC's ability to obtain information from broadcast licensees by limiting what action the Commission could taken and when it could do so. That *Act* empowered the CRTC to make regulations requiring all or some licensees to submit financial information or information about their affairs<sup>5</sup> and – when it renewed a broadcasting licence or five years thereafter – to impose conditions of licence on individual broadcasters which might involve the submission of information.<sup>6</sup> Parliament also empowered the CRTC to “undertake ... research relating to any matter within its jurisdiction” under the *Broadcasting Act*,<sup>7</sup> however.

15 The 2023 amendments to the *Broadcasting Act* have freed the Commission from the time-consuming process of enacting regulations to gather information and from the licence-based time limits of mandating specific information requirements: Appendix 1. The Commission may now order individual broadcasters to provide it with a range of financial, programming, expenditure and audience information (section 9.1(1)(o)) and it may still undertake research about any matter within its jurisdiction under the *Broadcasting Act*, such as the availability of news from broadcasters.

16 Information and evidence are key in any CRTC proceeding, and the CRTC has often said that its decisions are based on the public record and that it wants to engage with Canadians.

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<sup>5</sup> 1991 *Broadcasting Act*, s. 10(1): The Commission may, in furtherance of its objects, make regulations ...  
(i) requiring licensees to submit to the Commission such information regarding their programs and financial affairs or otherwise relating to the conduct and management of their affairs as the regulations may specify; ....

<sup>6</sup> S. 9(1):  
Licences, etc.  
9. (1) Subject to this Part, the Commission may, in furtherance of its objects,  
...  
(b) issue licences for such terms not exceeding seven years and subject to such conditions related to the circumstances of the licensee  
(i) as the Commission deems appropriate for the implementation of the broadcasting policy set out in subsection 3(1), and  
(ii) in the case of licences issued to the Corporation, as the Commission deems consistent with the provision, through the Corporation, of the programming contemplated by paragraphs 3(1)(l) and (m);  
(c) amend any condition of a licence on application of the licensee or, where five years have expired since the issuance or renewal of the licence, on the Commission's own motion;

<sup>7</sup> S. 14(1): “The Commission may undertake, sponsor, promote or assist in research relating to any matter within its jurisdiction under this Act and in so doing it shall, wherever appropriate, utilize technical, economic and statistical information and advice from the Corporation or departments or agencies of the Government of Canada.”

#### Figure 4 CRTC bases decisions on the public record

“... the CRTC is an independent quasi-judicial tribunal that regulates the Canadian communications sector in the public interest. We hold public hearings on telecommunications and broadcasting matters and we make decisions based on the public record. ...”

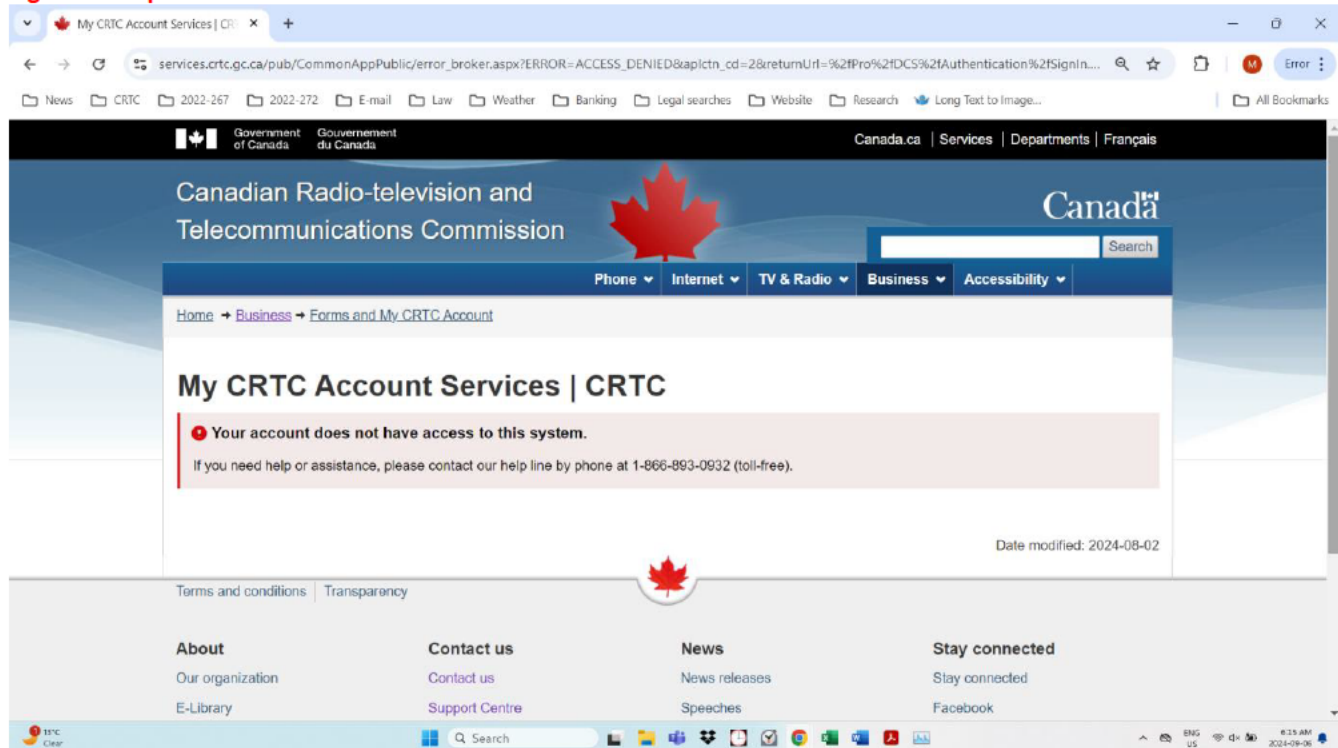
““

“All along the way, as I mentioned, we are engaging with Canadians to ensure that we have a robust public record on which to make our decisions.”

“15 minutes with ...Vicky Eatrides”, [InterMEDIA \(December 2023\), Vol. 51, Issue 4.](#)

- 17 Although the CRTC has abandoned the requirement in the case of radio, the Commission requires its television programming licensees to submit information about their programming every month: Appendix 2.
- 18 The CRTC also requires broadcasters to submit an *Annual Return* with financial and staffing information. It does not, however, make even blank *Annual Returns* available to the public: Figure 5.

#### Figure 5 No public access to CRTC's blank *Annual Return* forms



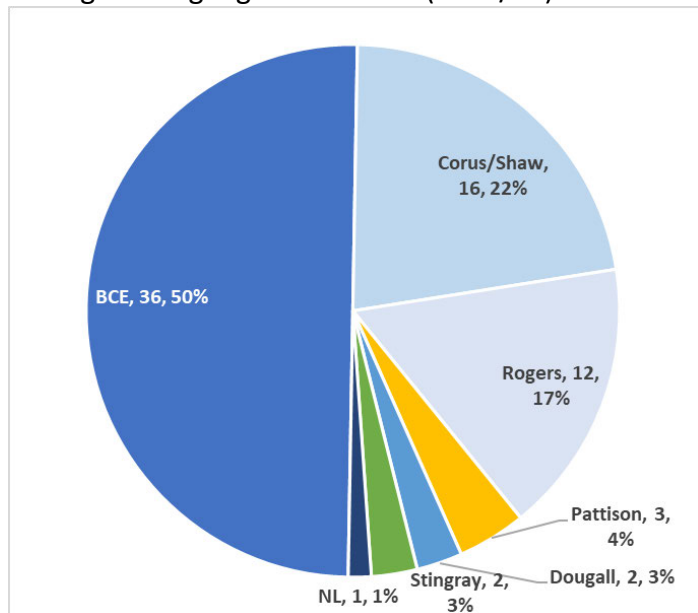
- 19 Given the virtual treasure trove of data it must hold, is unclear why the CRTC did not publish any objective programming information about the stations that receive ILNF funding, and in particular – since the ILNF was established – each station’s
  - Annual hours of broadcast news
  - Annual hours of local broadcast news
  - Annual hours of first-run or original news broadcast, and

- the number of reporters or news-gathering staff (full-time or equivalents) at each station, per year since the ILNF's establishment.

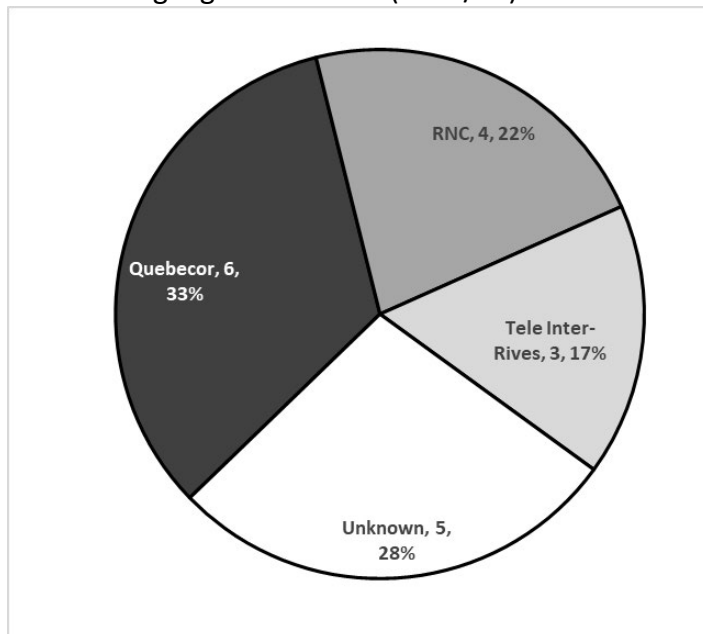
20 The 15 companies that control Canada's 90 English- and French-language over-the-air television stations have this information: see Figure 6. Each knows how much news each of their stations broadcasts in any given period, how much this programming costs and how many people they employ to gather, report and produce news.

**Figure 6 90 TV private commercial English- or French-language stations in Canada controlled by 15 broadcasters**

72 English-language TV stations (2023/24)



18 French-language TV stations (2023/24)



Sources: CRTC, [Communications Market Reports – Open Data](#), Broadcasting Sector, Tabs 16; [CRTC ownership charts](#) 27, 32, 35, 47, 97, 115, 143, 156, 168, 191 and 224

- 21 The CRTC also knows how much news broadcasters broadcast. It has been collecting data about all broadcasters for at least 50 years, although it has now destroyed these data for the years before 2014: Appendix 3.
- 22 Unions, guilds and industry associations also have some or a great deal of information about broadcast programming.
- 23 The only party in this proceeding that does not have access to key evidence about broadcast television news is the proceeding's target – the public.<sup>8</sup> Presumably, then, the Commission

<sup>8</sup> FRPC asked the CRTC for the total annual hours of news broadcast by Canadian over-the-air television stations on 18 May 2022. The CRTC sent a 189-page paper copy of this information on 22 September 2022 (4 months later) which could not be converted into either a Word document or an Excel spreadsheet. When asked in August 2023 for an electronic spreadsheet version of the September 2022 data, the CRTC provided data from 2014/15 to 2021/22 which excluded the 2017/18 broadcast year and repeated results for the years 2018/19, 2019/20, 2020/21 and 2021/22 but with different numbers of hours.



does not assume that comments from members of the public will be able to form detailed, evidence-based opinions to evaluate the impact of the ILNF.

