20 October 2025

Marc Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

Filed online

Dear Secretary General,

Re: ***Call for comments on proposed amendments to existing exemption orders for various types of radio programming undertakings*****, Broadcasting Notice of Consultation CRTC 2025-267 (Gatineau, 10 October 2025)**

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 that serves the public interest.

FRPC'S intervention in the above-noted proceeding is attached. We look forward to the opportunity to review comments by other parties.

Sincerely yours,

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Ottawa, Ontario

***Call for comments on proposed amendments to existing exemption orders for various types of radio programming undertakings*, Broadcasting Notice of Consultation CRTC 2025-267**
(Gatineau, 10 October 2025)

***Modernization of radio processes*, Broadcasting Regulatory Policy CRTC 2025-165 (Gatineau 10 October 2025), Appendix 1 (Proposed orders imposing conditions on licensees of various FM stations)**

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

Monica Auer
Executive Director
Forum for Research and Policy in Communications (FRPC)
20 October 2025

Contents

Summary

ES 1 On October 10, 2025 – 329 days after it launched the 2024-290 public consultation on modernizing its radio processes – the CRTC gave the public ten calendar or six working days to review, evaluate and comment on its proposal to allow commercial FM radio stations to fill half or more of their broadcast week with spoken-word programming for a temporary, one-year period, and also to review, analyze and comment on a dozen proposed exemption orders.

ES 2 The Forum's comments focus on the manner in which the CRTC's proposals comply with the *Broadcasting Act* and requirements for procedural fairness.

ES 3 Insofar as procedures are concerned, it may be that the CRTC decided to hasten the consultation process due to Cabinet's requirement in its *Order Issuing Directions to the CRTC (Sustainable and Equitable Broadcasting Regulatory Framework)* that the Commission "make any changes to its regulatory framework that are necessary for the purposes of the implementation of this Order within two years" of 9 November 2023. Even so, the Commission's decision to give itself 248 calendar days to consider the 2024-290 issues (from the end of the public phase of the 2024-290 proceeding on 4 February 2025 to 10 October 2025 when it issued BRP 2025-265), and to give the public only a week and a half (10 days) to consider its proposed orders is, to say the least, unbalanced.

ES 4 It is also somewhat unclear how many people in Canada will realize that the CRTC is proposing to allow commercial FM radio stations to dramatically increase their spoken-word programming – thereby reducing the time available for music – because the CRTC did not issue a consultation notice about that issue. Instead, it proposed and invited comments on this order in BRP 2025-265; as of 19 October 2025, however, BRP 2025-265 does not appear to be an 'open consultation', making it difficult for those inexperienced in CRTC matters to submit any comments they have. This seems unfair – and the proposal itself ignores the impact of granting FM radio stations the right (albeit temporarily) to transform themselves into better-sound AM clones: has the CRTC forecast the impact its Spoken Word proposal for commercial FM stations will have on commercial AM stations?

ES 5 As well, it is unclear how the BRP 2025-265 Spoken Word proposal relates to the November 2024 Part 1 Application concerning the replacement by Leclerc Communication's CJPX-FM Montreal of much of its non-Spoken Word programming with spoken-word programming broadcast online by Québecor. In

mid-August 2025 the CRTC's staff stated that the Commission would "issue a decision in the coming weeks": is the BRP 2025-265 Spoken Word proposal that decision? Even if it is not, would the CRTC's implementation of the BRP 2025-265 Spoken Word proposal effectively make complaints about the Leclerc-Québecor matter moot? In the Forum's view, this would be unreasonable.

ES 6 Also and while the Commission explained that the exemption proposals flowed from the CRTC's radio-modernization consultation and decision, two of the orders involve television undertakings and one deals with distribution undertakings – neither was mentioned in the 2024-290 notice. Consequently, interveners in that process could not know the 'true' case they had to meet – another apparent breach of procedural fairness.

ES 7 The Forum is also concerned that, while Parliament granted the CRTC the authority to exempt classes of broadcaster when and only when it "is satisfied" that this class is unable to contribute "in a material manner" to implementing Parliament's *Broadcasting Policy for Canada*, the exemption orders proposed in 2025-267 are not clearly identified in terms of 'class' and provide no objective evidence to support the CRTC's view that exemptions are warranted.

ES 8 The only data that FRPC could locate regarding exempted undertakings shows that from 2010 to 2025 exempted broadcasting distribution undertakings made more than $200 million in operating profits, and but for one year enjoyed operating margins above 90% from 2016 to 2024. If the CRTC has objective evidence it should publish this when it invites comments about its proposals – but should at least provide that evidence when it makes decisions about its proposals.

ES 9 The absence of facts to support the 2025-267 exemption orders matters even more because the 2023 *Broadcasting Act* now also requires the CRTC to end or amend its exemption orders when it believes the exempted broadcasters are able to contribute materially to the *Broadcasting Policy for Canada*. If the current status of soon-to-be exempted broadcasters is unknown, how can the CRTC ever end or amend such exemptions?

ES 10 FRPC has made the following recommendations:

Recommendation 1 The CRTC should set out reasons when it varies or dispenses with its *Rules of Practice and Procedure*.

Recommendation 2 The CRTC should rescind the November 2024 erasure from its May 2024 *Regulatory Plan* of a consultation on its *Rules*, and schedule this consultation for fall 2026.

Recommendation 3 The CRTC should publish a current and up-to-date list of its broadcasting classes on its website, and identify these classes in its list of exemption orders.

Recommendation 4 The CRTC should set out in its decision(s) regarding 2025-267 the evidence that exempted broadcasting undertakings cannot make a material contribution to the implementation of the *Broadcasting Policy for Canada*, including the number of undertakings affected by each order.

Recommendation 5 The CRTC should undertake in its decisions regarding 2025-267 to report annually on the financial position and number of exempted broadcasting undertakings to enable the public and members of Parliament to understand the CRTC's approach to exemptions going forward and its compliance with subsection 9(5) of the *Broadcasting Act*.

I Introduction: Exemption orders proposed by the CRTC

1 The Forum for Research and Policy in Communications (FRPC) is a non-profit and non-partisan organization established in 2013 to undertake research and policy analysis about communications, including broadcasting. The Forum supports a strong Canadian communications system that serves the public interest by implementing Parliament's *Broadcasting Policy for Canada* set out in section 3(1) of the current *Broadcasting Act* as amended by the *Online Streaming Act* (Bill C-11) on 27 April 2023.1

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1 When Bill C-11 received Royal Assent on 23 April 2023 subsection 2(3) of the 1991 *Act* was replaced by the following interpretation clause:

> Interpretation
> (3) This Act shall be construed and applied in a manner that is consistent with
> (a) the freedom of expression and journalistic, creative and programming independence enjoyed by broadcasting undertakings and creators;
> (b) the right to privacy of individuals; and
> (c) the commitment of the Government of Canada to enhance the vitality of official language minority communities and to support and assist their development, as well as to foster the full recognition and use of both English and French in Canadian society.

Bill C-13, *An Act to amend the Official Languages Act, to enact the Use of French in Federally Regulated Private Businesses Act and to make related amendments to other Acts* – which received first reading in the House on 1 March 2022 - replaced subsection 2(3)(b) regarding individuals' right to privacy with a second clause dealing with official language minority communities, stipulating that the change would take place when C-11 received Royal Assent:

> 70 (1) Subsections (2) and (3) apply if Bill C-11, introduced in the 1st session of the 44th Parliament and entitled the *Online Streaming Act* (in this section referred to as the "other Act"), receives royal assent.
> (2) On the first day on which both section 2 of the other Act and section 21 of this Act are in force, paragraph 2(3)(b) of the Broadcasting Act is replaced by the following:
> (b) the commitment of the Government of Canada to enhance the vitality of English and French linguistic minority communities in Canada and to support and assist their development, taking into account their uniqueness, diversity and historical and cultural contributions to Canadian society, as well as to foster the full recognition and use of both English and French in Canadian society.

The Library of Parliament's *Legislative Summary of Bill C-13* stated that C-13 would "confirm the federal government's commitment to":

> … specifying the contribution of the Canadian Broadcasting Corporation (CBC) to enhancing the vitality of official language minority communities and promoting English and French in Canada (clause 2(3)), as it applies to:
> …
> existing provisions of the *Broadcasting Act*, [44]
> …

Footnote 44 of the *Legislative Summary* then appears to show the impact of the C-13 change, reflecting the repetitive wording in new subsections 2(3)(b) and (c):

> [44] *Broadcasting Act*, S.C. 1991, c. 11. Pursuant to sections 3(1)(m)(iv) and 3(1)(m)(v) of this legislation, Canadian Broadcasting Corporation programming should "be in English and in French, reflecting the different needs and circumstances of each official language community, including the particular needs and circumstances of English and French linguistic minorities" and "strive to be of equivalent quality in English and in French." Pursuant to sections 2(3)(b) and 2(3)(c), the *Broadcasting Act* must be construed in a way that is consistent with:
>
> > the commitment of the Government of Canada to enhance the vitality of English and French linguistic minority communities in Canada and to support and assist their development, taking

2 The Forum is intervening in this proceeding to comment on twelve exemption orders proposed by the CRTC and appended to Broadcasting Notice of Consultation CRTC 2025-267, and to provide brief comments regarding the order proposed in BRP 2025-265 which would impose a spoken-word condition on various FM licensees.

3 In Part II FRPC addresses three issues related to these proceedings' procedural unfairness, the CRTC's legal authority regarding exemptions and the foundational concept of 'class'. Part III then addresses several issues raised by the CRTC's proposals. These include changes to the meaning of previously defined terms, the absence of information about classes, the lack of evidence provided to support the CRTC's findings with respect to the *Broadcasting Policy for Canada*, and the lack of information about the timing of a review. Part III sets out FRPC's conclusions and recommendations.

