



20 January 2025

Marc Morin  
Secretary General  
CRTC  
Ottawa, ON K1A 0N2

Filed online

Dear Secretary General,

**Re: *Call for comments – Modernization of radio processes*, [Broadcasting Notice of Consultation CRTC 2024-290](#) (Ottawa, 15 November 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.

Our comments regarding BNoC 2024-290 are attached. Briefly, the absence of any relevant evidence from the CRTC in 2024-290 about the impact of its past and proposed regulatory approaches to radio on implementation of Parliament's *Broadcasting Policy for Canada* leaves the Forum without any basis to support many proposals. FRPC does, however, support indeterminate licence terms for radio ownership groups all of whose undertakings have met the CRTC's regulatory requirements for the past 14 years – the equivalent of two full licence terms under the 1991 *Broadcasting Act* – if in making this change the CRTC adopts competitive licence renewals to spur implementation of Parliament's *Broadcasting Policy for Canada*, especially with respect to local news. A national, bilingual survey undertaken in January 2025 on FRPC' found that just over a third (35.1%) of all Canadians believe their local news stations offer their communities less news than before while only 5.1% believe they now offer more news than before. (The survey questionnaires and excel-spreadsheet results are attached to this submission; FRPC will be publishing a more complete analysis at a later date.)

Should the CRTC later decide to hold a public hearing about the important issues raised in this proceeding, FRPC would appreciate the opportunity to appear before the CRTC hearing panel to respond to other parties' comments and to the panel's questions.

Sincerely yours,

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



***Call for comments –  
Modernization of radio processes,  
Broadcasting Notice of Consultation CRTC 2024-290  
(Ottawa, 15 November 2024):***

**No data, no dice**

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

20 January 2025

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\* Please see separate Excel spreadsheet submitted with this comment.



## Terminology

<b>BBG</b>	Board of Broadcast Governors
<b>BPF</b>	Broadcasting Participation Fund
<b>BNoC</b>	Broadcasting Notice of Consultation
<b>C-11</b>	Bill C-11, the <i>Online Streaming Act</i>
<b>CAB</b>	Canadian Association of Broadcasters
<b>CBC/RC</b>	Canadian Broadcasting Corporation / Radio-Canada
<b>CBSC</b>	Canadian Broadcast Standards Council
<b>CCTS</b>	Commission of Complaints for Telecom-television Services
<b>CRTC</b>	Canadian Radio-television and Telecommunications Commission

## Summary

- ES 1 BNoC 2024-290 is the CRTC's 35<sup>th</sup> or more review of its radio policies and regulations for radio since 1968. It proposes giving "more flexibility" (*Summary*) to "existing and prospective" "radio undertakings operating in Canada" so as "to reduce the administrative burden then operators may be experiencing" (¶18). It adds that "[t]his flexibility needs to be carefully supervised to ensure that programming continues to serve the public interest and responds to market specificities" (¶18).
- ES 2 the majority of the objectives set out by Parliament in its *Broadcasting Policy for Canada* relate to programming: it specifically requires Canadian programming to predominate in each private radio station's programming and for Canadian "creative and other human resources" to predominate in creating, producing and presenting programming.<sup>3(1)(f)</sup> Broadcasting Notice of Consultation CRTC 2024-290 provides no objective information about the programming currently being broadcast by Canada's radio stations or their employment of people in Canada.
- ES 3 In 2021 the CRTC acknowledged that since January 2014 it had not analyzed
- the types and amounts (hours and/or percentages) of programming broadcast by privately owned radio stations in Canada (using the programming categories set out in Broadcasting Regulatory Policy CRTC 2010-819);
  - the amount or hours of total and/or original spoken word material of direct and particular relevance to the communities served which was broadcast by Canadian commercial radio stations, including total and/or original amounts of hours of local news (A-2020-00072);
  - the amount of original local news broadcast by stations licensed to large ownership groups (A-2020-00066); and
  - employment opportunities at commercial radio stations (A-2020-68, Appendix 5).
- ES 4 In early 2021 the CRTC's staff confirmed that it asks for programming information "in general once per license [*sic*] period" (see ¶14).
- ES 5 The lack of evidence about Canadian radio stations' programming performance and about the degree to which an unknown number of Canadian radio stations "may" be burdened by the CRTC's radio policies and regulations places the public at a major disadvantage compared to radio broadcasters. It would be understandable if many would prefer lower administrative and other expenses, and they may be presumed to have significant levels of evidence about their own

programming and expenditures, and also about the programming and expenditures of their sector of Canada’s radio system. Bearing in mind the CRTC’s statement that it relies on the evidence from the public record of its proceedings, it is difficult to determine what evidence the public will be able to provide to the Commission regarding its apparent determination to grant broadcasters reduced reporting and licensing requirements.

ES 6 As the CRTC said it “remains open to considering other issues and concerns relating to the radio sector and that fall within its jurisdiction and authority under the *Broadcasting Act*”, the Forum has briefly addressed the issue of local news and information. In support of these comments the Forum in early January 2025 commissioned an interactive-voice-response telephone survey that took place from Thursday, January 16, 2025 to Saturday, January 17 2025. 1,598 people in Canada’s provinces and territories answered 8 questions about Canadian radio (and 7 demographic questions that allowed the results to be weighted by gender, age and province).

ES 7 Given the CRTC’s decision to launch 2024-290 as well as BNoC 2024-288 on the same day and with the same deadline,<sup>1</sup> the Forum has submitted the English- and French-language questionnaires in this comment (Appendix 2) along with the weighted results by question attached in an Excel spreadsheet (see Appendix 3). FRPC will publish its analysis of the survey results at a later date.

ES 8 The Forum’s answers to the questions in BNoC 2024-290 are set out in Appendix 12 of this submission.

The Forum’s recommendations are set out below:

Recommendation 1 The CRTC should publish the evidence it has regarding radio-station operators’ administrative burden. If necessary for reasons of confidentiality, the CRTC should publish administrative-burden data by size of radio-station operator (Major, Large, Medium or Small, as set out in CRTC, “Table 16 Profit margin for commercial radio by entity size”, Tab B-T16, data-broadcasting-overview.xlsx (accessed 10 January 2025). 10

Recommendation 2 Before adopting the 2024-290 proposals the CRTC should audit a random sample of 50 to 100 radio stations to determine more precisely how much of their administrative staff’s time is devoted to administering the CRTC’s radio policies and regulations 11

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<sup>1</sup> With the exception of a one-week extension in the 2024-288 proceeding granted to Deaf Wireless Canada Consultative Committee.



Recommendation 3	The CRTC should revise its radio regulations to require the automatic submission of program logs to the CRTC every month, and the CRTC should make these logs available to the public as it currently does for television services.	12
Recommendation 4	Each year – or more frequently – the CRTC should publish information about the total and first-run hours broadcast by individual radio stations, in terms of the program categories used by the CRTC to identify types of programming such as local news.	12
Recommendation 5	The CRTC should obtain and publish programming data from radio stations to enable the Commission and the public to evaluate its proposals for administrative burden	13
Recommendation 6	The CRTC should undertake an empirical comparison of major, large, medium, small and single-station operators to determine whether differences exist between the administrative expenses (and staffing) of these groups of broadcasters	13
Recommendation 7	If the CRTC has or has access to radio stations' annual returns it should aggregate the data regarding employment by expense category and publish these data for this proceeding, and also for each year going forward.	16
Recommendation 8	The CRTC should clarify how it decides which broadcast ownership groups file or need not file aggregated financial summaries.	17
Recommendation 9	As BNoC 2024-290 is dealing with licensed radio stations, the CRTC should ensure that evidence filed in support of (or in opposition to) the CRTC's flexibility or streamlining initiatives excludes online services affiliated with the stations.	17
Recommendation 10	The CRTC should clarify whether licensed radio broadcasters include or exclude online revenues, expenses and staffing from the annual returns these broadcasters submit to the CRTC	17
Recommendation 11	The CRTC should obtain and publish current programming information from licensed radio undertakings and should also publish any data it holds concerning the programming broadcast by radio stations in the past	21
Recommendation 12	The CRTC should publish objective evidence about radio-station programming by radio station and by type of broadcaster (the national public broadcaster, private commercial broadcasters, community and other broadcasters)	25



Recommendation 13    The CRTC should undertake a study of the potential advantages and disadvantages of a competitive renewal process for radio programming undertakings

## I. Introduction

- 1 The Forum for Research and Policy in Communications (FRPC) is a non-profit and non-partisan organization established in 2013 to undertake research and policy analysis about communications, including telecommunications. The Forum supports a strong Canadian communications system, provided it serves the public interest defined by Parliament in the *Broadcasting Act*.
- 2 Broadcasting Notice of Consultation CRTC 2024-290 (BNoC 2024-290 or 2024-290) states that its “objective ... is to identify ways to provide flexibility to certain radio processes” – licensing, exemptions and enforcement – “to reduce the administrative burden” that some radio broadcasters “may be experiencing” so that “programming continues to serve the public interest and responds to market specificities”.<sup>2</sup>
- 3 2024-290 goes on to say at paragraph 11 that the CRTC wants to know how best to reduce reporting requirements, provide incentives for regulatory compliance, streamline processes and promote broadcasters’ sustainability while Canadian and Indigenous creators are supported:

... this proceeding will allow the Commission to determine the best ways to do the following:

  - ...
  - reduce reporting requirements, if applicable, while ensuring support for Canadian and Indigenous creators;
  - review the current compliance measures and introduce new measures, including new incentive measures;
  - streamline processes to harmonize them with requirements, where possible. [sic] [and]
  - promote the sustainability of broadcasters, especially in underserved markets; ....
- 4 BNoC 2024-290 is at least the 36<sup>th</sup> CRTC review of its radio policies since it was established 57 years ago (Appendix 1). Over the course of this period, in other words, the CRTC has reviewed its radio policies on average every 18 months.
- 5 BNoC 2024-290 does not set out any evidence to enable the public to determine whether the CRTC’s existing radio policies have achieved their then-stated objectives or the degree to which they have furthered implementation of Parliament’s *Broadcasting Policy for Canada*.
- 6 FRPC’ comments begin in Part II by setting out its concerns about 2024-290. Part III briefly discusses the five issues identified by the Commission for discussion in this

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<sup>2</sup> Call for comments – Modernization of radio processes, [Broadcasting Notice of Consultation CRTC 2024-290](#) (Ottawa, 15 November 2024), at ¶18.

proceeding. In light of the CRTC’s statement that it “remains open to considering other issues and concerns relating to the radio sector and that fall within its jurisdiction and authority under the *Broadcasting Act*” Part IV addresses FRPC’ concerns about the CRTC’s data-publication practices. The Forum’s conclusions and recommendations about BNoC 2024 follow in Part V.

## II. Concerns about evidence

### A. *Expectations and requirements that CRTC provide the public with evidence*

7 The CRTC – a “single independent public authority” – exists to regulate and supervise the broadcasting system to implement Parliament’s *Broadcasting Policy for Canada*.<sup>3</sup> Parliament most recently set out this policy in subsection 3(1) of the April 2023 *Broadcasting Act*.<sup>4</sup>

8 Canada’s *Broadcasting Policy* consists today of 56 separate provisions in subsection 3(1).<sup>5</sup> These differ in terms of their application: most apply to the entire broadcasting system; just three are directed at individual broadcasting undertakings such as radio stations. T the *Broadcasting Policy* requires *each* undertaking to help implement Canada’s *Broadcasting Policy*.<sup>S.3(1)(a)</sup> and to employ Canadians to create, produce and present programming. <sup>S.3(1)(f) & (f.1); see FN 6</sup>

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<sup>3</sup> *Broadcasting Act*, s. 5(1):

3(2) It is further declared that the Canadian broadcasting system constitutes a single system and that the objectives of the broadcasting policy set out in subsection (1) can best be achieved by providing for the regulation and supervision of the Canadian broadcasting system by a single independent public authority.

....

5(1) Subject to this Act and the Radiocommunication Act and to any directions to the Commission issued by the Governor in Council under this Act, the Commission shall regulate and supervise all aspects of the Canadian broadcasting system with a view to implementing the broadcasting policy set out in subsection 3(1) and, in so doing, shall have regard to the regulatory policy set out in subsection (2).

<sup>4</sup> *Broadcasting Act*, S.C. 2023, c.8, implemented through Bill C-11, *An Act to amend the Broadcasting Act and to make related and consequential amendments to other Acts or Online Streaming Act*, which received Royal Assent on 27 April 2023.

The 1968 *Broadcasting Act*, 16&17 Eliz. 2, c. 25 set out the *Broadcasting Policy for Canada* in subsection 2; the 1991 *Broadcasting Act*, S.C. 1991, c. 11 moved this policy to subsection 3(1).

<sup>5</sup> 17 standalone sections and 39 subsections of other clauses (from (i) to (viii) and including clauses such as (iii.1) through to (iii.7)).

<sup>6</sup> S. 3(1) It is hereby declared as the broadcasting policy for Canada that

(a.1) each broadcasting undertaking shall contribute to the implementation of the objectives of the broadcasting policy set out in this subsection in a manner that is appropriate in consideration of the nature of the services provided by the undertaking;

(f) each Canadian broadcasting undertaking shall employ and make maximum use, and in no case less than predominant use, of Canadian creative and other human resources in the creation, production and presentation of programming, unless the nature of the service provided by the undertaking, such as specialized content or format or the use of languages other than French and English, renders that use impracticable, in which case the undertaking shall make the greatest practicable use of those resources; [and]

- 9 While requiring the CRTC to regulate and supervise Canada’s broadcasting system, Parliament also requires the CRTC in Part II of the *Broadcasting Act* to exempt broadcasters from its requirements, orders and regulations when it “is satisfied that” their “compliance with those requirements will not contribute in a material manner to the implementation of the broadcasting policy”.<sup>S. 9(4)</sup>
- 10 In 1991 Parliament added a *Regulatory Policy* to the *Broadcasting Act*. It says the CRTC “shall have regard to” 14 matters when it implements the *Broadcasting Policy*.<sup>S.5(1)</sup> Parliament then went on to say that the “broadcasting system *should* be regulated and supervised in a flexible manner”,<sup>S.5(2)</sup> meaning that the individual matters themselves are not mandatory. In the case of “administrative burden”, moreover, the CRTC is not required to eliminate or reduce it, but to be “sensitive” to its existence *if* it is due to its regulation and supervision.
- 5(2)(g) The Canadian broadcasting system should be regulated and supervised in a flexible manner that ... is sensitive to the administrative burden that, as a consequence of such regulation and supervision, may be imposed on persons carrying on broadcasting undertakings;
- 11 As Figure 1 shows on the next page, the CRTC reviewed and increased the flexibility of its regulation of radio stations before and after the *Regulatory Policy* was added to the *Broadcasting Act*. Despite the often-limited available of usable broadcast frequencies for radio stations in large communities the CRTC allows some television broadcasters to simulcast their radio programming (Appendix 6).
- 12 Parliament set limits on the CRTC’s application of the *Regulatory Policy*. If its provisions conflict with those of the *Broadcasting Policy* Parliament said the CRTC “shall” give primary consideration to the *Broadcasting Policy’s* goals.
- Conflict

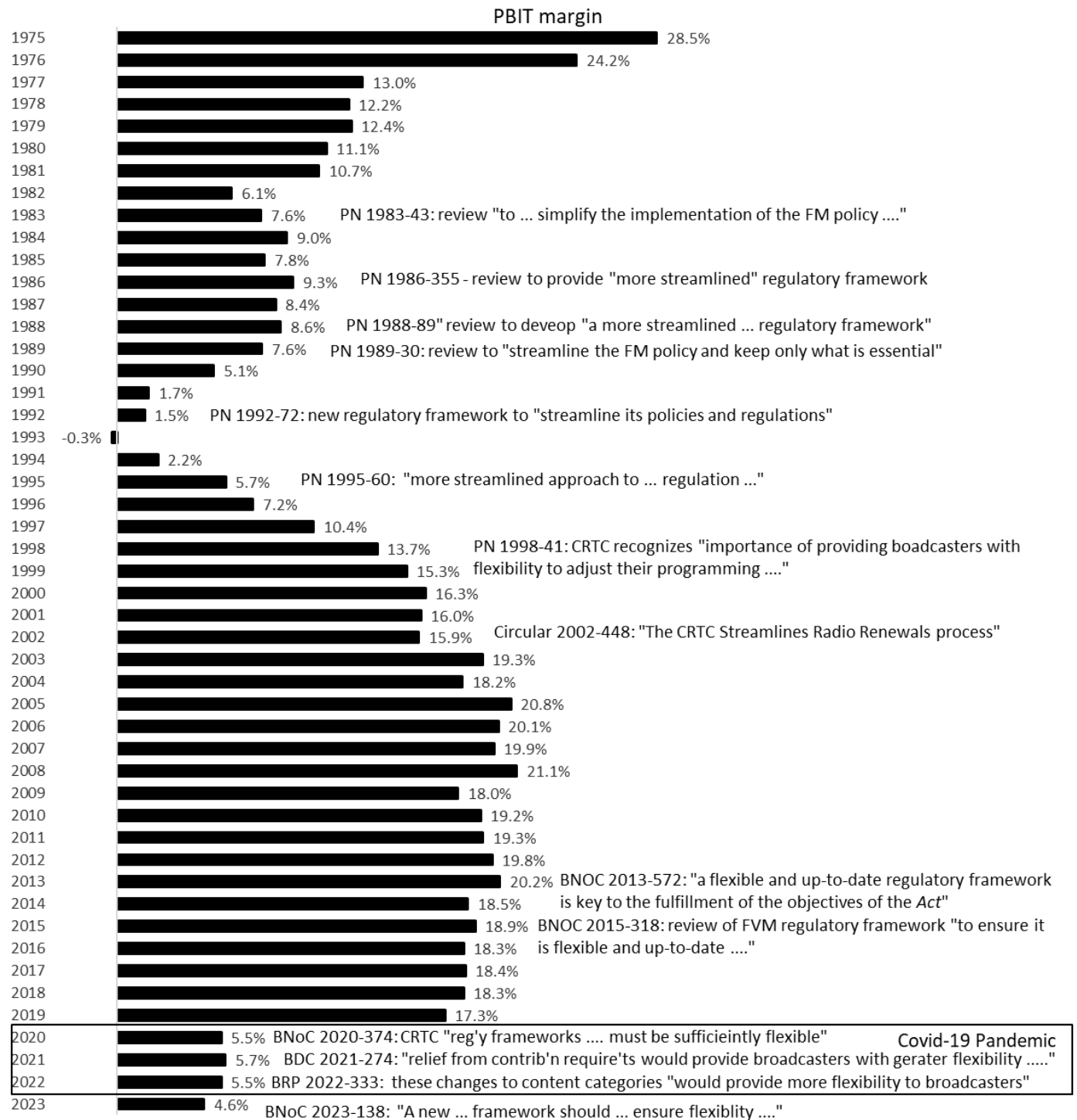
5(3) The Commission shall give primary consideration to the objectives of the broadcasting policy set out in subsection 3(1) if, in any particular matter before the Commission, a conflict arises between those objectives and the objectives of the regulatory policy set out in subsection (2).
- 13 In other words, Parliament requires the CRTC to evaluate not just the impact of implementing any of the section 5(2) *Regulatory Policy* elements but also their impact on the *Broadcasting Policy’s* objectives.

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(f.1) each foreign online undertaking shall make the greatest practicable use of Canadian creative and other human resources, and shall contribute in an equitable manner to strongly support the creation, production and presentation of Canadian programming, taking into account the linguistic duality of the market they serve;

**Figure 1 The CRTC and regulatory simplification, streamlining and flexibility**



14 The CRTC has required broadcasters for decades to submit annual financial and statistical information to it every year, and the *Radio Regulations, 1986* permit it to ask broadcasters to submit their programming logs. In April 2019 the CRTC’s staff told CRTC Commissioners

- that the CRTC asks radio licensees for “a set of logs, recordings, music lists and other documents submitted generally “once per licence period” [underlining omitted].<sup>7</sup> This may explain the very limited amount of information available even from within the CRTC about the level of Canadian content broadcast by private radio stations (see Appendix 7 and ).
- 15 BNoC 2024-290 does not summarize or analyze any radio stations’ programming or employment information, either independently or in relation to 2024-290’s claims that some broadcasters are burdened by regulation. The CRTC’s website does not include any pages that summarize results of its analyses of programming and while it publishes employment data, these are aggregated for entire sectors (private stations, private FM, private AM etc.). Although the CRTC has been regulating radio since 1968, its employment and financial information about radio are published only in 5-year tranches that also leave changes from one year to the next unexplained. Following the CRTC’s one-time publication of private radio station employment by programming expense category in 2014, the CRTC subsequently removed the information from its website (it is now only available through the Wayback Machine: Appendix 9) and no longer has such information ‘under its control’ (Appendix 11) despite the fact that it still collects it through the annual return forms for radio. The CRTC’s recently introduced open-data datasets similarly provide limited 5-to-10 year descriptions of private radio stations and audio services’ financial information (and no programming data): Appendix 10.
- 16 Consequently, the basis for the CRTC’s statement in BNoC 2024-290 that that radio stations’ programming “continues to serve the public interest and responds to market specificities” (underlining and italics added) is known only to the CRTC itself.
- 17 Overall, the lack of objective data in BNoC 2024-290 makes it impossible for the public to understand and weigh the evidence on which the CRTC is relying to determine that its regulatory approach to radio stations is an administrative burden for some radio broadcasters.

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<sup>7</sup> CRTC, *Supplementary Release Package.pdf* in response to A-2020-00068 (Ottawa, 20 February 2023): CRTC staff, *Subject: Radio non-compliances [sic] – Overview and measures, DM# 3627317 document for a Full Commission Meeting on 30 April 2019, [original underlining omitted]* (Gatineau, 12 April 2019), at 19 of 98: Appendix B: “... [m]onitoring material consists of a set of logs, recordings, music lists and other documents submitted at the Commission’s request for all licensees (in general once per licence period).” [underlining in original text].

## B. *No evidence of regulatory burden*

18 As noted above, BNoC 2024-290 states that the CRTC needs to reduce radio-station broadcasters' administrative burden, referring to this burden 14 times in the notice.

19 While the CRTC does not state which "operators may be experiencing" this burden, it implies that others 'may [not] be experiencing" the same burden.

20 Having undertaken several reviews of its regulations in the past – see Appendix 1 – one assumes that the CRTC reviewed their impact given that in many cases the CRTC was attempting to reduce broadcasters' expenses and/or increase their revenues. For example:

- the CRTC dropped advertising limits for AM radio stations in 1986<sup>8</sup> and for FM stations in 1993;<sup>9</sup>
- also in 1993 it dropped all requirements for news and other spoken word material for AM<sup>10</sup> and reduced spoken word requirements for FM stations to 15%;<sup>11</sup>
- it allowed broadcasters in 1996 to simulcast programs on their commonly-owned AM and FM stations for a third of the broadcast week,<sup>12</sup> and allowed radio broadcasters in the

2024-290, ¶18: The objective of this proceeding, which is directed primarily to radio station operators, is to identify ways to provide flexibility to certain radio processes in order to reduce the administrative burden these operators may be experiencing. This flexibility needs to be carefully supervised to ensure that programming continues to serve the public interest and responds to market specificities.

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<sup>8</sup> *Regulations Respecting Radio Broadcasting*, Public Notice CRTC 1986-248 (Ottawa, 19 September 1986), <http://www.crtc.gc.ca/eng/archive/1986/PB86-248.HTM>.

<sup>9</sup> *POLICIES FOR LOCAL PROGRAMMING ON COMMERCIAL RADIO STATIONS AND ADVERTISING ON CAMPUS STATIONS*, [Public Notice CRTC 1993-38](#) (Ottawa, 19 April 1993).

<sup>10</sup> *Ibid.*; *Amendments to the Radio Regulations, 1986; Elimination of Minimum Requirements for Spoken Word Content*, Public Notice [CRTC 1993-113](#) (Ottawa, 28 July 1993).

<sup>11</sup> *POLICIES FOR LOCAL PROGRAMMING ON COMMERCIAL RADIO STATIONS AND ADVERTISING ON CAMPUS STATIONS*, [Public Notice CRTC 1993-38](#) (Ottawa, 19 April 1993); *Amendments to the Radio Regulations, 1986; Elimination of Minimum Requirements for Spoken Word Content*, Public Notice [CRTC 1993-113](#) (Ottawa, 28 July 1993).

<sup>12</sup> *Proposed Amendments to the Radio Regulations, 1986: Changes to Three Areas Related to the Commission's Regulation of Radio: Simulcasting, Ownership, and Canadian Content for Radio Stations Programming High Levels of Instrumental Selections*, [Public Notice CRTC 1996-27](#) (Ottawa, 26 February 1996).



same locations to operate using ‘local management agreements’<sup>13</sup> and ‘local sales agreements’ to minimize common operating costs.<sup>14</sup>

- 21 By 1995, in fact, the CRTC said that it had “... reduced the level of regulation to that absolutely necessary to ensure the diversity and quality of radio programming and to guarantee exposure for Canadian music and Canadian talent”.<sup>15</sup> (The CRTC then re-reviewed its commercial radio policies two years later<sup>16</sup> and undertook at least five more reviews from 1996 on.)
- 22 The CRTC has in the past rejected parties’ arguments that Commission proposals “did not provide any evidence” about matter such as reducing “the minimum percentage of Canadian content” offered by Canadian television services (from 60% to 55% over the broadcast year).<sup>17</sup> The CRTC said that it had “explained the need” for this change (¶19).
- 23 While this history leaves the issuance of BNoC 2024-290 unsurprising, the times have changed and the CRTC has been asked specifically to change with them. In its letter to the CRTC in February 2023, for example, the Ministers of Canadian Heritage and of Innovation, Science and Economic Development expressed their trust that “interested parties, civil society, and the public can continue to count on the CRTC to help them understand the ... evidence, and data underpinning its decisions.”<sup>18</sup>
- 24 The following year (March 2024) Canada’s Treasury Board Secretariat (TBS) explained in [2023-2026 Data Strategy for the Federal Public Service](#), that

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<sup>13</sup> *COMMISSION'S APPROACH TO DEALING WITH LOCAL MANAGEMENT AGREEMENTS IN CANADIAN RADIO MARKETS*, Public Notice CRTC 1996-138 (Ottawa, 16 October 1996),

<sup>14</sup> *The Commission's policy on local management agreements (LMAs) - Determinations concerning the appropriateness of various existing and proposed LMAs, including local sales agreements, between licensees of radio stations serving the same market*, [Public Notice CRTC 2005-10](#) (Ottawa, 31 January 2005).