**“Public interest decision making requires hearing from diverse interests. Right now, there is a perception among many that access to CRTC processes is unequal. While the regulator’s open and evidence-based processes are a core strength, barriers to participation remain. Smaller organizations and civil society groups, in particular, expressed concern about not having the same level of resources as large corporate interests to participate in CRTC proceedings.”**

Canadian Heritage, *New CRTC Chair’s Leadership Will Help Shape the Future of Canada’s Communication System*, News release (Gatineau, 6 February 2023), [Letter of 6 February 2023](#) from the Ministers of Canadian Heritage and Innovation, Science and Economic Development to the Chair of the CRTC

- 24 Unequal access to relevant evidence in quasi-judicial proceedings is unfair, unreasonable and unjust – and creates two serious risks. The first is that the CRTC may place less weight on public comments on the ILNF if such comments are not based on evidence. Placing less weight on comments not based on evidence creates an implication that the Commission may place more weight on evidence-based comments, such as those of broadcasters. Counterintuitively, therefore, the CRTC’s evidence-free proceedings disadvantage the very people whose interests the CRTC purports to serve.
- 25 The second risk exists if, in an effort to balance arguments from the public which are not based on evidence with evidence-based industry arguments, the CRTC relies on its own expertise. Such reliance poses the risk of legal challenge, however, even if the CRTC publishes the evidence on which it relies: publishing decisions based on hither-to secret knowledge is contrary to basic standards of due process in Canada.
- 26 Given the many challenges being faced by the CRTC at this time – due to the *Online Streaming Act* and the *Online News Act* – it may be that the lack of information in BNoC 2024-164 is simply an oversight. In that case, the CRTC can correct this gap by publishing the data it has about television stations’ local-news programming: in our view, **the CRTC should initiate a second phase in this proceeding, publish all evidence it has regarding the ILNF and television new programming, and invite comments based on that evidence.**
- C. **Confusion over scope of BNoC 2024-164**
- 27 BNoC 2024-164 states that its purpose is limited to “a focused review of the ILNF regulatory framework and activities” and to consider the application by Corus Entertainment Inc. (Corus) to become eligible for ILNF funding (¶¶5-6). BNoC 2024-164 later adds that it will “accept comments ... as well on matters related to the ILNF” (¶26).
- 28 BNoC 2024-164 has not set clear parameters about the specific matters it is studying. For example, while it mentions news 58 times, refers variously not just to local news (the ‘Independent Local News Fund’, underlining added) but also to
  - News and current events (¶1)

- News and analysis (¶2)
- News and information (¶12)
- Local and national news programming (¶1)
- Local news (Summary, second paragraph; ¶2)
- Television news (Summary, first paragraph)
- Local television news (Summary, first paragraph)
- Local news and information (Summary, second paragraph)
- Locally reflective news and information (¶7, ¶9)
- Locally relevant and reflective news and information (¶1) as well as
- Original local and regional news and community programming (¶1)
- 

29 When FRPC asked the CRTC on 7 August 2024 to clarify whether the scope was limited to the focussed ILNF framework review and Corus, or to all matters related to the ILNF, the CRTC on 3 September 2024 wrote,

[t]o clarify, the Commission intends to issue determinations on the impact of the proposed increase to the funding of the ILNF and on Corus's application. In terms of paragraph 26 of the Notice, the Commission is also mindful that other questions may be raised by interveners which may provide the Commission with useful information to help inform future proceedings. The decisions of this proceeding will respond to the specific questions outlined in the Notice.

30 FRPC appreciates the CRTC's clarification.

## II. Local television news

### A. *CRTC's initial approach to local news, 1968-1984*

31 After the CRTC's establishment in 1968 it addressed the news provided by TV stations to the communities they were licensed to serve. Half a century ago the CRTC denied three applications for private television licences to serve Vancouver, in part because the applicants did not pay enough attention to Vancouver residents' concerns.

*Television Services in the Vancouver and Victoria Areas*, Decision CRTC 73-398 (Ottawa, 10 August 1973) Public Announcement

...

Vancouver is a large and growing city with an assured potential in the cultural, educational and entertainment fields. As a seaport providing access to the Pacific it is also destined to be not only a major industrial and distribution centre, but also a meeting place where new energies and ideas can develop.

In these circumstances the CRTC has decided that the three applications for the use of Channel 10 in Vancouver do not adequately reflect the potential of a rapidly growing city with the unique cultural possibilities inherent in its location and people. They fail to broaden the television programming services already provided so as to give greater scope to the interests, views and concerns of people living in the Vancouver area. Insufficient attention was also paid to countering the often-expressed opinion that the views of people living in the area are not now being adequately represented either in the area or to the rest of Canada.

...

- 32 A year later the Commission called on Télémedia to employ sufficient reporters to provide an adequate news service:

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

The Commission renews this network licence (for the Télémedia network, including stations CKAC, Montreal, CHLN, Trois Rivières, CHLT, Sherbrooke and CKCH, Hull, Que. ....

...

The Commission considers that Télémedia's information network should make a positive contribution to the availability and quality of provincial, national and international news broadcast by each of the affiliated stations.

In accordance with the applicant's stated policy, the Commission expects 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 implementation of this policy and expects the applicant to submit periodical reports on the activities of the network.

...

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

- 33 By 1979, a decade after its establishment, the CRTC was linking revenues earned from local advertising to "locally-produced, locally-oriented programming",<sup>9</sup> and in 1982 denied an amendment that would have enabled CKCO-TV to offer separate feeds of commercials through its rebroadcasting transmitters because the licensee did not set out "any specific plans or commitments for increasing the amount of separate local programming for the communities served by these transmitters and no commitments as to the amount of increased revenues it would allocate for the production of additional local programming."<sup>10</sup>

- 34 The advent of television services distributed by satellite – so-called super stations and death stars – led the Commission to change its approach to licensing and programming requirements beginning in the mid-1980s.

## **B. The move to consolidated ownership, 1988 to present day**

- 35 Confronted by audience interest in new and novel programming offered by non-Canadian satellite-based television programming services, the CRTC let ownership of Canada's private television sector consolidate. It hoped that larger entities would produce and acquire programming to retain Canadian audience interest and, in turn, revenues from advertisers.

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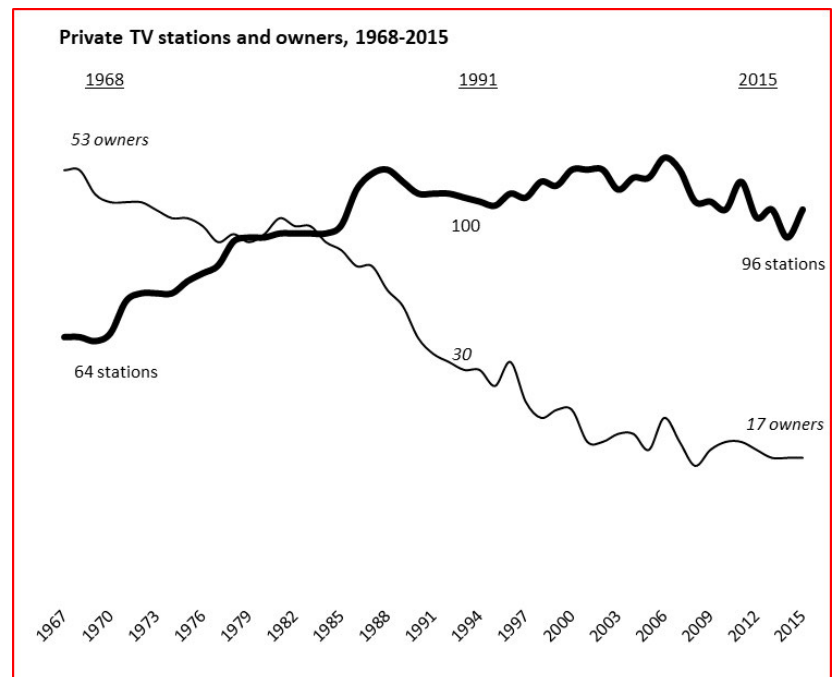
<sup>9</sup> *Philippe de Gaspé Beaubien, representing a company to be incorporated, Decision CRTC 75-522 (Ottawa, 28 October 1975): "The Commission considers that the applicant should endeavour to develop the necessary facilities to produce local programming in Trois-Rivières, as soon as it is feasible to do so. The licence granted therein will be subject to the condition that no local TV sales activity take place in the Trois-Rivières market area until the licensee provides to the community a programming service approved by the Commission."*

<sup>10</sup> *CAP Communications Limited, Decision CRTC 82-866 (Ottawa, 20 September 1982), p. 2.*



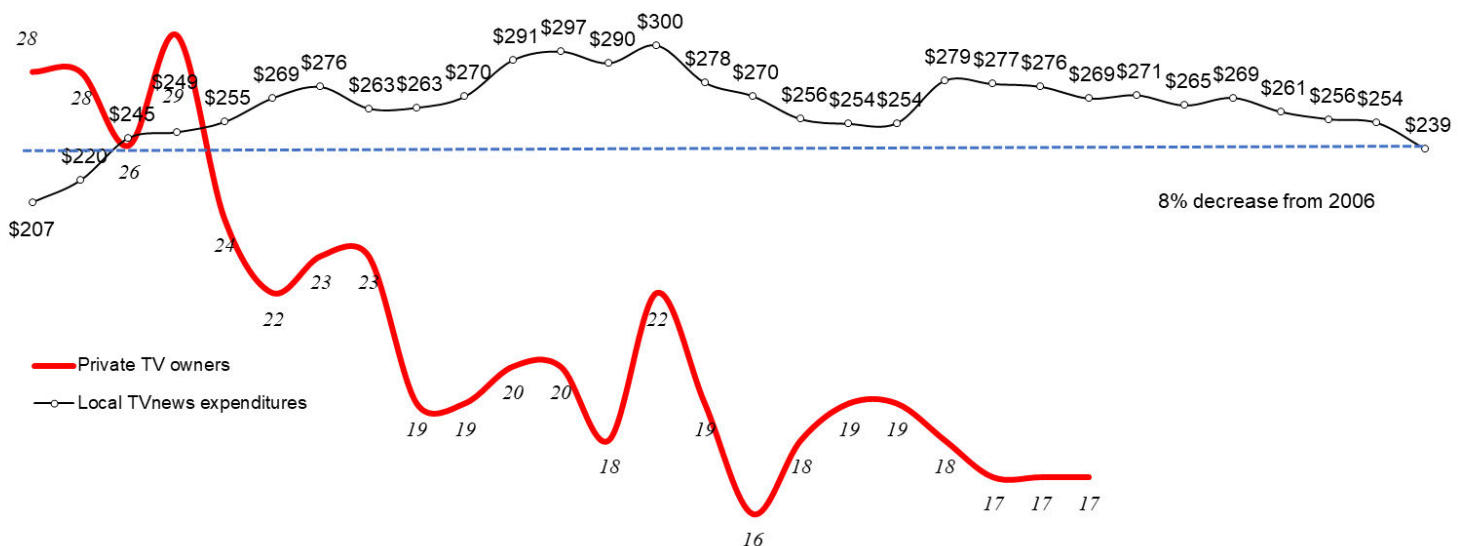
**Figure 7 TV stations and ownership, 1968-2015**