II Legal context

A Procedural fairness

4 The idea that procedures in CRTC processes must be fair predates the CRTC. In 1911 the United Kingdom's House of Lords held that administrative decision-makers must act in good faith and 'listen fairly' to different 'sides'. Specifically, Lord Loreburn held that some cases addressed by "departments or officers of State" will sometimes

> … involve matter [*sic*] of law as well as matter [*sic*] of fact or even depend upon matter [*sic*] of law alone. In such cases [the named Board] will have to ascertain the law and also to ascertain the facts. I need not add that in doing either they must act in good faith and fairly listen to both sides, for that is a duty upon every one who decides anything. …[2]

5 More recently, the Federal Court held in 2020 that

> … it is fair to say that the ultimate question raised when procedural fairness and alleged breaches of fundamental justice are the object of an application for judicial review is not so much whether the decision was "correct". It is rather whether, taking into account the particular context and circumstances at issue, the process followed by the decision maker was fair and offered the affected parties a right to be heard and a full and fair opportunity to know the

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> into account their uniqueness, diversity and historical and cultural contributions to Canadian society, as well as to foster the full recognition and use of both English and French in Canadian society;
> the commitment of the Government of Canada to enhance the vitality of official language minority communities and to support and assist their development, as well as to foster the full recognition and use of both English and French in Canadian society.

[2] Per Lord Loreburn LC, cited in *The Queen v. Board of Broadcast Governors and The Minister of Transport, Ex parte Swift Current Telecasting Co. Ltd*., 1961 CanLII 141 (ON SC) as "Bd. of Education v. Rice, [1911] A.C. 179"; currently referred to online as *Board of Education v Rice*, HL (6 Apr 1911).

> case they have to meet and to respond to it (*CPR* at para 56; *Huang v Canada (Citizenship and Immigration)*, 2018 FC 940 at paras 51-54).[3]

2025-267 raises at least two concerns regarding the fairness of its procedures: lack of notice and unexplained abbreviated deadlines and .

1 A regulatory policy, a consultation or both?

6 The CRTC first invited the public to comment on proposals for modernizing the Commission's radio processes in mid-November 2024, in Broadcasting Notice of Consultation CRTC 2024-290.[4] The public participation phase of 2024-290 ended on 4 February 2025, 81 calendar days after the CRTC issued 2024-290. The Commission issued its regulatory policy on the modernization of its radio processes 329 days after issuing BNoC 2024-290, in Broadcasting Regulatory Policy CRTC 2025-265.[5]

7 BRP 2025-265 not only sets out a new policy for radio processes, but invites comments on a proposal to permit FM radio stations to devote half their broadcast time to spoken-word programming.[6]

8 Canadians are entitled to rely on the procedures described in the CRTC's own *Rules*: specifically, section 21(1) of the *Rules of Practice and Procedure* states that the CRTC "must post a notice of consultation on its website". While it is true that anyone could have asked the CRTC from October 10th to the 20th to amend its deadlines, it may well be that very few people were aware either that BRP 2025-265 concealed a call for comments or of 2025-267 itself.

9 It is also true that the CRTC's *Rules* empower it to vary or dispense with its own procedural requirements when it believes "that considerations of public interest and fairness permit".[7] Yet the CRTC has not set out those considerations in BRP 2025-265,

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3 *Foster Farms LLC v. Canada (International Trade Diversification)*, 2020 FC 656 (CanLII), at paragraph 28.

4 (Ottawa, 15 November 2025).

5 Between issuing Broadcasting Regulatory Policy CRTC 2025-265 and BNoC 2025-267 the CRTC issued *Guidance on the requirements for the addition of rebroadcasting transmitters*, Broadcasting Information Bulletin CRTC 2025-266 (Gatineau 10 October 2025).

6 BRP 2025-265, paragraphs 180-181:

> 180. As noted at paragraphs 114 and 160, pursuant to subsection 9.1(1) of the Act, the Commission proposes to make the orders set out in Appendix 1 to this regulatory policy authorizing licensees of commercial FM radio stations to devote more than 50% of the programming broadcast during their broadcast week to programming drawn from content category 1 (spoken word) for a period of one year and requiring licensees of all FM radio stations operating SCMOs to register their SCMOs.
> 181. Consistent with subsection 9.1(4) of the Act, parties, including those who may be subject to these conditions of service, may file comments on the proposed orders by no later than 20 October 2025.

7 *CRTC Rules*, s. 7: "If the Commission is of the opinion that considerations of public interest or fairness permit, it may dispense with or vary these Rules."

however, nor has it explained its rationale for inviting comments on aspects of a new policy within that very policy.

10 The CRTC places its integrity in question and casts doubt on its administration of the responsibilities delegated to it by Parliament by failing to abide by the *Rules* it set for itself, and without acknowledgement or explanation.

Recommendation 1 The CRTC should set out reasons when it varies or dispenses with its *Rules of Practice and Procedure*

11 The 6 May 2024 version of the CRTC's *Regulatory Plan to modernize the Broadcasting Framework* scheduled a "Consultation on the CRTC Rules of Practice and Procedure" for Spring 2026. The CRTC dropped this consultation half a year later when it published the 15 November 2024 version of the *Regulatory Plan*.

12 Given the Commission's apparent willingness to disregard its *Rules* without explanation, the CRTC should revise its *Regulatory Plan* to include a consultation on its *Rules* so as either to update its procedures to reflect contemporary law and contemporary CRTC practices, or explain how the Commission's practices reflect contemporary Canadian law concerning administrative tribunals' procedures.

Recommendation 2 The CRTC should rescind its November 2024 erasure from its May 2024 *Regulatory Plan* of a consultation on its *Rules*, and schedule this consultation for fall 2026

2 Two consultations, same 10-day deadline

13 The CRTC issued both its policy for modernizing its radio processes and BNoC 2025-267 on October 10, 2025.

14 It gave interveners the same six working-day deadline (20 October 2025) to submit interventions on the proposals raised in each document.

15 FRPC recognizes that the *CRTC Rules* permit the Commission to set any deadline it wishes in its proceedings: interested parties "may intervene in a proceeding in writing within 30 days after the day on which the application is posted on the Commission's website or, if a notice of consultation is posted by the Commission on its website, within the time period set out in the notice" (section 26(1), underlining added).

16 Yet neither BRP 2025-265 nor BNoC 2025-267 sets out reasons for the CRTC's departure from its usual 30 calendar-day deadlines.

17 FRPC notes, however, that BRP 2025-265 refers to the idea of administrative or regulatory burden 34 times while 2025-267 claims that the CRTC's proposed exemption orders' purpose "is to ease the regulatory burden on broadcasters".[8]

18 As it happens, in November 2023 Cabinet required the CRTC to, "where appropriate, minimize the regulatory burden on the Canadian broadcasting system"[9] and "to make any changes to its regulatory framework that are necessary for the purposes of the implementation of this Order" before 11 November 2025.[10]

19 Perhaps the CRTC's six working-day deadlines reflect its desire to meet Cabinet's deadline: if so, it is puzzling that the CRTC appears to have ignored this deadline for the entirety of the 248 calendar days since the public comment phase of 2024-290 ended eight and a half months ago.

20 Some parties may be able to respond on very short notice to CRTC requests for comments, but there is no evidence that the majority of people in Canada – including Indigenous communities and people in official-language minority communities are able to learn about, review, research and prepare comments on the CRTC's proposals. In our view, and based on our years of interaction with the Commission, requiring parties to review, research and respond to two calls for comments issued on the same day, within six working days, is unreasonable.

3 No prior notice regarding television and network exemptions

21 BNoC 2025-267 proposes to make changes to existing exemption orders listed in twelve separate appendices to the consultation notice.

22 On 10 October 2025 the CRTC stated in BNoC 2025-267 that the changes it is proposing to exemption orders are consistent with the determinations it announced the same day it issued 2025-267:

> Summary
> …

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8 BNoC 2025-267, paragraph 4.

9 *Order Issuing Directions to the CRTC (Sustainable and Equitable Broadcasting Regulatory Framework)*, SOR/2023-239 (Registration 2023-11-09), s. 8(1).

10 *Order Issuing Directions to the CRTC (Sustainable and Equitable Broadcasting Regulatory Framework)*, SOR/2023-239 (Registration 2023-11-09), s. 19:

> [t]he Commission is directed to make any changes to its regulatory framework that are necessary for the purposes of the implementation of this Order within two years after the day on which it comes into force. In doing so, the Commission is directed to prioritize the implementation of sections 13 to 16 and to ensure that any changes to its regulatory framework are made as soon as feasible and on a continual basis during that two-year period.

The *Order* entered into force on the day it was registered (*Ibid*., s. 20), which was "2023-11-09".

> … in Broadcasting Regulatory Policy 2025-265, the Commission announced that it would update the existing exemption orders to allow for the imposition of conditions of service on exempt radio undertakings.
> …
> 6. Accordingly, consistent with the determinations made in Broadcasting Regulatory Policy 2025-265, the Commission proposes to amend the following exemption orders to reflect the modernized Act

23 *Modernization of radio processes*, Broadcasting Regulatory Policy CRTC 2025-265 (Gatineau, 10 October 2025) sets out its determinations regarding the CRTC's late-2024 *Call for comments – Modernization of radio processes*, Broadcasting Notice of Consultation CRTC 2024-290 (Ottawa, 15 November 2024).

24 As it happens, 2024-290 did not invite comments on or mention proposed exemption orders involving television or networks. While BRP 2025-265 makes two references each to networks and television, these references are simply part of the list of existing exemption orders at paragraph 68.

25 Consequently, 2025-267 is the first opportunity that interested parties have had to learn that the exemption orders that the CRTC is proposing include exemptions for television networks and certain TV services.

26 In the Forum's view, BRP 2025-265 and 2025-267 fail to provide parties with procedural fairness. Procedural fairness "has been described as 'a cornerstone of modern Canadian administrative law'": *Canadian Pacific Railway Company v. Canada (Attorney General)*, 2018 FCA 69 (CanLII), [2019] 1 FCR 121 per Rennie J.A. for the Court at paragraph 46, citing *Dunsmuir v. New Brunswick*, 2008 SCC 9, [2008] 1 S.C.R. 190 at paragraph 79. Justice Rennie went on to say (paragraph 56) that **"[n]o matter how much deference is accorded administrative tribunals in the exercise of their discretion to make procedural choices, the ultimate question remains whether the applicant knew the case to meet and had a full and fair chance to respond**" [bold font added].

