



21 October 2024

Filed online

Marc Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Secretary General,

Re: Notice of hearing, [Broadcasting Notice of Consultation CRTC 2024-213](#) (Ottawa, 19 September 2024), Items 1 & 2 (Applications [506992 N.W.T. Ltd.](#) and [2024-0247-8](#), respectively)

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 intervention in the above-mentioned notice is attached. FRPC is intervening in support of application 506992 N.W.T. Ltd. by Cabin Radio and in opposition to application 2024-0247-8 by Vista Radio Ltd. Whether the Commission grants or denies Cabin Radio's application, FRPC recommends that it not grant the application submitted by Vista Radio on the basis of insufficient evidence and contradictory arguments.

FRPC does not request the opportunity to appear at the CRTC's 11 February 2025 public hearing in Yellowknife.

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Notice of hearing,
[Broadcasting Notice of Consultation CRTC 2024-213](#)
(Ottawa, 19 September 2024)
Items 1 & 2
Applications [2023-0253-7](#) and [2024-0247-8](#)
by 506992 N.W.T. Ltd. and Vista Radio Ltd., respectively

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

Monica L. Auer
Executive Director

21 October 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 communications, including broadcasting. FRPC believes that the public interest is served when it meets Parliament’s objectives for the broadcasting system, as set out in section 3 of the current *Broadcasting Act*.
- ES 2 While Parliament’s *Broadcasting Policy for Canada* sets out dozens of objectives, none specifically directs or encourages the CRTC to immunize licensees from competition. The *Policy* does, however, require the Commission to strengthen the cultural, political, social and economic fabric of Canada, to serve the needs and interests of all Canadians through programming and employment, and to ensure that all Canadians have access to the expression of differing views on matters of public concern.
- ES 3 Four broadcasters offer radio service to Yellowknife, providing the national public radio service, an Indigenous radio service, a community radio station and a commercial radio station – CJCD-FM. CJCD-FM has been the only commercial radio station operating in Yellowknife since it was first licensed in 1979. Vista Radio Ltd. (Vista), which is owned and controlled by Thomson Investments Limited through a trusteeship, acquired CJCD from Charles Dent in 2007.
- ES 4 Cabin Radio has operated an online radio service in Yellowknife since 2018. It applied for a commercial radio licence in August 2019; the CRTC returned the application to Cabin Radio in February 2023 on the basis of its belief that Yellowknife could not support a second commercial radio station. Cabin Radio submitted a second application for a Yellowknife radio station in May 2023 and the CRTC invited applications to serve the city in March 2024.
- ES 5 FRPC considered five factors when it reviewed the Vista and Cabin Radio applications for a commercial radio station to serve Yellowknife: each applicant’s impact on diversity and news, on non-news programming, on audiences, on competition and on employment. Our analysis kept in mind the requirement in the *CRTC Rules of Practice and Procedure* for applicants to supply relevant facts, thereby enabling the CRTC to “rely on the evidence” when it makes its decision in this proceeding (as the CRTC’s Chairperson said in her [13 February 2023 letter](#) to the Ministers of Canadian Heritage and of Innovation, Science and Economic Development).
- ES 6 While Cabin Radio is proposing to broadcast less news than Vista, FRPC considers that the diversity that Cabin Radio offers to Yellowknife residents in its curation of news and in its non-news programming will benefit audiences. Cabin Radio’s online survey of prospective advertisers also indicates that half of those surveyed would increase their advertising budget, thereby limiting the financial impact of a new station on Vista’s existing CJCD-FM station. Since its establishment six years ago Cabin Radio has doubled its staff (from five to ten), meaning that if it were licensed employment in the licensed broadcasting system would increase.

- ES 7 Vista, on the other hand, is asking the CRTC either to deny Cabin Radio’s application or to grant Vista’s own application for a second radio station to serve Yellowknife, CJK-FM. Despite the fact that Vista operates radio stations in competition with even larger multi-station ownership groups in 14 communities across Canada, it argues that licensing Cabin Radio’s CJFC-FM service poses an existential threat to CJCD-FM and to Vista itself. While Vista proposes to broadcast 3 hours 40 minutes of news per week (more than double the 1.5 hours of news per week proposed by Cabin Radio), it is unclear how much of this news would be original; like Vista’s existing station, CJK-FM would only broadcast news from 6 am to 6 pm weekdays. Vista’s application does not clearly demonstrate how diversity in news would increase by granting a second Yellowknife radio licence to a broadcaster that currently operates 50 radio stations in Canada and which has applied to acquire another 21 licences (from Bell Media): further confusing matters is Vista’s argument that a second radio licence would simultaneously maintain and increase programming diversity in Yellowknife radio. It is unclear why Vista would strengthen its programming or improve its service to advertisers if, as its application states, CJK-FM would effectively protect its existing station by operating so as to minimize negative effects for Vista’s CJCD-FM. Vista states that it would add five new programming staff members, but it is unclear both whether these staff would also provide sales and marketing and whether they would be dedicated to covering Yellowknife or an unidentified, larger region.
- ES 8 Of the various factors evaluated by FRPC, the most important in our view has to do with diversity in news. We analyzed the number of licensed private English-language radio broadcasters operating in Canada in terms of their ownership and the communities they served. Of the 274 communities across Canada served by one or more English-language, originating commercial radio stations, 259 were served by one or more multi-station radio operators. Six of the 274 communities were served by a single-station and a multi-station radio operator, and just 14 were served only by a single-station radio operator.
- ES 9 While the CRTC could devote significant time and effort to determining whether the news items broadcast by each licensed radio station operating in Canada are diverse and reflect “differing views on matters of public concern”, it could cut the Gordian knot of diversity by simply licensing new entrants to Canada’s licensed broadcasting system whose ‘newness’ and independence from other broadcasters enables them to adopt different approaches to their programming and their operations.
- ES 10 FRPC recommends that the Commission grant Cabin Radio’s application for CJFC-FM and that it deny Vista’s application for CJK-FM, on the grounds that Vista’s application sets out contradictory arguments, provides insufficient evidence to support its arguments and lacks clear plans to ensure more diverse news and non-news programming.

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. FRPC is intervening with respect to Applications 2023-0253-7 and 2024-0247-8 by 506992 N.W.T. Ltd. (Cabin Radio) and Vista Radio Ltd. (Vista), respectively, each seeking a broadcasting licence to operate a commercial radio undertaking in Yellowknife.
- 2 Parliament states that the “Objects” of the CRTC are to “regulate and supervise all aspects of the Canadian broadcasting system with a view to implementing the broadcasting policy set out in subsection 3(1)” of the *Act*.¹ The legislature then states more specifically that when the CRTC issues broadcasting licences, it must do so “in furtherance of its objects”² – in other words, to implement Parliament’s *Broadcasting Policy for Canada*. The CRTC is currently the sole authority able to issue broadcasting licences.
- 3 The *Broadcasting Policy for Canada* set out in subsection 3(1) lists dozens of objectives, some directed at the broadcasting system, others at individual broadcasters and still others at different media. Most of the 3(1) objectives are within the CRTC’s discretion and deal with the manner in which Canadians’ different needs and interests are to be served by broadcasters.³ None of the *Broadcasting Policy* objectives requires the CRTC to protect the financial position of the services it licences, however, and the *Regulatory Policy* specifically enables the CRTC to promote innovation.⁴
- 4 FRPC considers that the following *Broadcasting Policy* objectives are of particular importance in considering the radio applications to serve Yellowknife which have been submitted to the Commission by Cabin Radio and Vista:⁵

3(1)(d) the Canadian broadcasting system should

- (i) serve to safeguard, enrich and strengthen the cultural, political, social and economic fabric of Canada,
- ...
- (iii) through its programming and the employment opportunities arising out of its operations, serve the needs and interests of all Canadians ...,

¹ *Broadcasting Act*, s. 5(1).

Note, incidentally, that the Regulatory Policy established by s. 5(2) is not itself an object of the Commission; it is a separate policy to which the Commission must have regard when making determinations in keeping with its objects.

² *Broadcasting Act*, s. 9(1)(b).