<sup>15</sup> *A Review of Certain Matters Concerning Radio*, [PN CRTC 1995-60](#) (Ottawa, 21 April 1995).

<sup>16</sup> *A review of the Commission's Policies for Commercial Radio*, Public Notice CRTC 1997-104 (Ottawa, 1 August 1997), <http://www.crtc.gc.ca/eng/archive/1997/PB97-104.HTM>

<sup>17</sup> In *Amendment to the Television Broadcasting Regulations, 1987 – Broadcast of Canadian programs*, [Broadcasting Regulatory Policy CRTC 2011-288](#) (Ottawa, 3 May 2011) at ¶17, “[t]he CRTC noted that some interveners had “argued that a reduction to the minimum percentage of Canadian content was not reflective of recent changes in ownership of television stations and that the Policy did not provide any evidence supporting the reduction.”

<sup>18</sup> Minister of Canadian Heritage and Minister of Innovation, Science and Economic Development, *New CRTC Chair's Leadership Will Help Shape the Future of Canada's Communication System*, [News Release \(Gatineau, 6 February 2023\)](#):

... there is a perception that the CRTC is taking too long to make decisions. CRTC regulatory decisions are essential to creating a stable, competitive, and innovative business environment. Undue delays create uncertainty and potentially impact investment decisions and service offerings for Canadians.

...

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.

...

[d]ata is [sic] an important part of everyday life that is essential to providing Canadians with the services and information that they need. Good data practices allow the government to produce stronger and better-informed policies, as well as improved delivery of effective, equitable and inclusive programs and services, among many other benefits.

25 TBS went on to say that

[o]ver the next three years, progress will be measured to ensure that the public service continues to focus on what matters to advance the data landscape. This includes adapting to changes and continuing to build greater knowledge from data so it can provide greater benefits for Canadians and support public good.<sup>19</sup>

Consultation

5.2 (1) The Commission shall consult with official language minority communities in Canada when making decisions that could adversely affect them.

(2) When engaging in consultations required by subsection (1), the Commission shall

(a) gather information to test its policies, decisions and initiatives;

...

(d) provide [the communities] with all relevant information on which those policies, decisions or initiatives are based;

....

26 And in April 2023 Parliament amended the *Broadcasting Act* to require

explicitly that the CRTC gather and provide information about its initiatives to official language minority communities. BNoC 2024-290 acknowledges at ¶13 that “decisions flowing from this proceeding could have an impact on OLMCs and other stakeholders and that this proceeding provides a means by which interested OLMCs and other stakeholders may provide their input”; the notice set out no evidence about English-language and French-language broadcasting in relation to OLMCs.

27 Moreover, Article 28.9 of the [Canada-United States of America-Mexico agreement](#) (CUSMA) remains in effect. Canada explicitly agreed to use and publish reliable and high-quality information *before* it finalizes regulations:

Article 28.9: Transparent Development of Regulations

1. ... **when a regulatory authority is developing a regulation, the Party shall, under normal circumstances, publish:**

(a) the text of the regulation along with its regulatory impact assessment, if any;

(b) an explanation of the regulation, including its objectives, how the regulation achieves those objectives, the rationale for the material features of the regulation, and any major alternatives being considered;

(c) **an explanation of the data, other information, and analyses the regulatory authority relied upon to support the regulation;** and

<sup>19</sup> Treasury Board Secretariat, [2023-2026 Data Strategy for the Federal Public Service](#), (Ottawa, 13 March 2024).

(d) the name and contact information of an individual official from the regulatory authority who may be contacted concerning questions regarding the regulation.

**At the same time the Party publishes the information listed in subparagraphs (a) through (d), the Party shall also make publicly available data, other information, and scientific and technical analyses it relied upon in support of the regulation, including any risk assessment.**

**2. With respect to the items required to be published under paragraph 1, each Party shall publish them before the regulatory authority finalizes its work on the regulation** and at a time that will enable the regulatory authority to take into account the comments received and, as appropriate, make revisions to the text of the regulation published under subparagraph 1(a).

[footnotes omitted; bold font added]

**28** More pragmatically, the CRTC has been and remains the only institution specifically empowered to obtain relevant information about broadcasting matters from broadcasters:

<i>1991 Broadcasting Act</i>	<i>2023 Broadcasting Act</i>
10(1). CRTC may make regulations (i) requiring licensees to submit financial or other information about their programming and financial affairs (j) about the audit or examination of records of licensees	9.1(1) CRTC may make orders imposing conditions regarding (n): information about licensees' ownership, governance, control and affiliation with licensees or exempted persons (o): information about financial, commercial, programming, expenditure, audience matters 10(1) CRTC may make regulations about auditing and examining broadcasters' records

**29** Yet none of the CRTC's 75 Open Data charts that address radio<sup>20</sup> sets out radio stations expenditures or staffing with respect to administrative expenses.

**30** The CRTC's decision not to place evidence on the public record has hindered the public's ability to make arguments about the impact of the CRTC's proposals.

***1. No evidence of administrative burden due to regulation or its scale***

**31** Contrary to its Ministers' expectations, TBS' exhortations and Canada's ratified treaty with its neighbours in North America, the CRTC's notice does not set out any evidence about radio broadcasters' administrative burden, including its specific cost or the number of full-time equivalent staff employed by radio to administer the CRTC's radio policies and regulations for each of Canada's 1,103 licensed or exempted radio stations (see Table 1).

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<sup>20</sup> The CRTC's data-broadcasting-overview.xlsx spreadsheet has 45 pages (tabs) and the data-radio-sector.xlsx spreadsheet has 30 pages, for a total of 75 pages.

**Table 1 Licensed or exempted radio stations in 2023**

Types of licensed or exempted radio stations in 2023:			
CBC/SRC Radio	87	Community	129
Private commercial AM stations	120	Community Developmental	0
Private commercial FM stations	615	Campus Community-based	49
Private commercial AM and FM network licences	0	Campus Instructional	0
Religious (music and spoken word)	36	Indigenous stations	54
		Other (tourist/traffic, etc.) – <i>may be exempted</i>	13
<b>Total number of over-the-air radio services</b>			<b>1,103</b>
Source: CRTC, Type and number of radio services and audio services authorized to broadcast in Canada, by language of broadcast, 2017-2023, data-radio-sector.xlsx, Tab RD-T6 (“Table 6”)			

32 In the CRTC’s case, the absence of any evidence in 2024-290 cedes the evidentiary ground in this proceeding primarily to radio broadcasters that have this evidence, placing the public at an insurmountable evidentiary disadvantage from the outset of the proceeding.

**Recommendation 1 The CRTC should publish the evidence it has regarding radio-station operators’ administrative burden. If necessary for reasons of confidentiality, the CRTC should publish administrative-burden data by size of radio-station operator (Major, Large, Medium or Small, as set out in CRTC, “Table 16 Profit margin for commercial radio by entity size”, Tab B-T16, data-broadcasting-overview.xlsx (accessed 10 January 2025).**

**2. Some regulatory requirements serve other functions for broadcasters**

33 FRPC disputes the CRTC’s unsupported assumption that radio broadcasters bear an administrative burden due to its regulations and policies.

34 For instance, since the majority of radio undertakings sell advertising time the program logs required by the CRTC’s radio regulations enable these stations to prove to advertisers that their ads have been broadcast. If the CRTC’s program-log system did not exist, broadcasters would have had to invent it.<sup>21</sup>

35 It is unreasonable to assume, therefore, that 100% of the administrative costs of radio-station operators result solely from the CRTC’s radio regulations and policies.

**Recommendation 2 Before adopting the 2024-290 proposals the CRTC should audit a random sample of 50 to 100 radio stations to determine more precisely how much of their administrative staff’s time is devoted to administering the CRTC’s radio policies and regulations**

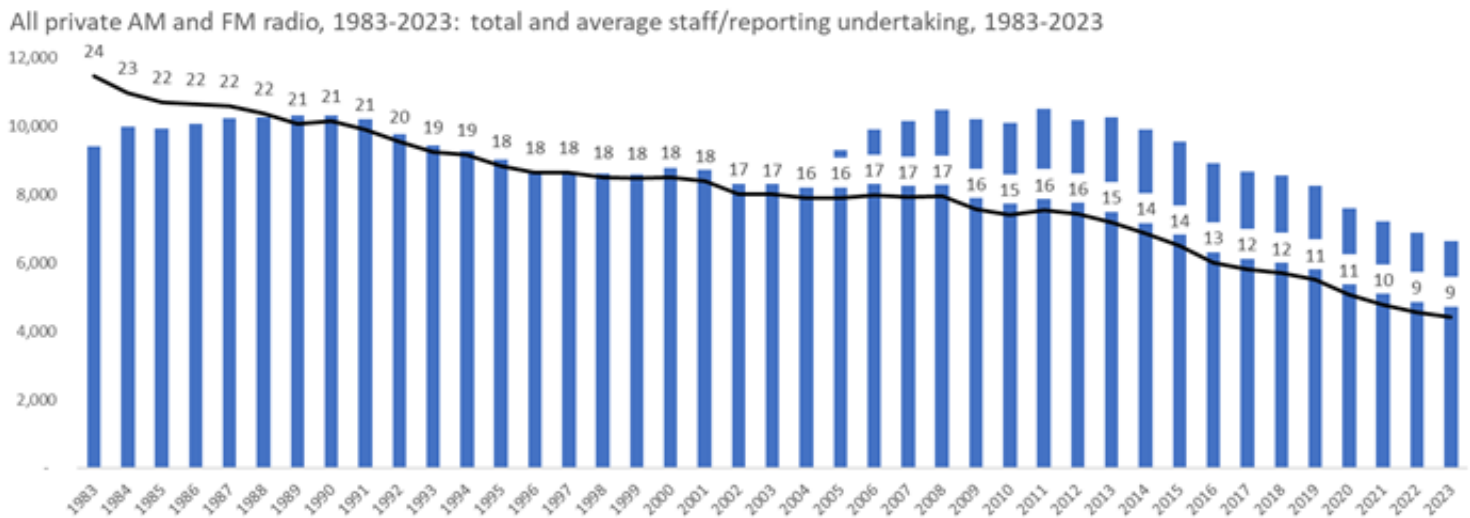
<sup>21</sup> FRPC notes that the Society of Composers, Authors and Music Publishers of Canada (SOCAN) accepts CRTC-program-log data from all campus and community radio stations (see NCRA/ANREC, [SOCAN Reporting](#), (Ottawa, 14 July 2016).

**3. Impact of technology on administration and staffing expenses**

36 Moreover, even if radio stations are required by the CRTC’s regulations to keep a log of the programming they broadcast, logging and broadcast-programming systems have been computerized for at least 30 or more years.

37 Declining staffing levels may reflect the impact of that computerization on radio stations’ administrative operations. Since the CRTC began to simplify its policies for radio-station operators in 1983, the average staff of a commercial radio station has decreased by 62.5% (from 24 to 9 persons): Figure 2.

**Figure 2 62.5% reduction in average radio station staff from 1983 to 2023**



38 The importance of news to Canada’s social, economic and political framework requires objective data to determine strengths and weaknesses of today’s radio programming. In this proceeding, however, the CRTC’s failure to publish any objective data about radio stations’ broadcast programming means that only participating broadcasters will have the key, relevant data to evaluate the impact of the CRTC’s proposed changes on their programming and operations – unfairly disadvantaging the people the broadcasting system is supposed to serve.

**Recommendation 3 The CRTC should revise its radio regulations to require the automatic submission of program logs to the CRTC every month, and the CRTC should makes these logs available to the public as it currently does for television services.**

**Recommendation 4 Each year – or more frequently – the CRTC should publish information about the total and first-run hours broadcast by individual radio stations, in terms of the program categories used by the CRTC to identify types of programming such as local news.**

**4. Fundamental change in private radio station ownership structure**

- 39 The structure of Canada’s radio system has changed significantly over time, which may change the nature of the administrative burden alleged to exist by the CRTC.
- 40 In 1969 the 21 largest radio broadcasters held licences for 74 stations – just 29% of the radio stations then operating (with an average of 3.5 stations per broadcaster).<sup>22</sup> FRPC estimates that at least 146 broadcasters had to meet the CRTC’s radio policies and regulations.
- 41 In 2023 the 21 largest radio broadcasters held 612 radio-station licences, or 84% of the stations then operating (with an average of 29 stations per broadcaster).<sup>23</sup> We estimate that 91 broadcasters were required to meet the CRTC’s radio policies and regulations in 2025 – 38% fewer broadcasters than in 1968.<sup>24</sup>
- 42 It seems reasonable to assume that this five-decade shift from many owners with very few stations to fewer owners with many stations (Appendix 4) has enabled larger radio-station operators to share administrative tasks required due to regulation – in which case the average ‘administrative burden’ for individual stations should have decreased.
- 43 If radio stations licensed to the same ownership group (or its affiliates) share at least some administrative tasks for their operations, some of their administrative costs may not be due solely to the CRTC’s regulatory policies and regulations. Again, 2024-288 did not provide any objective evidence on this point, thereby providing no context for the general public.
- 44 The CRTC has published some information about radio stations using four categories related (in an undefined way) to “entity size” (an undefined term): Table 2.

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<sup>22</sup> Updated version of database used in Monica Auer, “Is bigger really better? TV and radio ownership policy under review”, [Policy Options \(September 2007\)](#), at 79-83. See Appendix 4.

<sup>23</sup> CRTC, “Radio ownership market composition, 2018-2023” (Table 33), data-broadcasting-overview.xlsx, Tab B-T33; CRTC Ownership charts.

<sup>24</sup> FRPC used the CRTC’s list of 695 non-exempted, non-rebroadcasting radio services to determine the number of licensees; it offers only current (rather than historical) data. We then reviewed the CRTC’s ownership charts to match individual licensee names with ultimate owners. It is unclear, however, whether each radio station is associated with a specific chart, and as some CRTC licensing decisions do not disclose ultimate ownership, it is difficult to estimate the precise number of radio-station ownership groups operating today in Canada.

**Table 2 CRTC’s “entity size” data about radio**

CRTC, data-broadcasting-overview.xlsx, Table 16					
Profit margin for commercial radio by entity size, 2019-2023					
CRTC size designations:	2019	2020	2021	2022	2023
Major	24.0%	8.3%	2.0%	2.0%	8.3%
Large	16.3%	0.6%	4.1%	4.1%	5.8%
Medium	10.9%	-3.2%	-2.7%	-2.7%	7.1%
Small	12.6%	7.9%	10.8%	10.8%	10.8%

Source: CRTC data collection: , “Table 16 Profit margin for commercial radio by entity size”, Tab B-T16, data-broadcasting-overview.xlsx (accessed 10 January 2025)

- 45 To meet the first part of Parliament’s 2-part test for deregulation or exemption, the CRTC should obtain current programming data from licensed radio undertakings and publish the data based on the entity-size categories it uses to present profit-margin data for commercial radio. The CRTC should report separately for other categories of radio broadcasting undertaking (such as community or campus radio).

**Recommendation 5 The CRTC should obtain and publish programming data from radio stations to enable the Commission and the public to evaluate its proposals for administrative burden**

**Recommendation 6 The CRTC should undertake an empirical comparison of major, large, medium, small and single-station operators to determine whether differences exist between the administrative expenses (and staffing) of these groups of broadcasters**

**5. CRTC has but does not publish evidence relevant to ‘administrative burden’**

- 46 The public cannot evaluate the CRTC’s assumption that its regulations and policies are an administrative burden for radio-station operators because – although the Commission requires its radio licensees to report the number of staff they employ for programming, technical, sales and promotion and administration and general tasks (see Figure 3) – it does not publish administrative staffing information in its annual [Statistical and Financial Summaries](#) for radio.

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**Figure 3 CRTC annual return for radio**

[Home](#) > [Standards, data sources and methods](#) > [Questionnaires](#)

### Annual Return of Radio Survey, 2023

27-31

Employees and Remuneration

27a: **Programming and production - Average number of employees**

27b: Programming and production - Remuneration (included in total operating expenses above)

28a: **Technical - Average number of employees**

28b: Technical - Remuneration (included in total operating expenses above)

29a: **Sales and promotion - Average number of employees**

29b: Sales and promotion - Remuneration (included in total operating expenses above)

30a: **Administration and general - Average number of employees**

30b: Administration and general - Remuneration (included in total operating expenses above)

31a: Total - Average number of employees

31b: Total - Remuneration (included in total operating expenses above)

Source: Statistics Canada,  
[https://www23.statcan.gc.ca/imdb/p3Instr.pl?Function=assembleInstr&lang=en&Item\\_Id=1529161](https://www23.statcan.gc.ca/imdb/p3Instr.pl?Function=assembleInstr&lang=en&Item_Id=1529161), highlighting added

- 47 In 2010 the CRTC published expense-category staffing data for private radio from 1989/90 to 2008/09:<sup>25</sup> Figure 4. (The CRTC was asked on 8 November 2024 for the expense-category staffing data from 2014/15 to 2022/23; it answered two weeks later that it does not have any records about this issue under its control.<sup>26</sup>)
- 48 As the CRTC does not publish staffing information by expense category, the only available evidence on the public record is the 15-year-old data from 2010. It shows that in the 20 years from 1990 to 2009 private radio broadcasters reduced their administrative staffing by 242 positions, or 14.5%: Figure 4.

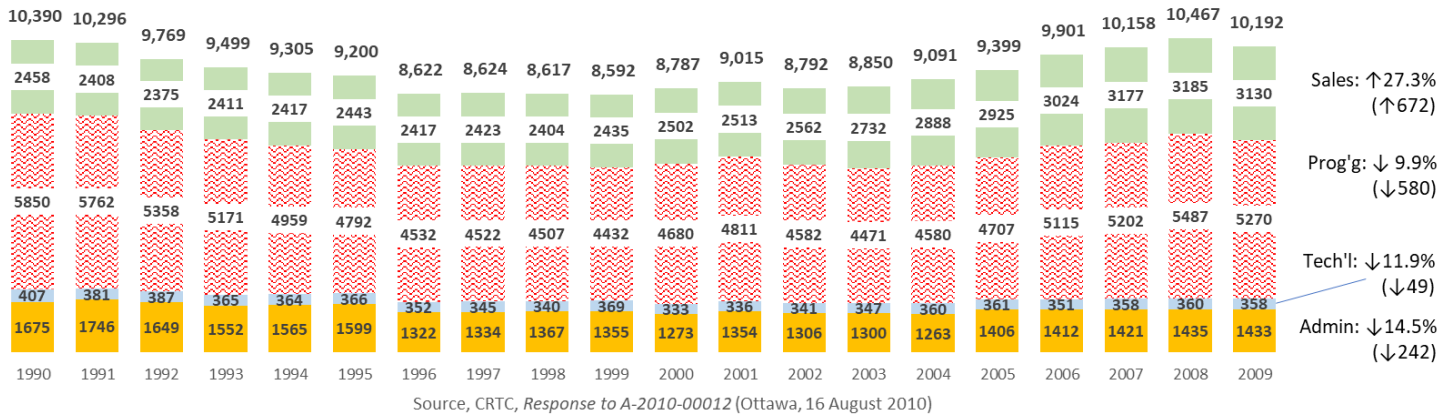
<sup>25</sup> On 16 August 2020 the CRTC released figures for private radio and private TV stations' staffing in programming and production, technical, sales and promotion, administration and general and total, for the broadcast years from 1989/90 to 2008/09 (A-2010-00012); it subsequently published these data online. While it later removed the data from its website, they are available at: <https://web.archive.org/web/20140918232258/http://www.crtc.gc.ca/eng/stats9.htm>.

<sup>26</sup> CRTC, *Final response letter A-2024-00057* (Ottawa, 18 November 2024).



**Figure 4 Employment by expense category**

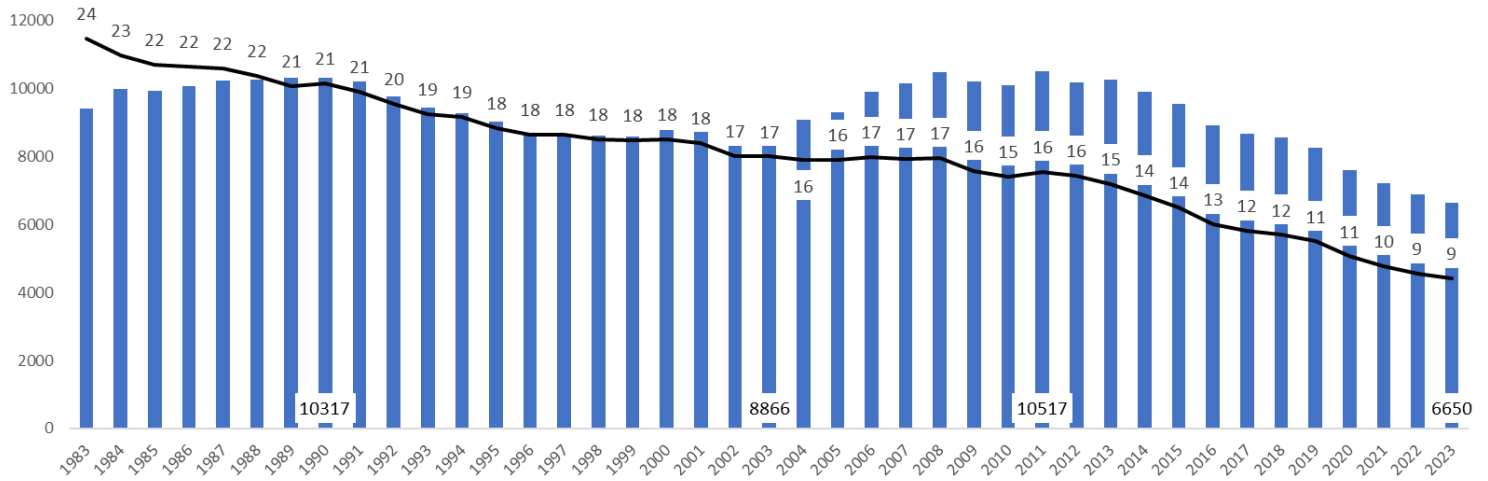
Private radio staffing by expenditure category, 1989/90 - 2008/09



49 The data available from the CRTC's *Statistical and Financial Summaries* for radio also show that overall private radio stations reduced their employment by 14% from 1990 to 2003 (from 10,317 to 8,866) and by 37% from 2011 to 2023 (10,517 to 6,650): Figure 5.

**Figure 5 Private radio staffing, 1983-2023**

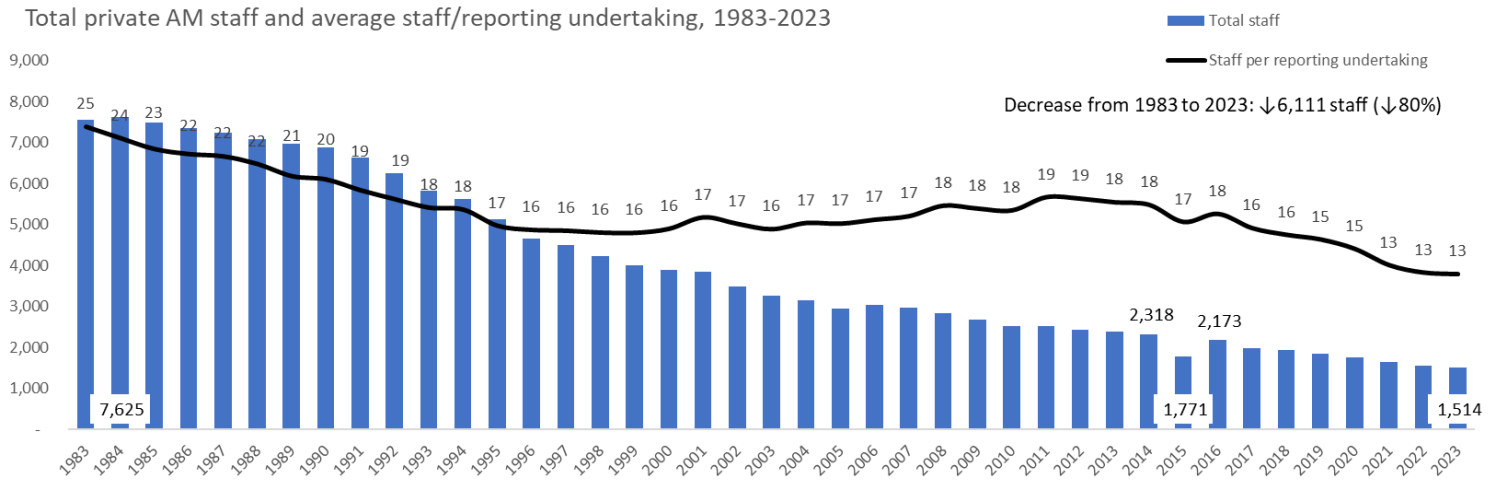
All private AM and FM radio, 1983-2023: total and average staff/reporting undertaking, 1983-2023



50 Private AM radio stations steadily reduced their staff, by 6,111 positions or 80% between 1983 and 2023: Figure 6.

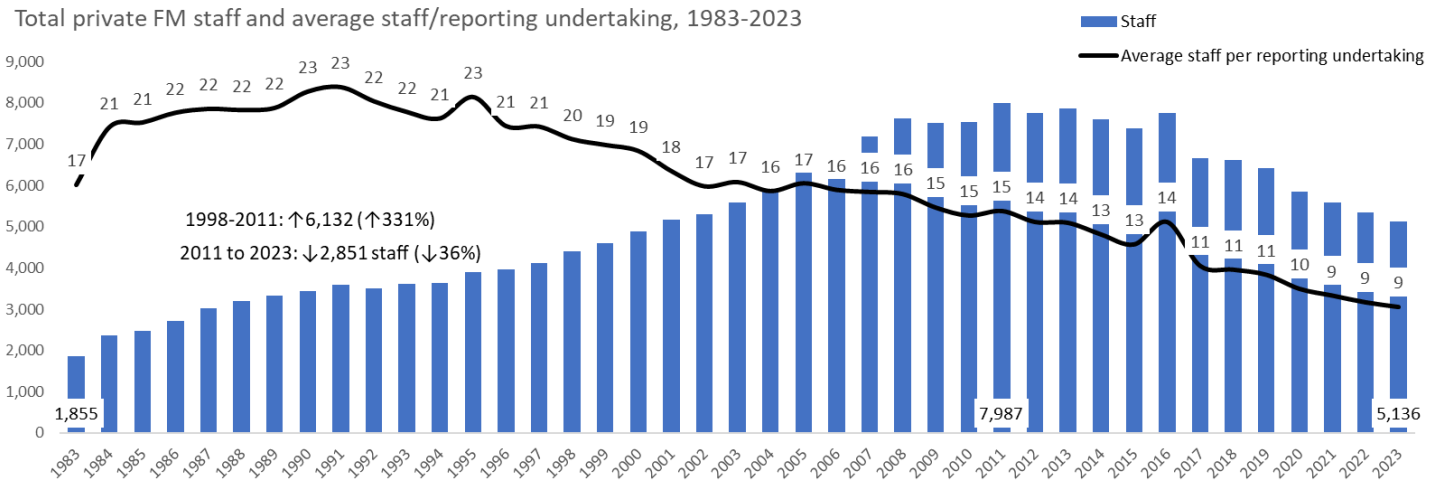
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**Figure 6 Private AM radio staffing, 1983-2023**



51 Initially some of those laid off from private AM radio may have found employment at private FM radio stations. FM station staff grew by 6,132 positions (331%) from 1983 to 2011: Figure 7. For just over the last decade, however, private FM stations reduced their staff by 2,851 people in 2011, to 5,136 people in 2023, a decrease of 36%.