- 36 More than 50 separate broadcasters operated 64 TV stations in the late 1960s – by 2015, 17 broadcasters operated 96 TV stations:<sup>11</sup> Figure 7.
- 37 Unfortunately, consolidated ownership did not provide local news programming with more, or with more consistent, financial support.
- 38 Baldly put, Canadians today are no better off in terms of private TV stations' expenditures on the production of news by individual stations than they were in 1994: Figure 8.



**Figure 8 Private TV owner numbers and local-station expenditures on news**

Private TV ownership numbers and local-station expenditures on news (\$ millions 2002)



Source; CRTC Statistical and Financial Summaries, 1993-2014; FRPC ownership data

<sup>11</sup> Monica Auer, "Is Bigger Really Better? TV and Radio Ownership Policy Under Review" *Policy Options*, September 2007, 78-83; updated information by FRPC.

### C. *Satellite TV and funding for television stations in small communities*

- 39 In the mid-1990s the CRTC licensed two Canadian DTH services, somewhat obliquely referring to the possibility that the services might be required to compensate smaller local television broadcasters for financial losses they incurred with respect to local or regional program rights, and/or local and regional advertising revenues.<sup>12</sup>
- 40 When broadcasters in smaller communities began to express concerns that they were not being carried by the newly licensed DTH services, negotiations between the Canadian Association of Broadcasters (CAB) and the DTH services from 1998 to 2000 resulted in the DTH services' compensating these broadcasters with respect to program-rights and advertising-revenue losses.<sup>13</sup> The payments ranged from \$0.20 to \$0.30 per DTH subscriber per month.<sup>14</sup>
- 41 These agreements also addressed a hypothetical scenario in which the CRTC might approve "an independent local and regional television programming fund" that would be "accessible by private local and regional television programming undertakings to assist in the creation, development, and production of television programming exhibited by local and regional private television undertakings."<sup>15</sup>
- 42 In summer 2022 Bell asked the Commission for temporary relief from requirements to provide simultaneous and non-simultaneous programming deletion on its DTH service and referred to

<sup>12</sup> *INTRODUCTORY STATEMENT - LICENSING OF NEW DIRECT-TO-HOME (DTH) SATELLITE DISTRIBUTION UNDERTAKINGS, and NEW DTH PAY-PER-VIEW (PPV) TELEVISION PROGRAMMING UNDERTAKINGS*, [Public Notice CRTC 1995-217](#) (Ottawa, 20 December 1995):

III. Regulatory Framework for DTH Satellite Distribution Undertakings

...

b) Program Substitution and Deletion

... The Commission notes that discussions have taken place between certain DTH distribution applicants and the Canadian Association of Broadcasters (CAB) respecting alternative measures or initiatives, other than deletions, as may be mutually agreed upon between the parties, to compensate or protect local and regional program rights, and local and regional advertising revenues. The Commission will accept such alternatives to the above requirements, as may be mutually agreed upon by the parties concerned. ...

<sup>13</sup> *Direct-to-home (DTH) broadcasting distribution undertakings - simultaneous and non-simultaneous program deletion and the carriage of local television signals in smaller markets: Introduction to Licence amendment for ExpressVu - relief from requirements for simultaneous and non-simultaneous program deletion*, Broadcasting Decision CRTC 2003-257, 16 July 2003, and *Licence amendment for Star Choice - relief from requirements for simultaneous and non-simultaneous program deletion*, Broadcasting Decision CRTC 2003-258, 16 July 2003, [Broadcasting Public Notice CRTC 2003-37](#) (Ottawa, 16 July 2003), at ¶¶10-14.

<sup>14</sup> *Ibid.*, at ¶¶13.

<sup>15</sup> [Broadcasting Public Notice CRTC 2002-57](#) (Ottawa, 4 October 2002) - Application by BELL EXPRESSVU INC., the general partner, and BCE Inc., the limited partner, doing business under the name of Bell ExpressVu Limited Partnership, for a licence amendment granting temporary relief from conditions of licence on simultaneous and non-simultaneous deletion of programming.

The Commission's determination

175. For the reasons set out above, the Commission is not satisfied that the applicants' proposed programming fund, as it would be constituted under the MOU, would be appropriate as part of a set of measures constituting an alternative to the applicants' existing program deletion conditions of licence.

176. However, as part of a set of such measures, the Commission is prepared to approve a new, independently administered fund intended to permit DTH licensees to assist small market, independently owned television licensees in contributing to Canadian programming and, in particular, to meeting their commitments to local programming.

the hypothetical local programming fund mentioned in its agreements with broadcasters. In October 2002 the CRTC asked the CAB and Bell ExpressVu to provide information about the fund's objectives, structure, governance, eligibility criteria, potential impact on the Canadian Television Fund.

**Table 2 Stations eligible for SMLPF per CRTC's 2003 determination**

**43** The CRTC approved the creation of the Small Market Local Production Fund (SMLPF) in mid-2003, requiring Canada's two licensed DTH BDUs to direct 0.4% of their gross broadcasting revenues to the SMLPF.<sup>16</sup> (The Commission authorized the use by the CAB of up to 2% of the monies collected to administer the SMLPF.)

**44** Noting that the ExpressVu-CAB proposal did not distinguish between large and small broadcasters, the CRTC said it would be inappropriate "to permit the use of DTH subscriber revenues ... to subsidize the production of local programming by stations controlled by the larger broadcast ownership groups."<sup>17</sup>

**45** The CRTC approved the establishment of the SMLPF to provide 17 stations with assistance "in contributing to Canadian programming and, in particular, to meeting their commitments to local programming"<sup>18</sup>: Table 2. The CRTC stated in a policy issued at the same time that the new fund was "solely ... to assist the licensees of the above-noted small market, independently owned television stations to meet their commitments to local programming."<sup>19</sup>

Broadcasting Public Notice CRTC 2003-37 (Ottawa, 16 July 2003), Appendix A: 19 small market, independently owned television stations	
Jim Pattison Industries Ltd.	Two (2) of CHAT-TV Medicine Hat (CBC) CFJC-TV Kamloops (CBC) CKPG-TV Prince George (CBC)
Mid West Television Ltd.	CKSA-TV Lloydminster (CBC) CITL-TV Lloydminster (CTV)
Norcom Telecommunications Limited	CJBN-TV Kenora (CTV)
Radio Nord Communications inc.	* Two (2) of CFGS-TV Gatineau (TQS) * CHOT-TV Gatineau (TVA) CKRN-TV Rouyn-Noranda (SRC) CFEM-TV Rouyn-Noranda (TVA) CFVS-TV Val d'Or (TQS)
Télé Inter-Rives Itée	Two (2) of CIMT-TV Rivière-du-Loup (TVA) CFTF-TV Rivière-du-Loup (TQS) CKRT-TV Rivière-du-Loup (SRC) CHAU-TV Carleton (TVA)
Standard Radio Inc.	CFTK-TV Terrace (CBC) CJDC-TV Dawson Creek (CBC)
Thunder Bay Electronics Limited	CKPR-TV Thunder Bay (CBC) CHFD-TV Thunder Bay (CTV)
* CRTC excluded "CHOT-TV and CFGS-TV Gatineau" from the fund as they served "a market having a population of more than 300,000), to ensure that they are able to provide local programming to their respective communities", ¶163	

**46** In 2016 the CRTC replaced the SMLPF with the Independent Local News Fund because 'much had changed' since the former's creation. The Commission stated that its objective was to

<sup>16</sup> *Direct-to-Home (DTH) Broadcasting Distribution Undertakings – Simultaneous and Non-Simultaneous Program Deletion and the Carriage of Local Television Signals in Smaller Markets*, [Public Notice CRTC 2003-37](#) (Ottawa, 16 July 2003). The CRTC had clarified in Broadcasting Public Notice CRTC 2002-57 (¶174) that it did "not consider it appropriate to permit the diversion of DTH contributions from the CTF to provide financial assistance to small market stations. Consequently, the Commission will not be commencing a process to amend the Regulations to implement this proposal."

<sup>17</sup> *Ibid.*, at ¶162.

<sup>18</sup> *Ibid.*, at ¶176.

<sup>19</sup> *Contributions to Canadian programming by broadcasting distribution undertakings*, [Broadcasting Public Notice CRTC 2003-38](#) (Ottawa, 16 July 2003), at ¶14.

support “the production of locally reflective news and information by private independent television stations.”<sup>20</sup> It excluded television stations licensed to vertically-integrated broadcasters that operated both programming and distribution broadcasting undertakings.<sup>21</sup> The ILNF replaced the SMLPF effective 1 September 2017, “with the objective of supporting the production of locally reflective news and information by private independent television stations.”<sup>22</sup> It excluded six stations that received SMLPF funding from receiving ILNF funding, as these were owned by BCE, Corus-Shaw and Shaw.<sup>23</sup>

- 47 Where the SMLPF was funded by 0.4% of DTH broadcasting revenues, the ILNF was to be funded by 0.3% of all licensed BDU’s broadcast revenues of the previous year,<sup>24</sup> generating “approximately \$20 million per year to support the creation of locally reflective news and information by independent stations”.<sup>25</sup> None of these funds were to be used by the CAB for administering the fund<sup>26</sup> and the Commission made “[a]ll private conventional television stations that provide locally reflective news and information and that do not belong to a vertically integrated group will be eligible to receive funding from the ILNF.”<sup>27</sup> The CRTC’s 2016 details about the ILNF are set out in Appendix 4. The Commission said it would evaluate the Independent Local News Fund in five years.