³ Denoted by Parliament’s use of “should” rather than “shall”; see *Interpretation Act*, R.S.C., 1985, c. I-21, s. 11: “11 The expression “shall” is to be construed as imperative and the expression “may” as permissive.”

⁴ S. 5(2)(c).

⁵ Vista and Cabin Radio filed their applications using *Application to Obtain a Broadcasting Licence to Operate a Commercial or Ethnic Radio undertaking (including low-power) – Form 101* (DM#4618430 and DM#4342235, respectively).

- (iii.5) ensure that Canadian independent broadcasting undertakings continue to be able to play a vital role within that system,
- (iv) promote innovation and be readily adaptable to scientific and technological change,
- (v) reflect and be responsive to the preferences and interests of various audiences, and
- (vi) ensure freedom of expression and journalistic independence;

...

- (i) the programming provided by the Canadian broadcasting system should
 - (i) be varied and comprehensive, providing a balance of information, enlightenment and entertainment for people of all ages, interests and tastes,
- ...
- (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, and
- (v) include a significant contribution from the Canadian independent production sector;

....

5 FRPC agrees with the CRTC’s view that Yellowknife “is not as well served as it could be”.⁶ We note the Commission has said it will consider the two Yellowknife applications in terms of the following six factors:

- plans and commitments regarding local programming, including how the applicant's commitments will reflect the interests and needs of the population;
- ...
- the capacity of the proposed business plan, whether commercial or non-commercial, to sustain the programming plans set out in the application.
- ...
- quality of the application;
- diversity of news voices in the market;
- market impact; and
- competitive state of the market.⁷

6 FRPC is also mindful of the *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure*⁸ that, among other things, require that applications provide

⁶ BNoC 2024-213, at paragraph 6.

⁷ BNoC 2024-213, “Preamble for items 1 and 2”.

⁸ See BNoC 2024-213, “Procedure”: “The Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure (the Rules of Procedure) apply to the present proceeding.”

“relevant facts”.⁹ In February 2023 the CRTC’s Chairperson confirmed that the Commission’s decisions “will rely on the evidence” set out in its consultations to make its decisions.¹⁰

- 7 FRPC sets out its analysis of the two applications in this proceeding below. Based on the evidence submitted by Cabin Radio, FRPC recommends approval of its application on the grounds that it will increase diversity, innovation, competition and employment in radio in Yellowknife. The general absence of facts and occasional contradictions of the evidence in the Vista application has led FRPC to recommend that the Commission deny its application.

II. The Yellowknife radio applications

- 8 Since 1958 the CRTC has licensed four radio broadcasters to serve Yellowknife:

Canadian Broadcasting Corporation	CBC/Radio-Canada CFYK-FM	1958 ¹¹
Vista Radio Ltd.	Commercial radio station CJCD-FM	1979 ¹²
Native Communications Society of the N.W.T.	Indigenous radio station CKLB-FM	84-723
Médias Ténois	Community radio station CIVR-FM	2000-133

- 9 Cabin Radio is seeking a licence for a radio station with the call sign, CJFC-FM;¹³ Vista, which currently holds the licence for Yellowknife’s only private commercial radio station, CJCD-FM, Vista has applied for a second licence for a radio station with the call sign, CJYK-FM.¹⁴

A. Vista – CJYK-FM Yellowknife

- 10 CJCD-FM has been operating in Yellowknife for almost half a century.¹⁵ Charles Dent, to whom¹⁶ the CRTC granted the initial CJCD-AM licence in 1979, operated the station until 2007 when it was acquired by Vista.
- 11 Vista is now owned and controlled by Thomson Investments Limited under the trusteeship of the Bank of Nova Scotia,¹⁷ and currently operates 50 radio-station licences including that of CJCD-FM Yellowknife.¹⁸ Vista states that while it operates “stations in many smaller,

⁹ *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure*, s. 22(2)(e).

¹⁰ Chairperson and Chief Executive Officer, CRTC, [Letter addressed to The Honourable Pablo Rodriguez, P.C., M.P., Minister of Canadian Heritage and Quebec Lieutenant and The Honourable François-Philippe Champagne, P.C., M.P., Minister of Innovation, Science and Industry](#), (Ottawa, 13 February 2023), at page 2.

¹¹ One of the CRTC’s predecessors, the CBC Board of Governors, recommended approval of an application by the Department of National Defence in 1949; control was transferred to the CBC/Radio-Canada in 1958: Canadian Communications Foundation, “[CFYK-FM](#)”.

¹² The CRTC approved an application by Charles Dent, then-executive assistant to the mayor of Yellowknife, for a private commercial radio station in Yellowknife on 20 March 1979: Canadian Communications Foundation, [CJCD-AM](#).

¹³ Cabin Radio, *Supplementary Brief*, paragraph 1.

¹⁴ Vista, *Supplementary Brief*, paragraph 4.

¹⁵ See Appendix 1.

¹⁶ Along with partners.

¹⁷ CRTC, [Ownership Chart #200](#) (“Vista”)

¹⁸ CRTC, [Ownership Chart #200](#) (“Vista”)

challenging markets” it “is a well-managed, financially successful radio broadcasting company ...”,¹⁹ yet it then also says that CJCD-FM “has been struggling for some time” and is operating on a “financially unsustainable basis.”²⁰

- 12 Vista says it is currently “developing an Indigenous Incubator program undertaken in conjunction with the Vista Launchpad program” and ‘aims’ “to provide a platform for these talented [local artists in Yellowknife] to showcase their work”.²¹ It is ‘unveiling’ “a new software platform that will revolutionize out-of-studio broadcasts, providing greater mobility and flexibility”, enabling it to broadcast live from Indigenous communities in Yellowknife and the Northwest Territories.²² Vista submitted its financial statements for the 2022-2023 broadcast year in confidence; in its the 2007-2008 broadcast year, CJCD-FM earned \$1,577,735 in revenues.²³
- 13 Vista’s CJYK-FM “would be operated jointly with station CJCD-FM Yellowknife”,²⁴ and is projected to lose \$188,000 in its first year of operations with total losses over a seven-year term of \$254,000.²⁵
- 14 Like CJCD-FM it would provide news from 6 am to 6 pm weekdays, but in addition will offer an unspecified number of “additional weekend newscasts when our listeners will be looking for regular access to information that will help them manage their family and daily life.”²⁶ Vista states that emerging and local Canadian artists would make up 5% of its weekly musical selections.²⁷

B. Cabin Radio – CJFC-FM Yellowknife

- 15 Cabin Radio’s owners and management live in Yellowknife²⁸ and operate a single online radio broadcasting service.
- 16 Cabin Radio began operating in 2018,²⁹ providing programming 24 hours daily, seven days a week.³⁰ The CRTC granted confidentiality to its financial statements. Cabin Radio’s financial projections forecast that CJFC-FM would show a modest profit of \$67,690 in its first broadcast year (2025-2026), and total profits of \$1.2 million over a seven-year term.

¹⁹ Vista, *Supplementary Brief*, paragraph 12.

²⁰ Vista, *Supplementary Brief*, paragraph 42.

²¹ Vista, *Supplementary Brief*, paragraph 10.

²² Vista, *Supplementary Brief*, paragraph 11.

²³ CRTC DOCS-#1373047-v1-2010-0125-5 - DefRep_1_1 - Attachment - New Stations and Licence Renewal - AFTER_June_2007_Decision - CJCD_Revised.XLS; DM#4339286, Appendix 1C.

²⁴ Vista, DM#4618442, Doc 22, *Financial Projections*, 7.1(b) Assumptions.

²⁵ *Ibid.*, 7.1(a) Financial Operations.

²⁶ Vista, *Supplementary Brief*, paragraph 51.

²⁷ Vista, DM#4618430, Application Form 101, page 17, response to question 8.5.

²⁸ Cabin Radio, *Supplementary Brief*, paragraph 16;

²⁹ Cabin Radio, DM#4339276, Cover Letter (Yellowknife, 4 May 2023), page 1.

³⁰ Cabin Radio, DM#4339277, *Supplementary Brief*, paragraph 3.