**Figure 7 Private FM radio staffing, 1983-2023**



52 Overall, the available data show that radio-station staffing is decreasing – but they do not clearly establish in what areas staff are being reduced. The absence of this information about radio-station staffing makes it impossible for the public to evaluate the impact of the CRTC’s proposals on either administrative burden or Parliament’s *Broadcasting Policy for Canada*.

**Recommendation 7 If the CRTC has or has access to radio stations’ annual returns it should**

**aggregate<sup>27</sup> the data regarding employment by expense category and publish these data for this proceeding, and also for each year going forward.**

**6. No data published about online audio broadcasters**

- 53 It may be that private radio broadcasters have offered those who have lost their positions employment at online audio programming services that the broadcasters operate: the Pattison Media Group, for example, operates 52 digital media audio online undertakings from the same address.<sup>28</sup>
- 54 The CRTC does not publish aggregated employment data about online audio undertakings, however, and in any event also does not publish aggregated financial summaries for most of the large radio-station ownership groups: this makes it impossible for the public to evaluate factors that may explain what makes these large radio-ownership groups' administrative expenses rise or fall.

**Recommendation 8 The CRTC should clarify how it decides which broadcast ownership groups file or need not file aggregated financial summaries.**

- 55 FRPC acknowledges BNoC 2024-290's statement that "the issue of online audio undertakings and their implications ... will be considered later in a separate audio content proceeding scheduled for 2025".<sup>29</sup>
- 56 Yet it is unclear from the CRTC's *Statistical and Financial Summaries* whether the CRTC data published about radio-station broadcasters includes or specifically excludes expenditures and staffing used by these broadcasters' online audio services. The alternative could be that some radio-station operators are sharing their staff and programming with their own online audio services. If radio-station data reported to the CRTC include online-audio services' data, the CRTC could mistakenly determine that the radio stations are 'overregulated' when in reality the radio stations are providing administrative support to their affiliated and as-yet more lightly regulated online services (that are not the subject of this proceeding).

**Recommendation 9 As BNoC 2024-290 is dealing with licensed radio stations, the CRTC should ensure that evidence filed in support of (or in opposition to) the CRTC's flexibility or streamlining initiatives excludes online services affiliated with the stations.**

**Recommendation 10 The CRTC should clarify whether licensed radio broadcasters include or exclude online revenues, expenses and staffing from the annual returns these broadcasters**

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<sup>27</sup> Report the results for all non-exempted radio stations, AM and FM stations, for Canada and the individual provinces and territories, and for 'major', 'large', 'medium' and 'small' radio broadcasters.

<sup>28</sup> CRTC, [List of registered online streaming services operated by the ownership group](#), "[Pattison Media Ltd.](#)" [accessed 16 January 2025].

<sup>29</sup> 2024-290, at ¶19.

**submit to the CRTC**

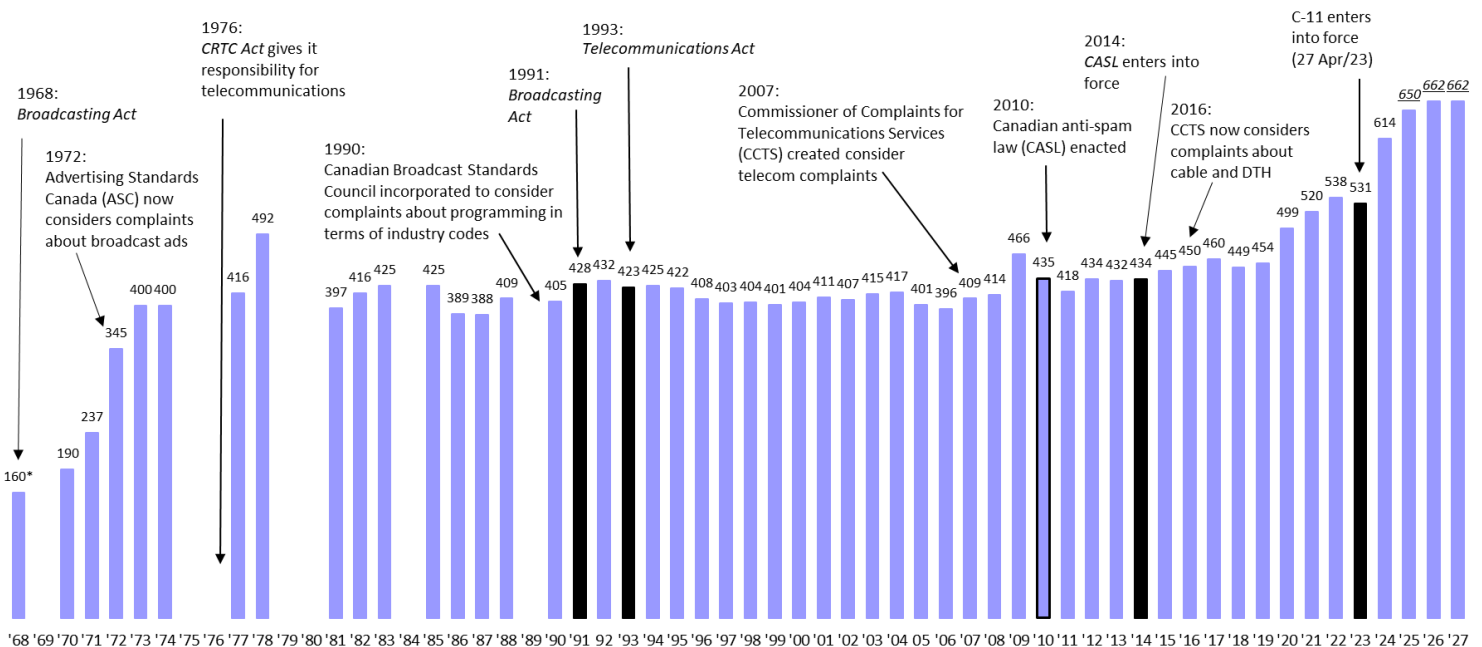
**C. Relevance of CRTC’s resources to administrative burden issue**

57 BNoC 2024-290 also says that the CRTC wants to reduce its own ‘regulatory burden’:

28. the purpose of exemption orders is to ease the regulatory burden on broadcasters and use fewer Commission resources for small, temporary or niche radio services that will have little impact on licensed broadcasters.

58 Subsection 5(2)(g) applies solely to broadcasters and the “administrative burden that ... may be imposed on persons carrying on broadcasting undertakings”, and the *Broadcasting Act* is silent with respect to CRTC resources. The CRTC’s staff increased 15.6% from 531 full-time persons or equivalents (FTEs) in 2022-23, to 614 in 2023-24: Figure 8.

**Figure 8 CRTC full-time or equivalent staffing, 1968-2027**



Sources: CRTC, *Annual reports, Part III Estimates, Departmental Performance Reports, Departmental Results Reports and Departmental Plans* (various years) - italicized and underlined text: CRTC’s staffing forecast

59 The Federal Court of Appeal explained in 2020 that administrative decision-makers must not ignore or distort the meaning of their enabling statutes to achieve a result they deem to be best:

For a while now, this Court has held that administrative decision-makers interpreting legislative provisions must consider the text, context and purpose of the provisions in order to arrive at the authentic meaning of the provisions [citations omitted], all of which follow the leading decisions of the Supreme Court in this area [citations omitted]. **This Court has also held**

that administrative decision-makers must interpret legislative provisions in a non-result-oriented manner, refraining from pursuing policy preferences alien to the governing legislation [citations omitted].

The empowering legislation of some administrative decision-makers gives them a policy-making or policy-applying role and some have expertise and specialization. These features may make them well-equipped to discern and appreciate the policy genuinely behind particular legislation. But it is not for them—or the courts for that matter—to amend that legislation. Absent specific and proper delegation of the power to legislate, making and changing legislation remains the exclusive preserve of those we elect: [citations omitted]. Administrative decision-makers, like courts, are limited to discerning the authentic meaning of legislation and applying that meaning faithfully—not ignoring or distorting that meaning to get a result in a particular case or to achieve whatever they imagine is best or right.<sup>30</sup>

[bold font added]

60 The Forum therefore disagrees with the CRTC that the Commission’s own resources play a role in evaluating administrative burden for the purposes of the *Broadcasting Act’s Regulatory Policy*.

#### *D. No evidence about impact of CRTC’s proposed changes on Broadcasting Policy*

61 As noted earlier, the CRTC is required by Parliament to place the matters set out in its *Broadcasting Policy for Canada* first if matters such as administrative burdens conflict with the *Regulatory Policy*. The main focus of Parliament’s broadcasting policy for Canada is arguably **programming**. At least ten sections of the policy describe the programming to be provided by broadcasters: Table 3.

### **Table 3 Private radio broadcasters’ purpose, role and programming**

#### **A. Recognition of official language communities**

Requirements for private English-language and French-language radio may differ<sup>3(1)(c)</sup>

#### **B. Purpose of broadcasters**

Private radio broadcasting should strengthen four aspects of Canada: its culture; political system; society and economy<sup>3(1)(d)(i)</sup>

#### **C. Role of broadcasters**

Private radio services should provide employment opportunities to Canadians<sup>3(1)(d)(iii)</sup>

Private radio broadcasters must support the creation of Canadian programming<sup>3(1)(e)</sup>

Private radio broadcasters must support the presentation of Canadian programming<sup>3(1)(e)</sup>

Private radio broadcasters should contribute significantly to the creation and scheduling of Canadian programming<sup>3(1)(s)(i)</sup>

Private radio broadcasters should respond to Canadians’ demands<sup>3(1)(s)(ii)</sup>

#### **D. Programming to be provided**

Canadian resources must predominate in each private radio station’s schedule<sup>3(1)(f)</sup>

<sup>30</sup> [Entertainment Software Association v. Society of Composers, Authors and Music Publishers of Canada, 2020 FCA 100](#) (CanLII) per Stratas J. for the Curt, at paragraphs 39-40; aff’d on other grounds by [Society of Composers, Authors and Music Publishers of Canada v. Entertainment Software Association](#), 2022 SCC 30.

Private radio programming should reflect Canadian opinions and ideas<sup>3(1)(d)(ii)</sup>

Private radio services should display Canadian talent<sup>3(1)(d)(ii)</sup>

Private radio services should reflect Indigenous Canadians <sup>3(1)(d)(iii)</sup>

Private radio services should reflect the multicultural and multiracial nature of Canada<sup>3(1)(d)(iii)</sup>

Private radio programming should offer information and analysis about Canada and other countries from a Canadian point of view<sup>3(1)(d)(ii)</sup>

Private radio programming should offer a balance of information, enlightenment and entertainment for all interests and tastes<sup>3(1)(i)(i)</sup>

Private radio programming should include local, regional, national and international content<sup>3(1)(i)(ii)</sup>

Private radio programming should offer different views on matters of public concern<sup>3(1)(i)(iv)</sup>

Private radio programming should include a “significant” amount of independent production<sup>3(1)(i)(v)</sup>

**62** The CRTC’s *Radio Regulations, 1986* enable the CRTC to require radio undertakings to submit statistics about the programming they broadcast,<sup>31</sup> based on five general programming categories with a total of 20 subcategories.<sup>32</sup> Table 4. Broadcasters need only submit these to the CRTC upon its “request”.<sup>33</sup>

**Table 4 CRTC’s radio programming content categories**

CRTC content categories	CRTC content subcategories
Content Category 1 - Spoken Word	Content Subcategory 11: News
	Content Subcategory 12: Spoken word-other
Content Category 2 - Popular Music	Content Subcategory 21: Pop, rock and dance
	Content Subcategory 22: Country and country-oriented
	Content Subcategory 23: Acoustic
	Content Subcategory 24: Easy listening
Content Category 3 - Special Interest Music	Content Subcategory 31: Concert
	Content Subcategory 32: Folk and folk-oriented

<sup>31</sup> Section 8(4): “A licensee shall furnish, to the Commission on request, its program log or record for any day, with a certificate signed by or on behalf of the licensee attesting to the accuracy of its content.”

<sup>32</sup> S. 2 of the *Radio Regulations, 1986* defines content categories as “content category means a content category of broadcast matter that is described in the appendix to Broadcasting Regulatory Policy 2010-819, dated November 5, 2010 and entitled Revised content categories and subcategories for radio; (catégorie de teneur)”.

<sup>33</sup> Subsection 8(1):

8 (1) Except as otherwise provided under a condition of its licence, a licensee shall

(a) keep, in a form acceptable to the Commission, a program log ... of the matter broadcast by the licensee;

(b) retain the log or record for a period of four weeks after the date when the matter 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 frequency of the licensee’s station,

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

(iv) in relation to each program broadcast,

...

(B) subject to subsection (2), the number of the relevant content category,

...

(2) When a program falls into more than one content category, a licensee shall cause to be entered in its program log or record the numbers of the two principal content categories in descending order of their relative importance in terms of broadcast time.

....

CRTC content categories	CRTC content subcategories
	Content Subcategory 33: World beat and international
	Content Subcategory 34: Jazz and blues
	Content Subcategory 35: Non-classic religious
	Content Subcategory 36: Experimental Music
Content Category 4 - Musical Production	Content Subcategory 41: Musical themes, bridges and stingers
	Content Subcategory 42: Technical tests
	Content Subcategory 43: Musical station identification
	Content Subcategory 44: Musical identification of announcers, programs
	Content Subcategory 45: Musical promotion of announcers, programs
Content Category 5 - Advertising	Content Subcategory 51: Commercial announcement
	Content Subcategory 52: Sponsor identification
	Content Subcategory 53: Promotion with sponsor mention:

63 The CRTC, however, has also disclosed in responses to access-to-information requests that since January 2014 it has not analyzed

- the types of programming broadcast by privately owned radio stations in Canada (A-2020-00065),
- the amount of original locally-relevant content broadcast by Canadian commercial radio stations (A-2020-72), or
- employment opportunities at commercial radio stations (A-2020-00067).

64 Other than stating broadly that the CRTC wants “to ensure that radio remains culturally dynamic and competitive” (Summary) and that radio “programming continues to serve the public interest and responds to market specificities” (¶18), 2024-290 says nothing about how its proposed changes may affect radio-stations’ current or historic programming.<sup>34</sup> (Nor does it state whether the CRTC asked for such logs to prepare for this proceeding.) Without this basic information the public has very limited information on which to base assessments about the impact of the CRTC’s proposed change.

65 The overall lack of radio-programming and other data makes it impossible for the public to evaluate how more flexible regulation would or could implement Parliament’s broadcast-policy objectives or how it will affect the programming and employment opportunities available to Canadians in the radio system.

**Recommendation 11 The CRTC should obtain and publish current programming information from licensed radio undertakings and should also publish any data it holds concerning the programming broadcast by radio stations in the past**

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<sup>34</sup> 1991 *Broadcasting Act*, s. 10(1)(i): “The Commission may, in furtherance of its objects, make regulations ... requiring licensees to submit to the Commission such information regarding their programs ... as the regulations may specify; ....”



- 66 BNoC 2024-290 states that radio-station programming “continues to serve the public interest” (paragraph 8). The CRTC similarly said in a 1997 review of programming that its review “focus on ensuring that Canadians continue to have access to Canadian music and other programming that reflects their communities and their country.”<sup>35</sup>
- 67 Vague statements such as these do not enable the public to evaluate the impact of regulatory proposals on specific requirements in Parliament’s *Broadcasting Policy for Canada*, and in particular the mandatory requirements concerning the predominance of programming made by Canadians and the requirement to employ Canadians. Simply stating, as 2024-290 does, that Canadian radio is “culturally dynamic” and that its programming “continues to serve the public interest” does not enable the public to determine how Canadian radio stations are implementing Parliament’s *Broadcasting Policy for Canada* or whether their performance is weakening, remaining level or improving.
- 68 As 2024-290 does not include any radio-station programming performance data, however, it is impossible for the public to determine the impact, if any, of reduced staffing on radio stations’ local and other programming, including weekly hours of first-run news and first-run information for individual local communities.
- 69 Nor can programming data be obtained elsewhere from the CRTC. Its Open-Data collections for broadcasting and radio set out 75 pages or tabs of information, of which 15 are devoted to audiences’ tuning behaviour and 10 are devoted to Canadian content expenditures: none of the pages describes the programming that radio stations offer to audiences.
- 70 In early January 2025 the Forum commissioned a survey about radio in Canada. The randomly dialled interactive-voice-response (IVR) telephone survey took place from Thursday, January 16, 2025 to Saturday, January 17 2025. It obtained 1,598 responses from people in Canada’s provinces and territories to 8 questions about Canadian radio (and 7 demographic questions that allowed the results to be weighted by gender, age and province). Due to lack of time in this proceeding, the Forum is submitting the English- and French-language questionnaires (Appendix 2) and the weighted results by question in an Excel spreadsheet (Appendix 3); FRPC will publish its analysis of the survey results on its website in February 2025.
- 71 We asked people whether they thought local radio stations in their community are providing the same, more or less local news than five years ago. A very small number – 6.7% -- thought there was more local news than before, while 35.1% thought there was less and 36.1% thought the amount had not changed: Table 5. That said, 48.6% of people aged from 25 to 34 years of age thought there was less local news than before.

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<sup>35</sup> A review of the Commission’s Policies for Commercial Radio, Public Notice CRTC 1997-104 (Ottawa, 1 August 1997), <http://www.crtc.gc.ca/eng/archive/1997/PB97-104.HTM>, at paragraph 2.



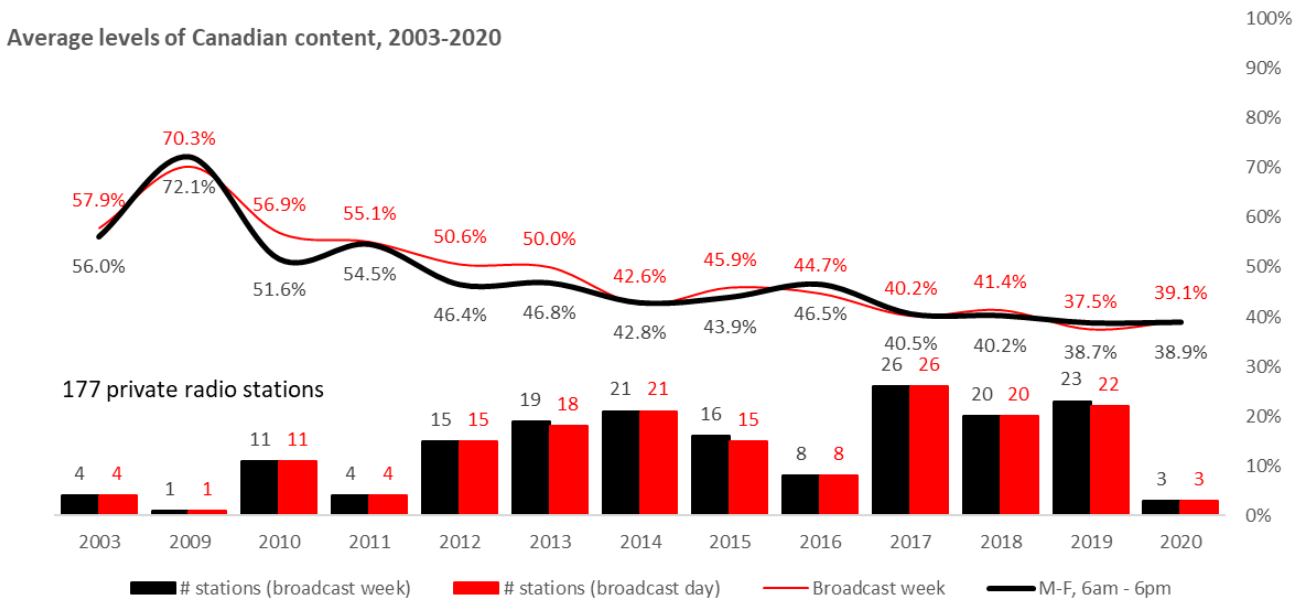
**Table 5 January 2025 perceptions of change availability of local radio news**

Q4. Local radio stations are often described as an important source of news about individual communities. Do you think the local radio stations in your community provide the same, more or less local news than they offered five years ago?	Language spoken at home			
	English	French	Other	Total (Canada)
As much local news as before	38.6%	35.3%	28.8%	36.1%
Less local news than before	35.3%	35.5%	2.3%	35.1%
More local news than before	5.1%	7.3%	12.7%	6.7%
Don't know or No opinion	20.9%	21.9%	56.2%	22.1%

Source: Random IVR telephone survey conducted on behalf of FRPC by Access Research, 16-18 January 2025 (n=1,598)

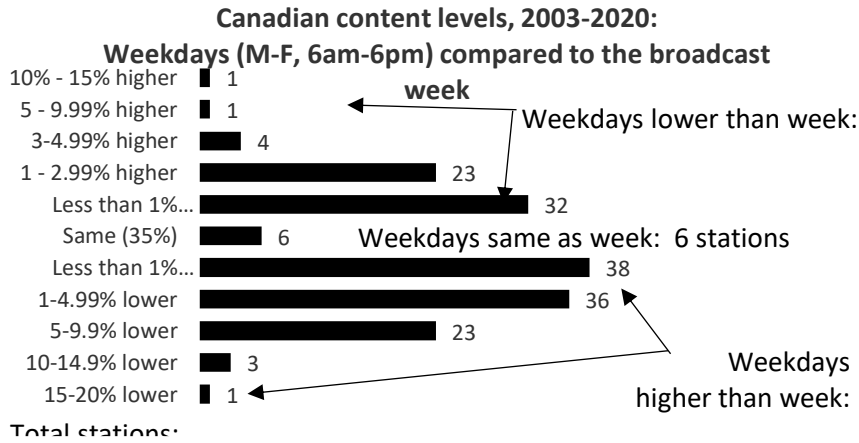
- 72 While knowing what Canadians think has been happening to local news is of interest, it is equally important to know how news programming has actually changed.
- 73 In response to access-to-information requests for information about the levels of Canadian content broadcast by Canadian radio stations, the CRTC provided results from its analyses of the Canadian and FLVM programming broadcast by 177 private radio stations for 13 years in the 18-year period from 2003 to 2020. Data for the stations' broadcast week are set out in Appendix 7; Appendix 8 provides data for the stations' peak listening period (weekdays 6 AM to 6 PM).
- 74 Results from the CRTC's own analyses initially suggest that while average levels of popular Canadian music on commercial radio stations have exceeded 35% over the last decade, the levels have been declining for at least a decade: Figure 9. This is true for the entire broadcast week and for peak listening periods. That said, the statistical results from 2003 to 2011 are based on very few radio stations.

**Figure 9 Average levels of Canadian content by broadcast week and peak listening period, 2003-2020**



75 Differences emerge when the week or day are considered. More than half (101 or 60%) of the 168 private radio stations analyzed by the CRTC broadcast a lower level of popular Canadian music during peak listening times – Monday to Friday, 6 AM to 6 PM – than over the week: Figure 10.

**Figure 10 Canadian content levels: broadcast weeks vs peak listening**



76 Of special interest were the results for weekdays. The CRTC monitored the programming of 133 private radio stations from 2013 to 2020; they made up 79% of the 168 stations analysed: Table 6. More than half of these stations – 94 (56%) – reported that 40% or more of their Category 2 musical selections were Canadian.

**Table 6 Levels of Canadian content (Category 2 popular music) by private radio stations, 2013-2020**

Range of Canadian content levels achieved by private radio broadcasters Monday – Friday, 6 AM to 6 PM: 2013-2020			
Canadian content levels – range of values	Stations in range	% of total	
10% - 19.99%	2	1.2%	
20% - 29.99%	1	0.6%	
30% - 34.99%	6	3.6%	
35%	1	0.6%	Canadian content from 35-38.9%: 65 stations (38.7% of total)
35.01% - 35.99%	11	6.5%	
36.0% - 36.99%	25	14.9%	
37.0% - 37.99%	15	8.9%	
38.0% - 38.99%	13	7.7%	
40% - 44.99%	39	23.2%	Canadian content from 40% - 100%: 94 stations
45% - 49.99%	19	11.3%	
50% - 54.99%	10	6.0%	

Range of Canadian content levels achieved by private radio broadcasters Monday – Friday, 6 AM to 6 PM: 2013-2020			
Canadian content levels – range of values	Stations in range	% of total	
55% - 59.99%	12	7.1%	(56.0% of total)
60% - 64.99%	6	3.6%	
65% - 69.99%	2	1.2%	
70% - 74.99%	3	1.8%	
75% - 79.99%	1	0.6%	
80% - 84.99%	1	0.6%	
100%	1	0.6%	
Total	168	100.05	

77 Such results seem highly relevant to the 2024-290 proceeding, and it is surprising that they were not included in BNoC 2024-290. After all, Canada’s public and private broadcasters know their own performance, presumably also retain historical data and can make well-informed estimates of their competitors’ performance. Canada’s community and campus radio stations may lack detailed information about their competitors, but are also aware of their own performance. Leaving the public in the dark about the programming now being broadcast by radio in Canada makes it extremely difficult for the public to participate effectively in this proceeding.