#### **D. SMLPF and ILNF funding**

- 48 From 2004 (when the SMLPF was established) to 2023 (after the ILNF was established in 2017), the local programming fund has distributed \$178.8 million in \$2002 to anywhere from 15 to 24 stations: Figure 9.

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<sup>20</sup> *Policy framework for local and community television*, [Broadcasting Regulatory Policy CRTC 2016-224](#) (Ottawa, 15 June 2016), at ¶196.

<sup>21</sup> *Ibid.*, at ¶119 and ¶186 (“... based on the evidence submitted as part of this proceeding, the Commission is of the view that the synergies and efficiencies that VI groups enjoy put them in a position to support the production of local news without the need for such a fund. Due to their direct relationship with Canadians, VI groups are also well positioned to determine their subscribers’ needs and allocate their resources accordingly.) The CRTC then also decided (¶190) generally to permit BDUs to transfer a portion or all of their required financial support for community channels to local television stations including stations they control.

<sup>22</sup> *Policy framework for local and community television*, [Broadcasting Regulatory Policy CRTC 2016-224](#) (Ottawa, 15 June 2016), at ¶196.

<sup>23</sup> *Ibid.*, footnote 10: “The local television stations that currently receive funding from the SMLPF but will be excluded as of 1 September 2016 are CFTK-TV Terrace and CJDC-TV Dawson Creek, British Columbia (BCE); CHEX-DT Peterborough, CHEX-TV-2 Oshawa and CKWS-DT Kingston, Ontario (Corus); and CJBK-TV Kenora, Ontario (Shaw).”

<sup>24</sup> *Ibid.*, ¶199.

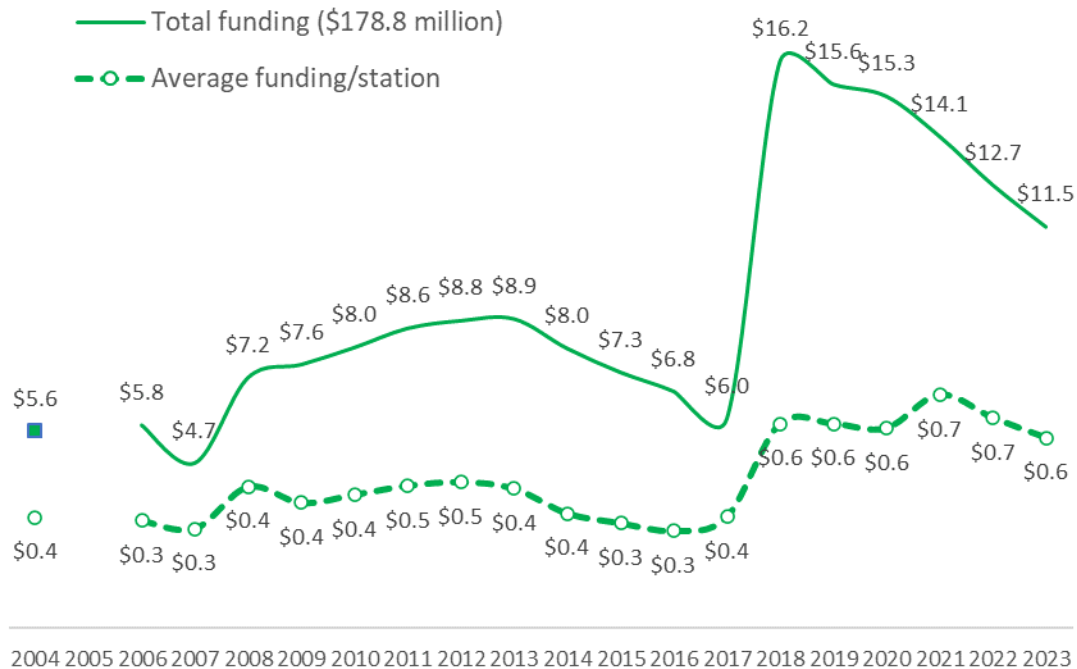
<sup>25</sup> *Ibid.*

<sup>26</sup> *Ibid.*

<sup>27</sup> *Ibid.*; the Commission clarified at footnote 13 that “As set out in Regulatory framework relating to vertical integration, Broadcasting Regulatory Policy CRTC [2011-601](#), 21 September 2011, “vertical integration” refers to the ownership or control by one entity of both audiovisual programming and distribution undertakings or both audiovisual programming undertakings and production companies.”

**Figure 9 SMLPF/ILNF funding, 2004-2023 (\$ M 2002)**

DTH/BDU subscriber funding for local TV stations' news, 2003/04 to 2022/23 (\$ millions 2002)



Source: Annual Reports of the Canadian Association of Broadcasters; Statistics Canada deflator series (2002=100)

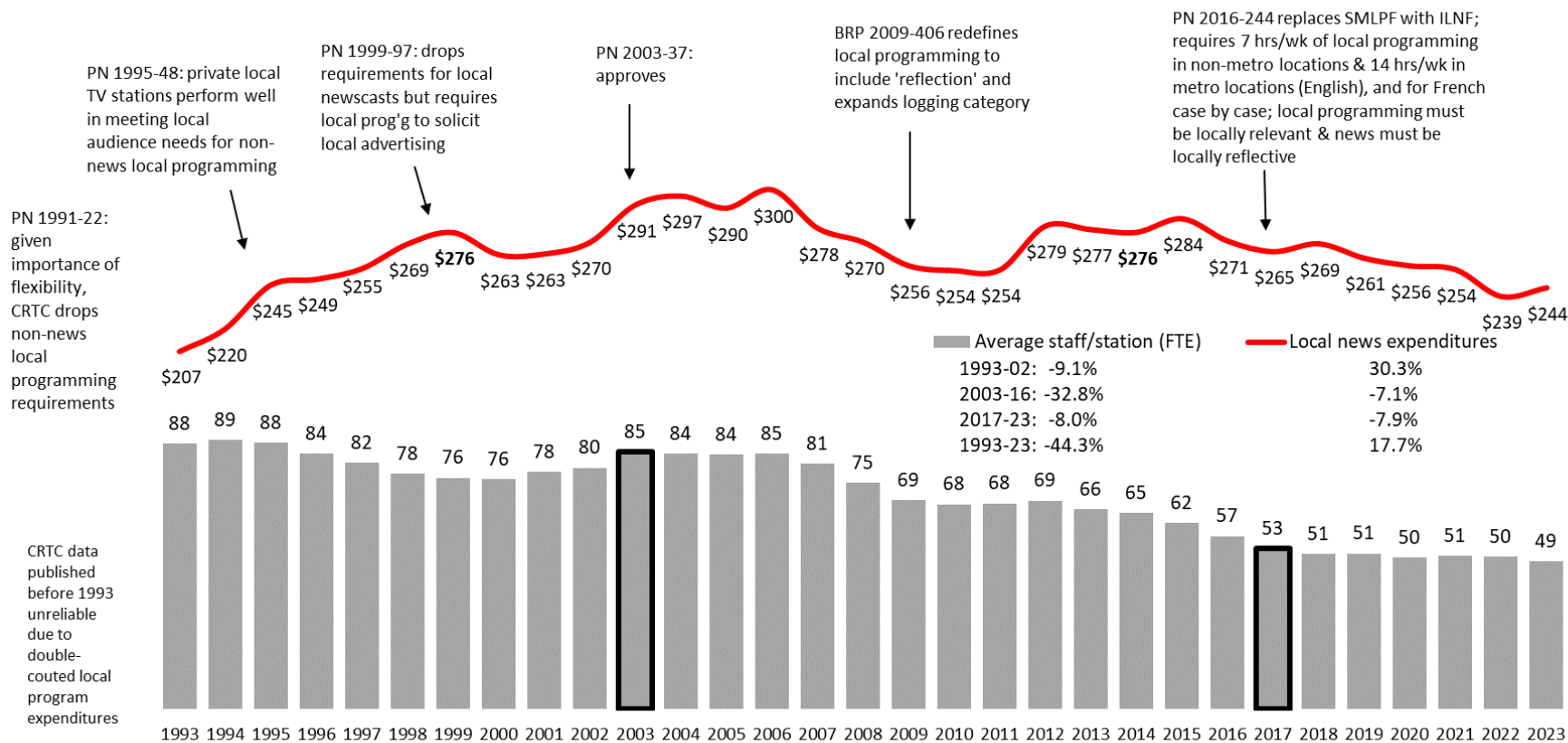
- 49 Over this period private television broadcasters as a whole reduced their local-station news production expenditures by \$52.9 million (or 17%), and average employment per station by 42%: Figure 12.

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50 Spending by private TV stations<sup>28</sup> on television news decreased from 2003 to 2016 (SMLPF to ILNF) and from 2017 (ILNF) to August 2023. The average number of full-time or equivalent staff at private television stations fell when the SMLPF was established (32.8% from 2003 to 2016), and by 8% since the ILNF's establishment (2017 to August 2023: Figure 10). Figure 10 Private

**Figure 10 Private TV stations' average staff/station and expenditures on local news (\$M 2002), 1993-2023**

**Average staff/private TV station and private TV stations' expenditures on station-produced news (\$ millions 2002): 1993-2023**



Source: CRTC Statistical and Financial Summaries, various years; Statistics Canada deflator (2002=100)



51 Although the CAB's annual reports for the SMLPF and the ILNF offered examples of the ways in which the local-news fund recipients deployed the resources provided by the fund, they provided no objective, long-term data describing either the level of local news broadcast by the recipient stations.

1. SMLPF/ILNF recipients' first-run local news

52 FRPC undertook a study of the local news programming broadcast by the TV stations that have received funding from the SMLPF and/or the ILNF. Due to limitations of time<sup>29</sup> FRPC reviewed the stations' program logs for November 2001 and November 2023, rather than for the full 22-year period or for each of the two years.

53 FRPC initially sought the first-run local-news data for 28 stations that receive or received SMLPF/ILNF funding. Due to missing files, inaccessible files and missing data, we ultimately obtained November 2001 and 2023 log data for 18 stations:

**Table 3 ILNF-recipient stations and programming logs from November 2001 and 2023**

Stations	Nov/01	Nov/23	Station	Nov/01	Nov/23
CFAP			CHEK		
CFEM			CHFD		
CFGS			CHOT		
CFJC			CIMT	Missing data	
CFJP			CITL		
CFKM			CJBN		No log found
CFKS	File unreadable		CJDC	No log found	
CFRS	File unreadable		CJIL	Missing data	
CFTF	No log found		CJON		
CFTK			CKPG		
CFVS			CKPR		
CHAT			CKRN		No log found
CHAU		Missing data	CKRT	Missing data	No log found
CHCH			CKSA		

54 FRPC assumes the information set out in the TV stations' program logs is accurate because the CRTC's *Television Broadcasting Regulations, 1987* require broadcasters to certify the accuracy of the logs they submit to the Commission.<sup>30</sup> We also assume the TV logs that the CRTC makes available through its website or the Open Data website are accurate copies of the logs the CRTC has received. To the extent that errors exist, we assume they are minor. (One station,

<sup>29</sup> The CRTC issued BNoC 2024-164 on 23 July 2024, it invited comments during the same period regarding the sale of radio assets by Bell in BNoC 2024-148 and BNoC 2024-172, a regulatory policy for closed captioning by online streaming services (BNoC 2024-137), a regulatory policy for descriptive video in BNoC 2024-138, and regarding the co-development of an Indigenous broadcasting policy in BNoC 2024-67.