27 The *Broadcasting Act* describes the CRTC as "a single independent public authority" (section 3(2)) while the *Canadian Radio-television and Telecommunications Commission Act* defines it as "a Commission … consisting of not more than 13 members" (section 3(1)). Is the CRTC an "administrative tribunal"? While it has been described as a specialized body, a regulatory body and a specialized, independent agency, the Supreme Court described it as an administrative tribunal in 1989 and 1995, as did the Federal Court of Appeal in 2018: Appendix 1.

28 Consequently, the Forum believes that requirements for procedural fairness as set out by the Courts (rather than in the CRTC's enabling statutes) apply. In 2025 the Federal Court addressed breaches of procedural fairness as follows:

> … when an application for judicial review concerns procedural fairness and a breach of the principles of fundamental justice, the question that must be answered is not necessarily whether the decision was "correct." Rather, **the reviewing court must determine whether, given the particular context and circumstances of the case, the process followed by the administrative decision maker was fair and gave the parties concerned the right to be heard, as well as a full and fair opportunity to be informed of the evidence to be rebutted and to have their case heard** (*CPR* at para 56; *Huang v Canada (Citizenship and Immigration)*, 2018 FC 940 at paras 51–54; *Algoma Steel Inc v Canada (Attorney General)*, 2023 FCA 164 at para 22). Reviewing courts are not required to show deference to administrative decision makers on matters of procedural fairness (*Maritime Employers Association v Syndicat des débardeurs (Canadian Union of Public Employees, Local 375)*, 2023 FCA 93 at para 81). [bold font added][11]

29 The Forum contends that the absence of any notice regarding changes to exemption orders involving television makes the procedures in calls for comments in BRP 2025-265 and 2025-267 unfair.

B Statutory authority with respect to exemptions

30 BNoC 2025-267 states that previous versions of the *Broadcasting Act* meant that the CRTC "could only hold persons operating exempt services to account by finding that they were broadcasting without a licence or proper authorization".[12] It adds that the current *Act* "has introduced additional flexibility for the Commission to regulate and supervise exempt services" by empowering it to issue "orders imposing conditions" on exempted undertakings.[13]

31 FRPC agrees that Parliament has long enabled the CRTC *not* to apply legislative requirements to specified groups of broadcasters. The sections of the 1968, 1991 and 2023 *Broadcasting Act* dealing with exemption are set out in Table 1. The 1968 *Broadcasting Act* initially permitted, but did not require, the CRTC to exempt broadcasting receiving undertakings (today's broadcasting distribution undertakings or BDUs) from requiring a licence to operate. It did not enable the Commission to impose conditions on such exemptions, however, and as penalties could only be imposed (by courts) on licensees that breached its regulations, it also lacked the ability to enforce regulatory requirements.

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11 *Tcherkas v. Canada (Attorney General)*, 2025 FC 1289 (CanLII), at paragraph 24.

12 2025-267, at paragraph 5.

13 *Ibid*.

Table 1 Exemption authority in 1968, 1991 and 2023 *Broadcasting Acts*

Statute [yellow highlighting shows changes from previous statute]	**Scope and requirements**
Broadcasting Act, 16 & 17 /Eliz. 2, c. 25 (7 March 1968) *Powers of the Commission* … 17(1) In furtherance of the objects of the Commission, **the Executive Committee**, after consultation with part-time members in attendance at a meeting of the Commission, **may** … (e) exempt persons **carrying on broadcasting receiving undertakings of any class** from the requirement that they hold broadcasting licences; …. 29. Every licensee who violates the provisions of any regulation applicable to him under this Part is guilty of an offence and is liable on summary conviction to a fine not exceeding twenty-five thousand dollars for a first offence and not exceeding fifty thousand dollars for each subsequent offence.	Discretionary authority to exempt BDUs from having to hold broadcast licences Licensees' breach of regulations
***Broadcasting Act*, S.C. 1991, c. 11** **Exemptions** 9(4) The Commission shall, by order, on such terms and conditions as it deems appropriate, exempt persons who carry on broadcasting undertakings of any class specified in the order from any or all of the requirements of this Part or of a regulation made under this Part where the Commission is satisfied that compliance with those requirements will not contribute in a material manner to the implementation of the broadcasting policy set out in subsection 3(1). **Contravention of regulation or order** [32] (2) Every person who contravenes or fails to comply with any regulation or order made under this Part is guilty of an offence punishable on summary conviction and is liable (a) in the case of an individual, to a fine not exceeding twenty-five thousand dollars for a first offence and not exceeding fifty thousand dollars for each subsequent offence; or (b) in the case of a corporation, to a fine not exceeding two hundred and fifty thousand dollars for a first offence and not exceeding five hundred thousand dollars for each subsequent offence. 33. Every person who contravenes or fails to comply with any condition of a licence issued to the person is guilty of an offence punishable on summary conviction.	Mandatory requirement to exempt any class of broadcaster from following any Part II requirement if compliance will not contribute to *Broadcasting Policy for Canada*'s implementation Non-compliance with orders Breach of condition of licence
***Broadcasting Act*, as am. as of 22 June 2023** **Exemptions** (4) The Commission shall, by order, on the terms and conditions that it considers appropriate, exempt persons who carry on broadcasting undertakings of any class specified in the order from any or all of the requirements of this Part, of an order made under section 9.1 or of a regulation made under this Part if the Commission is satisfied that compliance with those requirements will not contribute in a material manner to the implementation of the broadcasting policy set out in subsection 3(1). Repeal or amendment (5) The Commission **shall** repeal or amend an exemption order made under subsection (4) if the Commission considers that doing so will contribute in a material manner to the implementation of the broadcasting policy set out in subsection 3(1).	Mandatory requirement to exempt any class of broadcaster from following any Part II requirement if compliance will not contribute to *Broadcasting Policy for Canada*'s implementation New mandatory requirement to repeal or change exemption orders if CRTC believes this will contribute materially to *Broadcasting Policy for Canada*'s implementation

32 In 1991 Parliament made four key changes to the CRTC's authority with respect to exemptions. First, it established a threshold test for exemptions, requiring the CRTC to exempt types of broadcasters from licensing and regulation if this would not contribute 'materially' to the implementation of its *Broadcasting Policy for Canada*.

33 Second and third, Parliament empowered the CRTC to issue exemption orders to broadcasters of any "class" and to impose "terms and conditions" on such orders. Last, the 1991 *Broadcasting Act* enabled exempted broadcasters that contravened the CRTC's orders to be charged with an offence and fined if convicted.

34 It was unclear under the 1991 *Act* whether the CRTC could exempt a broadcaster from specific regulatory requirements because its regulations only applied to licensed broadcasters.[14] The CRTC's authority to enforce conditions on its exemption orders was similarly limited, as penalties for breaches of conditions were limited to those who contravened "any condition *of licence* issued" to broadcasters.[15]

35 Parliament's new legislation also did not clearly state when the CRTC should, could or ought to review its exemption orders. Consequently, although the CRTC stated in 1996 that "[w]hen circumstances warrant, the Commission will amend or revoke an exemption order",[16] it could decide not to consider reviewing or to actually review its exemption orders – such as the 1999 'new media' exemption order[17] - even when, by the 2010s, parties made evidence-based arguments that such undertakings could contribute materially to the implementation of the *Broadcasting Policy for Canada*.

36 In 2023 Parliament amended the CRTC's exemption authority in several ways. First, it replaced the vague reference in subsection 9(4) to "regulations under this Part" with a specific reference to new section 9.1: subsection 9.1(1) empowers the CRTC to issue orders that impose conditions on how broadcasting undertakings are carried on even if they are not licensed. Second, subsection 9.1(2) also permits the Commission to apply such orders to specific broadcasters, to broadcasters in any class established by the Commission or to all those carrying on undertakings.

37 Third, new Part II.2 adds teeth to the CRTC's enforcement powers by establishing a regime for administrative monetary penalties in which contraventions of orders – presumably including exemption orders – constitute a violation that can attract such penalties.

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14 1991 *Broadcasting Act*, s. 10(2): "A regulation made under this section may be made applicable to all persons holding licences or to all persons holding licences of one or more classes."

15 *Ibid*., s. 33: "Every person who contravenes or fails to comply with any condition of a licence issued to the person is guilty of an offence punishable on summary conviction."

16 See Appendix 2, 1996.

17 *Exemption order for new media broadcasting undertakings*, Public Notice CRTC 1999-197 (Ottawa, 17 December 1999).

38 Last, Parliament added subsection 9(5) to the *Broadcasting Act*: it requires the CRTC to end or modify its exemption orders when it believes that exempting broadcasters will contribute materially to the *Broadcasting Policy for Canada*'s implementation. CRTC's proposed exemption orders.

39 All that said, while 2025-267 states in its *Summary* and at paragraph 4 that "[t]he 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 limited impact on licensed broadcasters", the current *Act* states clearly that exemptions established, changed or repealed under the current *Act* are based on broadcasters' ability to contribute materially to the *Broadcasting Policy for Canada*'s implementation.

40 Consequently, when making exemption orders the CRTC should set out the objective measures and evidence on which it has based its belief that exempted broadcasters at the time of exemption are unable to make material contributions to the implementation of the *Broadcasting Policy for Canada*. If the CRTC does not include this objective information in its decisions about exemptions, members of the public and Parliament will be unable to determine whether exemption orders should be maintained, changed, or rescinded and will be unable to hold the Commission to account, whether for failing to change or to impose exemption orders.

III Issues raised by BRP 2025-265 and BNoC 2025-267

41 BRP 2025-265 and 2025-267 raise questions regarding the concept of 'class' and the evidentiary foundation for the CRTC's exemption orders.