**Recommendation 12 The CRTC should publish objective evidence about radio-station programming by radio station and by type of broadcaster (the national public broadcaster, private commercial broadcasters, community and other broadcasters)**

***E. Implications of lack of evidence about administrative burden and performance***

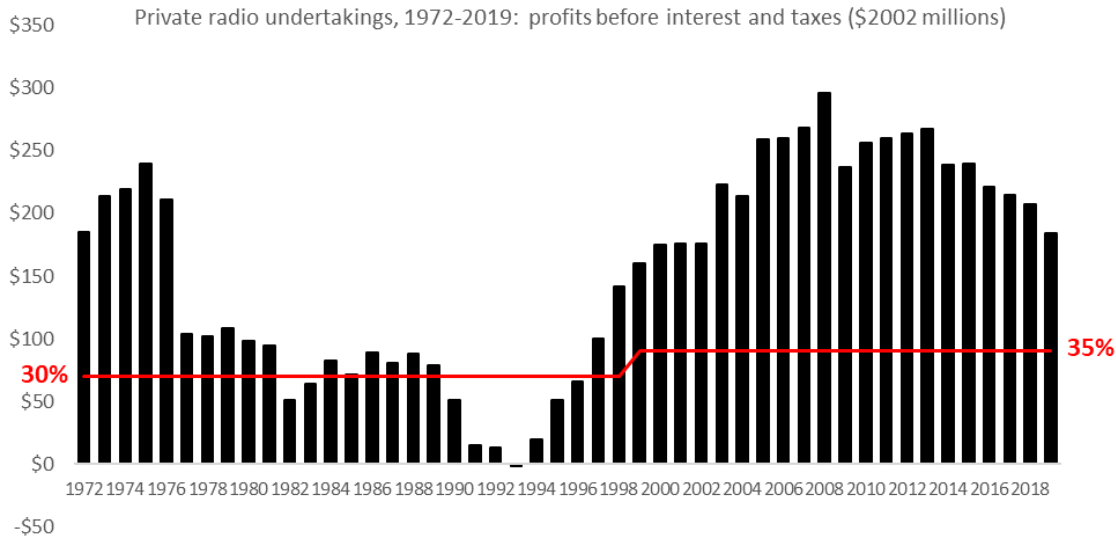
78 2024-290’s lack of objective information about the level (or *quantum*) of the administrative burden alleged to exist by the CRTC and the actual degree to which radio broadcasters meet the requirements of Parliament’s *Broadcasting Policy for Canada* means that the public cannot weigh and evaluate the impact of maintaining, increasing or decreasing the CRTC’s radio policies and regulations.

79 It also means that parties that – based on their review of the history of the CRTC’s deregulatory initiatives over the past several decades – oppose the CRTC’s proposals cannot provide the Commission with their own empirical evaluations. Those challenging the CRTC’s deregulatory approach in 2024-288 but lack relevant evidence are therefore highly unlikely to convince the Commission of the merits of their arguments because, as the CRTC has said, it makes its decisions about a proceeding based on the public record of that proceeding.

80 Meanwhile, next to no regulatory ‘symmetry’ has been offered to Canadians in exchange for streamlining commercial radio stations’ regulatory context. Since 1968 the CRTC has raised musical selections’ Canadian content requirement for the majority of radio stations

once – increasing the percentage of Canadian musical selections in poplar music broadcast by commercial radio stations from 30% to 35% in 1998.<sup>36</sup> Figure 11.

**Figure 11 Canadian content (category 2 popular music) and private radio station profits (PBIT)**



Source: CRTC statistical and financial summaries, various years; Statistics Canada (CPI=2002)

81 The Forum’s concern is that, in light of the absence of any data about programming, this 35<sup>th</sup> review of radio policy may reduce regulatory requirements for conventional radio stations without actually furthering the implementation of Parliament’s *Broadcasting Policy for Canada*. It is noteworthy, we believe, that 2024-290 does not mention “reflection” once, and touches on ‘cultural’ matters a scant three times:

Summary: ... [b]y streamlining its processes and requirements, the Commission wishes to ensure that radio remains culturally dynamic and competitive, while ensuring that programming continues to serve the public interest and responds to market specificities

...

4. ... [S]ubsection 3(1) of the Broadcasting Act describes the broadcasting policy for Canada and, highlights the importance of ensuring that the broadcasting system reflects Canada’s diverse communities, by supporting employment and production in languages that reflect Black and racialized communities and the diverse ethnocultural makeup of Canadian society

...

112. The Commission remains open to considering other issues and concerns relating to the radio sector and that fall within its jurisdiction and authority under the Broadcasting Act. Comments should take into account the various cultural, economic, social and technological policy objectives set out in the Broadcasting Act.

<sup>36</sup> SOR/2008-177 (in effective 1 September 2008).

...

82 BNoC 2024-290 refers, meanwhile, to flexibility 9 times, to “flexible” 5 times and to streamlining 6 times – though it refers to “news” 18 times.

83 The absence of objective data from the CRTC about commercial radio stations’ programming and detailed programming expenditures (such as expenditures on local-station news and employment) tilts the evidentiary playing field in this proceeding towards private broadcasters. They have and can pick the empirical evidence they need to make their case.

84 Canadians, however, in general are limited to offering their impressions of commercial radio in surveys and focus groups, or through comments filed in this proceeding. The CRTC’s decision to not include elementary information about some of the key issues for which it seeks Canadians’ comments – radio-station local programming and local news – places Canadians at a serious, asymmetrical disadvantage relative to private broadcasters.

### III. Issues and questions raised by BNoC 2024-290

85 The Forum’s answers to the 36 questions set out in BNoC 2024-290 are set out in Appendix 12.

86 We address below two general issues raised by the CRTC’s questions (licence terms and streamlining processes) and an issue of concern to the Forum – local radio-station news.

12. The Commission remains open to considering other issues and concerns relating to the radio sector and that fall within its jurisdiction and authority under the Broadcasting Act. Comments should take into account the various cultural, economic, social and technological policy objectives set out in the *Broadcasting Act*.

#### A. Licence terms

87 From 1918 – when the Department of Naval Services first issued two experimental radio broadcasting stations<sup>37</sup> - until 1967 the federal government decided whether to license broadcasters and for how long.

88 The novelty in establishing the CRTC in 1968 was that it empowered the Commission itself – rather than a government Minister – to decide whether to grant licences and also that it set out the maximum term for which the licence was valid. In other words, broadcasters were granted temporary permission to operate, initially on the theory that they were using the publicly owned spectrum. The new *Broadcasting Act* set a maximum limit for a

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<sup>37</sup> Frank Foster, *Broadcasting Policy Development*, (Frank Foster Communications Ltd.: 1982) at 5.

broadcasting licence of five years<sup>38</sup> and empowered the CRTC to impose conditions on licences to implement the equally-new *Broadcasting Policy for Canada*.<sup>39</sup>

- 89 The 1991 *Broadcasting Act* expanded the licence term to a maximum of seven years,<sup>40</sup> and the *Online Streaming Act* empowered the CRTC to issue licences for any length of time, including indefinitely.<sup>41</sup>
- 90 A licence that the CRTC issues for an indefinite term or, say, for one or two decades, may nevertheless be cut short. The *Online Streaming Act* empowers the Commission to suspend or revoke licences after a public hearing,<sup>42</sup> except in the case of CBC/Radio-Canada: the CRTC may only suspend or revoke its licences with its consent.<sup>43</sup> The CRTC rarely revokes radio-station licences, however. One concern that its staff has had is that in a community with just one station the result may be “a news desert which could have serious consequences for public safety, for example, in the instance of extreme weather events, or other public emergency situations.”<sup>44</sup>
- 91 According to the CRTC’s 2024/25 list of broadcast undertakings 471 communities are served by Canadian radio stations. Of these communities, 294 (62.4%) receive radio service from one station. More than half of the communities — 169 or 57.5% of the single-station communities — are served by commercial (164), “commercial-religious” (3) or “ethnic” (2) radio stations. Canada’s 21 largest private-radio ownership groups (see Appendix 4) serve 123 single-station communities or 42% of all single-station communities.
- 92 2024-290 states that the CRTC “wishes to amend licence terms to reduce the regulatory burden and reporting requirements on the licensees” (paragraph 20). The CRTC says it “considered regulatory frameworks for radio outside Canada”<sup>45</sup> and sets out comparative

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38 S. 17(1)(a) [first term] and (c) [renewal term].

39 S. 2.

40 S. 9(1)(b).

41 S. 9(1)(b): “Subject to this Part, the Commission may, in furtherance of its objects, ... issue a licence, the term of which may be indefinite or fixed by the Commission”.

The Forum opposed this amendment in Bill C-11, on the basis that indeterminate licence terms effectively create property rights in the broadcast licence – despite subsection 3(1)(b) of the *Broadcasting Act* which describes radio frequencies as “public property” (underlining added).

42 S. 24(1)(a). Requirements for a suspension or revocation hearing are set out in s. 18(1)(b).

43 S. 24(2).

44 CRTC, Radio Policy and Applications, “MEMORANDUM TO THE EXECUTIVE DIRECTOR BROADCASTING” (DM# 3914466 v.1), at p. 8. On 9 October 2024 the CRTC denied consideration [to FRPC’s 28 March 2024 Part 1 application asking the CRTC to review its broadcast emergency alerts policy](#) because in asking the CRTC to issue a notice of consultation about broadcast emergency alerts, FRPC was not an “applicant” ... who ‘... asks the Commission to make a decision, whether on a matter specific to the circumstances, like a new licence or a tariff, or on a more general policy issue.’”: <https://crtc.gc.ca/eng/archive/2024/lb241009.htm>.

45 ¶18.

data about the licence terms granted in nine other countries: Australia, France, Ireland, Mexico, New Zealand, Spain, Switzerland, the United Kingdom and the United States.

- 93 The CRTC has not explained why other nations' licence terms are relevant to its decisions on this point: Canada's circumstances are unique not merely because of its five-time-zone size, its shared border with the United States of America, its bilingual and multicultural character and – last but foremost – its unique broadcasting legislation and approach to licensing. The primary concern since the 1930s in Canada has been to ensure that Canadian broadcasters serve the needs and interests of Canadians; although at times the CRTC's licensing process for programming services has been described derisively as 'beauty contests'.<sup>46</sup>
- 94 The CRTC has also not explained why its 9-country comparison omits relevant evidence about the rationale for long licence terms. Canada issues broadcast programming licences based on applicants' capacity and commitment to implementing Parliament's broadcasting policy for Canada. New Zealand, on the other hand, issues broadcasting licences by auction or direct sale, to provide "those making significant long term investments in New Zealand's communications and broadcasting infrastructure" with "greater certainty of tenure": "rights are fully tradable between parties at any time", and "are initially allocated on a competitive basis, typically by auction, and last for periods of up to 20 years".<sup>47</sup>
- 95 As well, the CRTC has not explained how its proposal to grant licences to broadcasters forever (indefinitely) will either strengthen broadcasters' implementation of the *Broadcasting Policy for Canada* or benefit Canadians. The Commission has also not provided any evidence – apart from its 9-nation comparison – showing how indefinite radio licence terms will maintain or improve service to individual communities: after all, the CRTC does not require broadcasters to submit the monthly logs they are required to maintain, making regular and systematic evaluation impossible.
- 96 Due to the lack of explanation and evidence, it is reasonable to ask whether the CRTC is considering indefinite licence terms as a way of increasing the "good will" value now ascribed to broadcast licences: if that is the case, the benefits to broadcasters are clear – the benefits to Canadians are not.
- 97 Finally, the CRTC has not explained the impact of indefinite licence terms on the public. Since 1968 the CRTC has invited the public's comments on all radio broadcasters'

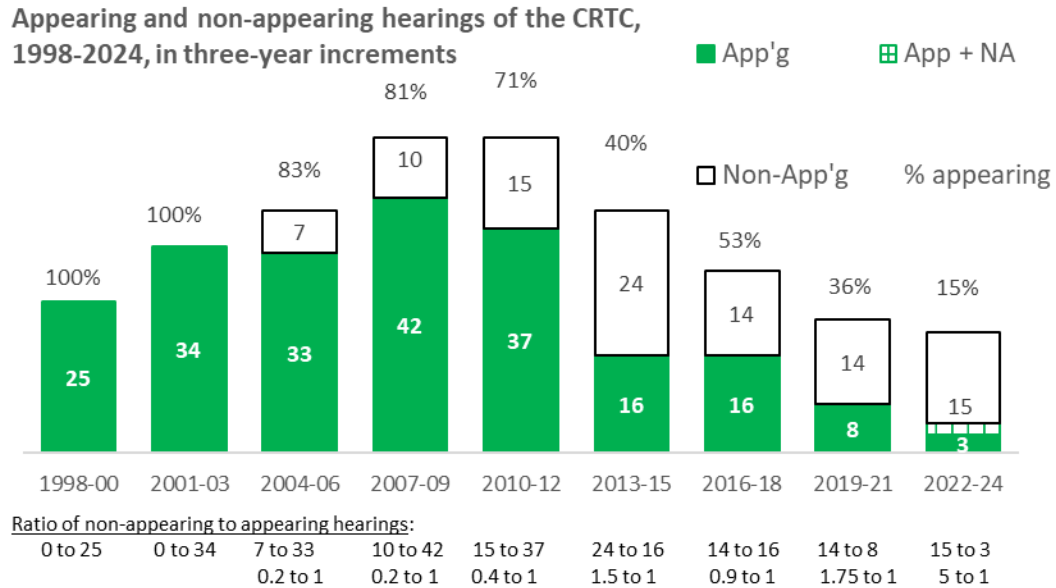
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<sup>46</sup> The difference being that while a beauty contest is primarily based on judgments about how participants' appearance, a licensing hearing is about participants' capacity and commitment to provide a service that implements Canada's *Broadcasting Policy*.

<sup>47</sup> See Government of New Zealand, "Certainty for commercial radio licence holders" [News release \(11 May 2003\)](#).

applications to renew their licences. At times it even holds public hearings about these renewals, although in the last decade far less frequently than before.

**Figure 12 CRTC’s appearing and non-appearing hearings, 1998-2024**



Source: CRTC public hearing transcripts and notices (includes broadcasting and telecom)

98 Public hearings enabled people served by a radio station<sup>48</sup> to address CRTC Commissioners directly about the station’s past performance and future plans. Indefinite licence terms sever the relationship between the Commission and the public in whose interests it says it regulates:

CRTC, [Chairperson \(28 November 2024\)](#)

...

As you know, the CRTC is an independent quasi-judicial tribunal that regulates the Canadian communications sector in the public interest. We hold public consultations on telecommunications and broadcasting matters and we make decisions based on the public record.

...

99 Although Canadians can write the Commission to express their concerns, a risk exists that the CRTC will forward letters about programming issues to the Canadian Broadcast Standards Council (CBSC). Even if the CRTC retains written concerns from members of the

<sup>48</sup> As well as industry associations, competitors of that station and public-interest organizations.



public, how certain can they be that the CRTC will investigate their concerns in the near future, or at all?<sup>49</sup>

100 FRPC does not support indefinite licence terms because its main effect is to limit Canadians' ability to hold broadcasters – and the Commission – to account.

101 The CRTC may nevertheless decide on the basis of the evidence on the record of this proceeding to forge ahead with indefinite licences.

102 In that case, the Forum says that the CRTC should base decisions about indefinite terms on the type of broadcaster eligible for an indefinite licence, broadcasters' demonstrated commitment to adhering to the CRTC's radio policies and regulations, and broadcasters' undertakings to strengthen their implementation of the *Broadcasting Policy* over time.

### 1. *Type of broadcaster*

103 Unlike the private element in Canada's broadcasting system, broadcasters that are part of the system's public and community elements operate from the premise that their role is to serve the public and communities. Consequently, there is a high probability that for these stations, quality of service matters more than profits.

104 The CRTC should therefore only issue indefinite licences to the public and community elements in radio broadcasting: the CBC/Radio-Canada's radio services, campus and community radio broadcasters and Indigenous radio broadcasters (regardless of which communities they serve).

### 2. *Compliance*

105 If the CRTC nevertheless decides to issue indefinite licences to different radio broadcasters of all classes, it should then determine its approach to radio broadcasters that do not meet its regulatory requirements. The CRTC currently publishes no comparative historical time-series data describing the scale, type or impact of regulatory non-compliance and does not publish comparative historical data describing its approach to licensees that breach its regulations or the *Broadcasting Act*.

106 The CRTC had committed in 2014 to "publish annual lists of radio stations in compliance and non-compliance with the Commission's regulations and their conditions of licence".<sup>50</sup>

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<sup>49</sup> When the Communications, Energy and Paperworkers union (CEP) asked the CRTC in the late 2000s to investigate a TV broadcaster's use of centralcasting, the CRTC's Vice-Chairperson (who lacked legal authority to speak on behalf of the Commission) assured CEP that the CRTC would investigate this issue at the licensee's next renewal hearing; the matter was not raised by the Commission in that proceeding.

<sup>50</sup> *A targeted policy review of the commercial radio sector*, [Broadcasting Regulatory Policy CRTC 2014-554](#), at ¶167.

In April 2019 CRTC staff told the Commission that that it “has limited data on the extent of non-compliance issues in the Canadian radio industry.”<sup>51</sup>

- 107 By May 2021 the CRTC had abandoned its commitment to publish lists of non-compliant radio stations “because it was not possible to have accurate, up to date information always available”.<sup>52</sup> It explained how the public could consult individual licence-renewal decisions concerning what were then 1,086 licensed radio stations<sup>53</sup> to learn about their non-compliance:<sup>54</sup>

However, license renewal or ownership decisions that highlight non-compliance are available on our web site. As an example, if you are looking for radio stations found in non-compliance through a 2020 renewal, carry out the following steps:

- Search the term Radio
- Filter results by type ‘decisions’,
- Filter results by subject ‘compliance’,
- Filter results by year ‘2020’.

Any non-compliance will be explained in the body of the decision under a special section. For an example, see Broadcasting Decision 2020-239 <https://crtc.gc.ca/eng/archive/2020/2020-239.htm>.

[Appendix CCC not provided in CRTC’s ATIP response]

- 108 Non-CRTC analyses show that regulatory non-compliance is a fact of life in Canadian broadcasting. Research published in 2006 described regulatory non-compliance by 499 commercial, community and campus radio stations from 1968 to 2005; the stations represented 68% of the stations of these three classes licensed in 2005.<sup>55</sup> FRPC updated these data from 2005 to 2012, and found that from 1968 to 2012 the CRTC had determined that 727 radio stations were non-compliant: Figure 13.

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<sup>51</sup> CRTC, *Radio non-compliances [sic] – Overview and measures*, DM# 3627317 (Gatineau, 12 April 2019), (CRTC A-2020-00068 Supplementary Release Package), at p. 1.

<sup>52</sup> On 10 May 2021 the CRTC said these lists “are no longer available” on its website, “because it was not possible to have accurate, up to date information always available”: CRTC Access to Information and Privacy Office, Response Letter A-2021-00007, (Ottawa, 10 May 2021).

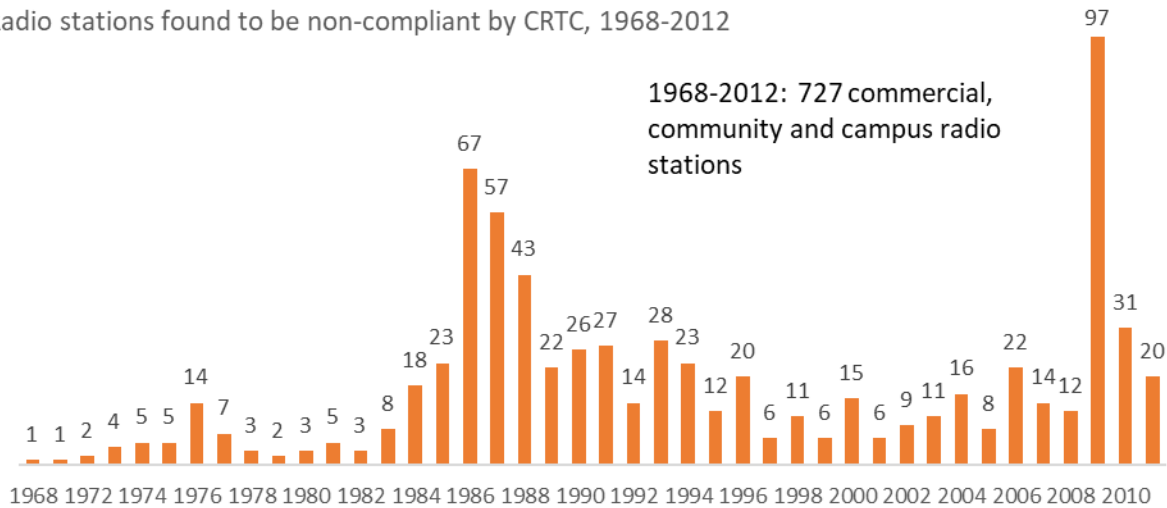
<sup>53</sup> CRTC, “Type and number of radio services and audio services authorized to broadcast in Canada, by language of broadcast, 2017-2023”, data-radio-sector.xlsx, Tab RD-T6 (“Table 6”)

<sup>54</sup> On 10 May 2021 the CRTC said these lists “are no longer available” on its website, “because it was not possible to have accurate, up to date information always available”: CRTC Access to Information and Privacy Office, Response Letter A-2021-00007, (Ottawa, 10 May 2021).

<sup>55</sup> Monica Auer, B.A. (French and German), M.A. (Political Science), LL.M., “[The CRTC's Enforcement of Canada's Broadcast Legislation: 'Concern', 'Serious Concern' and 'Grave Concern'](#)”, *Canadian Journal of Law and Technology*, Vol. 5, No. 3 (2006).

**Figure 13 Radio-station non-compliance, 1968-2012**

Radio stations found to be non-compliant by CRTC, 1968-2012



Source: FRPC analysis of CRTC decisions and public files

109 As noted earlier, the CRTC does not publish comparative data about regulatory non-compliance. In early January 2021, however, and in response to an access-to-information request asking for “any studies undertaken or commissioned by the CRTC since 1 January 2014 which analyze private broadcasters’ compliance with the CRTC’s policy or policies for commercial radio and with its radio regulations”<sup>56</sup> the CRTC released 98 pages of information about its approach to regulatory non-compliance in radio. These pages included a CRTC staff document provided to the Commission in mid-April 2019: “Overview of the extent of non-compliance issues in the Canadian radio industry”.<sup>57</sup>

**a Level of non-compliance**

110 The CRTC’s 2019 Overview recognized “that a ‘large number of licensees remain in non-compliance on an annual basis’” but had “limited statistical data on the extent of non-compliance issues in the Canadian radio industry.”<sup>58</sup> The CRTC’s staff undertook research “to establish the profile of radio non-compliance”.<sup>59</sup> They found that from 2014 to 2019 127 (35.8%) of 355

Year	Non-compliant	Total	% non-compliant
2014/15	34	96	35.4%
2015/16	32	94	34.0%
2016/17	32	105	30.5%
2017/18	29	60	48.3%
Total	127	355	35.8%
Source			

<sup>56</sup> A-2020-00068, submitted 4 February 2021.

<sup>57</sup> CRTC, *Radio non-compliances [sic] – Overview and measures*, DM# 3627317 (Gatineau, 12 April 2019), (CRTC A-2020-00068 Supplementary Release Package).

<sup>58</sup> CRTC, *Radio non-compliances [sic] – Overview and measures*, DM# 3627317 (Gatineau, 12 April 2019), at 1, (CRTC A-2020-00068 Supplementary Release Package).

<sup>59</sup>

radio stations evaluated (commercial, specialty/ethnic, campus/community, Indigenous and other) were non-compliant.

- 111 In September 2020 the CRTC’s staff noted “few overlaps in the types of non-compliance by radio and television licensees”. They attributed these differences to different regulatory approaches to radio and television, with a main difference being that TV broadcasters regularly submit programming information to the CRTC while radio broadcasters do not:<sup>60</sup>

**Comparison of types of non-compliance by radio vs. television licensees**

There are few overlaps in the types of non-compliance by radio and television licensees. Much of this can be attributed to differences in how television stations are regulated and the type of regulatory requirements imposed on television licensees. For example, television licensees are required to submit regular reports on programming schedules through an automated system. Any discrepancy between the reported programming schedule and regulatory requirements can be efficiently reviewed by Commission staff and can be subsequently addressed with the licensee prior to undertaking the licence renewal process. However, instances of non-compliance by radio licensees tend to be addressed through the licence renewal process. An exception to this practice relates to audits of annual returns; since 2014, the audit process has been decoupled from the licence renewal process which allows licensees to adjust their practices during a licence term in order to maintain compliance if informed of issues by the Commission. See Appendix CCC for comparison between non-compliance by radio vs television licensees and licence suspensions.

- 112 The CRTC’s staff suggested that their colleagues and CRTC Commissioners be sensitive to the lack of resources of small radio stations’ licensees, that they proposed to define as “any non-commercial radio station or any commercial licensee with less than 10 undertakings, not including any rebroadcasting transmitters”:<sup>61</sup>

**Definition of small radio broadcasters**

- Commission staff proposes to define a small radio station as any non-commercial radio station or any commercial licensee with less than 10 undertakings, not including any rebroadcasting transmitters;
- Levels of contributions to Canadian Content Development (CCD) may also reflect the size of a commercial broadcaster; a broadcaster with revenues of less than \$1.25 million is not required to make CCD contributions. For example, a broadcaster such as Sirius XM Canada Ltd, a licensee who holds only two licenses but makes significant basic CCD contributions would not meet the definition of a small broadcaster.