<sup>30</sup> 10(3) Except as otherwise provided under a condition of its licence, a licensee shall furnish to the Commission, within 30 days after the end of each month, the program log or machine-readable record of the licensee for that month, together with a certificate signed by or on behalf of the licensee attesting to the accuracy of the contents of the log or record.

for instance, coded roughly 45 minutes of a program entitled *SP: FUNNIEST FLUBS & SCREW UPS* as Category 1 News (010).) FRPC did not alter the data set out in the CRTC's logs.

- 55** The CRTC requires TV broadcasters to classify the programs they broadcast using the codes assigned to variables in Schedule I of the *Regulations*. (Unfortunately it does not publish these data.) Although the variable names and codes in Schedule I changed between 2001 and 2023, they enable the same information to be ascertained: specifically, whether the station identified a program as being produced by the station (rather than, say, by an affiliated station or network), whether it consisted of new (Category 010) and whether the program was being broadcast for the first time.

Variables	2001 Codes	2023 Codes
Station production	Production source: 1 (local station)	Production source: 1 (local station)
First-run	Composition 1 – live program 2 – recorded live program 3 – other recorded program (1 <sup>st</sup> play) 4 – repeat broadcast of 1, 2 or 3	Exhibition 1 – original exhibition of program broadcast or distributed by another licensed broadcast undertaking 2 – original first-run program (not broadcast or distributed by another licensed broadcast undertaking) 3 – repeat exhibition of a program 4 – live broadcast
Category	News: 010	News: 010

- 56** FRPC focussed specifically on first-run news for three reasons. First, we believe that audiences care more about new news than repeat news. Second, reliance on news reruns may enable broadcasters to reduce their staff, contrary to Parliament's objective regarding the employment of Canadians in its broadcasting policy for Canada. Third, reliance on news reruns – and in turn, a reduction in daily station staffing – may mean that newscasts from a previous day contain errors or omissions that, if all newscasts were first-run, would have been corrected.

- 57** Results from FRPC's analysis show that local first-run news hours increased by an average of 7 hours between November 2001 to November 2023 for five of the 18 stations whose logs the Forum reviewed: Table 4. First-run locally produced news decreased by an average of 35.2 hours (64.7%) among the remaining 13 stations. The logs for 3 of these 13 stations did not describe any first-run, station-produced local news hours.

**Table 4 Results from analyzing the November 2001 and 2023 program logs of 18 SMLPF/ILNF recipient stations**

TV stations	Nov-01		Nov-23		% change in first run local news, 2001-23
	Local first run news prog'g	Total news, including local	Local first run news prog'g	Total news, including local	
CFAP	56.74	121.95	18.72	92.08	-67.0%
CFEM	16.64	241.47	20.64	133.24	24.1%



TV stations	Nov-01		Nov-23		% change in first run local news, 2001-23
	Local first run news prog'g	Total news, including local	Local first run news prog'g	Total news, including local	
CFGS	40.18	102.70	14.58	88.94	-63.7%
CFJC	58.47	106.40	42.00	188.00	-28.2%
CFJP	112.55	112.55	34.06	92.09	-69.7%
CFKM	27.40	147.19	12.83	91.19	-53.2%
CFTK	23.38	75.85	7.89	150.09	-66.2%
CFVS	6.13	124.48	18.40	90.50	200.2%
CHAT	44.48	70.26	-	90.76	-100.0%
CHCH	135.78	138.27	10.97	253.32	-91.9%
CHEK	78.38	79.39	66.79	91.49	-14.8%
CHFD	27.82	75.30	39.73	169.36	42.8%
CHOT	19.69	201.01	21.05	133.02	6.9%
CITL	4.64	133.70	-	231.01	-100.0%
CJON	57.00	92.76	58.90	164.49	3.3%
CKPG	32.00	102.00	47.50	223.01	48.4%
CKPR	37.48	63.45	23.16	213.31	-38.2%
CKSA	34.25	87.91	-	108.39	-100.0%
Total, 18 stations	813.00	2,076.63	437.23	2,604.28	-64.7%
Average, 18 stations	45.17	115.37	24.29	144.68	
Average per week	10.54	26.92	5.67	33.76	

**58** FRPC is concerned that these data –though describing only a single month before the establishment of the SMLPF and a single month last year – raise questions about the specific quantitative impact of funding provided to “support the production of locally reflective news and information by private independent television stations”. Also, in the absence of the same information for all other private television stations it is unclear whether ILNF-supported private TV stations provide as much as, less than or more than the TV stations operated by vertically integrated licensees.

**59** *The CRTC should undertake and publish its own analysis of the hours of first-run news broadcast by stations that have – and have not – received SMLPF/ILNF funding over as many years as possible. (The CRTC has stated that it destroyed the logs it previously published from 1999 to 2014, making it therefore impossible to determine the before-and-after impact of the SMLPF/ILNF.)*

**2.** *BDU subscribers – impact*

**60** BNoC 2024-164 notes that licensed broadcasting distribution undertakings (BDUs) “must contribute to the ILNF” (¶17). To be more accurate, terrestrial and direct-to-home BDUs are not required to ‘contribute’ but to remit 0.3% of their gross broadcasting revenues from the

previous year to the ILNF unless the CRTC otherwise determines.<sup>31</sup> FRPC believes this statement is not entirely clear.

- 61 Unless BDUs are remitting payment to the ILNF from their profits, it is in fact the subscribers of licensed BDU services who have paid for and are still paying for the SMLPF/ILNF.
- 62 Consequently, simply requiring BDUs to increase the payments they make to the ILNF may unfairly and unreasonably burden BDU subscribers, and in particular, low-income subscribers. Currently there is no evidence establishing that expenses to provide the basic service account for the totality of the rate authorized by the Commission. **To ensure that BDU rates do not increase in general, the CRTC should consider requiring BDUs to remit payment to the ILNF not from their total gross broadcasting revenues, but from the revenues they obtain from their basic service, whose rate is regulated by the CRTC.**

### III. FRPC's responses to BNoC 2024-164 questions

#### A. *Impact*

- Impact of base contributions on the ILNF

***Q.1 Currently only private conventional television stations that provide locally reflective news and information are eligible to receive ILNF funding. Should the Commission revise the current criteria to permit access to the ILNF by a broader range of audiovisual news providers?***

- 63 There are three foundational differences between licensed OTA television stations and all other audiovisual providers that provide news.
- 64 First, individual television stations are available either as part of BDUs' basic service, or to those equipped to access OTA television signals without a BDU subscription: all other audiovisual news providers appear to be available only with a discretionary-service subscription, through the Internet, or through a subscription for an Internet service.
- 65 Second, TV stations were and for the moment remain licensed to provide service to individual communities, whereas with few exceptions (such as the OMNI regional stations, the BC news service and City News), discretionary television programming services and online offer national-level service.

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<sup>31</sup> *Broadcasting Distribution Regulations*, ss. 35 and 53:

Part 2 – Terrestrial Distribution Undertakings, s. 35: “Except as otherwise provided under a condition of its licence, a licensee shall, for each broadcast year, contribute an amount equal to 0.3% of its gross revenues derived from broadcasting activities in the previous broadcast year to the Independent Local News Fund.”

Part 4, DTH Distribution Undertakings, s. 53: “Except as otherwise provided under a condition of its licence, a licensee shall, for each broadcast year, contribute an amount equal to 0.3% of its gross revenues derived from broadcasting activities in the previous broadcast year to the Independent Local News Fund.”

66 Third, the CRTC at present is not requiring all audiovisual services to register with it and as a result may lack data to establish the number of potential audiovisual news providers that might seek financial support (other than through the *Online News Act*).

67 FRPC does not believe that sufficient evidence exists to support expansion of the ILNF to an unknown number of audiovisual news providers, the character of whose news – primarily international, national, regional or local? – is unknown.

***1(a) If so, which eligibility criteria should the Commission use?***

68 The current eligibility requirements (as set out in Broadcasting Regulatory Policy CRTC 2016-224 limit recipients to privately controlled television stations whose licensees (or ultimate owners) do not also hold BDU licences.

69 If the CRTC were to expand these eligibility requirements, FRPC submits that the CRTC would then also have to require evidence regarding potential recipients' ownership structure, local character of programming, current levels of first-run local programming, news-gathering and -production employment as well as expenditures.

70 The CRTC would then also have to determine whether such services should be entitled to solicit the local advertising now reserved for broadcasters that provide local programming content.

***Q.2 Local stations have always produced news to meet audience needs. However, this programming is becoming difficult to produce and the quality of news that viewers receive may suffer as a result. Are there any incentives or measures that the Commission should put in place to ensure that funds received from the ILNF are focussed on the production and broadcast of high-quality locally reflective news?***

71 FRPC notes that the CRTC's statement that "local stations have always produced news to meet audiences" assumes first, that local stations have always produced news. Based on our analysis of November 2023 program logs if this ever was the case, it is not the case now.