A Foundational concept of 'class'

42 BNoC 2025-267 invites comment on amendments that the Commission is proposing to make to twelve exemption orders. The notice states that its proposals are being made "consistent with the determinations made in Broadcasting Regulatory Policy CRTC 2025-265".[18] 2025-267 includes references to CRTC broadcasting policies 1991-105, 2000-10, 2000-11, 2006-143, 2014-446, and 2018-137.

43 As noted previously, however, the CRTC has been issuing exemption orders since at least 1977[19] and has issued determinations in other processes that are relevant to exemption orders. In addition to FRPC's concerns about procedural unfairness, the absence of any discussion of the CRTC's determinations in these earlier proceedings

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18 BNoC 2025-267, at paragraph 6.

19 See Appendix 1, 1977: *MATV Licensing and Exemption*, CRTC Public Announcement (Ottawa, 16 March 1977) [unavailable online from CRTC].

may lead to a public record that is incomplete. For example, the CRTC clarified its understanding of 'network' in 1989:[20] Appendix 2.

44 The *Broadcasting Act* that entered into force on 4 June 1991 gave the CRTC the discretion to "establish classes of licences",[21] to make regulations applicable to broadcasters "holding licences of one or more classes"[22] and to establish classes of licensees for paying fees.[23] The CRTC published a list of its new broadcasting classes two weeks later. [24]

45 By 2007 the Commission had established "some 50 different classes of licence".[25] Although - as shown in Table 1, above - the 2023 *Broadcasting Act* continues to link exemptions to 'classes', a review of the CRTC's website using its search engine during the intervention period of this proceeding did not yield a recent and complete list of all classes currently defined by the Commission.

46 Moreover, although the CRTC currently lists 43 broadcast exemption orders on its website (see Appendix 3) these orders are not categorized by 'class' but by medium (radio, television and distribution) and decision number.

47 The absence of a clear list of CRTC classes and the categorization of exemption orders in terms of medium rather than class does not 'ease' but increases the burden for interested parties to determine which classes of service are or are not exempted from regulatory requirements.

48 Rather than clarifying how the CRTC's existing classes (whatever these may be) relate to the twelve exemption orders[26] set out in BNoC 2025-267, the Commission instead states that the orders "will clearly identify the purpose and criteria an undertaking

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20 *RADIO NETWORKS AND SYNDICATION POLICY*, Public Notice CRTC 1989-3 (Ottawa, 10 January 1989), Part III, section (i) ("Definition of A Network"):

> …
> The Commission considers that a network operation may exist in the case of a program arrangement involving a network operator and only one station where the network operator also transmits the programming as a broadcaster. For private broadcasters where all the undertakings are owned by the same licensee, no network licence is required, since no delegation of control to another licensee occurs. For private broadcasters where all the undertakings are owned by the same licensee, no network licence is required, since no delegation of control to another licensee occurs.
> ….

21 *Broadcasting Act*, 1991, subsection 9(1)(a).

22 Subsection 10(2).

23 Subsection 11(1)(b).

24 *New Broadcasting Act – Amendments to Classes of Licence*, Public Notice CRTC 1991-63 (Ottawa, 19 June 1991).

25 *A guide to the CRTC processes for broadcasting applications and policy reviews*, Broadcasting Circular CRTC 2007-4 (Ottawa, 7 June 2007), at paragraph 5.

26 BNoC 2025-267., at paragraph 6.

must meet in order to qualify to operate under the exemption order."[27] The twelve exemption orders are set out in Table 2, showing the CRTC title for the order, the media to which they apply and their transmission characteristics.

Table 2 CRTC's 12 proposed exemption orders – identification and medium

App-endix	Undertaking identified in title of proposed exemption order	Medium
1	*Low-power tourist information related radio programming undertakings*	Radio - low-power
2	*Low-power radio programming undertakings providing programming that is derived solely from houses of worship*	Radio - low-power
3	*Certain Indigenous radio undertakings*	Radio
4	*Radio and television temporary network special event type 1 undertakings*	Radio & TV
5	*Low-power radio: limited duration special event facilitating undertakings*	Radio - low-power
6	*Low-power radio: Ultra low power announcement service (LPAS) undertakings*	Radio - ultra low-power
7	*Carrier current undertakings whose services are not carried on distribution*	Carrier current - using AM band
8	*Radiocommunication distribution undertakings*	Distribution - low or very low power
9	*Network operations*	Radio & TV
10	*Public emergency radio undertakings*	Radio
11	*Low-power radio: Temporary resource development distribution undertakings*	Radio - low-power
12	*Shortwave broadcast undertakings*	High frequency

49 Table 3 regroups the proposed distribution undertakings set out in *Call for comments on proposed amendments to existing exemption orders for various types of radio programming undertakings* by medium. Of the twelve proposed orders, two involve both radio and television; the others ten address radio programming, distribution or shortwave services. In other words, the proposed distribution orders cover more than radio distribution or programming services.

Table 3 Proposed exemptions by medium

App-endix	Undertaking identified in title of proposed exemption order	Medium
7	*Carrier current undertakings whose services are not carried on distribution*	Carrier current - using AM band
6	*Low-power radio: Ultra low power announcement service (LPAS) undertakings*	Radio - ultra low-power
1	*Low-power tourist information related radio programming undertakings*	Radio - low-power

27 *Ibid*., at paragraph 7.

App-endix	Undertaking identified in title of proposed exemption order	Medium
2	*Low-power radio programming undertakings providing programming that is derived solely from houses of worship*	Radio - low-power
5	*Low-power radio: limited duration special event facilitating undertakings*	Radio - low-power
11	*Low-power radio: Temporary resource development distribution undertakings*	Radio - low-power
3	*Certain Indigenous radio undertakings*	Radio
10	*Public emergency radio undertakings*	Radio
12	*Shortwave broadcast undertakings*	Shortwave
8	*Radiocommunication distribution undertakings*	Distribution - low or very low power
4	*Radio and television temporary network special event type 1 undertakings*	Radio & TV
9	*Network operations*	Radio & TV

50 As Table 2 shows, the 12 orders issued pursuant to the policy apply to broadcasters using the AM band of carrier currents, low-power and ultra low-power radio stations, two types of radio stations, a distribution service as well as radio and TV stations. Are these the 'classes' referred to in subsection 9(4) of the *Broadcasting Act*? If not, the CRTC should clarify what its classes are in its decision in this proceeding, and post an up-to-date list of these classes on its website.

Recommendation 3 The CRTC should publish a current and up-to-date list of its broadcasting classes on its website, and identify these classes in its list of exemption orders.

B Spoken Word programming and commercial FM stations

51 Two broadcasters and the Canadian Association of Broadcasters "suggested that the Commission remove the specialty formats for FM stations that provide news" (BRP 2025-265, paragraph 149), either to expand private radio broadcasters' ability "to operate news/talk radio stations on FM" or to "fully support local news" (paragraph 150). The CRTC therefore proposes in BRP 2025-265 to issue a one-year temporary order enabling FM commercial radio stations to "devote more than 50% of the programming broadcast during their broadcast week" to Spoken Word programming (Appendix 1). Briefly, the CRTC argues that

- it "continuously reminds licensees that they must ensure that Canadians have access to local programming that reflects their needs and interests and informs them of important current issues, including news (paragraph 153)
- in "recent years, many radio stations devoting the majority of their broadcast week to spoken word programming went off-air, which led to a reduction in news on radio stations" (paragraph 153), and
- AM licensees can move "their stations between formats without the Commission's approval" (paragraph 154).

52 To put this argument another way, the CRTC proposes to give FM radio licensees that must be continuously reminded by the CRTC of the importance of providing local news

some of the flexibility granted four decades ago to AM licensees – due to the AM band's lower sound quality – by allowing FM radio stations to fill more than half of the programming in the broadcast week to spoken-word programming – even though the CRTC is aware that many radio stations offering predominantly spoken-word programming have gone off air (though not necessarily out of the broadcasting business if they are broadcasting online). More succinctly, the CRTC is encouraging commercial FM stations to pursue the programming strategy that has demonstrably failed for the "many radio stations devoting the majority of their broadcast week to spoken word programming" and which are no longer broadcasting over the air: it is difficult to understand this rationale.

53 The Forum is concerned that one effect of the CRTC's proposed order would be to render moot the Part 1 Application filed in November 2024 by Cogeco and Bell regarding the broadcast by Leclerc Communication's CJPX-FM Montreal station of Québecor's online Spoken Word programming. FRPC notes that a CRTC staff letter dated 18 August 2025 confirmed "that the analysis of the application in question has been completed and that the Commission will issue a decision in the coming weeks": is the Spoken Word proposal in BRP 2025-265 the decision to which the staff letter referred?

54 The Forum is also concerned that the Spoken Word order proposed by the Commission in BRP 2025-265 is not accompanied by any objective information about the actual levels of spoken-word programming being broadcast by commercial FM stations. It is therefore unclear how the CRTC will evaluate the impact of its proposed, one-year temporary order. Without evidence about the level of spoken-word programming currently broadcast by FM radio stations, there will be no way to know after the one-year temporary period has ended whether audiences to commercial FM stations gained access to more – or less – diversity Spoken Word programming. Without evidence about FM radio stations' current sources of spoken-word programming, there will be no way to know at the end of the one-year temporary period whether FM radio stations' are simply rebroadcasting spoken-word programming broadcast online, and replacing actual local news and information.

