



5 November 2025

Filed online

Marc Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Secretary General,

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

1. On October 10, 2025 the CRTC gave the public 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.
2. The Forum submitted its comments to the CRTC on 20 October 2025, and replied to the three other parties then on the public record on 23 October 2025. (The Forum submitted its reply on 23 October 2025 rather than on 30 October 2025, so as to afford itself of the opportunity to be partially reimbursed for its work in the 2025-267 proceeding due to the decision made by the Broadcasting Participation Fund / Le fonds de participation à la radiodiffusion on 2 September 2025 to stop accepting applications for cost reimbursement.)
3. On 4 November 2025 (4:12 PM ET) the Forum received an e-mail from a CRTC Senior Analyst for English-language Radio regarding the CRTC's decision to grant the procedural request by James Bay Cree Communications Society to add its intervention and reply to the record of the above-noted 2025-267 proceeding.
4. FRPC was unable to locate the JBCCS documents on the CRTC's website until this afternoon – in other words, a day later than the documents were apparently posted. FRPC has now had the opportunity to review the JBCCS intervention and reply and seeks the opportunity to amend FRPC's reply as follows.

5. While the JBCCS submissions do not raise any concerns for the Forum, they highlight the importance of Spoken Word programming in Canada's radio (or audio) broadcasting system. The Society notes at page 2 of its intervention that Indigenous undertakings "are vital local institutions that ... are often the only source of Indigenous-language content available over the air".
6. The Forum shares the Society's concern regarding Spoken Word language.
7. FRPC notes that Appendix 1 of Broadcasting Regulatory Policy CRTC 2025-265 proposes to amend the conditions of service of commercial FM stations so that these stations "may devote more than 50% of the programming broadcast during their broadcast week to programming drawn from category 1 (spoken word) for a period of up to one year".
8. FRPC asks to amend its 23 October 2025 in the 2025-267 proceeding to add two brief, additional remarks concerning this proposal. We do not believe that the CRTC's granting of this amendment will in any way disadvantage the four other participants in the 2024-290/2025-267 proceedings, and may in fact contribute to the public record by identifying concerns about lack clarity regarding the proposed Spoken Word exemption order.
9. First, the Forum notes that section 15(5)(b) the *Radio Regulations, 1986* currently requires licensees with \$1,250,000 in total revenues to devote at least 45% of the eligible-initiatives contribution (established by subsection 15(2)) to FACTOR or MUSICACTION unless "the licensee is licensed to operate ... [a] spoken word station". In that case, "the licensee may instead make that percentage of the contribution to any eligible initiative that supports the creation of ... programming from content category 1, as the case may be." Section 15(1) of the same regulation defines a spoken word station as "an ... F.M. station ... that devotes more than 50% of a broadcast week to programming from content category 1".
10. As one effect of the 2025-265 exemption is to enable any commercial FM station to become a spoken-word station when more than 50% of its broadcast week consists of spoken-word programming, the CRTC should clarify its expectations regarding the allocation of 'contributions' by exempted commercial FM stations that avail themselves of the proposed exemption in 2025-265.
11. Second, the current *Radio Regulations, 1986* define Canadian content in terms of musical selections, while subsection 2.2(2) defines a Canadian selection as "a musical selection". (Section 2(1) defines a musical selection as "any live or recorded music of one minute or more in duration that is broadcast uninterrupted, and includes a medley and a montage".)
12. In other words, 'Canadian content' in Spoken Word programming is not clearly defined in the CRTC's regulations or in its current regulatory policy for commercial FM radio stations.

Nor does the CRTC's current commercial radio policy appear to require a specific level of Canadian content in commercial FM stations' programming.¹

13. In announcing its 2022 *Revised Commercial Radio Policy* three years ago, however, the CRTC stated that

... **the regulatory policy** is not intended to be an exact reflection of listening habits, but **serves to facilitate the Canadian broadcasting system's attainment of the Act's objectives, including safeguarding, enriching and strengthening the cultural, political, social and economic fabric of Canada and encouraging the development of Canadian expression** by providing a wide range of programming that reflects linguistic variety throughout the country.²

14. Although very little – nothing, in fact – is known about the level of Spoken Word programming broadcast by licensed Canadian radio stations or how much of this programming is Canadian,³ the circumstances of Canada's broadcasting system have changed, particularly since January 2024 when a new President of the United States of American assumed office and began to make statements suggesting that Canada become part of his country.
15. The Forum therefore requests that the CRTC clarify in its 'final' exemption order with respect to Appendix 1, Broadcasting Regulatory Policy CRTC 2025-265, that commercial FM radio stations availing themselves of the exemption order must ensure that Canadian content at least predominates in the Spoken Word programming they broadcast and that this programming respects the Commission's general approach to balance in religious and political content. If these clarifications are not made, Canada's radio system may – simply through the application of an exemption order and the rational appeal of low-cost, non-Canadian Spoken Word programming syndication – begin less to resemble the *Canadian* broadcasting system desired by Parliament's *Broadcasting Policy for Canada* and more the system of another country or countries. Requiring a high level of Canadian content in Spoken Word programming may also increase employment opportunities in the Canadian audiosector.

¹ See e.g. *Revised conditions of licence for commercial AM and FM radio stations*, [Broadcasting Regulatory Policy CRTC 2022-334](#) (Ottawa, 7 December 2022).

² *Revised Commercial Radio Policy*, [Broadcasting Regulatory Policy CRTC 2022-332](#) (Ottawa, 7 December 2022), at paragraph 301.

³ The CRTC's *Radio Regulations, 1986*, Schedule 1, Section E, include provision for a "Code Identifying Non-Canadian Programming" ("NC"):

Programming that originates outside Canada other than local programming as defined in Broadcasting Public Notice CRTC 2006-158, dated December 15, 2006 and entitled *Commercial Radio Policy 2006*, and other than programming that is produced by a Canadian as defined in section 1 of the *Direction to the CRTC (Ineligibility of Non-Canadians)*



Thank you for your consideration of the Forum's request to add this amendment to the Forum's 23 October 2025 reply to the public record of the 2024-290/2025-267 proceeding.

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