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<sup>60</sup> CRTC, Radio Policy and Applications, “MEMORANDUM TO THE EXECUTIVE DIRECTOR BROADCASTING” DM# 3914466 v.1 (Gatineau, 24 September 2020) at pp. 4 and 7 (CRTC A-2020-00068 Supplementary Release Package).

<sup>61</sup> CRTC, Radio Policy and Applications, “MEMORANDUM TO THE EXECUTIVE DIRECTOR BROADCASTING” DM# 3914466 v.1 (Gatineau, 24 September 2020) at 2 (CRTC A-2020-00068 Supplementary Release Package).

### Recommendations for future licence renewals for small radio stations in repeated non-compliance

- Ensure Commission staff and Commissioners are sensitized to licensee's lack of resources;
- Provide information on possible assistance (for example, the NCRA, ARC, CAB) in all communication with licensee including clarification letters and notice of consultations;
- Annual returns should (if they don't already) request information on specific costs related to regulatory compliance (for example, investments in new surveillance systems, costs associated with legal representation, hiring accounting firms);
- By requesting such data, Commission staff will be able to establish a baseline of information on the type of costs incurred by stations by size of operation, market, etc.;
- Commission staff may be able to communicate with licensee to troubleshoot future possible non-compliance during licence term if costs seem too low for the type of station

113 As the *Broadcasting Act* specifically assigns responsibility for broadcast programming to broadcast licensees,<sup>62</sup> it is unclear why the CRTC should approach regulatory non-compliance based on the undertaking that breaches its requirements – “small radio stations” – or on the broadcast licensee.

114 The Forum notes, moreover that many radio stations operating in one-radio-station communities are operated by large and therefore experienced broadcasters. According to the CRTC's list of non-exempted radio stations, 294 communities receive service from a single radio station: of these, 169 are served by commercial broadcasters. Of the single-radio-station communities served by commercial radio broadcasters, 123 (42%) are served by one of Canada's largest 21 radio-ownership groups (see Appendix 4). In other words, light-touch regulation for individual radio stations that are the only radio station serving their communities ignores their ownership and control by large and experienced broadcasters.

**Table 7 Types of radio stations serving single-station communities**

CRTC subcategory	# of communities served by single station	
Radio (commercial)	164	55.8%
Radio (commercial - religious)	3	1.0%
Radio (ethnic)	2	0.7%
<b>Commercial</b>	<b>169</b>	<b>57.5%</b>
Radio (community)	80	27.2%
Radio (native Type B)	29	9.9%
Radio (campus)	6	2.0%
Radio (CBC)	5	1.7%
Radio (religious specialty format)	4	1.4%
Radio (non-commercial)	1	0.3%
<b>Non-commercial</b>	<b>130</b>	<b>44.2%</b>
<b>Total</b>	<b>294</b>	<b>100.0%</b>

<sup>62</sup> S. 3(1)(h): “all persons who carry on broadcasting undertakings have a responsibility for the programs that they broadcast and over which they have programming control; ....”

115 Light-touch regulation for small radio stations on the basis that smaller commercial radio stations lack the financial capacity to purchase the up-to-date equipment and software needed to meet the CRTC’s regulations would also ignore the CRTC’s current analysis (set out in Table 2, above and replicated to the right).

116 It shows that “small” commercial radio entities enjoy a higher profit margin than all other broadcasters:

CRTC, data-broadcasting-overview.xlsx, Table 16					
Profit margin for commercial radio by entity size, 2019-2023					
	2019	2020	2021	2022	2023
Major	24.0%	8.3%	2.0%	2.0%	8.3%
Large	16.3%	0.6%	4.1%	4.1%	5.8%
Medium	10.9%	-3.2%	-2.7%	-2.7%	7.1%
Small	12.6%	7.9%	10.8%	10.8%	10.8%

117 Given the number of large broadcasters operating as the single station in single-station communities, the

CRTC, “Table 16 Profit margin for commercial radio by entity size”, Tab B-T16, data-broadcasting-overview.xlsx (accessed 10 January 2025)

CRTC should not grant multi-station radio ownership groups indeterminate licences unless the group (not its individual stations) has met the CRTC’s regulatory requirements for each of the past 14 years – representing two full 7-year licence terms. Ownership groups that reduce levels of original local news, reporters and programming employment should be required to justify these decisions and, in the event they are applying to renew their licences, should not automatically receive indeterminate licence terms.

### 3. *Commitment to the Broadcasting Policy for Canada*

118 Finally, the CRTC should only consider granting indeterminate licences to radio broadcasters that make enforceable commitments to increase implementation of Parliament’s *Broadcasting Policy for Canada*. This would enable the CRTC to impose penalties, including administrative monetary penalties, if it decides to enforce these commitments.

#### B. *Streamlining certain licensing processes*

119 The CRTC is proposing to change its approach to developmental radio stations (paragraph 67). Its goal is “to make broadcasting licences more accessible and to foster greater diversity among licensees by allowing less experienced players to enter the broadcasting landscape ....”.

120 The Forum supports the CRTC’s objective but believes it does not go far enough. FRPC proposes that in addition to easing entry to the broadcasting system through developmental licences, the CRTC should adopt a more business-like approach to broadcasters that are not meeting the requirements of the *Broadcasting Act*, of the CRTC’s policies and regulations, or of their licences.



- 121 Consider, for instance, Genex. It acquired the assets of CHOI-FM Québec City in February 1997 along with a 5-year licence.<sup>63</sup> The CRTC called Genex to a public hearing in early 2002 to discuss 47 complaints it had received between 1999 and 2001 about offensive content in CHOI-FM's programming as well as non-compliance with the CRTC's radio regulations;<sup>64</sup> the CRTC found Genex had breached the high-standard provision in the *Broadcasting Act* and renewed the licence for two years, until August 2004.<sup>65</sup> Genex applied to renew its licence in October 2003; the CRTC again called it to a public hearing (in early 2004) to consider more complaints about the station's programming<sup>66</sup> and its non-compliance with the CRTC's radio regulations.<sup>67</sup> In mid-July 2004 the CRTC denied Genex' renewal application<sup>68</sup> and invited applications to use the CHOI-FM frequency.<sup>69</sup> The Federal Court of Appeal granted Genex' application for leave to appeal and for a stay of the non-renewal,<sup>70</sup> and dismissed its appeal in September 2005.<sup>71</sup>
- 122 To put this brief history another way, CHOI-FM apparently provided programming of less-than-high standard to Québec City for the six years from 1999 to 2005 during which period the CRTC undertook two renewal processes.
- 123 The CRTC might have reduced Canadians' exposure to programming that the CRTC found was not of high standard if it had then agreed to consider competitive licence renewal applications – a process in which other parties apply to use licences whose terms are coming to an end.
- 124 Neither the 1968, the 1991 nor the 2023 broadcasting statutes prohibits the CRTC from using a competitive-renewal process, and the last time the CRTC publicly considered the matter was in 1978. In Proposed CRTC Procedures and Practices Relating to Broadcasting Matters, Public Announcement (Ottawa, 25 July 1978) the CRTC said competitive renewals were impracticable:

...the Commission has given serious consideration to the possibility of implementing a competitive transfer system whereby if control of a licensed

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<sup>63</sup> *Acquisition of assets*, [Decision CRTC 97-86](#) (Ottawa, 27 February 1997).

<sup>64</sup> [Notice of Public Hearing 2001-14](#) (Ottawa, 14 December 2001), item 12.

<sup>65</sup> *Short-term licence renewal for CHOI-FM*, [Broadcasting Decision CRTC 2002-189](#) (Ottawa, 16 July 2002).

<sup>66</sup> [Broadcasting Notice of Public Hearing CRTC 2003-11](#), (Ottawa, 18 December 2003), item 22.

<sup>67</sup> *CHOI-FM - Non-renewal of licence*, [Broadcasting Decision CRTC 2004-271](#) (Ottawa, 13 July 2004).

<sup>68</sup> *Ibid.*

<sup>69</sup> *French-language FM radio station in Québec*, [Broadcasting Decision CRTC 2006-600](#) (Ottawa, 20 October 2006); due to the FCA's stay of 2004-271 (supra) the CRTC subsequently issued Broadcasting Public Notice CRTC 2004-49-1 and limited the applicants to those proposing to use frequencies other than 98.1 MHz.

<sup>70</sup> *Genex Communications Inc. v. Canada (Canadian Radio-television and Telecommunications Commission)*, [2004] F.C.J. No 1400 (FCA).

<sup>71</sup> [Genex Communications v. Canada \(Attorney General\) \(F.C.A.\)](#), 2005 FCA 283 (CanLII), [2006] 2 FCR 199, leave to appeal to SCC dismissed in [Application for Leave Genex Communications Inc. c. Procureur général du Canada - et - Conseil de la radiodiffusion et des télécommunications canadiennes \(CRTC\)](#), 2007 CanLII 22312 (SCC).

undertaking were to be transferred, the situation would be treated as if the existing licence was being surrendered and a new one in its place being applied for, with interested parties entitled to submit competing applications. Such a procedure has been strongly advocated by a number of critics and intervenors. The Commission finds, however, that while there is much merit in theory in such a process, there are also such formidable obstacles to its implementation as to render it impracticable.<sup>72</sup>

- 125 Times have changed, however, and will continue to change. A competitive-renewal process would simplify the CRTC's work in evaluating individual radio stations' performance, as third parties seeking such licences would perform that work themselves and submit it as part of their applications. It could be of particular use in communities served by more than one ownership group, spurring regulatory compliance and encouraging stronger progress towards implementing Canada's *Broadcasting Policy*.
- 126 While greenmail – submitting competing applications so as to be paid to withdraw them – would be a risk (of unknown size), the CRTC could minimize the chances of this occurring by requiring applicants to submit proof of their financial capacity and corporate intention (such as financial institution statements and board resolutions) to evaluate intent.
- 127 If New Zealand is able to ensure that it “receives a fair financial return for the spectrum, which it administers on behalf of all New Zealanders”,<sup>73</sup> nothing should prevent the CRTC from similarly ensuring that communities receive a fair return in terms of high-quality information and entertainment programming.

**Recommendation 13 The CRTC should undertake a study of the potential advantages and disadvantages of a competitive renewal process for radio programming undertakings**

**C. *Radio stations and news***

- 128 The Forum's main concern in this proceeding involves news. In November 2024 the CRTC invited comments on creating a new fund (supported financially by online streaming services) for “local radio news”: it “determined that a new temporary fund for commercial radio stations in smaller markets should be created.”<sup>74</sup>
- 129 2024-290 says that it “will not address issues related to the contributions of traditional broadcasters, including regulatory requirements for programming” and that these issues “along with along with the issue of online audio undertakings and their implications, such

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<sup>72</sup> *Proposed CRTC Procedures and Practices Relating to Broadcasting Matters*, Public Announcement (Ottawa, 25 July 1978) at p. 44.

<sup>73</sup> Government of New Zealand, “Certainty for commercial radio licence holders” [News release \(11 May 2003\)](#).

<sup>74</sup> CRTC, “CRTC launches consultation on temporary fund to support local radio news”, [News release \(4 November 2024\)](#).



as the discoverability of Canadian audio content and news, will be considered later in a separate audio content proceeding scheduled for 2025” (¶9).

- 130 BNoC 2024-290 does not precisely state the demarcation between ‘reducing reporting requirements’ (¶11) and ensuring the availability of news to local communities. Our concern – speculative at this point, of course, because all we can know is what 2024-290 says, namely that it “this proceeding will allow the Commission to determine the best ways to do the following: ... reduce reporting requirements, if applicable, while ensuring support for Canadian and Indigenous creators; ....” (¶11).
- 131 BNoC 2024-290 refers to news in question 10: “ Should the Commission consider an exemption to encourage the launch of radio stations dedicated to broadcasting news content focused on local news?”
- 132 The Forum’s concern is that, since 2024-290 does not set out any evidence about conventional radio stations’ news programming, the CRTC may determine that it is entirely appropriate to exempt radio stations dedicated to broadcasting news focussed on local news following this proceeding. By the time it holds its “separate audio content proceeding” on “the discoverability of ... news”, therefore, the ‘problem of radio news’ will have been solved by an exemption order emerging from a consultation in which the CRTC declined to give the public information about the level of news now being broadcast by local radio stations.
- 133 At ¶112 of BNoC 2024-290, however, the CRTC said it “remains open to considering other issues and concerns relating to the radio sector and that fall within its jurisdiction and authority under the *Broadcasting Act*. Comments should take into account the various cultural, economic, social and technological policy objectives set out in the *Broadcasting Act*”.
- 134 Given this statement the Forum asked Canadians about radio-station news in an interactive-voice-response telephone survey that took place from Thursday, January 16, 2025 to Saturday, January 17, 2025. 1,598 people in Canada’s provinces and territories answered 8 questions about Canadian radio (and 7 demographic questions that allowed the results to be weighted by gender, age and province/territory).
- 135 Given the CRTC’s decision to launch 2024-290 as well as BNoC 2024-288 on the same day and with the same deadline<sup>75</sup> FRPC lacked time undertake a separate written analysis of the survey’s results. We have therefore submitted the English- and French-language questionnaires in this comment (Appendix 2), along with the weighted results by question in an Excel spreadsheet (Appendix 3). FRPC will publish its analysis of the survey results separately.

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<sup>75</sup> With the exception of a one-week extension in the 2024-288 proceeding granted to Deaf Wireless Canada Consultative Committee.

- 136** In terms of the *Broadcasting Act's* socio-cultural objectives the Forum notes in response to the question, “Do you think Canadians currently identify very strongly or very weakly with the communities where they live?”, fewer than half (43.7%) of people in Canada believe that Canadians today identify somewhat or very strongly with the communities where they live, while 34.3% believe that Canadians identify somewhat or very weakly with their communities (22% had no opinion).
- 137** Very few people in Canada (6.7%) believe that the amount of local news provided by local radio stations in their community has increased, while just over a third (35.1%) believe they offer less news than before:

Q4. Local radio stations are often described as an important source of news about individual communities. Do you think the local radio stations in your community provide the same, more or less local news than they offered five years ago?					
Responses:	Male	Female	Non-binary or other (n=18)	Prefer not to say (n=47)	Canada
They offer as much local news as before	38.6%	35.3%	16.7%	17.0%	36.1%
They offer less local news than before	35.1%	35.3%	11.1%	34.0%	35.1%
They offer more local news than before	5.1%	7.3%	27.8%	12.8%	6.7%
Don't Know or No opinion	20.9%	21.9%	44.4%	36.2%	22.1%
Access Research IVR survey, 13-15 January 2025 on behalf of FRPC					

- 138** Canadians also appear to perceive an underlying need for local radio in times of crisis. At least half (51.4%) think that when communities experience emergencies, people should go first to the local radio station serving their community to obtain current information about the emergency:

Q6. Suppose a community experiences an emergency such as a major ice storm or fire. If people cannot access the Internet, where should they go first if they want current information about the emergency?	
To a social-media site like Twitter or Facebook	10.4%
To an online news service	9.8%
To an online radio service	8.4%
<b>To a local radio station serving your community</b>	<b>51.4%</b>
To an online TV service	4.9%
To a local TV station serving your community	8.3%
Don't know or no opinion	6.8%
Access Research IVR survey, 13-15 January 2025 on behalf of FRPC	

- 139** If communities lose electricity, nearly half (46.5%) still believe people should go first to their local radio stations to obtain current information about local emergencies:

Q7. Suppose that community loses electricity. Where should people go first if they want current information about the emergency?	
To a social-media site like Twitter or Facebook	13.2%
To an online news service	17.1%
To an online radio service	8.1%

<b>To a local radio station serving your community</b>	<b>46.5%</b>
To an online TV service	1.9%
To a local TV station serving your community	2.4%
Don't know or no opinion	10.9%
Access Research IVR survey, 13-15 January 2025 on behalf of FRPC	

140 Consequently, the Forum believes that the CRTC should retain reporting requirements for radio stations regarding first-run local news, that these reports should be submitted to the CRTC monthly and that the CRTC should publish its analyses of these reports each year.

#### IV. Conclusions and recommendations

141 The world is undergoing seismic changes to which Canada is not immune. The current President of the United States has stated publicly that Canada should become part of his country.<sup>76</sup>

142 Even if *Broadcasting Policy for Canada* did not mandate the availability of programming made for, by and about Canadians, such statements underscore the need for the CRTC to ensure that Canadians have access to more and more distinctive Canadian content in Canadian radio stations' information and entertainment programming. Yet 2024-290's emphasis on flexibility referring to it 10 times seems to be made at the expense of Canadian culture (with culture or cultural mentioned just 4 times).<sup>77</sup>

143 The problem for the Commission now appears to be that, despite its many policy reviews undertaken to provide broadcasters with more regulatory flexibility<sup>78</sup> and its willingness to permit highly concentrated radio ownership to stave off larger foreign broadcasters once they arrive in Canada, its existing regulatory frameworks are still simply too much for broadcasters to handle.

144 One way to encourage new entrants desirous of meeting Parliament's *Broadcasting Policy for Canada* and also to promote diversity in radio ownership would be for the CRTC to adopt a new licensing model. Given the importance to the CRTC of competition, the Commission should reconsider its late 1970's prohibition on competitive licence renewals which, in any event, was never based on any objective evidence.

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<sup>76</sup> Jessica Murphy, BBC, "[Trudeau says 'not a snowball's chance in hell' Canada will join US](#)" (7 January 2025); CBC/RC, "[Join the U.S.? No way, say most Canadians surveyed. But nearly a quarter may be open to it](#)" (17 January 2025) (last updated 17 January 2025).

<sup>77</sup> BNoC 2024-290 refers to the "Ministry for Culture and Heritage" in New Zealand at ¶19; and cultural 3 times: "culturally dynamic" in the Summary, "ethnocultural makeup of Canadian society" at ¶4 and at ¶112, interveners' comments "should take into account the various cultural, economic, social and technological policy objectives set out in the Broadcasting Act".

<sup>78</sup>

**145** Adopting a competitive licensing framework would mean that any party – including campus or community stations – could seek the CRTC’s approval to use an existing commercial radio licence as its licence term nears completion, if the licensee’s performance makes it preferable to grant the licence elsewhere. In other words, rather than granting broadcasters regulatory flexibility to deal with competition, the CRTC should adopt competitive flexibility to reduce regulatory burdens.

**146** The Forum’s recommendations are summarized below.

- Recommendation 1** The CRTC should publish the evidence it has regarding radio-station operators’ administrative burden. If necessary for reasons of confidentiality, the CRTC should publish administrative-burden data by size of radio-station operator (Major, Large, Medium or Small, as set out in CRTC, “Table 16 Profit margin for commercial radio by entity size”, Tab B-T16, data-broadcasting-overview.xlsx (accessed 10 January 2025).
- Recommendation 2** Before adopting the 2024-290 proposals the CRTC should audit a random sample of 50 to 100 radio stations to determine more precisely how much of their administrative staff’s time is devoted to administering the CRTC’s radio policies and regulations
- Recommendation 3** The CRTC should revise its radio regulations to require the automatic submission of program logs to the CRTC every month, and the CRTC should make these logs available to the public as it currently does for television services.
- Recommendation 4** Each year – or more frequently – the CRTC should publish information about the total and first-run hours broadcast by individual radio stations, in terms of the program categories the
- Recommendation 5** The CRTC should obtain and publish programming data from radio stations to enable the Commission and the public to evaluate its proposals for administrative burden
- Recommendation 6** The CRTC should undertake an empirical comparison of major, large, medium, small and single-station operators to determine whether differences exist between the administrative expenses (and staffing) of these groups of broadcasters
- Recommendation 7** If the CRTC has or has access to radio stations’ annual returns it should aggregate the data regarding employment by expense category and publish these data for this proceeding, and also for each year going forward.
- Recommendation 8** The CRTC should clarify how it decides which broadcast ownership groups file or need not file aggregated financial summaries.

- Recommendation 9 As BNoC 2024-290 is dealing with licensed radio stations, the CRTC should ensure that evidence filed in support of (or in opposition to) the CRTC's flexibility or streamlining initiatives excludes online services affiliated with the stations.
- Recommendation 10 The CRTC should clarify whether licensed radio broadcasters include or exclude online revenues, expenses and staffing from the annual returns these broadcasters submit to the CRTC
- Recommendation 11 The CRTC should obtain and publish current programming information from licensed radio undertakings and should also publish any data it holds concerning the programming broadcast by radio stations in the past
- Recommendation 12 The CRTC should publish objective evidence about radio-station programming by radio station and by type of broadcaster (the national public broadcaster, private commercial broadcasters, community and other broadcasters)
- Recommendation 13 The CRTC should undertake a study of the potential advantages and disadvantages of a competitive renewal process for radio programming undertakings

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\* Please see separate excel-spreadsheet attachment for results from FRPC's January 2025 survey on radio.

## Appendix 1 CRTC reviews of radio policy, 1968-2024

Year	CRTC process
1968	CRTC issues first statement on the licensing of FM stations: "... FM channels are public assets to be developed to contribute to a more varied program service complementing and enriching services already available from existing stations." <sup>79</sup>
1969	Public Notice (Ottawa, 28 April 1969) calls "on the general public, broadcasters, and other interested parties to comment on the future of FM broadcasting in Canada." <sup>80</sup> Public hearing held 10-13 June 1969 on the FM Licensing Policy
1970	"On February 12, 1970, the Commission proposed changes in the allocation of time to Canadian music broadcast by AM Radio stations. Conditions governing the 'Canadian' character of the music were also attached, and these are to be met in two stages if the proposals are adopted. A special hearing on the proposals is scheduled for April 2, 1970, and representations respecting these proposals will be considered at that time." <sup>81</sup>
1973	"On 18 January 1973, phase 3 of the Canadian music regulations for AM radio came into effect. The Commission now stipulates that 30 percent of the music played between 6 AM and midnight must be Canadian on the basis of at least two of the following criteria: performer, lyrics, music, production; and that 5 percent of the musical selections receiving air play must have the music or lyrics composed by a Canadian. The Commission instituted these Canadian programming regulations in order to improve the opportunities for Canadian talent to have access to their own airwaves." <sup>82</sup>
1973	<i>Public Announcement 73-55</i> (Ottawa, 26 January 1973): ... The Commission is concerned with the quality of French spoken on the air and expects that appropriate measures will be taken by all broadcasters to improve this situation appreciably.
1973	A Proposal for an FM Radio Policy in the Private Sector, Public Announcement (Ottawa, 19 April 1973) "The opening of the FM spectrum, with its potential for high-quality audio broadcasting, was seen as a new and unique opportunity to give the Canadian public an improved radio service." <sup>83</sup> ... However, the Commission will require a very high commitment to the use of Canadian talent and resources in the non-musical elements of FM programming. The Commission will "vigorously discourage the purchase of 'off the shelf' foreign produced programs or programming inserts as a means of fulfilling the policy requirement for the reintroduction on FM of a proportion of programs with identifiable themes." The Commission stated that it would "give highest consideration and encourage to the broadcast of extended works written, performed, and produced by Canadians in Canada." <sup>84</sup>
1975	In <i>FM Radio in Canada: A Policy to Ensure a Varied and Comprehensive Radio Service</i> (Ottawa, 20 January 1975), the CRTC seeks greater diversity in spoken word and musical programming content On 4 July 1975 the CRTC delays implementation of its FM policy for one year
1976	Policy regarding the carriage by cable television of FM signals, (Ottawa, 19 July 1976) The CRTC sets out its policy on the carriage by cable systems of FM signals; it limits cable carriage of

<sup>79</sup> CRTC, *Annual Report 1968-1969*, at 9.

<sup>80</sup> CRTC, *Annual Report 1969-1970*, at 35.

<sup>81</sup> *Ibid.*, at 35-36.

<sup>82</sup> CRTC, *Annual Report 1972-1973*, at 18.

<sup>83</sup> CRTC, *Annual Report 1973-1974*, at 13.

<sup>84</sup> CRTC, *Annual Report 1973-1974*, at 14.