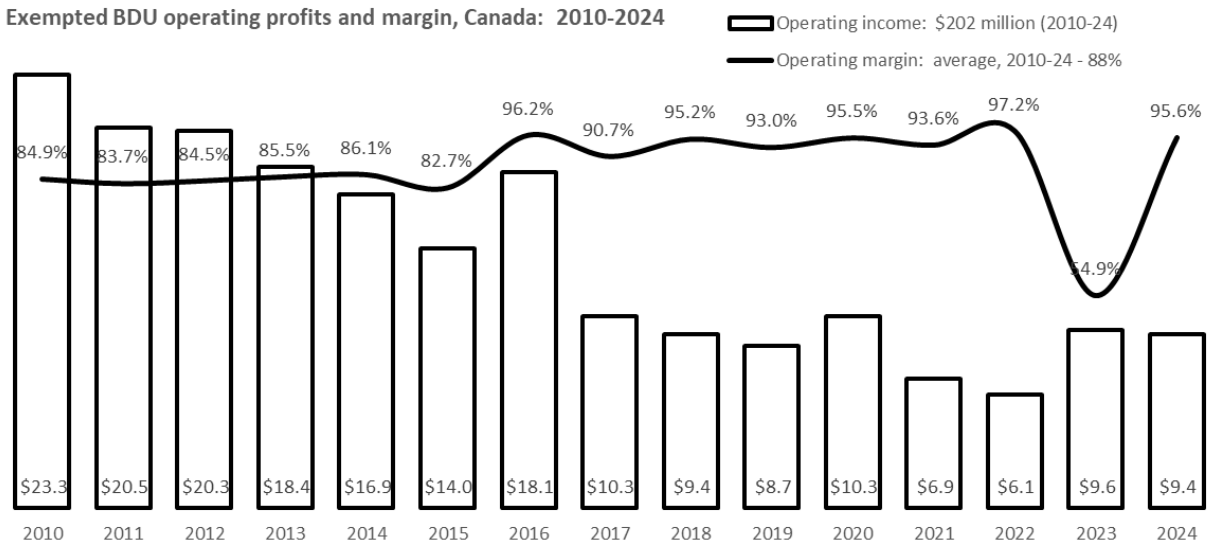
C Evidence and accountability

55 The orders proposed by the Commission in 2025-267 are not accompanied by any objective information about the undertakings involved in those orders or about the classes of these undertakings. As shown in Appendix 2, previous exemption orders and policy proposals are also generally evidence- and data-free: .

56 Lack of data in 2025-267 about undertakings that the CRTC proposes to exempt makes it impossible to evaluate the evidentiary foundation of the CRTC's belief - required by subsection 9(4) - that the undertakings it proposes to exempt cannot contribute to the implementation of the *Broadcasting Policy for Canada* or, if they can contribute, cannot do so in a material manner. Nor are such data readily available elsewhere.

While the CRTC reports extensive financial information about licensed broadcasting services, it publishes very little information about exempted broadcasting undertakings. The only data that FRPC could locate described the basic financial position of exempted BDUs in Canada and in the individual regions: Figure 1.

Figure 1 Exempted BDU operating profits and margin, 2010-2024



Source: CRTC, *Statistical and Financial Summaries for BDUs*, various years

57 The CRTC's financial summaries for exempted BDUs do not disclose the number of undertakings on which the summaries are based. According to these data, however, from 2015 to 2024 exempted BDUs in Canada had an average operating margin of 88%, and total operating income of $202 million. While the undertakings' annual operating income decreased over time, operating profit margins increased but for the 2022/23 broadcast year and have exceeded 90% since 2016. Presumably – given these extremely high profits – the CRTC must continue to believe that these services cannot contribute to the implementation of the *Broadcasting Policy for Canada*: but without evidence, how can people in Canada and members of Parliament understand the Commission's belief?

58 The CRTC should use the opportunity provided by a new *Broadcasting Act* to become more accountable. When it issues its decisions about its exemption proposals, the CRTC should publish the evidence that supports its belief that the exempted broadcasting undertakings cannot make a material contribution to implementation of the *Broadcasting Policy for Canada*. It should also state the number of undertakings affected by each order.

Recommendation 4 The CRTC should set out in its decisions regarding 2025-267 the evidence that exempted broadcasting undertakings cannot make a material contribution to the implementation of the *Broadcasting Policy for Canada*, including the number of undertakings affected by each order

59 Although the CRTC cannot fetter its discretion going forward, it should undertake to report annually on the financial position and number of exempted undertakings, by class. This will enable the public and Parliament to understand decisions by the CRTC to repeal, amend – or not to repeat or amend – its exemption orders over time, as subsection 9(5) requires.[28]

Recommendation 5 The CRTC should undertake in its decisions regarding 2025-267 to report annually on the financial position and number of exempted broadcasting undertakings to enable the public and members of Parliament to understand the CRTC's approach to exemptions going forward and its compliance with subsection 9(5) of the *Broadcasting Act*

IV Conclusions and recommendations

60 The Forum has noted two interventions on the record in the 2025-267 proceeding as of 19 October 2025, and was unable to locate the BRP 2025-265 proceeding on the CRTC's *Public proceedings* page.

61 Even if the CRTC is pressed for time due to Cabinet's November 2023 requirement that it implement its *Directions* on or before 8 November 2025, the Commission should have provided the public with more than six working days to consider the orders proposed in BRP 2025-265 and 2025-267 and, in particular to facilitate comment on the BRP 2025-265 orders, should have clarified the intervention process for that proceeding.

62 The Forum is concerned that, despite the requirement in subsection 9(4) of the current *Broadcasting Act* that the Commission be "satisfied that compliance with those requirements will not contribute in a material manner to the implementation of the broadcasting policy set out in subsection 3(1)", the Commission has not shared the evidence that supports its satisfaction.

63 This gap in evidence has implications for the CRTC's current adherence to subsection 9(4) – and also for its prospective approach to exemption orders going forward as provided for in subsection 9(5). If there is no evidence about the rationale for

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28 2023 *Broadcasting Act*, s. 9(5):

> The Commission shall repeal or amend an exemption order made under subsection (4) if the Commission considers that doing so will contribute in a material manner to the implementation of the broadcasting policy set out in subsection 3(1).

exemption orders now, how will anyone including the CRTC know whether exemptions orders should be maintained, repealed or amended?

64 The Forum's recommendations are set out below:

Recommendation 1 The CRTC should set out reasons when it varies or dispenses with its Rules of Practice and Procedure.

Recommendation 2 The CRTC should rescind the November 2024 erasure from its May 2024 Regulatory Plan of a consultation on its Rules, and schedule this consultation for fall 2026.

Recommendation 3 The CRTC should publish a current and up-to-date list of its broadcasting classes on its website, and identify these classes in its list of exemption orders.

Recommendation 4 The CRTC should set out in its decisions regarding 2025-267 the evidence that exempted broadcasting undertakings cannot make a material contribution to the implementation of the *Broadcasting Policy for Canada*, including the number of undertakings affected by each order.

Recommendation 5 The CRTC should undertake in its decisions regarding 2025-267 to report annually on the financial position and number of exempted broadcasting undertakings to enable the public and members of Parliament to understand the CRTC's approach to exemptions going forward and its compliance with subsection 9(5) of the *Broadcasting Act*.

Appendices

Appendix 1 What is the CRTC?

… There is nothing in the *Broadcasting Act*, nor was our attention directed to any other legislation which would give the Commission any other status than that of a **federal regulatory agency** established with defined statutory powers.…	*Capital Cities Comm. v. C.R.T.C.*, 1977 CanLII 12 (SCC), [1978] 2 SCR 141 at page 172
… within the context of a statutory appeal from an **administrative tribunal**, additional consideration must be given to the principle of specialization of duties. Although an appeal tribunal has the right to disagree with the lower tribunal on issues which fall within the scope of the statutory appeal, curial deference should be given to the opinion of the lower tribunal on issues which fall squarely within its area of expertise. …	*Bell Canada v. Canada (Canadian Radio-Television and Telecommunications Commission)*, 1989 CanLII 67 (SCC), [1989] 1 SCR 1722
The case at hand concerns a **specialized administrative tribunal**, the CRTC, which possesses considerable expertise over the subject matter of its jurisdiction. ….	*British Columbia Telephone Co. v. Shaw Cable Systems (B.C.) Ltd.*, 1995 CanLII 101 (SCC), [1995] 2 SCR 739, per Lamer C.J. and La Forest J., dissenting, at ¶30
… The C.R.T.C. is **a specialized body** with particular expertise in the area. …	*Mahar v. Rogers Cablesystems Ltd*., 1995 CanLII 7129 (ON SC), at ¶46
The CRTC is a **specialized, independent agency** to which, precisely because of its expertise, Parliament has granted extensive powers for the supervision and regulation of the Canadian broadcasting system to allow it to implement the broadcasting policy set out in section 3 of the *Broadcasting Act*, S.C. 1991, c.11.1 It is settled that the CRTC has broad discretion in exercising its powers to issue or revoke licences.	*Société Radio-Canada v. Métromédia CMRr Montréal Inc.*, 1999 CanLII 8947 (FCA), at¶2
[references omitted]	
The CRTC is a **highly specialized tribunal** with particular expertise. It enjoys a broad discretion over telecommunication matters and has broad powers to make remedial orders including financial remedies. The CRTC is entitled to curial deference. …	*Sprint Canada Inc. v. Bell Canada*, 1999 CanLII 3296 (ON CA), at ¶8
… The CRTC is a **specialized tribunal** applying its broadcasting policy in addressing this dispute. The court should defer to the CRTC as the proper forum to determine the plaintiffs' complaint at first instance. …	*Allarco Entertainment 2008 Inc. v. Rogers Communications Inc.*, 2009 CanLII 68464 (ON SC), at ¶42
The CRTC is **a creation of the *Canadian Radio-television and Telecommunications Commission Act***, R.S.C., 1985, c. C-22. …	*Bell Canada v. Amtelecom Limited Partnership*, 2015 FCA 126 (CanLII), at ¶6
The CRTC is a **specialized administrative tribunal** with expertise in the area of broadcasting. As such, it is owed deference by this Court. This deference extends to interpretation of the Broadcasting Act as one of its home statutes [citations excluded] …	*Bell Canada v. Canada (Attorney General)*, 2017 FCA 249 (CanLII), [2018] 4 FCR 300, at ¶28
… The C.R.T.C. is a **specialized body** with particular expertise in the area. …	*Bazos v. Bell Media Inc.*, 2018 ONSC 6146 (CanLII), at ¶65
The Canadian Radio-television and Telecommunications Commission is **a regulatory body** established in 1976. It has been called the "archetype" of an expert administrative tribunal …."	*Bell Canada v. Canada (Attorney General)*, 2019 SCC 66 (CanLII) , [2019] 4 SCR 845, per Abella and Karakatsanis JJ. (dissenting), at ¶64