17 Cabin Radio's music list for April 28, 2023 shows that 43% of its selections were Canadian, that 4% were by Indigenous artists and that 6% were from Northern artists.³¹

III. Arguments about the impact of licensing a new commercial radio station in Yellowknife

18 In 2022 the CRTC acknowledged that consolidated ownership "is likely to help improve the financial health of radio stations, which, in turn, will improve the resiliency and competitiveness of the overall radio industry."³² At the same time it warned that concentrated ownership "could still negatively" affect audiences, "as it could lead to a decrease in diversity of voices related to both news and programming, and could make it more difficult for smaller independent broadcasters to compete."³³

19 FRPC shares the CRTC's concern about the availability of news programming. Its main concern is that the level of first-run (original) news available in Canada's broadcasting system which is produced by and for local communities is decreasing. While FRPC's analysis of a range of CRTC television programming logs lends support to this perspective, the CRTC does not publish radio stations' logs. Nor does the CRTC publish its own studies showing how much original news is broadcast by individual radio stations.

20 The degree of consolidated or concentrated ownership that the CRTC has approved for the past several decades means that currently very few communities are served by radio stations that are not part of a larger corporation. In preparing this intervention FRPC downloaded the list of licensed and exempt-from-licensing radio stations operating in Canada, from its "[List of broadcasting services that do and do not need a licence](#)". We used the CRTC's [ownership charts](#) to determine English-language commercial radio stations' ultimate ownership and analyzed the data to determine whether communities are served by licensees with just one English-language commercial radio licence (single-station operators) or by licensees with more than one radio licence (multi-station operators). It should be noted that the CRTC does not guarantee the accuracy of these data.³⁴

21 FRPC's review found that 274 communities across Canada were served by one or more originating commercial radio stations. Of these communities, 14 were served by a single-station radio operator,³⁵ 259 were served by multi-station operators, and 6 communities were served by a single- and one or more multi-station operators. In other words, ownership diversity is very limited in Canada's commercial radio sector: most communities rely on

³¹ Cabin Radio, DM#4339301, Appendix 8C, page 2.

³² *Revised Commercial Radio Policy*, [Broadcasting Regulatory Policy CRTC 222-332](#) (Ottawa, 7 December 2022), at paragraph 40.

³³ *Ibid.*, at paragraph 41.

³⁴ CRTC, "[List of broadcasting services that do and do not need a licence](#)":

Some of the information above was provided by outside sources to the CRTC so it may only be available in the language in which it was provided to us. In some cases, it has been translated. The CRTC is not responsible for the accuracy, reliability, or currency of information that has been provided by outside sources.

³⁵ Amherstburg, Assiniboia, Barriere, Dauphin, Fort Saskatchewan, Little Current, Lunenburg, Mississauga, Surrey, Swan River, Tagish, Wallaceburg, Wawa and Whitehorse.

Canada's large or their largest communications companies for diversity in their news programming.

- 22 The CRTC could devote significant time and effort to determining whether the news items broadcast by each station of broadcast ownership group are diverse³⁶ and reflect “differing views on matters of public concern”.³⁷ It could also simply license new entrants in the broadcasting system, whose very ‘newness’ and independence from other broadcasters engender a different way of operating.

A. *Impact on diversity and original news*

- 23 Vista begins by arguing that approving its application for a second radio station in Yellowknife “would further increase diversity” in the city, “by introducing distinctive news and information programming specifically focused on younger people and which offers ‘real life stories in addition to the hard news of the day’”.³⁸ It then states that approving its application “will help to maintain the diversity and quality of the programming already available in the market”.³⁹ It is unclear how Vista’s new station would simultaneously maintain and increase diversity in Yellowknife’s radio programming. While it is clear that a different programming format - Vista’s CJYK-FM would operate as a “Hot AC” station – offers programming diversity by broadcasting different musical selections, the critical issue for the Commission is whether diversity in news will increase.
- 24 Vista states that its new station “will offer” 3 hours 40 minutes of news per week;⁴⁰ it is unclear how much of this programming will be first-run. Vista says as well that it will broadcast news and information “at regularly scheduled intervals” from 6am to 6pm weekdays, for a total of 4 hours and – but then states that it will provide “regular access to information that will help them manage their family and daily life” each day of the week.
- 25 Apart from the lack of detail about the time CJYK-FM will devote to this information, reports on “[r]oad conditions and weather reports plus information on community events”⁴¹ were in the past not generally categorized as news by the CRTC for logging purposes, but as surveillance, weather and traffic. Similarly, Vista noted that the “balance” of 4 hours and 6 minutes of its weekly spoken word programming “will be devoted to local information programming of particular interest to the target audience ... including ... ‘real life’ stories that

³⁶ It is unclear, moreover, how the CRTC would test whether a view broadcast by a radio station is more or less diverse than those of another station. How, for instance, would the CRTC have known whether Charles Dent’s election and re-election to the Northwest Territories Legislature from 1991 to 2007 and his service as a minister of the government affected the news selected for broadcast by the station he or his company was licensed to operate? (See Canadian Communications Foundation, [Charles Dent \(politician\)](#) [accessed 18 October 20 24]). According to Wikiwand, during his terms in elected office Mr. Dent served as “Government House Leader, Minister of Education, Culture and Employment, Minister of Human Resources, Minister Responsible for the Status of Women, Minister Responsible for Seniors, and Minister Responsible for Persons with Disabilities”: [Charles Dent \(politician\)](#).

³⁷ *Broadcasting Act*, s. 3(1)(i)(iv).

³⁸ Vista, *Supplementary Brief*, paragraph 64.

³⁹ Vista, *Supplementary Brief*, paragraph 65.

⁴⁰ Vista, DM#4618430, Application Form 101, page 17, response to question 8.4.d.

⁴¹ Vista, DM#4618430, Application Form 101, page 16, response to question 8.4.b.i.

affect and impact listeners every day”:⁴² while human interest stories often engage audiences they do not constitute news and, in any event, Vista does not state whether these stories or its community-events items will be first-run or replays.

- 26 It is also unclear to what extent new CJK-FM would support Vista’s online services: Vista says that the new station “and additional programming staff ... will ... provide expanded coverage of local news, information and community events on the air on both stations and on our community portal site, MyTrueNorthNow.com.”⁴³ In other words, while Vista’s evidence is that its new station would lose \$539,000 over seven years, it is unclear what percentage of its expenses (totalling \$2.4 million) would be devoted to its online site in addition to or in place of CJK-FM.
- 27 Cabin Radio proposes to offer 1.5 hours weekly of news, with 1 hour devoted to local and regional news,⁴⁴ with “a fresh perspective” that is “unencumbered by any other interests”.⁴⁵ It is unclear how much of this programming would be original, or whether it would repeat or supplement the news broadcast by its online service (assuming it continues to provide this service).
- 28 FRPC supports more, rather than fewer, hours of original news programming, and in the case of radio supports the idea of ensuring that the majority of news content reflects the communities that radio stations are licensed to serve. If both applicants had proposed to broadcast the same level of first-run local news to Yellowknife, Cabin Radio’s independent ownership would have tilted the balance in its favour based solely on diversity of ownership. As it stands, insufficient information exists about the precise quality and quantity of original local news and reporters proposed by either applicant.
- 29 FRPC asks that if the CRTC decides to issue a new radio station licence to either of the applicants in this proceeding, it impose a condition of service requiring that the local elements of their newscasts be entirely original (first-run). Given the increasing speed at which artificial intelligence (AI) is being implemented in very nearly every part of the economy and Parliament’s admonishment in section 3(1)(f) that Canadian undertakings “shall employ and make maximum use, and no case less than predominant use, of Canadian creative and other human resources” [underlining added] to create, produce and present programming, FRPC also requests that the CRTC prohibit any new licensee’s use of AI in connection with news and information.⁴⁶

B. Impact on non-news programming

- 30 It is difficult to evaluate the reliability of Vista’s commitments with respect to programming. Having stated, for instance, that its new radio station would provide emerging Canadian artists

⁴² Vista, DM#4648979, 17 June 2024 responses to CRTC Request for Information at page 4, response to CRTC question 4.

⁴³ Vista, DM#4618430, Application Form 101, page 16, response to question 8.4.b.i.

⁴⁴ Cabin Radio, DM#4342235, Application, page 18 at 8.5(b)(d).