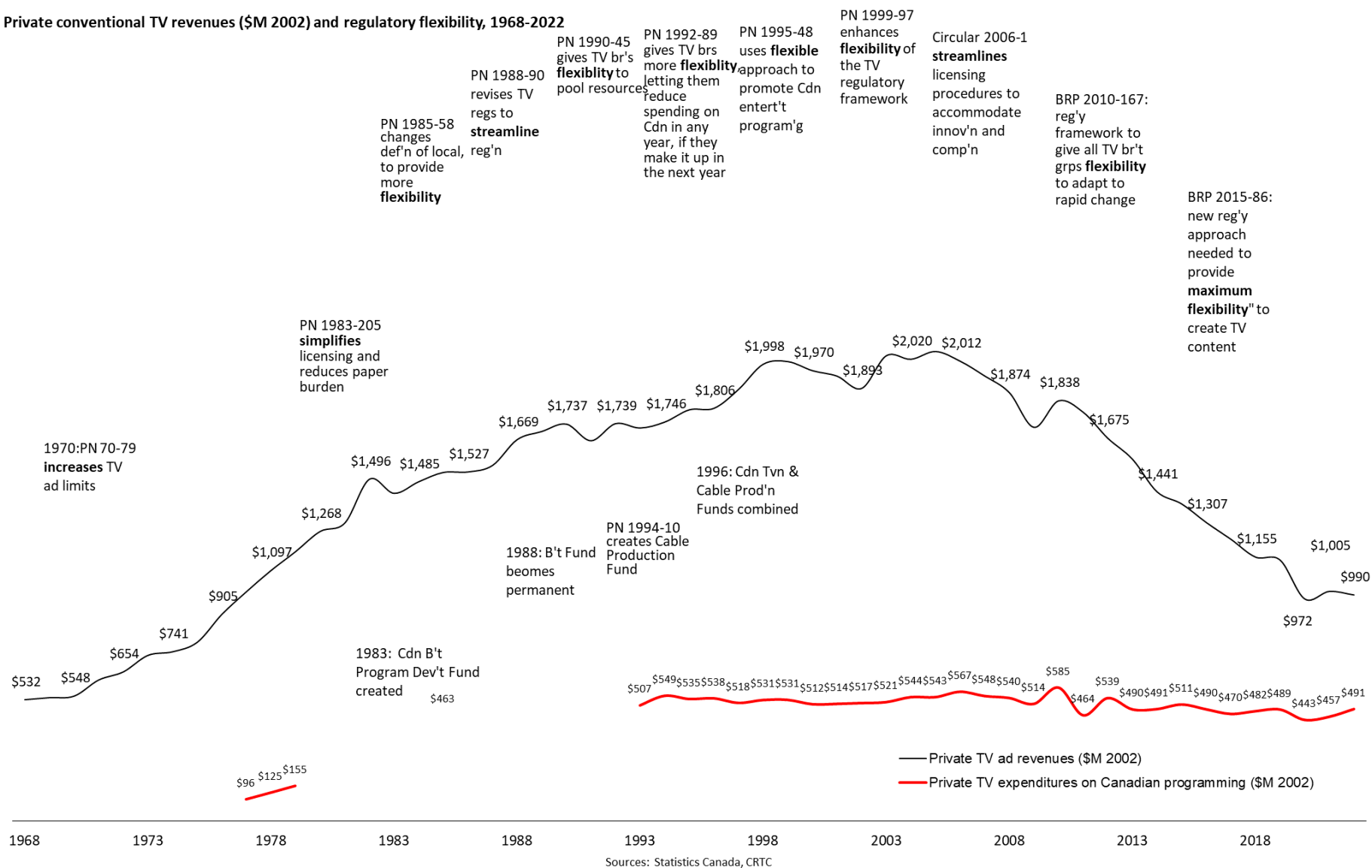
72 Second, this statement assumes that local stations meet audience needs, when this may not be true (and may account for declines in some stations' audience levels).

73 Third, even if stations would like to meet audience needs or have met audience needs in the past, their non-local owners' demands to reduce expenditures and staffing means that this assumption may no longer hold true.

74 As for the idea that 'incentives' may prompt higher spending on local-station news than orders, FRPC notes that over years of initiatives designed to maximize the regulatory flexibility afforded to private broadcasters expenditures by private TV stations on Canadian programming remained flat – whether their revenues grew or decreased: Figure 11

**Figure 11 Regulatory incentives (via flexibility) and expenditures on Canadian TV programming**

Private conventional TV revenues (\$M 2002) and regulatory flexibility, 1968-2022



- 75 Four steps would be needed to ensure that ILNF funding ‘focusses’ on the production and broadcast of high-quality locally reflective news. The CRTC should require each ILNF recipient to report
- a) the incremental expenditures it has made on news in the year it receives ILNF funding – this would help to ensure that broadcasters do not use the ILNF funding to replace their own spending;
  - b) the number of full-time or equivalent staff they have employed in each broadcast year to collect, assemble and produce first-run local news
  - c) the total hours of first-run local news broadcast per broadcast year, and
  - d) the CRTC should publish these data annually and including previous year’s information to facilitate expeditious comparisons over time.

- 76 Broadcasters that prefer to keep this information confidential would be free to decline funding from the ILNF.

**2(a) Which platforms (traditional and/or online) should the Commission prioritize?**

- 77 At this time the sector whose provision of first-run local news is most threatened remains OTA private television stations and this is the category of programming that should be given priority.

**2(b) What types of incentives would best further the broader distribution of local news and how should the Commission assess their impact?**

- 78 If the CRTC wants private television broadcasters to broadcast more first-run local news, it must issue orders to that effect. Expectations based on the theory that ‘marketplace competition’ will ensure the provision of this programming are fundamentally flawed: some communities have only one television services (meaning no competition), and if Parliament had accepted this premise it could have dispensed with the *Broadcasting Act* and the ‘radio-television’ component of the CRTC’s responsibilities decades ago. The most effective ‘incentive’ is the knowledge that breach of an order may result in a financial penalty.
- 79 The CRTC should assess the impact of the first-run television news requirements it imposes through orders by requiring each affected broadcaster to submit twice-yearly reports on the amount of first-run local news they have broadcast. The CRTC should then publish these data in an ongoing and regularly updated time series.

**Q.4 Should the allocation method favour recipients operating in rural, remote, and underserved communities?**

- 80 Yes – unless evidence establishes that advertising revenues of Indigenous television broadcasters operating in more urban and well-served communities is insufficient to ensure the provision of first-run local news.

**4(a) If so, how?**

- 81 The CRTC should limit its eligibility criteria to independent broadcasters whose stations operate in these areas. This would have implications for Corus' application to become eligible to receive the ILNF, in that a number of its TV stations operate in large urban centres: Appendix 5.

**B. *Impact of Corus's application on the ILNF***

***Q.5 The ILNF's goal is to promote the creation and distribution of high quality locally reflective news in markets served by its recipients. If stations like those owned by Corus or other services are added to the list of recipients of the ILNF, how should the Commission ensure that the distribution of funding is equitable among all recipients?***

- 82 It is not clear what the CRTC means, objectively speaking, by "high quality" news. If the CRTC measures the concept of high quality using expenditure data, insufficient evidence is available through BNoC 2024-164 or the CRTC's public record in general to provide a considered response.
- 83 FRPC also notes its concern that the issue of equitable distribution is unrelated to the question of whether communities have or do not have first-run local news.

***5(a) What other criteria should the Commission consider in its allocation method if it decides to change the current method in place?***

- 84 The CRTC should include criteria related to outcomes in its allocation method. Broadcasters that choose to reduce their expenditures on local news after receiving ILNF funding should be given one year to redirect this funding to that programming; broadcasters that nevertheless reduce their local news expenditures should become ineligible for ILNF funding.

***Q.7 What other measures should the Commission put in place to ensure that ILNF funds are fairly distributed across recipients?***

- 85 Rather than focusing on 'fair' distribution across recipients, FRPC considers that the Commission should assess outcomes for the communities served by stations that receive ILNF funding. Stations that reduce the level of first-run local news they broadcast to the communities they serve should after one year's grace, lose ILNF funding.

***Q.8 Would it be appropriate to impose the same measures regarding news and journalistic practices that are currently in effect for***

***conventional television stations on all ILNF recipients, including any additional recipients that may be deemed eligible for ILNF funding?***

86 Yes.

3. Measuring success

***Q.9 Currently, the ILNF administered by the CAB must file and make publicly available on its website reports detailing the amounts received and distributed on 30 November of each year. Further, ILNF recipients must file and make publicly available on their websites reports detailing how the funds received have been used to meet the ILNF's objectives. Considering the possible additional funding, should the Commission consider whether additional measures are needed to monitor the success of the ILNF?***

87 Yes. FRPC notes, however, that the CAB's SMLPF report on the CRTC's website for the 2003/04 broadcast year consisted of reports from CIMT (rather than reports from the CAB summarizing all SMLPF recipients' funding).

***9(a) If so, please provide the measures as well as the rationale. Please also address how frequently additional reports should be filed to increase transparency and to evaluate trends while not unduly increasing the administrative burden on ILNF recipients.***

88 The CRTC should establish a coherent framework to gather objective data about first-run local news broadcast by ILNF recipients. Specifically, each recipient should report

- Total hours of first-run local news broadcast in each community
- Total number of full-time or equivalent employees in each community who collect and report news
- Total expenditures of each ILNF recipient on first-run local news in each community.

89 The CRTC should collate and publish these data in a long-term format (over years, not year by year).

90 Ideally, the CRTC would also require ILNF recipients to report on local, provincial, territorial and federal elections as these happen.

91 As broadcasters already collect information about programming and presumably collect similar data about the people they employ, it is difficult to imagine to what extent reporting this information creates an undue burden. By way of comparison, administrative and general expenses of private TV broadcasters amounted to 18.2% of total expenses in 1988/89 (\$222 million of \$1,213 million) – and 7.8% of total expenses in 2022/23 (\$139 million of \$1,778 million). FRPC's estimates that the CRTC's regulatory streamlining from 1989 to 2023 has effectively saved private broadcasters \$3.3 billion.



***Q.10 Current ILNF recipients are members of the CBSC and are required to comply with the Radio Television Digital News Association of Canada's Code of Journalistic Ethics, the CAB's Equitable Portrayal Code and the Journalistic Independence Code. Should all ILNF recipients, including any that may be added further to this process, be required to comply with those codes?***

- 92 While such codes appear attractive, little evidence has been published that establishes their efficacy.

***10(a) If so, who should be responsible for ensuring compliance?***

- 93 Ultimately only the CRTC can enforce requirements it imposes on broadcasters. Assuming that the CAB continues to administer the ILNF, it should be expected to provide broadcasters with information and guidance about CRTC reporting requirements. Given the conflict between representing its members' needs and 'ensuring compliance' on behalf of the public interest or the CRTC, the CAB should not be expected to ensure broadcasters' compliance.

#### **IV. Conclusions: *All quid and no quo* defies Parliament**

- 94 In April 2023 Parliament essentially gave the CRTC a steroid-like cocktail of powers to gather the information it needs to implement the legislature's broadcasting policy for Canada.