Appendix 2 CRTC statements regarding exemption orders

[i]

Year	CRTC statements
1977	*MATV Licensing and Exemption*, CRTC Public Announcement (Ottawa, 16 March 1977) => unavailable online from CRTC In this public announcement the CRTC set out criteria to allow a class of persons operating those Canadian broadcasting receiving undertakings known as Master Antenna Television (MATV) systems to be exempted from the requirement to hold a broadcasting licence..
1981	*Resource Development Installations Exemption Order* Public Notice CRTC 1981-79 (Ottawa, 19 October 1981)
1983	Public Notice CRTC 1983-255 (Ottawa, 10 November 1983) => unavailable online from CRTC CRTC explains that while the availability of new satellite-delivered Canadian and non-Canadian discretionary services necessitated revision of its 1977 MATV exemption, the Commission was unable to do because of "the substantial legal, regulatory and administrative problems that would be involved in so doing."[29]
1988 – no data	*A POLICY PROPOSAL RESPECTING RADIO BROADCASTING NETWORKS AND RADIO SYNDICATION; AND PROPOSED AMENDMENTS TO THE RADIO REGULATIONS, 1986*, Public Notice CRTC 1988-89 (Ottawa, 1 June 1988) … IV. PROPOSED POLICY RESPECTING RADIO BROADCASTING NETWORKS AND SYNDICATION … The Commission regards networks as a central component of the Canadian broadcasting system. The nature of networks and other syndicated programming arrangements is uniquely capable of reaching, informing and entertaining Canadians with high quality, diverse programming. Consequently, the Commission regards networks as important vehicles to achieve the goals set for the system in the Act. As discussed at the public hearing, it is the Commission's view that the primary responsibility of AM and FM licensees is to provide locally oriented and original programming suited to the needs, interests and character of local communities. To this end, the Commission will continue, to the extent possible, to seek assurances that the programming broadcast by local stations is of direct relevance to local communities, particularly during peak audience periods, notwithstanding the benefits that may accrue to local stations and their respective audiences from quality programs acquired from other sources. Indeed, the Commission understands the position advanced at the public hearing by most broadcasters that future growth for certain radio stations may come from developing a complementary mixture of high quality local and acquired programs, particularly in light of the decreasing profitability of the radio industry and increased fragmentation of radio markets. In this vein, the proposed policy seeks to ensure that network and syndicated programs distributed and broadcast in Canada maximize the use and exposure of Canadian creative and other resources. … As set out in Part IV of this document, the Commission proposes to employ three criteria to determine delegation of control: Formal reserved time; De facto reserved time; and Editorial control. Formal reserved time refers generally to the existence of an affiliation or similar contractual agreement between a station and a third party that requires the station to broadcast particular programs at specified times or within specified time frames. Defacto

29 See *Master Antenna Television Systems Exemption*, Public Notice CRTC 1989-47 (Ottawa, 18 May 1989)

Year	CRTC statements
	reserved time refers generally to the scheduling of programs by stations in a pattern similar to that broadcast according to a formal reserved time agreement, but where no formal reserved time or similar agreement exists. Editorial control refers to the ability of a station to exert control over the content of live programming received directly over the air. Where any of these criteria for delegation of control exist, a network operation will be deemed to exist. However, arrangements where pre-recorded syndicated programs are broadcast on a direct-to-air basis with no reserved time requirements will not generally be considered as network operations. ….
1989 – no data	*Master Antenna Television Systems Exemption*, Public Notice CRTC 1989-47 (Ottawa, 18 May 1989) … On 10 November 1983, the Commission announced in Public Notice CRTC 1983-255 that it could not change its policy of exempting MATV systems due to the substantial legal, regulatory and administrative problems that would be involved in so doing. In order to achieve a more equitable balance between the services offered by MATV systems and cable television licensees, the Commission modified its 1977 exemption criteria to permit MATV systems to distribute all of the programming services authorized for distribution by the cable television system serving the same area. Where services received by microwave or by satellite transmission were being distributed, MATV operators were permitted to charge their users the pass-through fee for the reception of these services and were expected to enter into the necessary contractual arrangements that might be required with respect to such carriage. However, the prohibition against any charge to users for the over-the-air signals provided by an MATV system was maintained. Since 1983 the broadcasting environment has undergone fundamental changes. An expanded range of Canadian and U.S. satellite-delivered services is now available in Canada. In keeping With the Commission's policy of ensuring that fair competition exists between MATV and cable operators and that their respective subscribers are fairly treated, the Commission decided, in Public Notice CRTC 1988-179, to seek public comment as to whether there was a need to revise the MATV exemption criteria. 1989) … 2. Separate Fees The issue of permitting MATV operators to levy a separate fee over and above pass-through fees, as permitted under criterion 3, was discussed by the parties within the context of whether MATV operators should be permitted to make a profit on their operations. The cable industry took the position that a profit orientation should automatically trigger a requirement to obtain a broadcasting licence. Half of the programming service providers, the condominium MATV operators, the Government of Ontario and the CAC expressed similar viewpoints. MATV hardware suppliers, however, generally supported the explicit incorporation of profit-making within new criteria, a position supported by the balance of the programming service providers and by the federal Department of Consumer and Corporate Affairs. The Commission has decided not to permit a person carrying on an exempt MATV undertaking to realize any commercial gain or profit from the MATV undertaking. Moreover, in order to preclude the indirect realization of commercial gain or profit, persons carrying on an exempt MATV undertaking may not have any legal or beneficial ownership interest in any third party providing services to the undertaking. Contractual relationships that would otherwise be precluded by this requirement are permitted in respect of the individual MATV undertakings to which such relationships relate provided the contract was entered into on or before 18 May

Year	CRTC statements
	1989. The Commission has decided, however, to expand criterion 3 to permit a person carrying on an exempt MATV undertaking to levy separate fees over and above a fee payable to a distributor of a programming service. The following charges may be included in the fees levied by MATV operators: interest on money borrowed and depreciation, maintenance and administration costs as reasonably incurred by the operator of the undertaking in connection with the establishment and maintenance of the undertaking. The MATV operator may also include the reasonable charge or fee payable to the distributor of a service or to an agent appointed by the operator of an undertaking to act on his behalf in arranging and administering agreements with service distributors. These modifications are set out in the revised criterion 3 in the appendix. …. -
1989	*RADIO NETWORKS AND SYNDICATION POLICY*, Public Notice CRTC 1989-3 (Ottawa, 10 January 1989) … In consideration of the comments by the CAB and Westcom, the Commission will consider programs that are received live by the local station and broadcast on a tape delay basis to be live programs unless the tape delay is at least equal to the duration of the actual program or one hour, whichever is less. To determine the existence of the delegation of control from a radio station to another party, the Commission will use three primary criteria. These involve: formal reserved time; de facto reserved time; and, simultaneous distribution of live programs. Accordingly, delegation of control, and hence a radio network operation, will be deemed to exist when one or more of the primary criteria are present. … A. Definition of a Nework … 1. Delegation of Control The specific reference in the Act to the concept of control over programs or program schedules requires the Commission to regulate as a network operation any program distribution arrangement wherein such delegation occurs. To determine the existence of the delegation of control from a radio station to another party, the Commission will use three primary criteria. … … a) Formal Reserved Time ***Formal reserved time exists where a radio broadcaster, as a condition of the acquisition of all or parts of a program, is required by a formal agreement to broadcast the program at a specified time or within specified time frames***. ***Where formal reserved time exists, the Commission will consider that a radio network operation exists. Accordingly, it will require that, prior to the broadcast of the program, a network application be filed and a network licence obtained by the person who provides the proposed programming.*** A formal reserved time agreement is generally evinced by the existence of an affiliation agreement or similar contractual arrangement. Under a formal reserved time agreement, a local station generally does not have the power to refuse to air a program which it has contracted to broadcast until the expiration of the agreement, except on a temporary basis and under special circumstances as provided for in the contract. The local station is required to air the program at, or within, specified clock hours or time frames. In contrast, a purchase contract allows a radio station to determine the scheduling of a

Year	CRTC statements

program, whether or not a time frame is suggested by the program distributor, and thus does not constitute a formal reserved time commitment.

Whether the programming is distributed live, by tape, or is tape-delayed has no bearing on whether formal reserved time exists.

b) De Facto Reserved Time

De facto reserved time exists where there is no formal contract or written reserved time commitment, but where there is evidence that a program, or programs, are being broadcast by more than one undertaking at a designated time and where, in the Commission's view, the program or programs affect the Canadian broadcasting system in a way similar to that where a formal, reserved time agreement exists.

It is conceivable that programming acquisition arrangements between distributors and local radio station licensees may involve an informal or unwritten requirement for a program or programs to be scheduled at a specified time, as determined by a person other than the licensee of the local station. ***A useful indicator of the existence of such de facto reserved time is the presence of commercial content that is broadcast at a pre-determined time by the local station as a condition of the acquisition of the program.*** Another indicator of the existence of de facto reserved time is the simultaneous broadcast of the program by a number of local stations.

Consequently the net effect of the distribution and broadcast of this programming on the broadcasting system may be similar to the effect of centralized programming by networks and may produce a significant impact on other licensed components of the broadcast system and on a sizeable segment of the population. In such situations, the Commission may consider that a de facto radio network operation exists.