Year	CRTC process
	<p>out-of-market FM stations to those that do not compete with, but ‘complement’ the market’s FM stations</p> <p><i>Public Announcement</i> (Ottawa, 19 July 1976) defines a community radio station as being owned and controlled by a non-profit organization with members of the community in its membership, management, operation and programming</p>
1979	<i>Implementation of the FM Policy</i> , Public Announcement (Ottawa, 20 April 1979)
1980	The CRTC proposes to amend its Radio (FM) Broadcasting Regulations, by increasing the commercial limits for FM stations operated by holders of “joint FM” licences (those who own both an AM and an FM station in the same market); it also removes the 6-hour block restrictions on commercial content (SOR/80-784)
1983	<p>In <i>Review of Radio</i>, Public Notice CRTC 1983-43 (Ottawa, 3 March 1983) CRTC outlines its general approach to regulating FM radio, to improve and simplify implementation of the FM policy to ensure greater flexibility, and streamlined and flexible procedures while maintaining the policy’s objectives to ensure “that FM radio programming plays a major role in the provision of a varied and comprehensive broadcasting service”</p> <p>In CRTC 1983-215, the Commission proposes to allow joint FM licensees to increase the daily number of commercials they may carry from 120 minutes to 150 minutes; the change is implemented in January 1984 when SOR/84-119 amends the FM regulations, increasing for joint FM licensees commercial limits from 120 minutes/day, to 150 minutes/day</p>
1984	<p>In CRTC 1984-4, the Commission adopts its Consultative Committee recommendations on simplifying implementation of FM policy, by simplifying music subcategories and eliminating enrichment guidelines</p> <p><i>COMMUNITY RADIO</i>, <a href="#">Public Notice CRTC 84-201</a> (Ottawa, 31 July 1984)</p> <p>In <i>Review of Radio – Simplification of the FM Policy</i>, the Commission presents “a more simplified approach to FM radio .... to allow radio broadcasters to adopt a more flexible approach to programming in dealing with the changing and varied tastes of their listeners.” (CRTC 1984-151)</p> <p>FM Policy: <i>Additional Flexibility in the Scheduling of Mosaic Programming</i>, CRTC 1984-285 (Ottawa, 26 November 1984) announces additional flexibility in the scheduling of Mosaic programming on FM stations; as “a result of representations from FM broadcasters” gives licensees flexibility to design a mix of existing and new mosaic alternatives appropriate to their stations’ overall programming orientation, and to adjust the proportions of these mosaic programming types throughout the licence term, without informing CRTC; gives licensees double-time credit for certain Mosaic programming without having to detail counting method on their PoP</p>
1985	<i>Review of Community Radio - 23 April 1985 Public Hearing</i> , <a href="#">Public Notice CRTC 1985-34</a> (Ottawa, 22 February 1985)
1986	In <i>REVIEW OF RADIO NETWORKING, SYNDICATION, AND OTHER NEW AUDIO PROGRAM DEVELOPMENTS</i> ; <i>REVIEW OF TELEVISION NETWORK POLICY</i> , <a href="#">Public Notice CRTC 1986-355</a> (Ottawa, 23 December 1986) the CRTC announces review of radio networking, syndication and other new audio program developments, "to provide a more streamlined and rationalized regulatory framework" and also "to ensure that the various components of the Canadian broadcasting system remain financially viable"
1988	<p><i>French-language Popular Music</i>, Public Notice CRTC 1988-84 (Ottawa, 26 May 1988), <a href="http://crtc.gc.ca/eng/archive/1988/PB88-84.htm">http://crtc.gc.ca/eng/archive/1988/PB88-84.htm</a></p> <p>“... “This hearing should enable the Commission to review with the broadcasting and recording industries as well as other interested parties what has been accomplished to date, to discuss appropriate levels for the broadcast of French-language music by AM and FM radio stations and to determine what further measures need to be taken to develop the production of French-language vocal music. ...”</p>



Year	CRTC process
1989	<i>A Plan to Conduct an FM Policy Review</i> , Public Notice CRTC 1989-30 (Ottawa, 14 April 1989): Announces plan for comprehensive review of FM policy to ... allow the Commission ... streamline the FM policy and keep only what is essential to implement the goals of the Broadcasting Act"
1989	<i>Review of Advertising Levels on AM Radio</i> , Public Notice CRTC 1989-106 (Ottawa, 19 September 1989): CRTC concludes that unregulated advertising levels on Canadian AM stations are acceptable
1990	<i>AN FM POLICY FOR THE NINETIES</i> , <a href="#">Public Notice CRTC 1990-20</a> (Ottawa, 16 February 1990)
1992	<i>Policies for community and campus radio</i> , <a href="#">Public Notice CRTC 1992-38</a> (Ottawa, 20 November 1991)
1992	In PN CRTC 1992-32, <i>A Review of the Content Requirements for Canadian Music on Radio</i> (Ottawa, 30 April 1992) CRTC asks for comments on tools used to implement Canadian content requirements for music on radio
1992	In <i>A Review of the CRTC's Regulations and Policies for Radio</i> , <a href="#">CRTC-PN 1992-72</a> , (Ottawa, 2 November 1992) based on the 90-day review, the CRTC develops new regulatory framework that "will allow broadcasters as much flexibility as possible in responding to the financial difficulties they now face, insofar as these difficulties relate to regulation" and "to consolidate and streamline its policies and regulations .... to develop a simplified, efficient regulatory structure that responds to the requirements of the Broadcasting Act without unduly hindering licensees in their operations"; the CRTC will drop the limit on the Maximum Repeat Factor and 850-minimum of distinct musical selections/week for commercial English FM stations; it proposes to drop the 15% spoken word requirement; adding requirement that to sell locally, 1/3 of stations' programming would have to be local too The CRTC would up calling for comments on four items from the 90-day review of regulations, policies and procedures for radio: <ul style="list-style-type: none"> <li>- a proposal to delete the present requirements relating to levels of news and spoken word on FM stations;</li> <li>- a proposal to introduce, in place of the above-noted requirements, a new local programming requirement for licensees of commercial radio stations, both AM and FM, should they intend to solicit or accept local advertising;</li> <li>- a proposal to allow campus radio stations to broadcast limited amounts of conventional advertising; and</li> <li>- a general review of CRTC policies with respect to Canadian talent development.</li> </ul>
1993	<i>Changes to the Content Requirements for Canadian Music on Radio</i> , <a href="#">PN CRTC 1993-5</a> (Ottawa, 29 January 1993)
1995	In <i>A Review of Certain Matters Concerning Radio</i> , <a href="#">PN CRTC 1995-60</a> (Ottawa, 21 April 1995), CRTC announces measures for "a more streamlined approach to its regulation of commercial radio stations.... [it] reduced the level of regulation to that absolutely necessary to ensure the diversity and quality of radio programming and to guarantee exposure for Canadian music and Canadian talent"
1997	<i>A review of the Commission's Policies for Commercial Radio</i> , Public Notice CRTC 1997-104 (Ottawa, 1 August 1997), <a href="http://www.crtc.gc.ca/eng/archive/1997/PB97-104.HTM">http://www.crtc.gc.ca/eng/archive/1997/PB97-104.HTM</a>
1999	<i>Call for comments on a proposed new policy for campus radio</i> , <a href="#">Public Notice CRTC 1999-30</a> (Ottawa, 18 February 1999)
2006	<i>Review of the Commercial Radio Policy</i> , Broadcasting <a href="#">Notice of Public Hearing 2006-1</a> (Ottawa, 13 January 2006) 1. On 30 April 1998, the Commission issued Public Notice CRTC 1998-41, Commercial Radio Policy 1998 (the 1998 Policy), which had three major objectives: <ol style="list-style-type: none"> <li>(i) To ensure a strong, well-financed radio industry that is better poised to achieve its objectives under the Broadcasting Act (the Act) and meet the challenges of the 21st century.</li> <li>(ii) To ensure pride of place for Canadian artists.</li> <li>(iii) To ensure that a French-language presence in radio broadcasting is maintained.</li> </ol>
2013	<i>Call for comments on a targeted policy review for the commercial radio sector</i> , <a href="#">Broadcasting Notice</a>

Year	CRTC process
	<a href="#">of Consultation CRTC 2013-572</a> (Ottawa, 30 October 2013)
2014	<i>A targeted policy review of the commercial radio sector</i> , <a href="#">Broadcasting Regulatory Policy CRTC 2014-554</a> (Ottawa, 28 October 2014)
2015	<i>Review of the regulatory framework for French-language vocal music applicable to the French-language commercial radio sector</i> , <a href="#">Broadcasting Notice of Consultation CRTC 2015-318</a> (Ottawa, 16 November 2015)
2020	<p><i>Call for comments – Commercial radio policy framework review</i>, <a href="#">Broadcasting Notice of Consultation CRTC 2020-374</a> (Ottawa, 12 November 2020)</p> <p>The Commission is initiating a public proceeding to review the regulatory framework for the commercial radio sector. The main objective of this proceeding is to assess the relevance and effectiveness of the regulatory tools governing commercial radio. The purpose is to update the regulatory framework to best serve the needs and interests of Canadians, while taking into account increased competition from online services. If necessary, some tools could be removed, changed or added to best achieve the following results in a balanced manner:</p> <p>For Canadian listeners: Provide diverse, relevant and quality programming that serves their needs and interests;</p> <p>For Canadian artists: Ensure that artists (music and spoken word) are best supported by broadcasters in a balanced manner for the creation, presentation and discoverability of Canadian content;</p> <p>For broadcasters: Establish a flexible regulatory framework that enables both English- and French-language radio to remain competitive in the digital environment.</p>
2024	<i>Call for comments – Modernization of radio processes</i> , <a href="#">Broadcasting Notice of Consultation CRTC 2024-290</a> (Ottawa, 15 November 2024)

## Appendix 2 FRPC' 16-18 January 2025 survey on radio – questionnaires

N=1,500 (10 provinces and territories)

Hello. This is XXX calling on behalf of the Forum for Research and Policy in Communications. We would like to ask you some questions about radio in Canada. The survey will take about 5 minutes of your time. Just use the touchpad on your phone to select the correct answer when prompted. If you have any questions about this call, you can reach our firm, Access Research, at 1-855-561-3603 or at [inquiry@access-research.com](mailto:inquiry@access-research.com).

[Si vous souhaitez entendre ces questions en français, appuyez sur 1 maintenant]

Prelim First of all, are you at least 18 years of age or older, and living in Canada?

- a. Press 1 if Yes
- b. Press 2 if No => Thank you, and terminate

T1. Thank you, that's all the questions I have. Have a great day.

Q1. There are many ways today to hear local news, weather etc., with two basic ways being through a radio or through computers or other devices connected to the Internet. Thinking about radio stations that broadcast over the air to radio sets, how often do you listen to a radio set in your car or in your home?

- Press 1 if Most days of the week
- Press 2 if A couple of times a week
- Press 3 if Very rarely
- Press 4 if Never
- Press 5 if Don't know

Q2. How often do you listen to a radio station made available online or through the Internet?

- Press 1 if Most days of the week
- Press 2 if A couple of times a week
- Press 3 if Very rarely
- Press 4 if Never
- Press 5 if Don't know

Q3. The Canadian Radio-television and Telecommunications Commission or CRTC is a federal agency that regulates radio in Canada. It requires radio stations to tell it about the programming they broadcast every week, which the stations generally track themselves by computer. Do you think radio stations should have to tell the CRTC how much original local news they broadcast every week?

- Press 1 if Yes
- Press 2 if No
- Press 3 if Don't know or No opinion

Q4. Local radio stations are often described as an important source of news about individual communities. Do you think the local radio stations in your community provide the same, more or less local news than they offered five years ago?

Press 1 if They offer as much local news as before

Press 2 if They offer less local news than before

Press 3 if They offer more local news than before

Press 4 if Don't know or No opinion

Q5. Do you think radio services that operate online only should have local reporters in the communities they say they serve?

Press 1 if you Strongly disagree

Press 2 if you Somewhat disagree

Press 3 if you don't know or have no opinion

Press 4 if you Somewhat agree

Press 5 if you Strongly agree

Q6. Suppose a community experiences an emergency such as a major ice storm or fire. If people cannot access the Internet, where should they go first if they want current information about the emergency?

Press 1 if to a social-media site like Twitter or Facebook

Press 2 if to an online news service

Press 3 if to an online radio service

Press 4 if to a local radio station serving your community

Press 5 if to an online TV service

Press 6 if to a local TV station serving your community

Press 7 if Don't know or no opinion

Q7. Suppose that community loses electricity. Where should people go first if they want current information about the emergency?

Press 1 if to a social-media site like Twitter or Facebook

Press 2 if to an online news service

Press 3 if to an online radio service

Press 4 if to a local radio station serving your community

Press 5 if to an online TV service

Press 6 if to a local TV station serving your community

Press 7 if Don't know or no opinion

Q8. Do you think Canadians currently identify very strongly or very weakly with the communities where they live?

Press 1 if very weakly

- Press 2 if a somewhat weakly
- Press 3 if No opinion or Don't know
- Press 4 if somewhat strongly
- Press 5 if very strongly

**Demographic information**

Q9. So that we can group our data, the next few questions are about yourself. Your answers will be kept confidential and anonymous. First, please indicate your gender.

- Press 1 for Female
- Press 2 for Male
- Press 3 for Non-binary or other
- Press 9 if you prefer not to say

Q10. How old are you?

- Press 1 if between 18 and 24 years of age
- Press 2 if between 25 and 34
- Press 3 if between 35 and 44
- Press 4 if between 45 and 54
- Press 5 if between 55 and 64
- Press 6 if between 65 and 74
- Press 7 if 75 years of age or older
- Press 9 if you prefer not to answer

Q11. What language do you speak at home?

- Press 1 for English
- Press 2 for French
- Press 3 for Other
- Press 9 for Prefer not to answer

Q12. In which province or territory do you live?

- Press 1 if British Columbia
- Press 2 if Alberta, Saskatchewan or Manitoba
- Press 3 if Ontario
- Press 4 if Quebec
- Press 5 if Newfoundland and Labrador, or New Brunswick
- Press 6 if Nova Scotia or Prince Edward Island
- Press 7 if Northwest Territories
- Press 8 if Nunavut
- Press 9 if Yukon
- Press 0 to repeat the question and answer options

Q13. Please tell me about the number of people in the community where you live.

Press 1 if more than one million people

Press 2 if between 100,000 and one million people [large urban centres]

Press 3 if between 30,000 and 100,000 people [medium urban centre]

Press 4 if between 1,000 and 30,000 people [small urban centre]

Press 5 if fewer than 1,000 people [rural]

Press 6 if Don't know

Q14. What is the highest level of education that you have completed?

Press 1 if Grade 8 or less

Press 2 if Some high school or a high-school diploma or equivalent

Press 3 if College or CEGEP

Press 4 if Bachelor's degree

Press 5 if a Master's degree or Doctorate

Press 9 if you prefer not to answer

Press 0 to repeat the question and answer options

Q15. Which of the following categories best describes your total household income in 2024, before taxes?

Press 1 if under \$39,000

Press 2 if \$40,000 to just under \$70,000

Press 3 if \$70,000 to just under \$90,000

Press 4 if \$90,000 to just under \$120,000

Press 5 if \$120,000 to just under \$150,000

Press 6 if \$150,000 and above

Press 9 if you prefer not to answer

Press 0 to repeat the question and answer options

T2. Thank you very much for your assistance. Your opinion is very valuable to us. If you have any questions about this call, you can reach .....

N=1,500 (10 provinces et territoires)

Bonjour. C'est Access Research qui vous appelle au nom du Forum pour la recherche et les politiques des communications. Nous aimerions vous poser quelques questions sur la radiodiffusion au Canada. Le sondage prendra environ 5 minutes de votre temps. Utilisez simplement le clavier de votre téléphone pour sélectionner la bonne réponse lorsque vous y êtes invité. Si vous avez des questions au sujet de cet appel, vous pouvez communiquer avec Access Research, au 1-855-561-3603 ou à [inquiry@access-research.com](mailto:inquiry@access-research.com)  
[If you would like to hear these questions in English, please Press 1 now]

S1. Tout d'abord, êtes-vous âgé d'au moins 18 ans et vivez-vous au Canada ?

Appuyez sur 1 pour Oui

Appuyez sur 2 pour Non => Merci et terminez [T1]

T.1 Merci, je n'ai pas d'autre question à vous poser. Passez une bonne journée.

Q1. Il existe aujourd'hui de nombreuses façons d'écouter les nouvelles locales, la météo, etc., mais les deux principales sont la radio ou les ordinateurs et autres appareils connectés à Internet. En pensant aux stations de radio qui diffusent en direct sur des postes de radio, à quelle fréquence écoutez-vous une station de radio dans votre voiture ou à la maison?

Appuyez sur 1 pour La plupart des jours de la semaine.

Appuyez sur 2 pour Une à deux fois par semaine

Appuyez sur 3 pour Une ou deux fois chaque trois mois

Appuyez sur 4 pour Jamais

Appuyez sur 5 si Vous n'êtes pas sûr

Q2. À quelle fréquence écoutez-vous des stations de radio disponible en ligne ou sur Internet?

Appuyez sur 1 pour La plupart des jours de la semaine

Appuyez sur 2 pour Une à deux fois par semaine

Appuyez sur 3 pour Une ou deux fois chaque trois mois

Appuyez sur 4 pour Jamais

Appuyez sur 5 si vous n'êtes pas sûr

Q3. Le Conseil de la radiodiffusion et des télécommunications canadiennes ou CRTC est un organisme fédéral qui réglemente la radio au Canada. Il exige que les stations de radio l'informent de la programmation qu'elles diffusent chaque semaine ce que les stations font de toute façon sur un ordinateur. Pensez-vous que les stations de radio devraient être obligées d'informer le CRTC de la quantité de nouvelles locales originales qu'elles diffusent chaque semaine?

Appuyez sur 1 pour Oui

Appuyez sur 2 pour Non

Appuyez sur 3 si vous ne savez pas ou vous n'êtes pas sûr

- Q4. On décrit souvent les stations de radio locales comme une source importante d'information sur les communautés. Pensez-vous que les stations de radio locales de votre communauté diffusent autant, davantage, ou moins de nouvelles locales qu'il y a cinq ans?

Appuyez sur 1 si elles offrent autant d'information locale qu'auparavant

Appuyez sur 2 si elles offrent moins d'information locale qu'auparavant

Appuyez sur 3 si elles offrent plus d'information locale qu'auparavant

Appuyez sur 4 si vous ne savez pas ou vous n'êtes pas sûr

- Q5. Pensez-vous que les services de radio qui sont exploités en ligne uniquement devraient embaucher des journalistes locaux dans les communautés qu'ils disent desservir?

Appuyez sur 1 si vous êtes totalement en désaccord

Appuyez sur 2 si vous êtes plutôt en désaccord

Appuyez sur 3 si vous ne savez pas ou vous n'avez pas d'opinion

Appuyez sur 4 si vous êtes plutôt d'accord

Appuyez sur 5 si vous êtes tout à fait d'accord

- Q6. Supposons qu'une collectivité soit confrontée à une situation d'urgence, comme une tempête de pluie verglaçante ou un incendie. Si les gens ne peuvent accéder à Internet, où devraient-ils aller en premier pour obtenir de l'information à jour sur la situation d'urgence?

Appuyez sur 1 pour répondre sur un site de médias sociaux comme Twitter ou Facebook

Appuyez sur 2 pour répondre sur un service d'actualités en ligne

Appuyez sur 3 pour répondre sur un service de radio en ligne

Appuyez sur 4 pour répondre sur une station de radio locale desservant leur communauté

Appuyez sur 5 pour répondre sur un service de télévision en ligne

Appuyez sur 6 pour répondre sur une station de télévision locale desservant leur communauté

Appuyez sur 7 si vous ne savez pas ou que vous n'avez pas d'opinion

- Q7. Supposons que cette communauté perde l'électricité. Vers quel service les gens devraient-ils aller en premier s'ils veulent obtenir des renseignements à jour sur la situation d'urgence?

Appuyez sur 1 pour répondre sur un site de médias sociaux comme Twitter ou Facebook



Appuyez sur 2 pour répondre sur un service d'actualités en ligne  
Appuyez sur 3 pour répondre sur un service de radio en ligne  
Appuyez sur 4 pour répondre sur une station de radio locale desservant leur communauté  
Appuyez sur 5 pour répondre sur un service de télévision en ligne  
Appuyez sur 6 pour répondre sur une station de télévision locale desservant leur communauté  
Appuyez sur 7 si vous ne savez pas ou n'avez pas d'opinion

Q8. Pensez-vous que les Canadiennes et Canadiens s'identifient très fortement ou très faiblement aux communautés où ils vivent?

Appuyez sur 1 pour répondre très faiblement  
Appuyez sur 2 pour répondre faiblement  
Appuyez sur 3 si vous n'avez pas d'opinion ou ne savez pas  
Appuyez sur 4 pour répondre fortement  
Appuyez sur 5 pour répondre très fortement

### Information démographique

Q9. Pour que nous puissions regrouper nos données, les prochaines questions portent sur vous. Vos réponses resteront confidentielles et anonymes. Tout d'abord, veuillez indiquer votre genre.

Appuyez sur 1 si vous êtes un homme  
Appuyez sur 2 si vous êtes une femme  
Appuyez sur 3 si vous vous identifiez comme non-binaire ou autre  
Appuyez sur 9 si vous préférez ne pas répondre

Q10. Quel âge avez-vous ?

Appuyez sur 1 si vous avez entre 18 et 24 ans  
Appuyez sur 2 si vous avez entre 25 et 34  
Appuyez sur 3 si vous avez entre 35 et 44  
Appuyez sur 4 si vous avez entre 45 et 54  
Appuyez sur 5 si vous avez entre 55 et 64  
Appuyez sur 6 si vous avez entre 65 et 74  
Appuyez sur 7 si vous avez 75 ans ou plus  
Appuyez sur 9 si vous préférez ne pas répondre

Q11. Quelle langue parlez-vous à la maison ?

Appuyez sur 1 pour l'anglais  
Appuyez sur 2 pour le français  
Appuyez sur 3 pour toute autre langue  
Appuyez sur 9 si vous préférez ne pas répondre

Q12. Dans quelle province ou quel territoire habitez-vous ?

- Appuyez sur 1 pour la Colombie-Britannique
- Appuyez sur 2 pour l'Alberta, la Saskatchewan ou le Manitoba
- Appuyez sur 3 pour l'Ontario
- Appuyez sur 4 pour le Québec
- Appuyez sur 5 pour Terre-Neuve-et-Labrador ou le Nouveau-Brunswick
- Appuyez sur 6 pour la Nouvelle-Écosse ou l'Île-du-Prince-Édouard
- Appuyez sur 7 pour les Territoires du Nord-Ouest
- Appuyez sur 8 pour le Nunavut
- Appuyez sur 9 pour le Yukon
- Appuyez sur 0 pour répéter les options

Q13. Quel est le plus haut niveau de scolarité que vous avez complété ?

- Appuyez sur 1 pour le primaire
- Appuyez sur 2 pour le secondaire
- Appuyez sur 3 pour le collège ou le cégep
- Appuyez sur 4 pour un baccalauréat (BAC)
- Appuyez sur 5 pour une maîtrise ou un doctorat
- Appuyez sur 9 si vous préférez ne pas répondre
- Appuyez sur 0 pour répéter les options

Q14. Laquelle des catégories suivantes décrit le mieux le revenu total de votre ménage avant impôt en 2024?

- Appuyez sur 1 pour moins de 39 000 \$
- Appuyez sur 2 pour 40 000 \$ à moins de 60 000 \$
- Appuyez sur 3 pour 60 000 \$ à moins de 90 000 \$
- Appuyez sur 4 pour 90 000 \$ à moins de 120 000 \$
- Appuyez sur 5 pour 120 000 \$ moins de 150 000 \$
- Appuyez sur 6 pour 150 000 \$ et plus
- Appuyez sur 9 si vous préférez ne pas répondre
- Appuyez sur 0 pour répéter les options

T.2 Merci beaucoup d'avoir répondu à nos questions. Votre avis nous est très précieux. Si vous avez des questions au sujet de cet appel, vous pouvez joindre Access Research au 1-855-561-3603 ou à [inquiry@access-research.com](mailto:inquiry@access-research.com). Merci.

### **Appendix 3 Results from January 2025 random IVR survey about radio\***

\* Please see separate Excel spreadsheet submitted with this comment.

## Appendix 4 Radio station ownership, 1969 and 2023

Ownership of radio stations in 1969		
Rank	Ownership	Number of radio stations
1	Maclean-Hunter	7
2	Southam family (Southam)	6
3	Dougall family (Thunder Bay)	5
4	Moffat family	5
5	Waters family (CHUM)	5
6	Rogers	4
7	Armstrong	3
8	Bellman WE (Q Broadcasting)	3
9	Finnerty (Okanagan Radio)	3
10	Garrison GG	3
11	Greco CP (Algonquin)	3
12	Green family (News Publishing Co.)	3
13	Lavigne JC	3
14	Morton family (Quinte Broadcasting)	3
15	Sifton family (Armadale)	3
16	Stiring family (Nfld Bg)	3
17	Taylor (Argus-Standard)	3
18	Thomson	3
19	Allen family (CHIC Radio)	2
20	Bromley-Browne	2
21	Brown WH (Southern Alberta)	2
Subtotal, radios controlled by 21 largest groups		74
Total operating radio stations		254
21 largest owners' stations as % of total		29.1%

Source: CRTC ownership charts and additional research

Note that the owners shown above with 2 licences were the first 3 (in alphabetical order) of 35 owners that held 2 radio station licences; another 114 owners held 1 licence each.

Ownership of radio stations in Canada in 2023			
Rank	Ownership	2023 - Radio stations	Source
1	BCE	109	B-T33
2	Stingray	74	B-T33
3	Rogers	56	B-T33
4	Pattison	50	Chart 97
5	Vista	50	Chart 200
6	Hildebrand	40	Chart 131
7	Corus	39	B-T33
8	Pace	30	Chart 152
9	Cogeco	20	B-T33
10	Arsenal	19	Chart 236
11	Acadia	18	Chart 73

<b>Ownership of radio stations in Canada in 2023</b>			
<b>Rank</b>	<b>Ownership</b>	<b>2023 - Radio stations</b>	<b>Source</b>
12	My Broadcasting Corporation	18	Chart 233
13	Evanov	15	Chart 132
14	Blackburn	13	Chart 6
15	Harvard	13	Chart 139
16	Bayshore	10	Chart 241
17	RNC	10	Chart 47
18	Bas St-Laurent	8	Chart 35
19	Durham	7	Chart 75
20	Rawlco	7	Chart 29
21	Neeti P. Ray	6	Chart 251
Subtotal, 21 largest ownership groups		612	84.2%
Total	Reporting radio undertakings	727	100.0%
Average	Stations / broadcaster	29.1	
Green shading	CRTC publishes aggregated financial summaries for this group		

## Appendix 5 CRTC has no data on broadcast employment by expense category




Conseil de la radiodiffusion et des  
télécommunications canadiennes

Canadian Radio-television and  
Telecommunications Commission

Access to Information and Privacy Office (ATIP)  
Ottawa, ON K1A 0N2

Our File  
A-2024-00057 / OA

Ms. Monica Auer  


Dear Monica Auer:

This is further to your request that was received in this office on November 8, 2024.  
We note that, pursuant to the *Access to Information Act* (ATIA), you wish to obtain the following information:

*"Re: Broadcast employment by category Further to CRTC access-to-information response A-2015-00042 (27 October 2015), please provide in a machine-readable spreadsheet (and not a PDF), for each of the broadcast years from 2014/15 to 2022/23, employment by category ('programming and production', 'technical', 'sales and promotion', 'administration and general' and 'Total') for private TV, private radio, CBC TV, CBC radio and discretionary programming services. In other words, [Years in columns] 2014/15 2015/16 ... 2022/23 [Type of broadcaster and employment category in rows] Private TV - Programming & production - Technical - Sales & promotion - Admin & general - Total (of above 4 categories) Private radio [same as above] CBC TV [same as above] etc. Thank you for your time."*

We regret to inform you that a search of the records under the control of the Canadian Radio-television and Telecommunications Commission has revealed none relating to the subject of your request under the *Access to Information Act* (ATIA).