##### ***A. Data, data everywhere – except on the CRTC's public record***

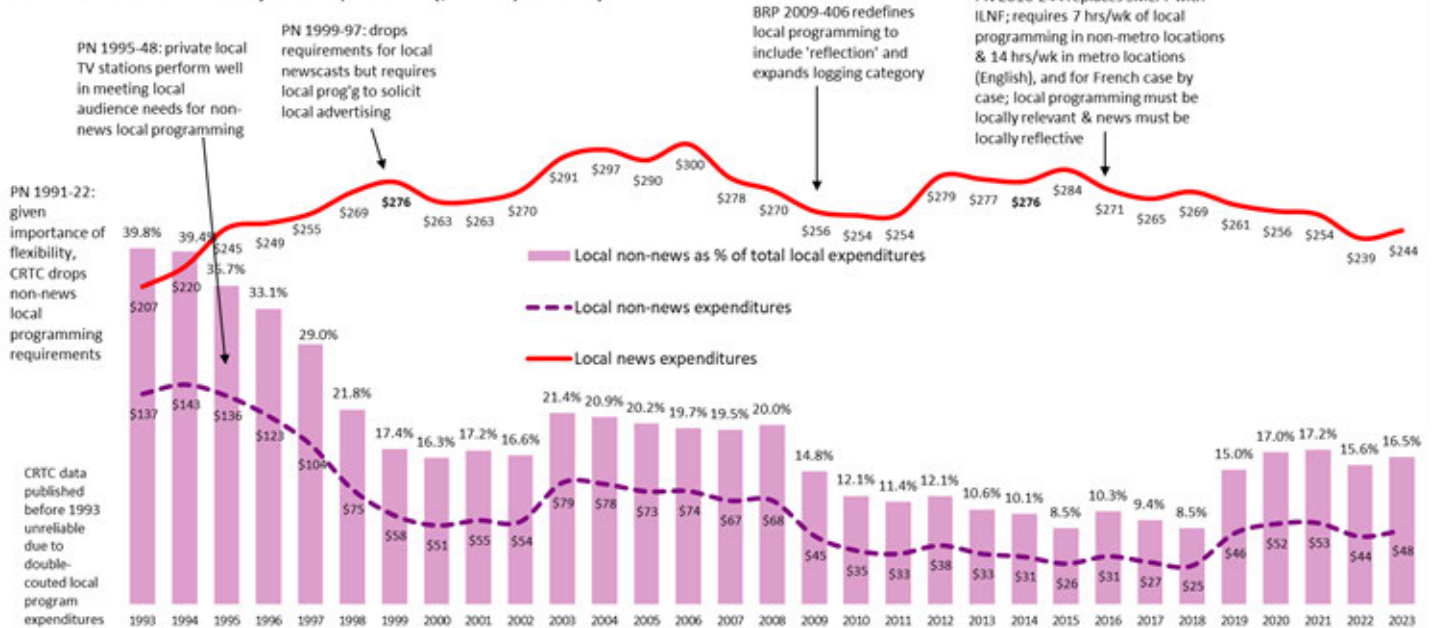
- 95 Yet, and despite the written urging of the Heritage Minister to become more open, transparent and accountable, it seems that the CRTC either does not have or does not want to disclose the data it has about the financing and availability of news in Canada. The lack of information provided by the CRTC in this proceeding stymies evidence-based discussion of problems and potential solutions. Non-broadcasters in this proceeding are forced to either make arguments without evidence, or to devote excessive time locating data that, when it comes from the CRTC, may be unreliable due to inaccessible or missing documents or gaps in data.

- 96 FRPC is concerned, moreover, that BNoC 2024-164's focus on news ignores the role that private TV stations once played in encouraging civic engagement. Civil society is more than a collection of reported facts: it involves the reflection of community members' activities and interests. As Figure 12 shows, while expenditures on local station news have been decreasing since 2006, spending on local non-news programming has declined even further, though making a slight recovery since 2019.

**Figure 12 Private over-the-air TV stations' expenditures on local news and non-news programming, 1993-23**



Private OTA television station expenditures, 1993-2023 (\$ millions, 2002=100)



Source: CRTC Statistical and Financial Summaries, various years; Statistics Canada deflator (2002=100)

97 It is difficult to see how the Commission can implement the requirement of Parliament's broadcasting policy to reflect "a wide range of programming that reflects Canadian attitudes, opinions, ideas, values and artistic creativity" without requiring private TV stations to provide more non-news local programming.

## B. Summary of recommendations

98 FRPC has made the following specific recommendations:

- the CRTC should initiate a second phase in this proceeding, publish all evidence it has regarding the ILNF and television new programming, and invite comments based on that evidence
- the CRTC should undertake and publish its own analysis of the hours of first-run news broadcast by stations that have – and have not – received SMLPF/ILNF funding over as many years as possible. (The CRTC has stated that it destroyed the logs it previously published from 1999 to 2014, making it therefore impossible to determine the before-and-after impact of the SMLPF/ILNF.)
- to ensure that BDU rates do not increase in general, the CRTC should consider requiring BDUs to remit payment to the ILNF not from their total gross broadcasting revenues, but from the revenues they obtain from their basic service, whose rate is regulated by the CRTC.



## Appendices

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**Appendix 1 CRTC's new powers to gather information and make orders**

<b>1991 Broadcasting Act</b>	<b>2023 Broadcasting Act as am. by Online Streaming Act</b>
<p>9. (1) Subject to this Part, the Commission may, in furtherance of its objects,</p> <p>...</p> <p>(b) issue licences for such terms not exceeding seven years and subject to such conditions related to the circumstances of the licensee</p> <p>(i) as the Commission deems appropriate for the implementation of the broadcasting policy set out in subsection 3(1), and</p> <p>(ii) in the case of licences issued to the Corporation, as the Commission deems consistent with the provision, through the Corporation, of the programming contemplated by paragraphs 3(1)(l) and (m);</p> <p>(c) amend any condition of a licence on application of the licensee or, where five years have expired since the issuance or renewal of the licence, on the Commission's own motion;</p>	<p>9 (1) Subject to this Part, the Commission may, in furtherance of its objects,</p> <p>...</p> <p>(b) issue a licence, the term of which may be indefinite or fixed by the Commission;</p> <p>...</p> <p>(d) amend a licence other than as to its term, on the application of the licensee or on the Commission's own motion;</p> <p>...</p>
<p>10. (1) The Commission may, in furtherance of its objects, make regulations</p> <p>...</p> <p>(i) requiring licensees to submit to the Commission such information regarding their programs and financial affairs or otherwise relating to the conduct and management of their affairs as the regulations may specify;</p> <p>(j) respecting the audit or examination of the records and books of account of licensees by the Commission or persons acting on behalf of the Commission;</p>	<p>9.1 (1) The Commission may, in furtherance of its objects, make orders imposing conditions on the carrying on of broadcasting undertakings that the Commission considers appropriate for the implementation of the broadcasting policy set out in subsection 3(1), including conditions respecting</p> <p>...</p> <p>(o) the provision to the Commission, by persons carrying on broadcasting undertakings, of any other information that the Commission considers necessary for the administration of this Act, including</p> <p>(i) financial or commercial information,</p> <p>(ii) information related to programming,</p> <p>(iii) information related to expenditures made under section 11.1, and</p> <p>(iv) information related to audience measurement, other than information that could identify any individual audience member; ...</p> <p>...</p> <p>(2) An order made under this section may be made applicable to all persons carrying on broadcasting undertakings, to all persons carrying on broadcasting undertakings of any class established by the Commission in the order or to a particular person carrying on a broadcasting undertaking.</p>

	<p>....</p> <p>18(2) The Commission shall ... hold a public hearing in connection with the following matters unless it is satisfied that such a hearing is not required in the public interest:</p> <p>...</p> <p>(b) the making of an order under subsection 9.1(1) or 11.1(2); and</p>
<p>Research</p> <p>14. (1) The Commission may undertake, sponsor, promote or assist in research relating to any matter within its jurisdiction under this Act and in so doing it shall, wherever appropriate, utilize technical, economic and statistical information and advice from the Corporation or departments or agencies of the Government of Canada.</p>	<p>Research</p> <p>14 (1) The Commission may undertake, sponsor, promote or assist in research relating to any matter within its jurisdiction under this Act and in so doing it shall, wherever appropriate, utilize technical, economic and statistical information and advice from the Corporation or departments or agencies of the Government of Canada.</p>

## Appendix 2 CRTC's current regulations regarding information about television programming in Canada

### Television Broadcasting Regulations, 1987 (SOR/87-49)

10 (1) Subject to any condition of licence, a licensee shall

(a) keep, in a form acceptable to the Commission, a program log or a machine readable record of its programming;

(b) retain the log or record for a period of one year after the date when the programming was broadcast; and

(c) cause to be entered in the log or record each day the following information:

(i) the date,

(ii) the call letters, location and channel of the licensee's station,

(iii) the time at which each station identification announcement is made,

(iv) the time of commencement of advertising material, its duration and, in the case of a commercial message, the name of the person selling or promoting goods, services, natural resources or activities, and

(v) in relation to each program broadcast,

(A) its title and any additional information that is to be included by the appropriate subitem of Schedule I,

(B) subject to subsection (4), the key figure set out in Schedule I describing the program,

(C) the time at which the program begins and ends,

(D) the code set out in Schedule II indicating the language, type or group, as applicable, and

(E) where applicable, the code set out in Schedule II indicating an accessible program, and

(F) where applicable, the code set out in Schedule II indicating programming that is locally relevant.

(2) The times required to be entered pursuant to subparagraphs (1)(c)(iii) and (iv) and clause (1)(c)(v)(C) are local times.

**(3) Except as otherwise provided under a condition of its licence, a licensee shall furnish to the Commission, within 30 days after the end of each month, the program log or machine-readable record of the licensee for that month, together with a certificate signed by or on behalf of the licensee attesting to the accuracy of the contents of the log or record.**

(4) Where more than one subitem of Schedule I applies to a program, a licensee may, in respect of that program, cause to be entered in its program log or machine readable record

- (a) the key figures indicating the subitems that apply to each segment of the program, in the order in which the segments are broadcast; and
  - (b) the start time and duration of each segment of the program.
- (5) A licensee shall retain a clear and intelligible audio-visual recording of all of its programming
- (a) for four weeks from the date of broadcast; or
  - (b) where the Commission receives a complaint from any person regarding programming or for any other reason wishes to investigate it and so notifies the licensee before the expiration of the period referred to in paragraph (a), for eight weeks from the date of the broadcast.
- (6) Where, before the expiry of the applicable period referred to in subsection (5), the Commission requests from a licensee a clear and intelligible audio or audiovisual recording of its programming, the licensee shall furnish it to the Commission forthwith.
- (7) Where a program is broadcast during reserved time by a station operator who operates as part of a television network, subsection (5) applies only to the network operator.
- (8) This section does not apply to the licensee of a remote station where logging or record-keeping requirements are set out in a condition of licence.

...