As with formal reserved time, the fact that a program is delivered live, by tape or has been tape-delayed, has no direct bearing on whether de facto reserved time may be deemed to exist.

c) Simultaneous Distribution of Live Programs

In order to distinguish between network and syndicated operations, the Commission considers that the ability or opportunity on the part of the licensee to edit or alter the contents of a program is central to the determination of delegation of control referred to in the Act. This should not be confused with the power to decide whether or not to broadcast a program. This notion of editorial control is particularly significant in the case of live programs. Distribution arrangements involving pre-produced or pre-recorded programs that are made available to stations (e.g. via satellite), even in cases where stations retransmit such programs simultaneously over-the-air, will be treated as syndicated operations, except where formal reserved time or de facto reserved time exists.

In the case of a live program which is a program that involves the presentation of a live event, such as a sports event which is received and broadcast by a station simultaneously, the Commission considers that the station has abandoned its ability to edit or alter the contents of the program and therefore will consider that a network operation is in place. In situations where both live and pre-recorded elements co-exist within a single segment or continuous block of programming, the Commission will also consider this to be network programming.

With regard to live programs, several related issues are discussed below:

(i) Tape Delay

The Commission will accept the use of a tape delay as a means for a local licensee to maintain editorial control over live programming if the length of the delay is sufficient to allow reasonable screening of the program. For this purpose, the Commission will consider the program to be live unless the time delay is at least equal to the duration of the actual program

Year	CRTC statements
	or one hour, whichever is less. (ii) Rebroadcasting of Programs From Other Stations In certain situations, the Commission has authorized local radio broadcasters to pick up and rebroadcast the programming of other stations temporarily in situations where the local station is experiencing financial or other difficulty in filling its program schedule. ***Where the Commission has been satisfied in such cases that the terms of the arrangement between the originating and rebroadcasting stations are based on a form of co-operation that does not affect the ability of the rebroadcasting station to exercise control over its programs or program schedules, the Commission will continue its policy not to require a network licence application***. (iii) Brokerage Brokerage refers to the purchase by program distributors of blocks of time from local station licensees for the broadcast of programming oriented to specific audiences. As stated in Public Notice CRTC 1985-139 entitled "A Broadcasting Policy Reflecting Canada's Linguistic and Cultural Diversity", the Commission recognizes that brokerage provides an important source of programming, particularly for audiences not well served by mainstream broadcasting. ***The Commission will not consider brokerage arrangements to be network operations provided the local station maintains control over the content and scheduling of the programs and brokered programs are not distributed as live programs to other stations.*** (iv) News Services With respect to news distribution arrangements, which generally involve some degree of pre-screening and editing by the distributor, in cases where the station is not bound by a formal or an apparant de facto agreement to broadcast the program, the Commission will not consider these to be network operations. ***In all cases where the existence of a network operation is not clear, the Commission will be guided primarily by the presence of some aspects of one or more of the primary criteria, and the impact of that operation on the Canadian broadcasting system as a whole.*** …. 3. Two or More Broadcasting Undertakings The network definition set out in the Act applies to arrangements which involve two or more broadcasting undertakings. The Commission considers that a network operation may exist in the case of a program arrangement involving a network operator and only one station where the network operator also transmits the programming as a broadcaster. ***For private broadcasters where all the undertakings are owned by the same licensee, no network licence is required, since no delegation of control to another licensee occurs.***
1989 – no data	*RADIO NETWORKS AND SYNDICATION POLICY*, Public Notice CRTC 1989-3 (Ottawa, 10 January 1989) … III (i) Definition of a Network The industry was generally satisfied with the proposed criteria to define a network (i.e. formal reserved time, de facto reserved time and editorial control).
1991 – 'classes'	*New Broadcasting Act - Amendments to Classes of Licence*, Public Notice CRTC 1991-63 (Ottawa, 19 June 1991)
1991 – no data	*ORDER EXEMPTING CERTAIN SHORTWAVE BROADCASTING UNDERTAKINGS*, Public Notice CRTC 1991-105 (Ottawa, 8 October 1991) …

Year	CRTC statements
	… the Commission, by order pursuant to subsection 9(4) of the Act, hereby exempts from the requirements of Part II of the Act those persons carrying on broadcasting undertakings of the class consisting of shortwave radio broadcasting undertakings that: - operate on the high frequency band 3 MHz to 30 MHz; [two criteria related to intended reception outside of Canada and programming] … For the purpose of clarification, persons carrying on broadcasting undertakings falling within the class defined above are only exempted from the requirements of Part II of the Act in their carrying on of the undertakings of the said class. …
1996 – no data	*POLICY REGARDING THE USE OF EXEMPTION ORDERS*, Public Notice CRTC 1996-59 (Ottawa, 26 April 1996), [bold font and italics added] I BACKGROUND In its 19 May 1995 report entitled "Competition and Culture on Canada's Information Highway: Managing the Realities of Transition" (the Convergence Report), the Commission stated that it would undertake a public process to explore further the matter of exemptions and to determine whether a more expeditious regulatory process can be devised to deal with certain classes of undertakings. Accordingly, the Commission held a public hearing beginning 19 February 1996 in the National Capital Region. Written submissions were received from 36 parties and the Commission heard 16 oral presentations. … Exemption orders contain a description of the class to be exempted, and set out the terms and conditions under which individual undertakings qualify for exemption. Notwithstanding an exemption order, persons carrying on broadcasting undertakings are expected to act in a responsible manner at all times, and to operate at a high standard, having regard to all relevant Commission policies. ***When circumstances warrant, the Commission will amend or revoke an exemption order.*** … Most of the exemption orders issued by the Commission since the promulgation of the Act in 1991 have been for classes of undertakings whose services have minimal impact on the broadcasting system or are of limited capacity to contribute to the attainment of the broadcasting policy set out in the Act. … For the most part, the Commission's exemption orders have met with broad acceptance by the industry and the general public. However, in three particular cases - namely the exemption orders respecting direct-to-home (DTH) satellite distribution undertakings (Public Notice CRTC 1994-111); video games programming undertakings (Public Notice CRTC 1995-5) and teleshopping programming service undertakings (Public Notice CRTC 1995-14) - the Commission's decisions have resulted in significant debate and controversy. In the view of some parties, the services provided by undertakings in these three classes are examples of the new types of broadcasting service that could have a significant future impact on the broadcasting system. Others have claimed that, despite the detailed descriptions of the services in the exemption orders, the Commission will not be able to monitor effectively the development of undertakings in these classes and, thus, will not be able to ensure that they make the contributions to the system expected of them, or that they adhere to the relevant industry codes. …

Year	CRTC statements
	Consistent with the general approach to exemptions set out in this notice, it is the Commission's policy, generally, to exempt classes of programming undertakings only where: i) **it is evident to the Commission that the licensing and regulation of the class of undertaking will not result in a significantly greater contribution to the Canadian broadcasting system, whether with respect to the Canadian programming carried by undertakings of that class, or the expenditures on Canadian programming made by such undertakings;** and ii) **it is evident to the Commission that undertakings operating under the exemption order will not have an undue impact on the ability of licensed undertakings to fulfil their regulatory requirements.** e) Review of Exemption Orders At the 19 February 1996 public hearing, many of the parties, including the Department of Canadian Heritage, proposed that the Commission establish time limits for exemption orders, perhaps similar to the licence terms specified in broadcasting licences. It was argued that this would enable the Commission and other interested parties to review the effectiveness of exemption orders at appropriate intervals, and to take into account changing circumstances. The Commission agrees that it would be reasonable to conduct a periodic review of exemption orders. Accordingly, ***all new exemption orders will be reviewed. Such reviews will normally take place five years from the date of issuance of the order and will be subject to the Commission's normal public process.*** Further, in order to ensure consistency with the policies set out in this notice, the Commission intends to conduct reviews of all existing exemption orders. These reviews will normally take place between five and seven years from the date of issuance of the order. ***At the time of review, the Commission will expect those carrying on undertakings affected by the exemption order to file the information the Commission will require to conduct a thorough examination of the impact and contribution of such undertakings*.** ….
1998 – no data	*Review of Certain Exemption Orders*, Public Notice CRTC 1998-40 (Ottawa, 23 April 1998) 1. In Public Notice CRTC 1996-59 dated 26 April 1996, and entitled Policy Regarding The Use Of Exemption Orders, the Commission stated that it would conduct a periodic review of exemption orders at appropriate intervals. The Commission determined that exemption orders would normally be reviewed between five and seven years following the date of their issuance. Appended to this notice is a list of the exemption orders that are now due for such review. Details concerning the written public process the Commission will use to conduct this review are set out below. ….
1999 – no data	*Proposed revisions to certain exemption orders*, Public Notice CRTC 1999-133 (Ottawa, 12 August 1999) … **Low power radio: Limited duration special event facilitating undertaking** … 14. … the Commission proposes to add an exemption criterion indicating that exempt undertakings in this class must abide by the Canadian Association of Broadcasters (CAB) codes respecting sex-role portrayal and advertising to children. This criterion was included in the exemption order for certain native radio undertakings set out in Public Notice CRTC 1998-62. The Commission considers that it should also apply to other exempted low-power radio undertakings. **Carrier current undertakings**