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.

In the event you decide to avail yourself of this right, your notice of complaint should be addressed to:

*Office of the Information Commissioner  
30 Victoria Street, 7th Floor  
Gatineau, QC K1A 1H3*

You may obtain additional information on the complaint process by visiting the website of the Office of the Information Commissioner at [www.oic-ci.gc.ca](http://www.oic-ci.gc.ca).

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

Yours sincerely,  


ATIP Coordinator

## Appendix 6 TV stations that rebroadcast radio programming

CIVI-DT Victoria has broadcast a radio newscast from CFX Victoria as original and local television news since at least late 2009.<sup>85</sup> In November 2009 CIVI-TV's program logs showed that 31.1 hours (34.4%) of CIVI-TV's original local news hours came from CFX:

November 2009 Original news produced and originated by CIVI-TV	Program composition		Total hours
	First play	Recorded live	
<i>A News</i>	47.90		47.90
<i>CFAX Live</i>	26.75		26.75
<i>CFAX Live 1</i>	0.28		0.28
<i>CFAX Live 2</i>	1.62		1.62
<i>CFAX Live 3</i>	1.19		1.19
<i>CFAX Live 4</i>	1.28		1.28
<i>News Tease</i>		0.08	0.08
<i>News Update</i>		0.36	0.36
<i>Remembrance Day Special</i>	0.58		0.58
<i>Vancouver Island Report</i>	10.45		10.45
Total hours of local station news	90.04	0.43	90.48
Average per week (total % 30, x 7)	21.01	0.10	21.11
Weekly average, excluding radio	13.75	0.10	13.85

Source: CIVI-DT's program log for November 2009

In November 2014 CIVI-DT's program logs showed that 31.01 hours (34.5%) of its original local news came from CFX:

November 2014 Original news produced and originated by CIVI-DT	Program composition		Total hours
	First play	Recorded live	
<i>CFAX Live</i>	30.01		30.01
<i>CTV News Vancouver Island</i>	0.50		0.50
<i>CTV News Vancouver at Six</i>	19.99		19.99
<i>CTV News Vancouver Island</i>	16.03		16.03
<i>CTV News Vancouver Island at Five</i>	20.01		20.01
<i>News Tease</i>		0.03	0.03
<i>News Update</i>		0.40	0.40
Total hours of local station news	86.54	0.43	86.96

<sup>85</sup> The CRTC licensed CIVI-TV in 2009 after a competitive process; CHUM promised "extensive local news, as well as local programming falling into other categories" for the new station: Broadcasting Decision CRTC 2000-219, (Ottawa, 8 June 2007) at para. 32. CHUM also "proposed to broadcast 26 hours per week of original local programming, including 19.5 hours per week of local news." *Ibid.*, para. 33. CIVI-TV went on air in October 2001. The CRTC approved CTVgm's purchase of the station in June 2007, stipulating that due to the "importance of diversity of voices in the context of cross-ownership of media", it required "the independent management of news departments and the maintenance of separate presentation structures." Transfer of effective control of CHUM Limited to CTVglobemedia Inc., Broadcasting Decision CRTC 2007-165, <http://www.crtc.gc.ca/eng/archive/2007/db2007-165.htm>, at paras. 73-74

November 2014 Original news produced and originated by CIVI-DT	Program composition		Total hours
	First play	Recorded live	
Average per day, times seven ( <i>i.e.</i> , per week)	20.19	0.10	20.29
Weekly average, excluding radio	13.19	0.10	13.29

Source: CIVI-DT's program log for November 2014

Rogers and CBC have also begun to broadcast radio on their television news stations. Rogers replaced City-TV Winnipeg's Breakfast Television "with a televised version of radio station 92 CITI FM's morning program" in January 2015, and CBC made a similar announcement in August 2015:

"The show will still air from 5:30 a.m. ET to 8:30 a.m. on Radio One. We're simply providing you another way to access the program. You'll see the Daybreak team broadcasting from Studio 20 in La Maison Radio Canada"<sup>86</sup>

<sup>86</sup> Shelagh Kinch, CBC news, "Managing Director's blog: Daybreak on TV begins", (posted 22 August 2015, 6:01 AM ET, last updated 22 August 2015, 6:01 AM ET), <http://www.cbc.ca/news/canada/montreal/managing-director-s-blog-daybreak-on-tv-begins-1.3199561>.



## Appendix 7 CRTC Canadian content statistics for the broadcast week for private radio stations (A2020-00043)

Category 2 music: Broadcast week - % of musical selections that were Canadian													
Callsign	2003	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CFAM										39.60%			
CFAN-FM						38.20%							
CFCP-FM											37.40%		
CFDC-FM										41.50%			
CFEI-FM					36.40%								
CFEL-FM								52.10%					
CFGE-FM								57.40%					
CFGL-FM			55.40%										
CFHK-FM													38.80%
CFIX-FM			58.20%		47.00%								
CFJB-FM													36.90%
CFJO-FM								64.90%					
CFLM-FM						67.90%							
CFLY-FM										36.06%			
CFMC-FM							37.00%						
CFMG-FM												35.80%	
CFMP-FM												41.20%	
CFMS-FM											40.40%		
CFMV-FM					65.70%								
CFMX-FM													
CFOM-FM								42.00%					
CFOR-FM						69.00%							
CFPG-FM							36.50%						
CFPV-FM											35.80%		
CFRY										47.06%			
CFTX-FM			54.80%				68.00%						
CFVM-FM								58.40%					
CFVR-FM											41.10%		
CFXL-FM												36.80%	
CFXN-FM										39.35%			
CHAW-FM												63.10%	
CHBE-FM												36.06%	
CHBN-FM												41.00%	
CHBY-FM										43.24%			
CHEQ-FM				52.10%							59.00%		
CHER-FM											36.87%		
CHFT-FM												37.20%	
CHGB-FM										40.43%			
CHHI-FM									37.30%				
CHIK-FM					32.40%								
CHKX-FM												37.22%	

Category 2 music: Broadcast week - % of musical selections that were Canadian													
Callsign	2003	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CHLC-FM								66.00%					
CHLG-FM								40.20%					
CHLQ-FM											37.00%		
CHLX-FM						50.40%							
CHMZ-FM										35.20%			
CHNO-FM												36.59%	
CHOO-FM						41.80%							
CHOY-FM							80.70%						
CHPR-FM	53.60%												
CHRC-FM										35.00%			
CHSM										36.10%			
CHUC-FM							40.90%						
CHWK-FM												41.06%	
CHXX-FM			60.30%										
CHYC-FM											67.40%		
CHYK-FM	60.90%												
CICS-FM									41.40%				
CIDC-FM								32.50%					
CIDG-FM								45.30%					
CIDR-FM								23.70%					
CIEL-FM-4					59.20%								
CIHI-FM									41.30%				
CIKR-FM											35.86%		
CIKZ-FM							41.00%						
CIMF-FM			58.20%										
CIMG-FM							44.40%						
CIMM-FM										46.60%			
CIMX-FM												23.49%	
CIND-FM										41.86%			
CINU-FM													
CIOO-FM										36.42%			
CIRR-FM											40.20%		
CISF-FM												41.60%	
CISN-FM												36.90%	
CISO-FM													
CIXM-FM											35.39%		
CJ EC-FM						42.00%							
CJBP-FM							39.30%						
CJBQ											35.86%		
CJCH-FM												36.95%	
CJCS-FM												38.80%	
CJCW						37.70%							
CJDJ-FM							36.30%						
CJDM-FM					46.90%								

Category 2 music: Broadcast week - % of musical selections that were Canadian													
Callsign	2003	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CJEB-FM								57.30%					
CJEC-FM			52.30%										
CJEM-FM			60.00%										
CJFH-FM													
CJGM-FM							40.90%						
CJIM-FM										43.00%			
CJJC-FM							42.20%						
CJKR-FM										36.10%			
CJMB-FM									100.00%				
CJMC-FM					71.00%								
CJMJ-FM											35.30%		
CJML-FM												43.29%	
CJMS		70.30%											
CJMV-FM					46.20%								
CJMX-FM											35.77%		
CJOI-FM					46.70%								
CJOT-FM							42.40%						
CJPG-FM												45.70%	
CJPT-FM										36.62%			
CJPX-FM													
CJQQ-FM							36.60%						
CJRB										42.04%			
CJSD-FM										36.54%			
CJSO-FM						61.40%							
CJSP-FM											35.90%		
CJUV-FM										40.84%			
CJVA	58.80%												
CJWF-FM												36.21%	
CJWL-FM										42.40%			
CJXR-FM										44.56%			
CKCK-FM						37.60%							
CKCN-FM					67.20%						57.80%		
CKCR-FM								39.50%					
CKDH-FM						38.30%							
CKDR-FM						40.30%							
CKEA-FM							40.10%						
CKEZ-FM									22.50%				
CKFG-FM								13.30%					
CKFU-FM									35.60%				
CKGC-FM												35.20%	
CKHY-FM							41.40%						
CKIK-FM												40.50%	
CKIX-FM							36.40%						
CKKL-FM										44.40%			

Category 2 music: Broadcast week - % of musical selections that were Canadian													
Callsign	2003	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CKKW-FM							37.40%						
CKLC-FM							36.70%						
CKLD-FM								62.90%					
CKLE-FM	58.30%												
CKLJ-FM							40.80%						
CKLO-FM											40.10%		
CKLP-FM										41.10%			
CKLX-FM						67.60%							
CKMF-FM					41.90%								
CKMO-FM											41.57%		
CKMW-FM										44.60%			
CKNI-FM											40.00%		
CKNO-FM									41.50%				
CKNW												0.00%	
CKOB-FM				57.80%									
CKOI-FM			43.80%		35.60%	55.60%							
CKOY-FM				54.80%									
CKPK-FM													41.70%
CKPM-FM											30.50%		
CKPP-FM											44.10%		
CKRA-FM								38.33%					
CKRO-FM						74.00%							
CKRS-FM				55.70%									
CKSA-FM												39.62%	
CKTF-FM			49.30%		39.80%	60.00%							
CKTG-FM							38.40%						
CKTO-FM											38.35%		
CKUV-FM						43.50%							
CKVM-FM					65.80%								
CKWM-FM						37.90%							
CKWR-FM									37.90%				
CKXA-FM												37.32%	
CKXO-FM			62.00%										
CKY-FM							36.40%						
CKYQ-FM						53.10%							
CKZM-FM								40.30%					
CIPC-FM			71.90%		56.70%								
VOWR						33.60%							

## Appendix 8 CRTC Canadian content statistics for peak listening period for private radio stations (A2020-00043)

<b>Category 2 music: Peak listening (Monday-Friday, 6am – 6pm) - % of musical selections that were Canadian</b>													
Callsign	2003	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CFAM										45.54%			
CFAN-FM						37.70%							
CFCP-FM											36.60%		
CFDC-FM										41.80%			
CFEI-FM					32.30%								
CFEL-FM								46.70%					
CFGE-FM								50.50%					
CFGL-FM			49.10%										
CFHK-FM													39.00%
CFIX-FM			51.90%		45.70%								
CFJB-FM													36.40%
CFJO-FM								56.40%					
CFLM-FM						71.30%							
CFLY-FM										36.21%			
CFMC-FM							36.90%						
CFMG-FM												35.00%	
CFMP-FM												41.30%	
CFMS-FM											40.50%		
CFMV-FM					66.60%								
CFMX-FM													
CFOM-FM								37.20%					
CFOR-FM						69.90%							
CFPG-FM							35.90%						
CFPV-FM											38.30%		
CFRY										49.54%			
CFTX-FM			49.00%				63.80%						
CFVM-FM								56.20%					
CFVR-FM											41.05%		
CFXL-FM												36.40%	
CFXN-FM										38.81%			
CHAW-FM												59.00%	
CHBE-FM												35.88%	
CHBN-FM												41.30%	
CHBY-FM										42.57%			
CHEQ-FM				55.00%							50.20%		
CHER-FM											35.51%		
CHFT-FM												36.20%	
CHGB-FM										42.48%			
CHHI-FM									35.10%				
CHIK-FM					30.70%								
CHKX-FM												37.18%	
CHLC-FM								60.30%					
CHLG-FM								40.00%					
CHLQ-FM											36.90%		

Category 2 music: Peak listening (Monday-Friday, 6am – 6pm) - % of musical selections that were Canadian													
Callsign	2003	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CHLX-FM						45.40%							
CHMZ-FM										36.30%			
CHNO-FM												38.21%	
CHOO-FM						41.60%							
CHOY-FM							82.40%						
CHPR-FM	55.90%												
CHRC-FM										36.40%			
CHSM										36.80%			
CHUC-FM							39.60%						
CHWK-FM												40.88%	
CHXX-FM			55.40%										
CHYC-FM											63.20%		
CHYK-FM	58.00%												
CICS-FM									42.50%				
CIDC-FM								35.50%					
CIDG-FM								40.50%					
CIDR-FM													
CIEL-FM-4					57.30%								
CIHI-FM									41.50%				
CIKR-FM											35.91%		
CIKZ-FM							41.00%						
CIMF-FM			52.10%										
CIMG-FM							43.80%						
CIMM-FM										48.60%			
CIMX-FM												22.46%	
CIND-FM										41.84%			
CINU-FM													
CIOO-FM										36.64%			
CIRR-FM											40.20%		
CISF-FM												41.40%	
CISN-FM												37.20%	
CISO-FM													
CIXM-FM											36.02%		
CJ EC-FM						35.20%							
CJBP-FM							40.40%						
CJBQ											35.10%		
CJCH-FM												36.82%	
CJCS-FM												39.60%	
CJCW						37.70%							
CJDJ-FM							36.20%						
CJDM-FM					42.90%								
CJEB-FM								49.60%					
CJEC-FM			49.80%										
CJEM-FM			60.50%										
CJFH-FM													
CJGM-FM							40.50%						
CJJM-FM										44.30%			

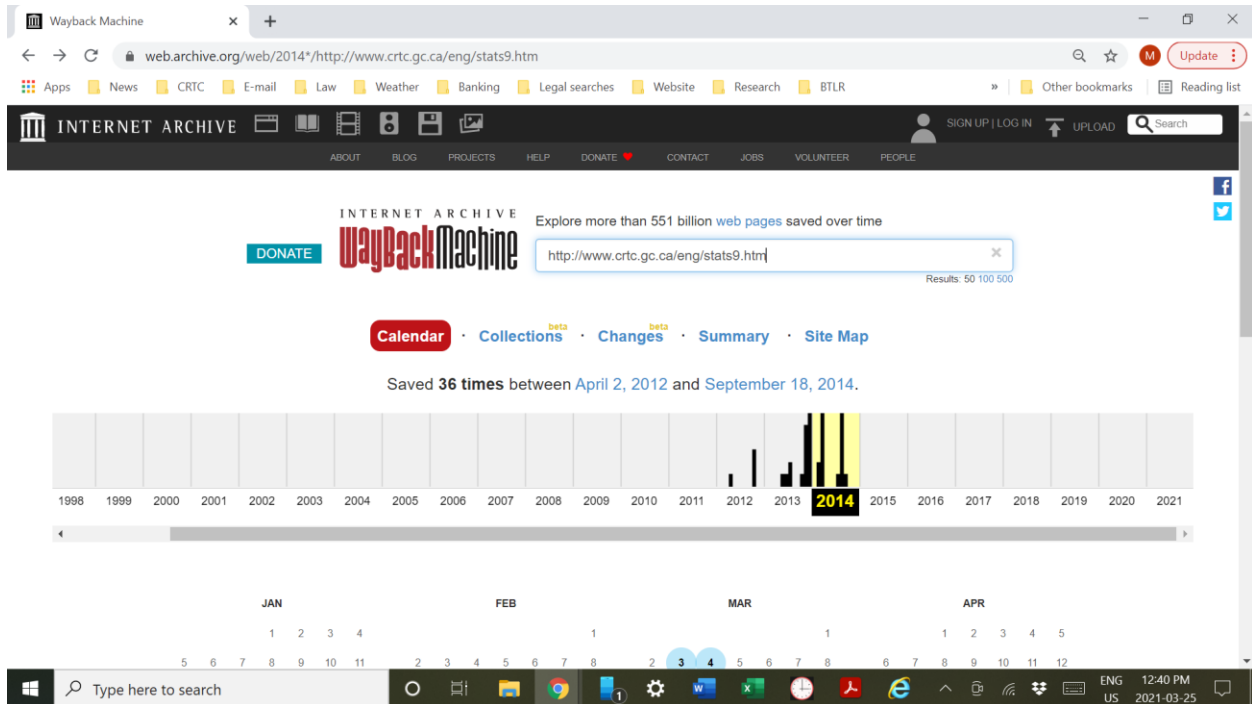
Category 2 music: Peak listening (Monday-Friday, 6am – 6pm) - % of musical selections that were Canadian													
Callsign	2003	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CJKC-FM							45.40%						
CJKR-FM										36.80%			
CJMB-FM									100.00%				
CJMC-FM					73.60%								
CJMJ-FM											36.90%		
CJML-FM												41.72%	
CJMS		72.10%											
CJMV-FM					42.60%								
CJMX-FM											35.93%		
CJOI-FM					46.40%								
CJOT-FM							45.50%						
CJPG-FM												45.92%	
CJPT-FM										36.41%			
CJPX-FM													
CJQQ-FM							37.30%						
CJRB										43.67%			
CJSD-FM										36.62%			
CJSO-FM						54.90%							
CJSP-FM											35.60%		
CJUV-FM										40.67%			
CJVA	58.20%												
CJWF-FM												35.76%	
CJWL-FM										37.10%			
CJXR-FM										45.58%			
CKCK-FM						36.60%							
CKCN-FM					59.30%						46.40%		
CKCR-FM								39.10%					
CKDH-FM						37.60%							
CKDR-FM						39.00%							
CKEA-FM							40.60%						
CKEZ-FM									37.00%				
CKFG-FM								14.90%					
CKFU-FM									36.30%				
CKGC-FM												33.40%	
CKHY-FM							40.10%						
CKIK-FM												40.38%	
CKIX-FM							37.20%						
CKKL-FM										39.43%			
CKKW-FM							36.10%						
CKLC-FM							37.40%						
CKLD-FM								54.70%					
CKLE-FM	52.00%												
CKLJ-FM							42.70%						
CKLO-FM											40.60%		
CKLP-FM										41.30%			
CKLX-FM													
CKMF-FM					36.00%								



Category 2 music: Peak listening (Monday-Friday, 6am – 6pm) - % of musical selections that were Canadian													
Callsign	2003	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
CKMO-FM											42.52%		
CKMW-FM										44.60%			
CKNI-FM											37.80%		
CKNO-FM									40.80%				
CKNW													
CKOB-FM				54.70%									
CKOI-FM			36.90%		30.70%	48.90%							
CKOY-FM				53.00%									
CKPK-FM													41.20%
CKPM-FM										29.00%			
CKPP-FM										45.20%			
CKRA-FM								36.50%					
CKRO-FM						76.70%							
CKRS-FM				55.40%									
CKSA-FM												37.94%	
CKTF-FM			42.50%		32.70%	51.90%							
CKTG-FM							39.20%						
CKTO-FM											38.80%		
CKUV-FM						45.10%							
CKVM-FM					61.00%								
CKWM-FM						37.90%							
CKWR-FM									38.60%				
CKXA-FM												37.96%	
CKXO-FM			59.10%										
CKY-FM							36.10%						
CKYQ-FM						40.90%							
CKZM-FM								40.20%					
CIPC-FM			60.80%		38.60%								
VOWR						33.50%							



## Appendix 9 CRTC data on Over-the-air Radio and TV employees by Staffing Category



Canadian Radio-television and Telecommunications Commission  
 www.crtc.gc.ca

Home > Broadcasting Sector > Financial Summaries

**Over-the-air Radio and TV Employees by Staffing category**

	# of Employees for Privately-owned Radio Undertakings				Total
	Programming & Production	Technical	Sales & Promotion	Administration & General	
1989-1990	5,849.8	406.7	2,458.4	1,675.3	10,390.2
1990-1991	5,761.7	380.6	2,407.5	1,746.2	10,296.1
1991-1992	5,358.2	386.9	2,375.1	1,649.2	9,769.3
1992-1993	5,171.1	364.8	2,411.0	1,552.3	9,499.3
1993-1994	4,958.5	363.9	2,417.4	1,564.9	9,304.7
1994-1995	4,792.1	365.7	2,442.7	1,598.9	9,199.5
1995-1996	4,531.6	351.8	2,416.6	1,322.1	8,622.1
1996-1997	4,521.9	345.0	2,423.1	1,324.2	8,624.1
1997-1998	4,506.5	339.6	2,403.6	1,367.2	8,616.9
1998-1999	4,431.8	369.4	2,435.2	1,355.1	8,591.6
1999-2000	4,679.8	333.0	2,501.7	1,272.9	8,787.4
2000-2001	4,811.1	336.1	2,513.4	1,354.0	9,014.6
2001-2002	4,582.2	341.4	2,561.8	1,306.3	8,791.7
2002-2003	4,471.1	347.2	2,731.7	1,299.7	8,849.7
2003-2004	4,579.5	360.2	2,888.4	1,263.0	9,091.1
2004-2005	4,706.5	361.3	2,924.9	1,406.2	9,398.9
2005-2006	5,114.6	350.9	3,024.3	1,411.6	9,901.4
2006-2007	5,201.5	358.2	3,177.4	1,420.5	10,157.6
2007-2008	5,487.1	360.4	3,184.5	1,435.3	10,467.3
2008-2009	5,270.1	358.1	3,130.4	1,433.0	10,191.7

Over-the-air Radio and TV Empl: x +

web.archive.org/web/20140918232258/http://www.crtc.gc.ca/eng/stats9.htm

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# of Employees for Privately-owned OTA TV Programming Undertakings					
	Programming & Production	Technical	Sales & Promotion	Administration & General	Total
1989-1990	5,340.7	949.5	1,094.1	1,261.8	8,646.1
1990-1991	5,401.6	856.0	1,151.2	1,146.3	8,555.0
1991-1992	5,183.7	818.0	1,107.0	1,181.5	8,290.2
1992-1993	5,241.8	733.3	1,095.6	1,074.7	8,145.3
1993-1994	5,453.3	663.9	1,059.1	1,087.3	8,263.7
1994-1995	5,359.5	664.5	1,093.4	1,058.4	8,175.8
1995-1996	5,189.2	648.3	1,112.3	1,017.1	7,966.8
1996-1997	5,069.5	623.1	1,105.6	863.6	7,661.8
1997-1998	5,192.8	575.4	1,081.9	858.3	7,708.3
1998-1999	5,109.2	547.5	1,110.6	828.6	7,595.9
1999-2000	5,097.5	530.1	1,133.3	821.4	7,582.3
2000-2001	5,425.4	428.9	1,093.9	736.9	7,685.1
2001-2002	5,545.0	435.2	1,107.6	726.4	7,814.1
2002-2003	5,698.8	406.9	1,104.7	704.0	7,914.4
2003-2004	5,723.0	435.7	1,115.6	739.7	8,014.0
2004-2005	5,849.1	427.2	1,071.3	719.8	8,067.4
2005-2006	5,923.7	493.6	1,059.3	720.0	8,196.6
2006-2007	5,649.7	487.5	1,009.9	726.3	7,873.4
2007-2008	5,065.8	728.8	983.8	623.1	7,401.6
2008-2009	4,525.3	764.9	869.6	587.1	6,746.9

**Notes:**  
 The CRTC no longer has employment information for the broadcast year 1988-1989.  
 Minor discrepancies are noted between the total staff count figures above and those previously released in financial summary publications. This is due to licensees filing annual returns subsequent to the date of publication of the related financial summary.  
 The figures are compiled from the annual returns completed for each licensed undertaking by the licensee on a yearly basis for the period Sept. 1 - Aug 31.

Date Modified: 2010-08-18

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US 2021-03-25

## Appendix 10 Data CRTC publishes about radio

CRTC, <a href="#">data-radio-sector.xlsx</a> (accessed 12 January 2025)		
Tables	Tab Name	Title
Table 1	RD-T1	Average weekly hours of tuning in to traditional radio vs listening to streamed audio services, by Canadians 18+, 2013-2023
Table 2	RD-T2	Listening habits (%) for Canadians 18+ by language and platform, any given month
Table 3	RD-T3	Number of radio ownership transactions, the value of those transactions (\$ million) and the resulting tangible benefits (\$ million), by language of service, for the period 1 January 2014 to 31 December 2023
Table 4	RD-T4	Non-commercial radio overview, 2018-2023
Table 5	RD-T5	Internet-based audio services reported revenue, 2014-2023
Table 6	RD-T6	Type and number of radio services and audio services authorized to broadcast in Canada, by language of broadcast, 2017-2023
Table 7	RD-T7	Number of public/community-based and private radio services authorized to broadcast over-the-air in Canada, by province and language of broadcast, 2018-2023
Table 8	RD-T8	Number of new over-the-air radio stations licensed by the Commission by language of service, licence category, type of service, and licensing process, 2014-2023
Table 9	RD-T9	French- and English-language radio revenues and number of undertakings reporting for the largest commercial radio operators in Canada, 2015-2023
Table 10	RD-T10	Average weekly hours of radio tuned per capita by age group for all Canada, 2013-2023
Table 11	RD-T11	Radio tuning share (%) in an average week for French- and English-language AM and FM stations, 2013-2023
Table 12	RD-T12	Average weekly hours tuned (per listener, total), 2013-2023
Table 13	RD-T13	Tuning (millions of hours) and tuning share (%) achieved by the largest French-language private commercial radio operators in Canada in an average week, 2015-2023
Table 14	RD-T14	Tuning (millions of hours) and tuning share (%) achieved by the largest English-language private commercial radio operators in Canada in an average week, 2015-2023
Table 15	RD-T15	Radio tuning (%) by station type in diary markets, 2018-2023
Table 16	RD-T16	Summary of annual CCD contributions reported by radio station licensees (\$ thousands), 2012-2023
Table 17	RD-T17	Annual CCD contributions reported by Basic CCD Contributions (\$ thousands), 2015-2023
Table 18	RD-T18	Annual CCD contributions reported by Over and Above CCD Contributions (\$ thousands), 2015-2023
Table 19	RD-T19	Annual CCD contributions reported by new radio station licensees during the first licence term (\$ thousands), 2012-2023
Table 20	RD-T20	Annual CCD contributions reported by radio licensees in the context of licence renewals (\$ thousands), 2012-2023

<b>CRTC, <a href="#">data-radio-sector.xlsx</a> (accessed 12 January 2025)</b>		
<b>Tables</b>	<b>Tab Name</b>	<b>Title</b>
Table 21	RD-T21	Annual CCD contributions reported by radio licensees in the context of changes in ownership and control (\$ thousands), 2012-2023
Table 22	RD-T22	Contributions to Canadian content development by type (\$ millions), 2009-2023
Table 23	RD-T23	Types of radio and audio services authorized to broadcast in Canada, as a percentage of all such services, 2018-2023
Table 24	RD-T24	Number of radio transmitters (including rebroadcasting transmitters), serving the OLM population in Canada by type of service, 2018-2023
Table 25	RD-T25	Radio transmitters serving the OLM population (stations and rebroadcasting transmitters) per province as a percentage of all radio transmitters, and percentage of OLM population as a percentage of total population, for each province and territory, and for Canada as a whole, 2018-2023
Table 26	RD-T26	Number of Indigenous authorized to broadcast over-the-air in Canada, by province and language of broadcast, 2018-2023
Table 27	RD-T27	Radio tuning (millions of hours) in home vs. out of home, 2016-2023
Table 28	RD-T28	Payments by radio broadcasters to copyrights collectives as reported in Radio Expenses 2018-2023, by rights and type of works
Table 29	RD-T29	Average Weekly Hours spent streaming audio, 2017-2023, 18+
Table 30	RD-T30	Commercial Radio OLMC Revenue and Expenditures, 2021-2023



## Appendix 11 CRTC no longer keeps data it collects



Conseil de la radiodiffusion et des  
télécommunications canadiennes Canadian Radio-television and  
Telecommunications Commission

Access to Information and Privacy Office (ATIP)  
Ottawa, ON K1A 0N2

Our File  
A-2024-00057 / OA

Ms. Monica Auer



Dear Monica Auer:

This is further to your request that was received in this office on November 8, 2024.