⁴⁵ Cabin Radio, *Supplementary Brief*, paragraph 28.

⁴⁶ The United States has already begun to enact legislation governing AI and employment: see *e.g.* Michael D. Schlemmer, “[AI in the Workplace: The New Legal Landscape Facing US Employers](#)”, *MorganLewis.com* (1 July 2024).

with exposure that is needed because they “receive little or no exposure in Yellowknife market”,⁴⁷ Vista did not explain why these artists have been neglected in light of its operation of CJCD-FM Yellowknife for the past 16 years.⁴⁸

C. *Impact on audiences*

31 Vista says that young adults in Yellowknife currently have “limited content”.⁴⁹ Yet it does not explain why, if young people in Yellowknife lack programming that appeals to them, Vista has until now chosen not to provide it. After all, Statistics Canada data show that three years ago half (50.0%) the population of the City of Yellowknife was under 35 years of age, with people aged 35 to 54 years of age comprising just under a third (30.4%) of the City’s population. Did Vista choose not to meet younger people’s interests because it lacked the competitive spur needed to do so?

Age group	Total	% of total
0-19 years	5260	26.4%
20-34 years	4695	23.6%
Subtotal, 0-34 years of age	9955	50.0%
35-54 years	6050	30.4%
55-64 years	2460	12.4%
65 years and over	1450	7.3%
Total	19910	100.0%

Source: Statistics Canada, [Special Interest Profile, 2021 Census of Population - Profile of interest: Age, Yellowknife \(City\)](#), “Total - Age groups, average age and median age for the population in private households - 25% sample data”

32 Cabin Radio says that 40% of the musical selections broadcast by online service are Canadian, but proposes to reduce this level if its service is licensed, to 35%.⁵⁰ FRPC supports an increase in the presence and discoverability of Canada’s performing artists. That said, Cabin Radio does not confine itself to a defined format. Its *Supplementary Brief* describes the playlist of its online service as follows:

Our playlist incorporates rock and pop standards from 1960 to 2024 while exploring a vast archive of popular indie, alternative, and folk music – a mix that resonates extraordinarily well in Yellowknife, a city that blends white-collar workers with a hipster houseboat community.

The Cabin Radio playlist is the bedrock of shows during the broadcast weekday. After 6pm and at weekends, Cabin Radio proudly airs a broad range of specialist programming produced to a high standard in conjunction with community members. Shows aired by Cabin Radio in these time slots include a weekly celebration of female performing artists, a two-hour show devoted to mental well-being, a weekly classical music show hosted by a pilot for a northern line, an exploration of jazz standards, a

⁴⁷ Vista, DM#4618430, Application Form 101, page 16, response to question 8.4.b.ii.

Our proposed new FM radio station will play a mix of popular music from today and yesterday for a young adult audience across the region featuring artists such as Adele, Imagine Dragons, Rihanna, Bruno Mars, Justin Bieber, Ed Sheeran, Taylor Swift, Coldplay and The Weeknd. A minimum of 40% of the music played between 6a-Midnight Sun-Sat will be by Canadian Artists. A minimum of 5% of all musical selections will be by emerging Canadian artists. Many of these music artists receive little or no exposure in the Yellowknife market. Our new FM radio station will extensively showcase new Canadian music.

⁴⁸ Vista defines “local artist” broadly, audio description “a musical artists who currently resides in the Northwest Territories”: Vista, DM#4648979, 17 June 2024 responses to CRTC Request for Information at page

⁴⁹ Vista, DM#4618430, Application Form 101, page 18, response to question 8.7.

⁵⁰

two-hour weekly country music show that has in the past broadcast live from the Canadian Country Music Association’s annual awards, and a weekly show dedicated to Yellowknife’s arts community.⁵¹

- 33 Licensing Cabin Radio may provide Vista with the competitive ‘spur’ to devote programming time to serving all of its audience’ interests and needs, benefitting both broadcasters and their audiences.

D. *Impact on competition*

- 34 Vista’s main argument is that the CRTC should not grant any new commercial radio licence to serve Yellowknife – but if the Commission nevertheless decides to do so, it should grant the licence to Vista so as to protect the company’s financial position. The company says that CJYK-FM, the station it is proposing,

... will benefit from operating synergies with *True North FM* thereby allowing this new radio station to deliver a high-quality local radio service on a financially sustainable basis with a much-reduced negative impact on other local stations compared to the impact of the licensing of a new standalone radio station.⁵²

- 35 Vista then argues that licensing Cabin Radio will have a “severe” “impact on True North FM and on its ability to maintain its service”.⁵³ As Vista’s financial statements are not available on the public record it is difficult to evaluate the evidentiary foundation of this statement. Yet Vista also states that its own new station may “never become financially sustainable”, that it will be “an ongoing drain on Vista’s financial resources”, that it will be unable “to do battle with the foreign owned ‘Digital Giants’” and that its capacity “to provide high quality radio service in some of [its] marginally profitable markets” will decrease.⁵⁴

- 36 Vista is an experienced broadcaster operating 50 originating radio stations. According to the CRTC’s ["List of broadcasting services that do and do not need a licence"](#) it operates these licensed broadcasting⁵⁵ radio stations in 43 communities across Canada: see Appendix 2. In 13 of these communities Vista competes directly with the commercial radio stations operated by one or more other large multi-station ownership groups: specifically, Vista’s originating radio stations compete for audiences against the originating radio stations of Bayshore Broadcasting, Bell Media, Golden West Broadcasting, Pattison Media, Rogers and/or Stingray.

- 37 Given this experience and the fact that Vista describes itself as a “well-managed, financially successful radio broadcasting company”⁵⁶ is unclear why an online broadcaster against which CJCD-FM has already been competing for audience’ time in Yellowknife for just over half a

⁵¹ Cabin Radio, *Supplementary Brief*, paragraphs 31 and 32.

⁵² Vista, *Supplementary Brief*, paragraph 4.

⁵³ Vista, *Supplementary Brief*, paragraph 70.

⁵⁴ Vista, *Supplementary Brief*, paragraph 71.

⁵⁵ Broadcasting, rather than rebroadcasting, stations.

⁵⁶ Vista, *Supplementary Brief*, paragraph 12.

decade would now pose an existential threat to either CJCD-FM and Vista itself simply by being licensed.

- 38 Vista then also argues that if its CJYK-FM station were licensed it would have “incentives to minimize” negative effects on Vista’s existing station.⁵⁷ Although such a statement could be interpreted as implying anti-competitive behaviour, Vista then goes on to say that it expects its new station, CJYK-FM, “to generate only very modest revenues given the very limited potential for growth in this market.”⁵⁸ Essentially, Vista seems to be arguing that the entry of a new station in Yellowknife’s radio sector could have either a significant or an insignificant impact, depending on who operates the station.
- 39 Even if the licensing of Cabin Radio’s CJFC-FM creates a new licensed commercial radio station where only one existed before, Vista has not addressed the question of why this additional competitor would not lead it or both parties to ‘up their game’, so to speak. Were this to happen, benefits may materialize in four areas: audiences may enjoy more attractive programming; prices and scheduling opportunities may improve for advertisers; both stations’ employees may gain new experience otherwise unavailable in communities with a single radio station, and the broadcasting system itself may experience a rare increase in programming diversity and innovation.
- 40 What Vista has also not provided is clear evidence to support its claim that granting a radio station license to an online broadcaster that has been competing with Vista for audiences in Yellowknife for the last six years⁵⁹ now poses an existential threat to either CJCD-FM or Vista. Logically, the entry of a new commercial entity in a given location offers three possibilities with respect to advertising: that advertisers will maintain their existing spending patterns, divert some of their spending to the new entity or allocate ‘new’ spending to the new entity.
- 41 Vista says that it ‘expects’ that if licensed, advertisers will divert some of their advertising budget from CJCD-FM to Vista’s new station (that will “derive a portion of its revenues from True North FM”⁶⁰). It provides no facts to support this assertion, however. Cabin Radio, by contrast, undertook an online survey of “[l]ocal merchants, service suppliers, government agencies [and] community associations”.⁶¹ 106 participants responded to the survey. While online surveys cannot be used to infer to larger populations,⁶² the evidence available from Cabin Radio is that just over half (52.3%) of the survey’s respondents said they were very likely (18.2%) or likely (34.1%) to “increase their media budget to advertise on a new FM station.”⁶³

⁵⁷ Vista, *Supplementary Brief*, paragraph 70: “... the new entrant, unlike Vista, will face few incentives to try to minimize the impact on our station.”