Year	CRTC statements
	…
	18. The Commission does, however, propose to add an exemption criterion indicating that exempted undertakings in this class must abide by the CAB codes respecting sex-role portrayal and advertising to children.
	Temporary Network Special Event Undertakings
	…
	24. The Commission does, however, propose to add a criterion to the orders indicating that exempted undertakings in this class must abide by the CAB codes respecting gender portrayal and advertising to children.
	…
	Licensing of MATVs
	…
	49. A few parties submitted that the Commission should adopt a registration requirement for these undertakings to help ensure that they are aware of and are meeting the terms of the exemption order. The Commission has previously examined the question of registration and, in PN 1996-59, stated that "any registration or reporting request for exempt undertakings would be difficult and would, in practice, be tantamount to licensing."
	….
2000 – no data	*Final revisions to certain exemption orders*, Public Notice CRTC 2000-10 (Ottawa, 24 January 2000)
	Does not make further changes to exemption orders discussed in Public Notice CRTC 1999-133
2000 - no data	*Exemption order respecting public emergency radio undertakings*, Public Notice CRTC 2000-11 (Ottawa, 24 January 2000)
	…
	6. One party also suggested that the time limit for generating such an undertaking be increased from 7 days to 28 days, as an emergency could conceivably last for more than a 7-day period. The Commission is of the view that this exemption order is for short-term emergencies, and is not convinced that the time limit needs to be increased. In all likelihood, any emergency that did exist beyond this period would be covered by conventional radio and television stations. Consequently, the Commission will allow such emergency transmitters to operate for a period of up to seven days for each particular emergency.
	….
2006 – no data	*Call for comments on a proposed exemption order respecting certain network operations*, Broadcasting Public Notice CRTC 2006-40 (Ottawa, 31 March 2006)
	…
	Proposed exemption order applicable to other types of network operations
	6. Radio networks form the majority of the network operations currently licensed by the Commission. Radio networks provide a wide variety of programming, including: coverage of sports events or other specific programs originating from licensed radio stations; Canadian television programs whose audio portion is simulcast on radio stations; and native radio programs shared by other stations in the same region. A person wishing to carry on a network operation is required to file an application either for a temporary network licence in the case of a single program or a series of programs extending for a period of less than sixty days, or for a network licence in all other cases. In many cases, the network licensee is also the licensee of the radio or television station from which the network's programming originates.
	7. The Commission proposes to exempt from licensing requirements each network undertaking whose operator is also the licensee of the radio or television station from which the network programming originates, and where the programming is for simultaneous broadcast by one or more licensed or exempted radio stations. The proposed exemption order and the exemption criteria are set out in the appendix to this public notice. The exemption

Year	CRTC statements
	order would not apply to the network operations involving the Canadian Broadcasting Corporation.
2006 – no data	*Exemption order respecting certain network operations*, Broadcasting Public Notice CRTC 2006-143 (Ottawa, 10 November 2006) … Description … 5. The operator of the undertaking is also the licensee of the originating radio or television station. 6. The undertaking provides programming in Canada only to licensed or exempted radio stations.
2014 – no data	*Amendments to various regulations, the standard conditions of licence for video-on-demand undertakings and certain exemption orders - Provisions requiring the mandatory distribution of emergency alert messages*, Broadcasting Regulatory Policy CRTC 2014-444 and Broadcasting Orders CRTC 2014-445, 2014-446, 2014-447 and 2014-448 47. Accordingly, the Commission has amended the Radio Regulations, the TV Regulations and the exemption orders for tourist and Native radio stations to reflect its decision that a public alerting system is to be installed at the originating station, with alerts fed to all associated transmitters. To this end, the Commission has adopted the wording proposed by broadcasters in their interventions. Nevertheless, to improve the effectiveness of the alerting system, it encourages broadcasters to strive to implement alerting at the transmitter level. … 51. In general, viewers/listeners within regional service contours receive the broadcasting signal. Further, broadcasters may choose to market or target their station to different communities within both the local and regional contours. Accordingly, the Commission amends the Radio Regulations, the TV Regulations and the tourist radio and Native radio exemption orders to require the distribution of emergency alert messages relevant to areas within a station's regional service contour. … Accordingly, the Commission has adopted the changes to the BDU Regulations as proposed in the Notice, which would require licensed BDUs to deliver emergency alert messages in both digital and analog format. In light of the costs to smaller systems, it has also amended the applicable exemption order to require terrestrial BDUs serving more than 2,000 subscribers and fewer than 20,000 subscribers to deliver emergency alert messages solely on a digital basis. Nevertheless, the Commission encourages exempt BDUs to distribute emergency alert messages on an analog basis.
2016 – no data	*Call for comments on proposed amendments to exemption orders for various types of radio programming undertakings*, Broadcasting Notice of Consultation CRTC 2016-427 (Ottawa, 26 October 2016) Proposes amendments to exemption orders for radio programming undertakings
2018 – no data	*Amendments to exemption orders for various types of radio programming undertakings*, Broadcasting Regulatory Policy CRTC 2018-137 (Ottawa, 27 April 2018) Notes at paragraphs 4 and 5 that it issued mandatory orders regarding two radio programming undertakings exempted due to their purported status as low-power tourist information related programming undertakings, which were in fact being operated as commercial radio undertakings Explained at paragraph 6 its proposal to require low-power tourism radio programming undertakings to register with the Commission 17. Evanov submitted that operators of exempt tourist services should be required to keep an audio log of all broadcasts for a set period. SABC proposed that this be a requirement only in

Year	CRTC statements
	the event that the Commission does not restrict exemption to services broadcasting in English, French and Aboriginal languages. … 19. The Commission agrees that having access to audio recordings is helpful in some cases. However, although there is currently no obligation to keep audio recordings, obtaining them from exempt services has not been an issue in the past. Further, the absence of such a requirement in the exemption order does not prevent the Commission from requesting that an exempt service operator retain audio recordings for submission to the Commission. Finally, the Commission considers that a requirement to this effect would impose an unnecessary regulatory burden on exempt service operators. 20. In light of the above, the Commission considers that implementing this proposal is not warranted. However, it encourages the retention of audio recordings for 28 days from the date of broadcast as a best practice for all exempt tourist services.
2025	*Modernization of radio processes*, Broadcasting Regulatory Policy CRTC 2025-265 (Gatineau, 10 October 2025) … 114. Accordingly, the Commission proposes to make an order pursuant to subsection 9.1(1) of the Act requiring licensees of FM stations to register with the Commission should they make use of the SCMO for broadcasting audio programs. The specifics of the proposed order are set out in Appendix 1 to this regulatory policy. The Commission will make similar orders in relation to registered exempt undertakings. … 160. In light of the above, the Commission proposes to make an order authorizing licensees of commercial FM stations to devote more than 50% of the programming broadcast during their broadcast week to programming drawn from content category 1 (spoken word) programming for a period of one year, provided they notify the Commission of their intention to do so and apply for a permanent condition of service if they wish to continue doing so. The specifics of the proposed order are set out in Appendix 1 to this regulatory policy. … The proposed orders 180. As noted at paragraphs 114 and 160, pursuant to subsection 9.1(1) of the Act, the Commission proposes to make the orders set out in Appendix 1 to this regulatory policy authorizing licensees of commercial FM radio stations to devote more than 50% of the programming broadcast during their broadcast week to programming drawn from content category 1 (spoken word) for a period of one year and requiring licensees of all FM radio stations operating SCMOs to register their SCMOs. 181. Consistent with subsection 9.1(4) of the Act, parties, including those who may be subject to these conditions of service, may file comments on the proposed orders by no later than 20 October 2025. 182. Parties, including those who would be subject to these conditions of service, may submit a reply to any comments received, by no later than 27 October 2025. 183. Parties who wish to submit comments on the proposed orders may do so on the Commission's public proceedings webpage. …

Appendix 3 CRTC exemption orders as of 18 October 2025

Medium	Order [shading shows two identical orders]	Number issued
Distribution	Amendment to the exemption criteria for master antenna television systems (MATV)	1
	Amendments to the Exemption order respecting terrestrial relay distribution network undertakings	1
	Amendments to the Parliamentary and Provincial or Territorial Legislature Proceedings Exemption Order – new provision relating to emergencies	1
	Conditions of service for carrying on certain online undertakings	1
	Exemption order for classes of online undertakings in respect of the Online Undertakings Registration Regulations	1
	Exemption order respecting community programming network undertakings	1
	Exemption order respecting distribution undertaking temporary network special event type 2 undertakings	1
	Exemption order respecting resource development installations	1
	Exemption order respecting still image programming service undertakings	1
	Revised exemption order for radiocommunication distribution undertakings	1
	Revised Exemption Order Respecting Teleshopping Programming Service Undertakings	1
	Terms and conditions of the exemption order for terrestrial broadcasting distribution undertakings serving fewer than 20,000 subscribers	1
	Terms and conditions of the exemption order for video-on-demand undertakings	1
	Subtotal, distribution orders	**21**
Radio	Amendment to Exemption order respecting radio and television temporary network special event type 1 undertakings	1
	Canadian Broadcasting Corporation radio licences	1
	Exemption order for low-power radio programming undertakings providing programming that is derived solely from houses of worship	1
	Exemption order for low-power radio stations that provide programming from houses of worship	1
	Exemption order for low-power tourist information related radio programming undertakings	1
	Exemption order for radiocommunication distribution undertakings	1
	Exemption order respecting carrier current undertakings whose services are not carried on distribution undertakings	2
	Exemption order respecting certain Indigenous radio undertakings	1
	Exemption order respecting certain native radio undertakings	1
	Exemption order respecting certain network operations	1
	Exemption order respecting low-power radio: Limited duration special event facilitating undertakings	2
	Exemption order respecting low-power radio: Temporary resource development distribution undertakings	1
	Exemption order respecting low-power radio: Ultra low power announcement service (LPAS) undertakings	2
	Exemption order respecting public emergency radio undertakings	1
	Exemption order respecting radio and television temporary network special event type 1 undertakings	1
	Order Exempting Certain Shortwave Broadcasting Undertakings	1
	Revised exemption order for radiocommunication distribution undertakings	1
	Terms and conditions of the exemption order for low-power tourist information related radio programming undertakings	1

Medium	**Order** [shading shows two identical orders]	**Number issued**
	Subtotal, radio orders	9
TV	Amendment to Exemption order respecting radio and television temporary network special event type 1 undertakings	1
	Amendment to the Exemption order respecting closed circuit video programming undertakings	1
	Exemption order respecting certain network operations	1
	Exemption order respecting discretionary television programming undertakings serving fewer than 200,000 subscribers	2
	Exemption order respecting still image and low-motion programming service undertakings	1
	Exemption orders respecting certain classes of low-power and very low-power programming undertakings	1
	Review of exemption orders respecting experimental video-on-demand programming undertakings, video games programming service undertakings and teleshopping programming service undertakings	1
	Terms and conditions of the exemption order for video-on-demand undertakings	1
Total media: 3	**Total orders: 41**	**Total issued: 43**

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