



24 February 2024

Filed online

Marc Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Secretary General,

Re: *Notice of hearing, [Broadcasting Notice of Consultation CRTC 2025-18](#) (Ottawa-Gatineau, 24 January 2025), ~~Items 1 through 6 (of 7)~~ 4 and 5*

1 The Forum for Research and Policy in Communications (FRPC) is a non-profit and non-partisan organization established a decade ago to undertake research and policy analysis about communications, including broadcasting, whether offline or online. In our view, a strong Canadian communications system is one that serves the public interest as described by Parliament, in the case of broadcasting, in the Broadcasting Act.

2 Given the overlapping deadlines of BNoC 2025-2 and 2025-18 and the consequent constraints this places on the time available to FRPC to review the materials in the 2025-18 notice, the Forum is making very brief comments regarding items 4, 5 and 6.

I. Item 4: My Broadcasting Corporation

3 My Broadcasting Corporation (MBC) proposes to acquire CKOT-FM Tillsonburg, CJD-L-FM Tillsonburg and CJET-FM Smiths Falls from Rogers Media Inc. MBC has said that it plans to continue operating the three stations using their existing musical format.¹

4 MBC has said that it plans to provide a “hyper-local service” to Tillsonburg and Smiths Falls² and commends the company for its commitment to “return journalist positions” to Tillsonburg and Smiths Falls.³

5 FRPC notes MBC’s evidence that it does not intend to broadcast any international news.⁴ The Forum assumes that MBC’s decision not to broadcast

¹ DM##4781083, MLB response to question 2, at 3 of 3 (Renfrew, 10 January 2025).

² DM##4757955, MLB Supplementary Brief, at 3 of 4.

³ DM##4757955, MLB Supplementary Brief, at 3 of 4.

⁴ DM##4774437, MLB response to question 11, at 8 of 13 (Renfrew, 19 December 2024).

- international news is related to the fact that the CBC/RC's CBCL-FM London station serves Tillsonburg with a rebroadcaster (CBCL-FM-1). Whether this is the case or not, perhaps MBC could confirm that it will broadcast international news of unusual importance so that those in its audience who choose not to tune to the CBCL-FM-1 service can obtain this information. The Forum is not proposing that the Commission issue an order to this effect but asks that MBC undertake to provide 'breaking' and significant international news when such stories break.
- 6 MBC is proposing to allocate \$40,500 (or up to \$65,700⁵) in tangible benefits for the broadcasting system, including \$3,375 for the Community Radio Fund of Canada (CRFC) and \$6,750 for discretionary purposes.⁶ The Forum supports the allocation of funding for the CRFC, and asks that the discretionary-purpose funds be allocated to the Broadcasting Participation Fund of Canada that is once again experiencing uncertainty as to its funding. Should MBC disagree with this proposal, FRPC recommends that the discretionary funding be allocated in whole or primarily to the Broadcasting Accessibility Fund (BAF).

II. Item 5: Truth Broadcasting Network Inc.

- 7 Truth Broadcasting Network (TBN) is proposing to acquire the assets of CJC-FM Yorkton, an English-language specialty FM radio service that provides religious music. TBN would operate without any employees, using an unknown number of personnel whose location is unknown and who would work under contract (presumably, to TBN).⁷
- 8 The Forum does not support approval of TBN's application. First, TBN is proposing to operate CJC-FM remotely from Edmonton, approximately 920 kilometres away from Yorkton, and to meet regularly with community representatives from Yorkton. It is unclear from TBN's application how often it would meet with community representatives from Yorkton,⁸ leaving uncertainty as to the service's reflection of the Yorkton community's interests and concerns.
- 9 Second, TBN's commitment to the *Broadcasting Act*, as implemented by the CRTC's conditions of service is unclear. We note TBN's answer regarding the alignment of CJC-FM's programming and employment practices with the *Broadcasting Policy for Canada* does not clearly commit TBN to adhering to the objectives of the *Policy*:

⁵ DM#4781083, MLB response to question 1, at 2-3 (Renfrew, 10 January 2025).

⁶ DM#4757955, MLB Supplementary Brief, at 2 of 4.

⁷ DM#4768017, TBN, (10 December 2024) at 1.

⁸ DM#4768017, TBN, (10 December 2024) at 2, response to question 6a.

Our goal is not to try and reach every diverse group in the community, nor is that with any other radio station in the community. If we were a country station then we would try and reach the country music lovers within the community. If we were a rock station then we would try and reach the rock music lovers with the community and so on. Diversity happens when there are choices to make. If every station in the market was trying to reach the same diverse group then there would be no choices and thus no freedom and no diversity. Is the commission against freedom of choice in the community or do we need to all believe and look the same. If we are, then that's no freedom.

- 10 Similarly, in the case of ensuring inclusivity and respect for equity deserving groups including individuals from the 2SLGBTQI+ community, TBN responded as follows:

Christian radio is geared to the families within the community.

Obviously what is presented here by the commission is definitely an attack on what some consider Christian and on how they want to live their lives with their families within a free nation. Canada is established under the Supremacy of God and the Rule of Law. Those that believe this within our communities are the people we are serving. We are not excluding anyone who wants to come on the radio and express how they feel about certain things within the community however it will be within the balance of those who think differently. Each expression will be given, but will not be exclusive to what others may wish to express.

...

We will have no problems with programming that gives a balanced point of view in matters of public concern regarding different groups within the community. The commission has already revealed exclusion by not even mentioning the family or the Christian community within the listening audience of Yorkton, SK. That's why there is such a need to continue the Christian radio station in Yorkton.

- 11 It is unclear why TBN believes that a question asking it to commit to ensuring inclusivity and respect for all groups "is definitely an attack" by the CRTC on Christians or how Christians live in Canada, or that such questions 'reveal' exclusionary practices of the Commission. To be clear, the Forum does not believe the CRTC or its staff's questions attacked TBN or disclosed any exclusionary practices; rather, the questions appear to have been posed – as the CRTC almost always poses such questions to prospective licence applicants – to ensure that the applicants understand their legal obligations under Canada's *Broadcasting Act*.



- 12 The Forum respectfully submits that TBN's answers have disclosed sufficient doubt as to the applicant's commitment to meeting the objectives of Parliament's *Broadcasting Policy for Canada* – particularly those set out in subsections 3(1)(d) and 3(1)(g) – that it should not grant TBN's application.

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