⁵⁸ Vista, *Supplementary Brief*, paragraph 62.

⁵⁹ Cabin Radio, *Supplementary Brief*, paragraph 3.

⁶⁰ Vista, *Supplementary Brief*, paragraph 69.

⁶¹ Cabin Radio, DM#4339288, *Yellowknife – Retail Media Study Conducted Apr 12-24, 2023 via Survey Money: Results*, Appendix 1E, at page 2.

⁶² As they lack the random quality required for inferential probability statistics.

⁶³ Cabin Radio, DM#4339288, *Yellowknife – Retail Media Study Conducted Apr 12-24, 2023 via Survey Money: Results*, Appendix 1E, at page 5.

In other words, half of the respondents said they would increase their advertising budget, not divert it away from Vista.

- 42 As noted previously, Vista has been competing against Cabin Radio’s online services for the past six years, giving it the advantage of experience with Cabin Radio’s programming approach. Rather than providing clear facts and evidence about the impact of Cabin Radio’s online service on Vista’s CJCD-FM station, Vista has offered the Commission speculative and sometimes contradictory claims. The actual evidence available to the public and on the record is that Vista is operating in in a dozen other locations against the commercial radio stations of one (or two, as in Grande Prairie and Lethbridge), and that it wants to expand (by seeking the CRTC’s approval of Vista’s purchase of the majority of the radio assets put up for sale by Bell Media). FRPC therefore opposes Vista’s application due to its reliance on speculation due to the absence of any supporting evidence.

E. *Impact on employment*

- 43 Vista’s application form states that its new station would account “for an additional five programming staff members in news and on-air capacities.”⁶⁴ Its *Supplementary Brief*, on the other hand, says that its plan “includes an additional five programming staff members in news and on-air and sales and marketing capacities [underlining added]”,⁶⁵ leaving it unclear how many new staff Vista would employ in its news programming in Yellowknife. An advertisement posted by Vista in mid-July 2024 for a News Reporter in Yellowknife also explained that this position would be “part of a regional team of ... dedicated reporters and on-air staff, with local and remote supervision and support” [underlining added].⁶⁶ Vista has committed to an annual award of “\$5,000 to an Indigenous student who is pursuing a career in journalism or broadcasting.”⁶⁷
- 44 Cabin Radio’s does not state the number of on-air employees its proposed station would have. Its *Supplementary Brief* notes that Cabin Radio began with five people in 2017,⁶⁸ has had “seven to eight full-time employees for more than five years”,⁶⁹ and that it is “now sustaining up to eight more salaries than it did in 2017, plus all associated overhead costs Cabin Radio must pay.”⁷⁰ FRPC notes that Cabin Radio’s website indicates that the online service employs 10 people:⁷¹

Here’s the Cabin Radio directory:

Andrew Goodwin is the station’s general manager: aj@cabinradio.ca 867-688-0086

Ollie Williams is the editor of our news coverage: ollie@cabinradio.ca 867-688-0105

Sarah Pruys is our account manager: sarah@cabinradio.ca

⁶⁴ Vista, DM#4618430, Application Form 101, page 16, response to question 8.4.b.i.

⁶⁵ Vista, *Supplementary Brief*, paragraph 52.

⁶⁶ “News Reporter / Announcer - Yellowknife NT”, <https://www.milkmanunlimited.com/post/news-reporter---announcer-yellowknife-nt> (17 July 2024).

⁶⁷ Vista, *Supplementary Brief*, paragraph 61.

⁶⁸ Cabin Radio, *Supplementary Brief*, paragraph 15.

⁶⁹ Cabin Radio, *Supplementary Brief*, paragraph 10.

⁷⁰ Cabin Radio, *Supplementary Brief*, paragraph 54.

⁷¹ Due in part to federal funding: Cabin Radio, *Supplementary Brief*, paragraph 50.

Scott Letkeman is our program director and creative director: scott@cabinradio.ca

Jesse Wheeler is our morning show host: jesse@cabinradio.ca

Emily Blake is our assistant editor: emily@cabinradio.ca

Our sales team is sales@cabinradio.ca or reach **Sam Pitre**, our sales executive: sam@cabinradio.ca

Our reporters are news@cabinradio.ca or reach them individually:

Aasth Sethi – aastha@cabinradio.ca

Aastha covers everything taking place in the NWT's smaller communities.

Simona Rosenfield – simona@cabinradio.ca

Simona is responsible for our coverage of the Dehcho and the territory's housing crisis.

Kaylee Nitsiza – kaylee@cabinradio.ca

Kaylee is a reporter and broadcaster supported by the Canadian Race Relations Foundation's Media Fellowship.

Our 2024 summer newsroom interns are:

Caelan Beard – caelan@cabinradio.ca

Claire McFarlane – claire@cabinradio.ca

Our 2024 broadcast intern is:

Elke Sorensen – elke@cabinradio.ca

To reach **anyone else**, email mailbox@cabinradio.ca.

[font as appears online]

45 Vista Radio's new station would rely on "operating synergies", share operating expenses with its first station⁷² and is only now planning to offer training opportunities to youth in Yellowknife. It says that "as a multi-station radio broadcasting company" Vista "has the capacity to offer the employees of CJYK-FM will have access to a broad range of in-house training programs as well as career advancement opportunities in other markets."⁷³ The company does not appear to have provided any facts demonstrating that it has actually used this capacity; according to Cabin Radio "[n]o FM radio stations in Yellowknife run sustained training and development programs for northern residents."⁷⁴

46 Despite the barriers of the "cost and reliability of Internet and mobile service" acknowledged by Vista,⁷⁵ Cabin Radio's programming has been sufficiently appealing to enable the company's employment to double in just five years and it is actually already providing training to young people.⁷⁶ It also proposes to "expand the range of training opportunities we presently offer for northern youth"⁷⁷ and commits as well to "provide training and development for

⁷² Vista, *Supplementary Brief*, paragraph 69:

... if this application is approved, while we will endeavor to attract new advertising revenues into the local radio market, we expect CJYK-FM to derive a portion of its revenues from *True North FM*. This necessarily will have a negative impact on *True North FM*, though that impact will be somewhat offset by operating synergies which will allow that station to share some of its operating expenses with CJYK-FM.

...

⁷³ Vista, *Supplementary Brief*, paragraph 66.

⁷⁴ Cabin Radio, *Supplementary Brief*, paragraph 63.

⁷⁵ Vista, *Supplementary Brief*, paragraph 54.

⁷⁶ Based on its website information it employed three interns in 2024, due in part to federal funding.

⁷⁷ Cabin Radio, *Supplementary Brief*, paragraph 26.

Indigenous youth and Elders”.⁷⁸ While the application does not provide facts in support of this statement, Cabin Radio’s website lists three internships for 2024.

- 47 The absence of detail in Vista’s application concerning employment and the facts available regarding Cabin Radio’s approach to employment have again led FRPC to support the latter’s application for CJFC-FM. If the CRTC decides to issue a new radio licence to serve Yellowknife, FRPC asks that the Commission impose a condition of service prohibiting the use of AI content in any of the service’s news programming.