#### Submission of Information

- 12 (1) On or before November 30 of each year, a licensee shall submit to the Commission a statement of accounts, on the annual return of broadcasting licensee form, for the 12 month period ending on the previous August 31.
- (2) On or before September 1 of each year, a licensee shall submit to the Commission a program schedule for the 12 month period ending on August 31 of the following year.
- (3) At the request of the Commission, a licensee shall respond to
- (a) any complaint or request for resolution of a dispute filed by any person or any request for information regarding the programming originated or distributed by the licensee or regarding the licensee's technical operations, subscribership, financial affairs or ownership; and
  - (b) any request for information regarding the licensee's adherence to the conditions of its licence, the Act, these Regulations, industry standards, practices or codes or any other self-regulatory mechanism of the industry.

[bold font added]



-  
**Appendix 3 CRTC's June 2023 confirmation of destruction of TV logs before 2014**

----- Original Message -----

**Subject:** Fwd: Response to your Access to Information request: A-2023-00018/SK

**Date:** 2023-06-20 1:49 pm

**From:** Monica Auer <[mlauer453@gmail.com](mailto:mlauer453@gmail.com)>

**To:** "Forum for Research and Policy in Communications (FRCP)," <[execdir@frpc.net](mailto:execdir@frpc.net)>

----- Forwarded message -----

From: **AIPRP-ATIP** <[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)>

Date: Tue, Jun 20, 2023 at 12:27 PM

Subject: RE: Response to your Access to Information request: A-2023-00018/SK

To: Monica Auer [REDACTED]

Cc: AIPRP-ATIP <[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)>

Good afternoon,

We can confirm that all data prior to 2014 has been destroyed and no longer exists.

I hope this helps. Please let me know if you have any questions.

Regards,

[REDACTED]  
Analyste AIPRP| Gestion de l'information & Technologie de l'information  
Conseil de la radiodiffusion et des télécommunications canadiennes (CRTC)| Gouvernement du  
Canada

[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)

ATIP Analyst| Information Management & Information Technology

Canadian Radio-television and Telecommunications Commission (CRTC) | Government of Canada

[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)

**From:** Monica Auer [REDACTED]

**Sent:** June 20, 2023 11:28 AM

**To:** AIPRP-ATIP <[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)>

**Subject:** Re: Response to your Access to Information request: A-2023-00018/SK

\*\*\*ATTENTION\*\*\*

Ce courriel provient de l'extérieur du Gouvernement du Canada. Ne cliquez pas sur les liens et n'ouvrez pas les pièces jointes, à moins de connaître l'expéditeur et croire que le contenu est sécuritaire. This email originated from outside of the Government of Canada. Do not click links or open attachments unless you recognize the sender and believe the content is safe.

Thanks!

On Tue, Jun 20, 2023 at 10:54 AM AIPRP-ATIP <[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)> wrote:

Good morning,

I am looking into your question and will provide you a response soon.

Regards,

[REDACTED]  
Analyste AIPRP| Gestion de l'information & Technologie de l'information  
Conseil de la radiodiffusion et des télécommunications canadiennes (CRTC)| Gouvernement du  
Canada

[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)

ATIP Analyst| Information Management & Information Technology

Canadian Radio-television and Telecommunications Commission (CRTC) | Government of Canada

[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)





**From:** Monica Auer [REDACTED]  
**Sent:** June 19, 2023 4:05 PM  
**To:** AIPRP-ATIP <[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)>  
**Subject:** Re: Response to your Access to Information request: A-2023-00018/SK

\*\*\*ATTENTION\*\*\*

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Dear [REDACTED]  
Thank you for your response.  
I understand that the CRTC staff can no longer access the data.  
What I am trying to determine, though, is whether the data have been destroyed or still exist (somewhere).  
If you would like, I could make that another request, but otherwise, I just need to know if the data exist or do not exist.  
Thanks,  
Monica.

On Mon, Jun 19, 2023 at 3:43 PM AIPRP-ATIP <[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)> wrote:

Dear Monica Auer:

This is further to your request and \$5.00 application fee that were received in this office on May 26, 2023. We note that, pursuant to the *Access to Information Act* (ATIA), you wish to obtain the following information:

*"Please provide a copy of all electronic television program logs from January 1999 to December 2015"*

Our subject matter experts have advised that due to a change in the logging system, we no longer have data from before 2014. Furthermore, the information dating back to 2014 is publicly available at the following link: <https://open.canada.ca/data/en/dataset/800106c1-0b08-401e-8be2-ac45d62e662e>.

Please be advised that you are entitled to complain to the Information Commissioner concerning the processing of your request within 60 days after the day that you become aware that grounds for a complaint exist.

This completes our processing of your request. Should you have any questions or concerns about your request, do not hesitate to contact us by e-mail at [AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca).

Regards,  
[REDACTED]

Analyste AIPRP | Gestion de l'information & Technologie de l'information  
Conseil de la radiodiffusion et des télécommunications canadiennes (CRTC) | Gouvernement du Canada

[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)

ATIP Analyst | Information Management & Information Technology  
Canadian Radio-television and Telecommunications Commission (CRTC) | Government of Canada  
[AIPRP-ATIP@crtc.gc.ca](mailto:AIPRP-ATIP@crtc.gc.ca)



**Appendix 4 CRTC's 2016 requirements for the ILNF**

## **Appendix 1 to Broadcasting Regulatory Policy CRTC 2016-224**

### **Independent Local News Fund**

#### **Objective**

The Independent Local News Fund (ILNF), which will take effect 1 September 2017, is a fund available to support the production of locally reflective news and information by private independent television stations.

#### **Eligibility**

All private conventional television stations that provide locally reflective news and information and that do not belong to a vertically integrated group<sup>[Footnote13](#)</sup> will be eligible to receive funding from the ILNF.

#### **Allocation method**

Funds are to be allocated in the following manner:

- two thirds will be distributed in proportion to each eligible station's share of total expenditures on locally reflective news and information over the previous three broadcast years;
- one third will be distributed in proportion to the total number of hours of locally reflective news and information broadcast by each eligible station over the previous three broadcast years; and
- no station or group of stations operated by the same licensee in a given market will receive more than 10% of the funding in any given broadcast year.

#### **BDU contributions**

All licensed BDUs will be required to contribute 0.3% of their gross revenues from broadcasting activities in the previous broadcast year to the ILNF.

#### **Governance and administration**

The ILNF will be administered by the Canadian Association of Broadcasters.

#### **Accountability**

The ILNF will be accountable to the Commission. Recipients of funding will be accountable to the fund and to the Commission.

#### **Reporting**

By 30 November of each year, the ILNF will file and make publicly available on its website reports detailing:

- the amounts received and distributed; and
- all other information that may be requested by the Commission.

By 30 November of each year, fund recipients will file and make publicly available on their websites reports detailing how the funds received have been used to meet the ILNF's objectives.

## **Evaluation**

The ILNF will be evaluated after five years.

During the fourth year of operation, an evaluation of the ILNF will be conducted by a third party in line with Treasury Board program evaluation methods and best practices.

During the fifth year of operation, the Commission will launch a public process to seek comments on the evaluation of the ILNF in order to determine whether the fund is still necessary to achieve the objectives of the *Broadcasting Act* and whether changes are required to its operation to better achieve those objectives.

## Appendix 5 Corus stations

Source: Ownership chart 32b

### British Columbia

- CHAN-DT Vancouver (M)
- CHBC-DT Kelowna (M)

### Alberta

- CICT-DT Calgary (O)
- CISA-DT Lethbridge (O)
- CITV-DT Edmonton (M)

### Saskatchewan

- CFRE-DT Regina (O)
- CFSK-DT Saskatoon (O)

### Manitoba

- CKND-DT Winnipeg (M)

### Ontario

- CIII-DT-41 Toronto (M)

### Quebec

- CKMI-DT-1 Montréal (M)

### New Brunswick & PEI

- CHNB-DT Saint John (M)

### Nova Scotia

- CIHF-DT Halifax (M)

### National

- Deja View
- MovieTime

### Regional

- BC News 1

## Ownership 32d

### LICENSEES

591987 B.C. Ltd. is licensee of the following television programming undertakings:

### Ontario

- CHEX-DT Peterborough (O)
- CHEX-TV-2 Oshawa (O)
- CKWS-TV Kingston (M)
- CKWS-DT-1 Brighton (O)

Corus Radio Inc. is licensee of the following radio programming undertakings:

### British Columbia

- CFMI-FM New Westminster (M)
- CFOX-FM Vancouver (M)
- CKGO-AM Vancouver (O)
- CKNW-AM New Westminster (O)

#### Alberta

- CFGQ-FM Calgary (M)
- CHED-AM Edmonton (O)
- CHQR-AM Calgary (O)
- CHQT-AM Edmonton (O)
- CISN-FM Edmonton (O)
- CKNG-FM Edmonton (O)
- CKRY-FM Calgary (M)

#### Manitoba

- CFBG-FM Winnipeg (O)
- CJKR-FM Winnipeg (O)
- CJOB-AM Winnipeg (O)

#### Ontario

- CFHK-FM St. Thomas (O)
- CFIQ-AM Toronto (O)
- CFLG-FM Cornwall (O)
- CFNY-FM Brampton (O)
- CFPL-AM London (O)
- CFPL-FM London (O)
- CHAY-FM Barrie (O)
- CHML-AM Hamilton (O)
- CILQ-FM North York (O)
- CING-FM Hamilton (O)
- CJOT-FM Ottawa/Gatineau (O)
- CJSS-FM Cornwall (O)
- CJXY-FM Burlington (O)
- CKBT-FM Kitchener-Waterloo (O)
- CKDK-FM Woodstock (O)
- CKQB-FM Ottawa (M)

591989 B.C. Ltd is licensee of the following radio programming undertakings:

#### Ontario

- CFMK-FM Kingston (O)
- CIMJ-FM Guelph (O)
- CIQB-FM Barrie (O)
- CJDV-FM Cambridge (O)
- CJOY-AM Guelph (O)
- CKCB-FM Collingwood (O)
- CKRU-FM Peterborough (O)
- CKWF-FM Peterborough (O)
- CKWS -FM Kingston (O)

#### Ownership Chart 32h

Corus Television Limited Partnership

Corus Television G.P. Inc. (the general partner) and Corus Sales Inc. (the limited partner), carrying on business as Corus

Television Limited Partnership, are licensees of the following television programming undertakings and discretionary services:

British Columbia

- CHAN-DT Vancouver (M)
- CHBC-DT Kelowna (M)

Alberta

- CICT-DT Calgary (O)
- CISA-DT Lethbridge (O)
- CITV-DT Edmonton (M)

Saskatchewan

- CFRE-DT Regina (O)
- CFSK-DT Saskatoon (O)

Manitoba

- CKND-DT Winnipeg (M)

Ontario

- CIII-DT-41 Toronto (M)

Quebec

- CKMI-DT-1 Montréal (M)

New Brunswick & PEI

- CHNB-DT Saint John (M)

Nova Scotia

- CIHF-DT Halifax (M)

\* \* \* End of document \* \* \*