We note that, pursuant to the *Access to Information Act* (ATIA), you wish to obtain the following information:

*"Re: Broadcast employment by category Further to CRTC access-to-information response A-2015-00042 (27 October 2015), please provide in a machine-readable spreadsheet (and not a PDF), for each of the broadcast years from 2014/15 to 2022/23, employment by category ('programming and production', technical, 'sales and promotion', 'administration and general' and 'Total') for private TV, private radio, CBC TV, CBC radio and discretionary programming services. In other words, [Years in columns] 2014/15 2015/16 ... 2022/23 [Type of broadcaster and employment category in rows] Private TV - Programming & production - Technical - Sales & promotion - Admin & general - Total (of above 4 categories) Private radio [same as above] CBC TV [same as above] etc. Thank you for your time."*

We regret to inform you that a search of the records under the control of the Canadian Radio-television and Telecommunications Commission has revealed none relating to the subject of your request under the *Access to Information Act* (ATIA).

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.

In the event you decide to avail yourself of this right, your notice of complaint should be addressed to:

*Office of the Information Commissioner  
30 Victoria Street, 7th Floor  
Gatineau, QC K1A 1H3*

You may obtain additional information on the complaint process by visiting the website of the Office of the Information Commissioner at [www.oic-ci.gc.ca](http://www.oic-ci.gc.ca).

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

Yours sincerely,



ATIP Coordinator

Canada

## Appendix 12 CRTC questions

### Licence terms

- Q1. Please comment on the following proposals:**
- (a) indeterminate licence terms for all stations;**
  - (b) indeterminate licence terms for all AM stations.**

The Forum does not support indeterminate licence terms for commercial radio stations, including AM radio stations.

Our concern is that private broadcasters' legitimate goal of maximizing income for their owners creates an inexorable and enduring conflict with implementing Parliament's *Broadcasting Policy for Canada*, and that indeterminate licence terms eliminate the public's ability to participate in regular reviews of broadcasters' service to the communities they are licensed to serve.

With that in mind, the Forum would support indeterminate licence terms for non-commercial radio stations by the national public broadcaster, community or campus radio stations since their founding principles do not create the automatic conflict of interest noted above, provided the CRTC also commits to publish annual reviews of these broadcasters' programming performance and numbers of complaints received about individual radio stations.

No indeterminate licences should be granted to individual radio stations or to individual broadcast ownership groups if any of these have breached the CRTC's regulatory requirements in the previous two full licence terms – *i.e.* for the previous 14 years.

- Q2. If the Commission were to maintain licences with fixed terms, please provide comments for the following proposals relating to licence terms for different types of stations:**
- (a) 20 years for community and campus radio stations;**
  - (b) 15 years for commercial radio stations with annual revenues of less than \$2 million;**
  - (c) 10 years for commercial radio stations with annual revenues of more than \$2 million.**

The Forum supports the proposal to grant 20-year licence terms to community radio stations, and would support longer (10-year) terms for campus radio stations, provided the CRTC also commits to publish annual reviews of these broadcasters' programming performance and numbers of complaints received about individual radio stations.



As the CRTC has not explained why revenues rather than implementation of Parliament’s *Broadcasting Policy for Canada* would determine the length of commercial radio station licences, FRPC does not support proposals 2(b) and (c).

The Forum also notes that the CRTC’s own research found differences in non-compliance levels between stations in their first licence term, and stations that had been in operation for “several” licence terms:

**Appendix C: Radio non-compliance rates– Detailed data**

**Table C1: Comparison between non-compliance rates (2014-2018) for stations in their first license terms and those in operation for several license terms**

Sector	First license term			Several license terms			Gap (%)
	# of stations in non-compliance	Total # of renewed stations	Non-compliance rate (%)	# of stations in non-compliance	Total # of renewed stations	Non-compliance rate (%)	
“Mainstream” commercial	16	53	30.2	35	174	20.1	10.1
Ethnic/specialty	5	11	45.5	14	24	58.3	-12.9
Campus/community	6	13	46.2	23	44	52.3	-6.1
Native	3	3	100.0	14	21	66.7	33.3
Other	3	7	42.9	2	7	28.6	14.3
<b>TOTAL</b>	<b>33</b>	<b>87</b>	<b>37.9</b>	<b>88</b>	<b>270</b>	<b>32.6</b>	<b>5.3</b>

Source: CRTC, 31 March 2021 release package for A-2020-00068, page 21 of 98.

**Q3. To determine the licence term of a commercial station (10 or 15 years), the Commission would use the average revenues for the five years preceding the licence expiry date. Please comment on this proposal.**

**Potential exemption orders**

In addition, the Commission solicits comments on the possibility of exempting some low-power stations based on their revenues. Specifically, the Commission solicits comments on the possibility of exempting community stations based on the following criteria:

- a) a threshold based on total revenues from all sources;
- b) a threshold based on advertising revenues; and

- c) a threshold based on a percentage of advertising revenues in relation to the station's total revenue, up to a maximum amount of advertising revenues.

As the CRTC has not explained why revenues rather than implementation of Parliament's *Broadcasting Policy for Canada* would determine the length of community radio station licences, FRPC does not support proposals 3(a), (b) or (c). As noted above, FRPC supports 20-year licence terms for community radio stations, provided the CRTC also commits to publish annual reviews of these broadcasters' programming performance and numbers of complaints received about individual radio stations.

**Q4. Are the existing exemption orders included in Broadcasting Regulatory Policy 2018-137 that are currently in force still relevant? If not, what amendments should the Commission make to these orders?**

Yes. While the Forum may comment further in reply, it believes that the CRTC should also commit to publishing annual reviews of these broadcasters' programming performance and numbers of complaints received about individual exempted services.

**Q5. The Commission is considering exempting campus stations. Please comment on this proposal.**

Yes, although the CRTC should publish annual reports on campus stations' programming performance,

**Q6. The Commission is considering exempting community radio stations, regardless of their transmitter power, in markets where no station other than a CBC station is authorized to broadcast in the same language in any part of the community station's primary contour. Please comment on this proposal.**

The Forum supports this proposal due to the fact that, with very few exceptions in the past, community stations have been operated by members of the community the stations serve, to the benefit of those communities.

**Q7. The Commission is considering exempting community radio stations based on the following criteria:**

- (a) a threshold based on total revenues from all sources;
- (b) a threshold based on advertising revenues; and



- (c) a threshold based on a percentage of advertising revenues in relation to the station's total revenue, up to a maximum amount of advertising revenues.**

**Please comment on this proposal. Should the proposal be restricted to low-power stations? How should the Commission handle stations that exceed the established exemption threshold during a broadcast year, or licensed stations whose revenues fall below the exemption threshold?**

FRPC may comment in reply.

- Q8. Should the Commission impose advertising limits on exempt campus stations, on community stations, or on both?**

Yes, to distinguish them from their commercial counterparts . If exempt campus or community stations become reliant on this income it will inevitably affect their programming. Broadcasters that want to provide a commercial audio service may do so without restraint, and if the CRTC were to adopt a competitive licensing framework, any party including campus or community stations could seek the CRTC's approval to use an existing commercial radio licence if the licensee's performance makes it preferable to grant the licence elsewhere.

- Q9. Should the Commission consider an exemption for certain low-power commercial stations, operated by owners who own only one station, based on their revenues?**

FRPC may comment in reply.

- Q10. Should the Commission consider an exemption to encourage the launch of radio stations dedicated to broadcasting news content focused on local news?  
If yes:**

**(d) [sic] Should such stations be required to be owned and operated by qualified Canadian journalistic organizations or other organizations designated by the Commission under paragraphs 27(1)(b) and (c) of the Online News Act?**

**(e) [sic] What local programming threshold would be appropriate?**

**(f) [sic] What percentage of the broadcast week should be devoted to content subcategory 11: News to obtain an exemption?**

**(g) [sic] Should this type of exemption be offered to full-power stations?**

FRPC may comment in reply.

**Q11. For stations that could be exempt, the Commission is considering imposing a requirement for them to keep their audio recordings, music lists and program logs. Please comment on this proposal.**

FRPC supports this requirement with respect to audio recordings and music lists, but not for program logs: the CRTC should require exempted stations to submit their monthly program logs to the CRTC so that it is able to publish annual reports showing how and to what degree Parliament's *Broadcasting Policy for Canada* is being implemented by Canadian radio stations.

**Q12. For stations that could be exempt, the Commission is considering imposing a requirement to register with the Commission, similar to the registration requirement currently imposed on low-power tourist information stations. Please comment on this proposal.**

The Forum supports this proposal and may comment further in reply.

**Q13. For stations that could be exempt, the Commission is considering imposing minimal requirements relating to the broadcast of local programming, Canadian content and French-language vocal music, if applicable, and relating to the filing of simplified annual returns. Please comment on this proposal.**

FRPC may comment in reply.

**Q14. In cases where the Commission determines that a station is exempt, the Commission is considering extending the exemption to all SCMO audio programming services associated with the station, regardless of content. Please comment on this proposal or on other matters related to the Commission's SCMO service framework.**

FRPC may comment in reply.

### **Streamlining certain licensing processes**

**Q15. What changes could be made to facilitate the process leading to the launch of developmental stations?**

- (a) Should this class of stations be eligible for a renewal after five years, with complete requirements?**

- (b) In addition to campus and community stations, should the proposed changes to developmental stations apply to low-power commercial stations?**
- (c) In your view, if a simplified process existed for development stations, would more applicants use it?**
- (d) Could developmental stations allow underrepresented groups in the industry to access ownership of radio undertakings?**

FRPC may comment in reply.

**Q16. What specific barriers do equity-deserving groups and individuals face when applying for radio broadcasting licences or seeking permission to start broadcasting? How can these barriers be effectively addressed while allowing the Commission to fulfil its mandate to effectively regulate and supervise the broadcasting system?**

FRPC may comment in reply.

**Q17. How could the Commission streamline the licensing process to make it easier for equity-deserving groups and individuals to participate in the broadcasting industry?**

FRPC may comment in reply.

**Q18. What specific measures should be implemented in order to ensure that the diversity of Canadian society is well reflected in the ownership of radio undertakings?**

The CRTC should gather and publish annual data on radio-station ownership.

**Q19. What data should the Commission collect in order to evaluate whether the modernized broadcasting framework contributes to reducing obstacles for equity-deserving groups, including obstacles to their ability to obtain licences or authorizations?**

**(h) [sic] How could this data be used to make significant improvements?**

**(i) [sic] How can the Commission ensure that the voices and experiences of equity-deserving groups are reflected adequately in the data collection?**

The CRTC could consider commissioning a third party to survey these groups every two years, and report its anonymized findings to the CRTC; the CRTC should publish these reports within 3 months of receiving them.

**Q20. What additional flexibilities could be granted to AM radio stations?**

FRPC may comment in reply.

**Q21. Should the Commission consider a simplified process for low-power stations that wish to upgrade to full power, similar to a Part 1 process for a licence amendment, rather than an application for a new station?**

**(a) In the affirmative, how do you see this type of process unfolding?**

**(b) In the negative, please explain why.**

FRPC may comment in reply.

**Q22. How should the Commission collect ownership data on radio stations to determine which entities are owned or controlled by equity-deserving groups, taking into account self-reporting and data confidentiality? What about entities owned and controlled by more than one individual, only some of whom belong to an equity-deserving group?**

**(a) How often should this data be collected?**

**(b) How should this information be collected?**

**(c) How could the Commission meet its confidentiality and privacy obligations if it were to collect this information?**

FRPC may comment in reply.

**Q23. [a] What other measures or amendments should the Commission consider in order to alleviate the administrative burden on radio stations?**

**[b] What other measures could be implemented to ensure that regulatory changes lead to significant changes for equity-deserving groups?**

(a) BNoC 2024-290 does not provide evidence supporting the existence of an “administrative burden” of radio stations. The Forum therefore opposes any measures or amendments to alleviate a problem for which no evidence has been presented for the public to evaluate.

(b) FRPC may comment in reply.

**Q24. What are the obstacles to retransmitting a station’s programming over the Internet?**

FRPC may comment in reply.

**Current non-compliance measures and the possibility of implementing new compliance measures, including incentives**

**Q25. Are any of the non-compliance measures currently used by the Commission efficient or inefficient? If yes, what are these measures, and why are they efficient or inefficient?**

None of the compliance measures currently used by the CRTC can be readily evaluated because the CRTC has not, since 1968, established a publicly accessible compliance database. Consequently the efficiency of these measures cannot be evaluated.

That said, [a longitudinal study of radio-station non-compliance from 1968 to 2005](#)<sup>87</sup> (37 years), found that just over half (57% or 285 of 499 non-compliant radio stations) breached the CRTC’s requirements more than once:

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<sup>87</sup> Monica Auer, B.A. (French and German), M.A. (Political Science), LL.M., [“The CRTC’s Enforcement of Canada’s Broadcast Legislation: ‘Concern’, ‘Serious Concern’ and ‘Grave Concern’”](#), *Canadian Journal of Law and Technology*, Vol. 5, No. 3 (2006).

**Figure 2: Occasions of non-compliance**

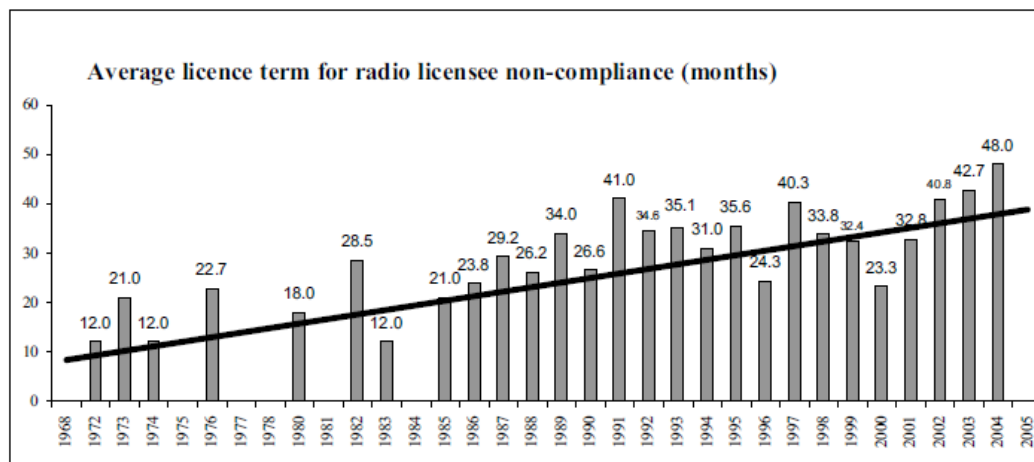
Occasions of regulatory or legislative breaches	All stations	% of breaching stations
One	214	43%
Two	129	26%
Three	72	14%
Four	36	7%
Five	18	4%
Six	15	3%
Seven	4	1%
Eight	6	1%
Nine	3	1%
Ten	1	0.2%
Eleven	0	0%
Twelve	0	0%
Thirteen	0	0%
Fourteen	0	0%
Fifteen	1	0.2%
<b>Total stations with 1 or more breaches</b>	<b>499</b>	<b>100%</b>
With 2 or more breaches, as % of 499	285	57%
With 3 or more breaches, as % of 499	156	31%

To be 'efficient, the CRTC's approach to non-compliance should actually deter future non-compliance and, preferably, not just by the initially offending station but by other stations as well.

The same study reviewed the length of the short-term licences granted due to radio stations' regulatory non-compliance, and found that the average term increased over the period reviewed, from 12 months in 1972, to 48 months in 2004.

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**Figure 2: Average licence term for radio licensee non-compliance (months)**



Given the level of repeat non-compliance, it is difficult to conclude that the CRTC’s approach from 1968 to 2005 was efficient.

The CRTC staff’s own analysis of recurrent non-compliance from 2014 to 2018 found somewhat similar results, with 50 (40%) of 124 radio stations committing additional regulatory breaches after an initial non-compliance incident:

**Table C2: Difference between stations in isolated and recurrent non-compliance (2014-2018)**

Sector	# of stations in isolated non-compliance	# of stations in recurrent non-compliance	Gap
Commercial	34	17	50%
Ethnic/specialty	7	11	-22%
Campus/community	11	18	-24%
Native	18	3	71%
Other	4	1	60%
<b>TOTAL</b>	<b>74</b>	<b>50</b>	<b>19%</b>

Source: CRTC, 31 March 2021 release package for A-2020-00068, page 22 of 98.

The CRTC staff study found that a quarter (32 of 124 stations [the sum of the 74 or 50 stations in “Table C2”, above] , or 25.8%) committed the same regulatory breach more than once: “Table C3”.

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**Table C3: Stations in recurrent non-compliance – Recurrence rate of the same types of non-compliance (2014-2018)**

Sector	Number of stations in recurrent non-compliance (several consecutive license terms)			Rate of stations in recurrent non-compliance whose instances of non-compliance of the SAME NATURE repeat over multiple license terms
	Non-compliance of a DIFFERENT NATURE	Non-compliance of the SAME NATURE	Total	
Commercial	9	8	17	47%
Ethnic/specialty	7	4	11	36%
Campus/community	2	16	18	88%
Native	0	3	3	100%
Other	0	1	1	100%
<b>TOTAL</b>	<b>18</b>	<b>32</b>	<b>50</b>	<b>64%</b>

Source: CRTC, 31 March 2021 release package for A-2020-00068, page 23 of 98.

The CRTC also summarized the measures the CRTC took with respect to radio-station non-compliance from 2014/15 to 2017/18 in “Appendix E”:



Appendix E:  
Commission's measures in cases of non-compliance

**Table E1: Number of non-compliant stations for which the Commission has imposed compliance mechanisms (since October 2014)**

	2014-15					2016					2017					2018				
	Commercial	Specialty/Ethnic	Campus/Community	Indigenous	Other	Commercial	Specialty/Ethnic	Campus/Community	Indigenous	Other	Commercial	Specialty/Ethnic	Campus/Community	Indigenous	Other	Commercial	Specialty/Ethnic	Campus/Community	Indigenous	Other
<b>ANNOUNCEMENTS</b>	2	0	0	0	0	2	1	1	0	0	3	3	1	0	0	1	1	3	0	0
<b>Additional CCD</b>	6	0	NA	NA	NA	2	1	NA	NA	NA	2	4	NA	NA	NA	0	2	NA	NA	NA
<b>Short-term renewal</b>	7	1	3	5	2	3	2	5	3	0	7	4	5	4	3	7		8	3	1
<b>Order</b>	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2	1	3	0	0
<b>No measures</b>	4	1	5	5	0	11	0	2	0	0	4	2	0	0	0	4	0	0	1	0
<b>TOTAL # of measures</b>	<b>20</b>	<b>3</b>	<b>9</b>	<b>10</b>	<b>2</b>	<b>18</b>	<b>4</b>	<b>8</b>	<b>3</b>	<b>0</b>	<b>16</b>	<b>13</b>	<b>6</b>	<b>4</b>	<b>3</b>	<b>14</b>	<b>4</b>	<b>14</b>	<b>5</b>	<b>1</b>

Source: CRTC, 31 March 2021 release package for A-2020-00068, page 28 of 98.

Summarizing the Appendix E data by year shows that the CRTC did not apply any compliance mechanisms with respect to just over a quarter (25.7% or 39) of 152 non-compliant radio stations:

	2014/15	2015/16	2016/17	2017/18	Total	
Announcements	2	4	7	5	18	11.8%
Additional CCD	6	3	6	2	17	11.2%
Short-term renewal	17	13	20	19	69	45.4%
Order	3	0	0	6	9	5.9%
No measures	15	13	6	5	39	25.7%
<b>Total</b>	<b>43</b>	<b>33</b>	<b>39</b>	<b>37</b>	<b>152</b>	<b>100.0%</b>

Source of data: CRTC staff's "Appendix E", above

**Q26. Should changes be made to the way radio station operators and the Commission address complaints and comments?**

Yes. The CRTC should publish the numbers of compliant and non-compliant radio stations by type (commercial, public broadcaster, community, campus etc.) at least every year, if not every six months. It should publish monthly statistics showing the numbers of complaints it receives, preferably grouped in terms of types of complaint.

**Q27. The Commission proposes that if the owner of a commercial station has serious or repeated non-compliance, an AMP would be imposed pursuant to criteria set out in subsection 34.5(2) of the Broadcasting Act. For example, the penalty could increase based on the number of instances of non-compliance and their severity. Please comment on this proposal.**

As FRPC' response to question 25 above, shows, the CRTC's staff data found that the CRTC did not impose compliance measures in the case of 25.7% of the radio stations that were non-compliant. The Forum is concerned that the CRTC's administration of its responsibilities will be brought into disrepute if the CRTC similarly applies AMPs in an unequal manner.

**Q28. The Commission considers that the payment of over-and-above CCD contributions is an effective measure to compensate for the harm caused to the broadcasting system stemming from a shortfall in CCD contributions or non-compliance relating to programming. Please comment on the use of CCD contributions for other types of non-compliance.**

The Forum does not agree with this proposal because support for Canadian content development should not rely on broadcasters' non-compliance with the statute that enabled the CRTC to establish Canadian content development requirements.

**Q29. What additional measures or incentives could the Commission use or develop to ensure that licensees respect their obligations and conditions of service?**

The only incentive that the CRTC should use to ensure that licensees meet their regulatory requirements is that it will impose non-financial or financial penalties on non-compliant licensees.

**Q30. How can the Commission ensure that the voices and experiences of equity-deserving groups are adequately reflected in the evaluation process? Are there industry initiatives upon which the Commission could build a framework in this regard?**

FRPC may comment in reply.

**Q31. What flexibility measures could help operators and licensees from equity-deserving groups achieve compliance, and what barriers would these measures address or mitigate?**

FRPC may comment in reply.

**Q32. What mechanisms do undertakings use to comply with the Commission’s requirements, and what improvements could the Commission make to facilitate reporting?**

FRPC may comment further in reply, but notes that Canadians believe the CRTC should obtain information from radio stations about what they broadcast, even if this is for every week (rather than a month at a time):

Q3. The Canadian Radio-television and Telecommunications Commission or CRTC is a federal agency that regulates radio in Canada. It requires radio stations to tell it about the programming they broadcast every week, which the stations generally track themselves by computer. Do you think radio stations should have to tell the CRTC how much original local news they broadcast every week?			
	<b>Yes</b>	<b>No</b>	<b>Don’t Know or No opinion</b>
BC	60.7%	19.7%	19.7%
Alta, Sask or Man.	47.4%	28.4%	24.2%
Ont.	54.1%	23.8%	22.0%
Que.	48.9%	25.6%	25.5%
NL or NB	39.8%	20.1%	40.1%
NS or PEI	62.4%	16.7%	20.9%
NWT, Nunavut and Yukon	Insufficient data (n=11)		
Access Research IVR survey, 13-15 January 2025 on behalf of FRPC			

**Licence renewal process**

**Q33. The Commission proposes a simplified licence renewal process, similar to that used in Broadcasting Notice of Consultation 2022-151, with specific follow-ups for radio stations that are in apparent non-compliance. Please comment on this new proposed approach.**

FRPC may comment in reply.

**Q34. If the Commission renewed licences by ownership group rather than by station, what would the advantages and disadvantages be for licensees? Could this approach simplify the licence renewal process?**

FRPC may comment in reply.

**Q35. If the Commission renewed licences by ownership group, and some stations of the same group were in non-compliance, how should the Commission apply non-compliance measures?**

The CRTC should apply non-compliance measures to the entire group, as to do otherwise is to ignore its failure to meet its regularity responsibilities. .

**Q36. What would be the advantages and disadvantages for licensees if the Commission were to standardize licence renewal dates by type of station rather than by individual station, regardless of the effective date for the licence? Could this approach simplify the licence renewal process?**

FRPC may comment in reply.

**Other questions**

**112. The Commission remains open to considering other issues and concerns relating to the radio sector and that fall within its jurisdiction and authority under the Broadcasting Act. Comments should take into account the various cultural, economic, social and technological policy objectives set out in the Broadcasting Act.**

The Forum has made submissions in the main part of its comments and may also comment in reply.

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