IV. Conclusion

- 48 FRPC’s review of the Vista and Cabin Radio applications has led us to conclude that the CRTC should not grant Vista a second commercial radio licence to serve Yellowknife and should issue a licence to Cabin Radio.
- 49 FRPC’s concern is that while Cabin Radio – being a single-station operator – is committed to surviving and thriving in Yellowknife with its neighbours, the future of Vista’s CJCD-FM Yellowknife service is inexorably tied to financial matters over which the residents have no control due to Vista’s many other radio interests. The key difference throughout the two applications is that while Cabin Radio is committed to work to serve Yellowknife as it grows, Vista appears close to closing its current radio station, CJCD-FM Yellowknife, claiming both that Yellowknife’s economy is either on its last legs or sinking fast and that growth is insufficient for the company’s needs.
- 50 Yet since 2018 Vista has purchased Clear Sky Radio, received CRTC approval for a new FM radio station in North Bay, acquired CJLT-FM Medicine Hat as well as CAB-K Broadcasting Ltd.⁷⁹ In March 2024 it asked the CRTC to approve Vista’s acquisition of 21 English-language commercial radio stations from Bell Media.⁸⁰ Supposing that the CRTC grants Vista’s application, the number of radio licences held by the company’s radio station would increase by more than a third (42%).
- 51 Where Cabin Radio’s focus will be on ensuring the performance of a single radio station, Vista must consider results of many other stations. Poor performance by stations other than in Yellowknife may well lead to reductions in service in Yellowknife – as the case of Bell this past spring has so clearly demonstrated.
- 52 For the reasons set out above, FRPC supports the CRTC’s approval of Cabin Radio’s radio-station application for CJFC-FM Yellowknife. Whether the CRTC approves or denies Cabin Radio’s application, FRPC opposes the issuance to Vista of a second commercial radio licence to serve Yellowknife on the grounds that this would neither serve the public interest nor implement the objects of Parliament’s *Broadcasting Policy for Canada*.

⁷⁸ Cabin Radio, *Supplementary Brief*, paragraph 68.

⁷⁹ CRTC, [Ownership Chart 200](#), at page 2: “Update”.

⁸⁰ *Notice of hearing*, Broadcasting Notice of Consultation CRTC 2024-148 (Ottawa, 2 July 2024), Item 4, [Application 2024-0135-5](#).

Appendix 1 Events related to BNoC 2024-213

1952	Radio station CFYK ('Canada's Finest Yellowknife') goes on air ⁸¹
1958	CBC/RC begins to operate CFYK ⁸² when it acquired control over a number of military and volunteer-operated radio stations, including in Yellowknife. ⁸³
20 March 1979	CRTC grants Charles Dent (OBCI), then the executive assistant to the mayor of Yellowknife, an AM radio licence to serve Yellowknife ⁸⁴
1981	CRTC approves transfer of control of CJCD Radio Ltd. to Charles Dent (50%) and Yellowknife Broadcasters Ltd. (50%) ⁸⁵ CRTC approves application to rebroadcast CJCD in Hay River on 21 February 1981
1984	Charles Dent elected as alderman to the Yellowknife city council ⁸⁶
1985	The Native Communications Society of Western Northwest Territories granted licences for CKLB-FM ⁸⁷
1991	Following his election to the Northwest Territories legislature Charles Dent no longer serves as the manager of CJCD ⁸⁸ (Mr. Dent was re-elected to the legislature until 2006, when he did not run for a fifth term in office) ⁸⁹
1996	<i>Licence renewal for CJCD and its transmitter</i> , Decision CRTC 96-515 (Ottawa, 26 August 1996) renews CJCD licences from September 1996 to August 2003
1997	CRTC approves CJCD Radio Limited's application for an FM radio licence; the FM station would simulcast the existing AM station's signal for 6 months and hits could comprise up to 85% of the musical selections broadcast each week ⁹⁰
2000	<i>Transfer of effective control</i> , Public Notice CRTC 2000-35 (Ottawa, 8 March 2000) CJCD Radio Limited Yellowknife, Northwest Territories – 199917423

⁸¹ Canadian Communications Foundation, [CFYK-FM](#).

⁸² Canadian Communications Foundation, [CFYK-FM](#).

⁸³ Canadian Communications Foundation, [CBC Northern Service \(Shortwave\)](#).

⁸⁴ Canadian Communications Foundation, [CJCD-AM](#) [accessed 18 October 2024; CRTC does not post its notices and decisions from before 1984 online].

⁸⁵ Canadian Communications Foundation, [CJCD-AM](#) [accessed 18 October 2024; CRTC does not post its notices and decisions from before 1984 online].

⁸⁶ "[Charles Dent \(politician\)](#)", Wikiwand.

⁸⁷ Canadian Communications Foundation, [CKLB-FM](#).

⁸⁸ Canadian Communications Foundation, [CJCD-AM](#) [accessed 18 October 2024; CRTC does not post its notices and decisions from before 1984 online].

⁸⁹ Canadian Communications Foundation, [CKLB-FM](#).

⁹⁰ *Conversion of CJCD from AM to FM – Approved*, [Decision CRTC 97-29](#) (Ottawa, 30 January 1997).

The Commission announces that it has approved, by Letter of Authority A00-0007 dated 14 February 2000, a change to the effective control of CJCD Radio Limited, licensee of radio programming undertaking CJCD Yellowknife, through the transfer of all the shares held by Okanagan Skeena Group Limited to Sasha's Jewellery & Giftware Limited.

Secretary General

2003 *CJCD-FM Yellowknife and its transmitter CJCD-FM-1 Hay River - Licence renewal, [Broadcasting Decision CRTC 2003-325](#) (Ottawa, 23 July 2003)*

2007 Charles Dent decides not to run in the 2007 Northwest Territories general election (having been elected in 1991 and re-elected in 1995, 1999 and 2003)⁹¹

In June 2007 Vista Broadcast Group applies to acquire CJCD Radio Ltd. At the time, Vista holds the broadcasting licences for 21 radio stations and a radio network:

- CFRI-FM Grande Prairie
- CFBV-AM Smithers
- CFCP-FM Courtenay
- CFFM-FM Williams Lake
- CFFM-FM-2 Quesnel
- CFLD-AM Burns Lake
- CFNI-AM Port Hardy
- CFWB-AM Campbell River
- CHNV-FM Nelson
- CHQB-AM Powell River
- CIRX-FM Prince George
- CIRX-FM-1 Vanderhoof
- CIVH-AM Vanderhoof
- CICI-FM Prince George
- CJSU-FM Duncan
- CKBX-AM 100 Mile House
- CKCQ-FM Quesnel
- CKGF-2-FM Grand Forks
- CKQR-FM Castlegar
- CKWL-AM Williams Lake
- xxxx-FM Greenwood (approved in Broadcasting Decision CRTC 2007-35) Network - Castelgar⁹²

Vista Broadcast Group, CJCD Radio Limited – Transfer of Effective Control, Application 2007-0874-5, Response to CRTC deficiency questions of 27 June 2007, (3 July 2007) (italics in original text)

Page 2:

... 7. Please identify the synergies that would result from this transaction (i.e. with Vista's existing radio stations).

The majority of synergies will come from Vista's introduction of our state of the art on line traffic system which allows traffic schedules to be created centrally and transferred to any station over the internet. The other synergies will come from central accounting and executive management.

⁹¹ Canadian Communications Foundation, [Charles Dent \(politician\)](#) [accessed 18 October 20 24].

⁹² Chair & CEO, Vista Broadcast Group Inc., *CJCD Application Form*, docs-771836-2007-0874-5 – APP – CJCD Application Form.DOC, response to section 3.1(a) (undated; cover letter is from Calgary, 3 June 2007).

Page 3:

9. Please indicate why this transaction is in the public interest (i.e. intangible benefits).

Vista has the capacity to ensure that CJCD remains a financially stable station that will continue to provide excellent service to Yellowknife and the surrounding communities in the NWT. Vista will combine a successful local team with a broader programming perspective to further enhance the creativity of the station and its interaction with the community.

In addition because of Vista's ownership of the station, CJCD will enjoy the benefits of belonging to a small but passionate and professional broadcast group, which include the following:

- 1. Greater Human Resources systems and infrastructure,*
- 2. Improved engineering and technical knowledge and infrastructure,*
- 3. Enhanced sales training and,*
- 4. Additional programming support.*

CJCD staff and management will benefit from the collective knowledge of the people across our collaborative company. Ultimately, the increased support will assist the management of CJCD achieve the full potential of the station. As the station continues to grow and strengthen – so too will it's [sic] ability to build on it's enviable track record by making greater promotional, programming and community service contributions in Yellowknife.

Transfer of ownership of CJCD to Vista for \$1.4 million is approved by the CRTC sometime between 1 July 2007 and 31 August 2007, "pursuant to its streamlined procedure"⁹³

2008 CJCD Radio limited and Vista Radio Ltd. amalgamate as one company – Vista Radio Ltd.⁹⁴

In the 2007/08 broadcast year CJCD-FM's revenues were \$1,577,735⁹⁵

2010 CRTC grants CJCD-FM Yellowknife a short-term renewal (from September 2010 to August 2014) due to non-compliance with the regulatory requirements for

⁹³ Applications processed pursuant to the streamlined procedure, [Broadcasting Public Notice CRTC 2007-116](#) (Ottawa, 16 October 2007), "Transfer of the ownership and control of CJCD Radio Limited from the Dent Family to Vista Broadcasting Group Inc.", [Application 2007-0801-8](#).

⁹⁴ Vista Radio Ltd., Re: *Application 2010-0125-5 – CJCD-FM Yellowknife and CJCD-FM-1 Hay River*, (Courtney, BC, 22 March 2010), Response 1.

⁹⁵ CRTC DOCS-#1373047-v1-2010-0125-5_-_DefRep_1_1_-_Attachment_-_New_Stations_and_Licence_Renewal_-_AFTER_June_2007_Decision_-_CJCD_Revised.XLS

Canadian content development (CCD);⁹⁶ at this time the “CJCD/Mix 100 Spoken Word Matrix” shows that it broadcasts 875.5 minutes of spoken word per week of which news made up 41 minutes from 6am to 6pm, Monday to Fridays (no news on Saturday or Sunday)

- 2018 Cabin Radio begins to operate an online radio service⁹⁷
- 2019 Cabin Radio files its first application for a radio licence to serve Yellowknife, Northwest Territories on 30 August 2019⁹⁸
- 2020 On 4 December 2020 Vista Radio changes the brand of CJCD-FM from Moose FM to True North FM: Ollie Williams, “NWT’s Moose Fm to become True North FM from Friday” cabinradio.ca (3 December 2020, 9:12am MT)

Yellowknife and Hay River radio station Moose FM will on Friday [4 December 2020] rebrand to True North FM, saying changes to the station in recent years were “wrong.”

Announcing the change in a news release, station owner Vista Radio said its service had “gotten away from what CJCD was intended to be,” referring to the station’s four-letter callsign.

“We realized this was wrong. And when you’re wrong, you need to admit it,” the news release added.

“We learned that we needed to focus more on being a true voice for the area, a true representation of the territory, and a true reflection of the people who call the North home. This is why we have introduced True North FM.”

Vista Radio said the rebrand would come with a “stronger, independent news voice” and the station would be “more representative of the culture of the area,” though no details were given.

It’s not clear if the station’s on-air format, such as its music choices or host lineup, will change. A new website, mytruenorthnow.com, had been registered by Vista Radio but was not active as of Thursday.

There was no mention of the coming rebrand on the station’s social media channels or existing website as of 9am on Thursday.

Founded in 2004, Vista Radio – part-owned by Sherry Brydson, reported to be Canada’s richest woman with an estimated wealth of some \$13.7 billion – owns a network of 44 radio stations across

⁹⁶ *CJCD-FM Yellowknife and its transmitter CJCD-FM-1 Hay River – Licence renewal*, [Broadcasting Decision CRTC 2010-625](#) (Ottawa, 26 August 2010).

⁹⁷ Cabin Radio, *Supplementary Brief*, paragraph 3.

⁹⁸ *Call for applications – Radio station to serve Yellowknife, Northwest Territories*, [Broadcasting Notice of Consultation CRTC 2024-567](#) (Ottawa, 14 March 2024), paragraph 3.

Canada. Of those, 19 are branded Moose FM according to the company's website.

CJCD will be Vista Radio's first True North-branded radio station. A broadcast group named True North Radio Network operates in the US state of Michigan, while an Edmonton-based internet radio station also uses the name.

Vista Radio acquired CJCD from former owners Charles and Eileen Dent in 2007. The station celebrated its 40th anniversary in 2019.

6 July 2021

Meeting of the CRTC's Broadcasting Committee, Item 3:

Notices of Consultation to consider new radio applications at a non-appearing hearing to serve the markets of Yellowknife (Northwest Territories), Squamish (British Columbia), Rouyn-Noranda (Quebec) and Sarnia (Ontario), deviating from Broadcasting Regulatory Policy 2014-554 (Patrick Pilon)
(Courtney Fitzpatrick)⁹⁹

Record of Broadcasting Committee Meeting of 6 July 2021¹⁰⁰

Members present:

C. Simard (Chairperson)

C. Anderson

A. Barin

E. Desmond

M. Lafontaine

C. Laizner

J. Levy

N. Naidoo

...

The Commission approved the issuance of Notices of Consultation seeking comments on market capacity to serve the above-noted markets, including an opportunity to file new applications, as an exception to Broadcasting Regulatory Policy CRTC 2014-554.

2021

CRTC issues *Call for comments on market capacity to serve Yellowknife, Northwest Territories, and call for applications to serve Yellowknife, Northwest Territories*, [Broadcasting Notice of Consultation CRTC 2021-374](#) (Ottawa, 12 November 2021)

2023

In *Findings regarding market capacity in the Yellowknife radio market*, [Broadcasting Decision CRTC 2023-33](#) (Ottawa, 15 February 2023) CRTC determines that "the market of Yellowknife cannot support an additional

⁹⁹ CRTC Release package for A-2024-00018, page 20 of 376.

¹⁰⁰ CRTC Release Package for A-2024-00018, page 27 of 376.

commercial radio station at this time”; Commissioners Claire Anderson and Joanne T. Levy dissent

Cabin Radio submits its second application to obtain a broadcasting licence for a commercial FM radio station in Yellowknife, on 4 May 2023¹⁰¹

CRTC Broadcasting Committee Meeting Agenda for 26 September 2023, Item 5:

Decision: Determination of the process in response to an application to serve the market of Yellowknife, Northwest Territories (Patrick Pilon) (Chigbo Ikejiani)¹⁰²

4. **DECISION:** Determination of the process in response to an application to serve the market of Yellowknife, Northwest Territories (DM #4463269)

The Commission approved by majority to issue a Call for Applications for the Yellowknife radio market, as an exception to the usual process.



103

2024

CRTC issues *Call for applications – Radio station to serve Yellowknife, Northwest Territories*, [Broadcasting Notice of Consultation CRTC 2024-57](#) (Ottawa, 14 March 2024)

Summary

...

Cabin Radio filed an application for a broadcasting licence in August 2019. Following a public proceeding and a thorough assessment of the evidence, the Commission denied that application on the basis that the Yellowknife market could not sustain another radio station.

Subsequently, Cabin Radio filed a new application revealing that circumstances had changed since its original application. Specifically, the COVID-19 pandemic and the wildfires in the Northwest Territories have highlighted the importance of having increased access to radio content in the north.

In light of the change in circumstances since Cabin Radio’s application in August 2019, including the impacts of major events, the Commission considers that the market is not as well served as it could be and that it should issue a call for applications for radio stations to serve Yellowknife.

¹⁰¹ DM# 4339276, Cabin Radio, 506992 N.W.T. Otd. o/a Cabin Radio, Application to obtain a broadcasting licence to operate a commercial FM radio station to serve Yellowknife, NWT as CJFC-FM 93.9, Cover Letter (Yellowknife, 4 May 2023).

¹⁰² CRTC Release Package for A-2024-00018, page 210 of 376.

¹⁰³ CRTC Release Package for A-2024-00018, page 215 of 376 [grey shading: redacted in CRTC’s release package].



This call for applications will initiate a process that examines the broadcasting needs of citizens in Yellowknife, as well as each application received in the context of the current process, in order to determine which proposal will best serve the needs and interests of the Yellowknife community and the broadcasting system as a whole. The Commission's decision in this matter will be based on the public record, including applications received, comments from interested parties, and updated data regarding market conditions in Yellowknife.



Appendix 2 Communities in which Vista operates radio stations

List of radio services downloaded from CRTC, "[List of broadcasting services that do and do not need a licence](#)" (19 October 2024); ownership determined by reviewing the CRTC's "[Detailed Index of Multiple Ownership Charts](#)", its licensing decisions or online sources

Services filtered as follows:

Broadcast Category: Radio

Broadcaster Type: "Broadcasters [sic] only" (excluding "Rebroadcasters [sic] only")

# of areas	Area served	Company Name	Type of radio service	Call Sign / Service Name	Type of ownership group
1.	Bancroft	Vista Radio Ltd.	Commercial	CHMS-FM	Multi-station ownership group
2.	Barry's Bay	Vista Radio Ltd.	Commercial	CHBY-FM	Multi-station ownership group
3.	Bolton	Vista Radio Ltd.	Commercial	CJFB-FM	Multi-station ownership group
4.	1 Bonnyville	Stingray Radio Inc.	Commercial	CJEG-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CFNA-FM	Multi-station ownership group
5.	2 Bracebridge	Bayshore Broadcasting Corporation	Commercial	CJMU-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CFBG-FM	Multi-station ownership group
6.	Burns Lake	Vista Radio Ltd.	Commercial	CFLD	Multi-station ownership group
7.	Campbell River	Aupe Cultural Enhancement Society	Indigenous	CKCC-FM	
		Total Change Christian Ministries	Specialty - religious	CHVI-FM	
		Vista Radio Ltd.	Commercial	CIQC-FM	Multi-station ownership group
8.	Castlegar	Vista Radio Ltd.	Commercial	CKQR-FM	Multi-station ownership group
9.	3 Cochrane	Golden West Broadcasting Ltd.	Commercial	CKXY-FM	Multi-station ownership group
		Harvest Ministries Sudbury	Specialty - religious	CFCJ-FM	
		Vista Radio Ltd.	Commercial	CHPB-FM	Multi-station ownership group
10.	4 Courtenay	Pattison Media Ltd.	Commercial	CKLR-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CFCP-FM	Multi-station ownership group
11.	5 Cranbrook	Pattison Media Ltd.	Commercial	CHBZ-FM	Multi-station ownership group
				CHDR-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CFSM-FM	Multi-station ownership group
12.	Creston	Vista Radio Ltd.	Commercial	CKCV-FM	Multi-station ownership group
13.	Duncan	Vista Radio Ltd.	Commercial	CJSU-FM	Multi-station ownership group
14.	Elliot Lake	Harvest Ministries Sudbury	Specialty - religious	CJTK-FM-3	
		Vista Radio Ltd.	Commercial	CKNR-FM	Multi-station ownership group



15.	Espanola	Vista Radio Ltd.	Commercial	CJIM-FM	Multi-station ownership group
16.	Grand Forks	Vista Radio Ltd.	Commercial	CKGF-FM	Multi-station ownership group
17.	6 Grande Prairie	Golden West Broadcasting Ltd.	Commercial religious	CJGY-FM	
		Pattison Media Ltd.	Commercial	CIKT-FM	Multi-station ownership group
				CJXX-FM	Multi-station ownership group
		Rogers Media Inc.	Commercial	CFGP-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CFRI-FM	Multi-station ownership group
18.	Haliburton	Haliburton County Community Radio Association	Community	CKHA-FM	
		Vista Radio Ltd.	Commercial	CFZN-FM	Multi-station ownership group
19.	Hearst	Les Médias de l'Épinette Noire Inc.	Community	CINN-FM	
20.	Huntsville	Hunters Bay Radio Inc.	Community	CKAR-FM	
		Vista Radio Ltd.	Commercial	CFBK-FM	Multi-station ownership group
21.	Iroquois Falls	Vista Radio Ltd.	Commercial	CFIF-FM	Multi-station ownership group
22.	Kapusking	Radio communautaire Kapnord Inc.	Community	CKGN-FM	
		Vista Radio Ltd.	Commercial	CKAP-FM	Multi-station ownership group
23.	Kemptville	Vista Radio Ltd.	Commercial	CKVV-FM	Multi-station ownership group
24.	7 Lethbridge	CKXU Radio Society	Campus	CKXU-FM	
		Pattison Media Ltd.	Commercial	CHLB-FM	Multi-station ownership group
		Rogers Media Inc.	Commercial	CFRV-FM	Multi-station ownership group
				CJRX-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CJOC-FM	Multi-station ownership group
25.	8 Lloydminster	Stingray Radio Inc.	Commercial	CKSA-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CKLM-FM	Multi-station ownership group
26.	9 Nelson	Bell Media Inc.	Commercial	CKKC-FM	Multi-station ownership group
		Kootenay Cooperative Radio	Community	CJLY-FM	
		Vista Radio Ltd.	Commercial	CHNV-FM	Multi-station ownership group
27.	10 North Bay	Harvest Ministries Sudbury	Specialty - religious	CJTK-FM-1	
		Rogers Media Inc.	Commercial	CHUR-FM	Multi-station ownership group
				CKAT	Multi-station ownership group
				CKFX-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CFCH-FM	Multi-station ownership group
		CFXN-FM	Multi-station ownership group		
28.	Parry Sound	Vista Radio Ltd.	Commercial	CKLP-FM	Multi-station ownership group
		Wasauksing Communications Group	Indigenous	CHRZ-FM	
29.	Port Hardy	Vista Radio Ltd.	Commercial	CFNI	Multi-station ownership group
30.	Powell River	Qathet Community Radio Society	Community	CJMP-FM	
		Vista Radio Ltd.	Commercial	CFPW-FM	Multi-station ownership group
31.	Prescott	Vista Radio Ltd.	Commercial	CKPP-FM	Multi-station ownership group



32.	11 Prince George	Canadian Broadcasting Corporation	CBC/Radio-Canada	CBYG-FM	
		CFUR Radio Society	Campus	CFUR-FM	
		Pattison Media Ltd.	Commercial	CKDV-FM	Multi-station ownership group
				CKKN-FM	Multi-station ownership group
		Prince George Community Radio Society	Community	CFIS-FM	
Vista Radio Ltd.	Commercial	CIRX-FM	Multi-station ownership group		
33.	Quesnel	Vista Radio Ltd.	Commercial	CFFM-FM-2	Multi-station ownership group
				CKCQ-FM	Multi-station ownership group
34.	Rose Prairie	Vista Radio Ltd.	Commercial	CKBX	Multi-station ownership group
35.	12 Sechelt	Rogers Media Inc.	Commercial	CFUN-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CKAY-FM	Multi-station ownership group
36.	Smithers	Smithers Community Radio Society	Community	CICK-FM	
		Vista Radio Ltd.	Commercial	CFBV	Multi-station ownership group
37.	Stratford	Vista Radio Ltd.	Commercial	CHGK-FM	Multi-station ownership group
				CJCS-FM	Multi-station ownership group
38.	Sturgeon Falls	Vista Radio Ltd.	Commercial	CFSF-FM	Multi-station ownership group
39.	13 Timmins	LE5 Communications Inc.	Commercial	CHYK-FM	Multi-station ownership group
		Rogers Media Inc.	Commercial	CJQQ-FM	Multi-station ownership group
		Vista Radio Ltd.	Commercial	CKGB-FM	Multi-station ownership group
		Wawatay Native Communications Society	Indigenous	CJWT-FM	
40.	Trail	Bell Media Inc.	Commercial	CJAT-FM	Multi-station ownership group
41.	Vanderhoof	Vista Radio Ltd.	Commercial	CIRX-FM-1	Multi-station ownership group
42.	Williams Lake	Sugar Cane Community Diversity Association	Indigenous	CJLJ-FM	
		Vista Radio Ltd.	Commercial	CFFM-FM	Multi-station ownership group
				CKWL	Multi-station ownership group
Western Singh Sabha Association	Ethnic	CISK-FM			
43.	Yellowknife	Canadian Broadcasting Corporation	CBC/Radio-Canada	CFYK-FM	
		Médias Téoios	Community	CIVR-FM	
		Native Communications Society of the N.W.T.	Indigenous	CKLB-FM	
		Vista Radio Ltd.	Commercial	CJCD-FM	Multi-station ownership group
Total: Vista operates in 43 communities, including 13 communities in which it competes against other multi-station ownership groups				97 stations	

*** End of document ***