



**Sent via GC Key**

9 February 2026

Marc Morin  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
Gatineau, Quebec  
K1A 0N2

**Re: Reply Comments of the Canadian Association of Broadcasters with respect to Application 2025-0593-3 – seeking to change television log filing requirements**

1. As the national voice of small, medium and large Canadian privately-owned and controlled television and discretionary broadcasters, including those operating under 9.1(1)(h) distribution orders, the Canadian Association of Broadcasters (CAB) is pleased to provide the following reply to the interventions filed with respect to our Part 1 application on behalf of our television members to change the television log filing requirements.
2. First and foremost, we object to those interventions that imply that without strict supervision, Canadian broadcasters might default on their Canadian content obligations. Although we do not have specific evidence we can share, our members confirm that with very few exceptions, they consistently fulfill their Canadian content obligations. Where broadcasters may fall short according to their television logs, it is usually inadvertent, insignificant, and often due to reporting errors rather than any actual or deliberate non-compliance. The CRTC has the data to investigate the extent to which this is true, and we would urge you to do so.
3. That said, a few of our members filed supporting interventions (as did CBC/Radio Canada), providing evidence of the challenges they face in fulfilling these onerous reporting obligations:
  - **Corus Entertainment** highlighted that the filing of 40 logs each month consumes significant resources that could be employed to better effect elsewhere:

*Each of Corus' 40 monthly log filings culminates a multi-step process of data input, reconciliation of information, system maintenance, document upload, error report review, additional data collection, and log resubmission. The process requires the expenditure of meaningful operational and capital resources, which we estimate at roughly 750-1000 person hours for our 40 channels per broadcast year. It continues against the backdrop of significant expense reductions at our organization, including in the business units traditionally charged with completing the relevant work. While these requirements have remained unchanged for decades, our organizational capacity to service them has diminished considerably.*

- **Quebecor Média** argued that the burden associated with the filing of monthly logs outweighs any regulatory benefit:

*Québecor Média soumet que ces exigences ne servent pas un objectif de supervision ou de réglementation suffisant pour justifier l'ampleur du fardeau administratif qu'elles imposent aux titulaires. Nous partageons ainsi pleinement le constat de l'ACR quant à la lourdeur opérationnelle importante des registres actuels, notamment vu l'indisponibilité répétée des numéros de certification canadienne des émissions et les cycles de révision et de resoumissions des registres qui en découle. Alors que la télévision traditionnelle fait face à une baisse continue de ses revenus, elle doit pouvoir concentrer ses ressources sur la création de contenus novateurs susceptibles d'attirer et de plaire aux téléspectateurs canadiens et québécois, plutôt que sur une reddition de compte excessive auprès du régulateur.*

- **Rogers Media** similarly outlined that the current requirements impose a material burden on its stations:

*Rogers can attest that the current requirement to file monthly logs imposes a material and ongoing administrative burden, especially when "error reports" impede the timely submission of logs. Removing this requirement would provide several operational efficiencies and help lighten the administrative workload, including easing time pressure, reducing administrative email volume related to log submissions and resubmissions, and limiting repetitive error-correction work across our stations, which would allow for more efficient operations. It would also significantly reduce the need for retroactive updates regarding new certification or CAVCO numbers, saving substantial time and effort.*

4. In sum, the current level of reporting burden is disproportionate to the alleged benefits, particularly in the current financial environment. Canadian television broadcasters generally face considerable declines in revenue and profitability. In such a context, the Commission must be sensitive to the administrative burden it places on those undertakings, who are already having to cut expenses in every aspect of their operations. They do not have the capacity to prepare detailed monthly reports and email back and forth in response to numerous error messages, especially given that the TV logs capture information on aspects of Canadian broadcasting that is no longer regulated (i.e. advertising and genre) or is captured in other ways, such as annual production reports.

5. As we have been urging for the last few years, the Commission must take a more proportionate approach, and focus on key aspects of the regulatory regime where specific monitoring is actually required, rather than attempting to track and analyze every minute of every day broadcast (by Canadian broadcasters) in Canada. We have called on you on numerous occasions to undertake a thorough review of the burden imposed on Canadian broadcasters, particularly given that the Commission itself does not have the capacity to review and analyze all of the information that it collects. It must also seek to balance the reporting obligations of Canadian broadcasters and foreign online streamers who have a significantly lower level of reporting burden and are unlikely to have to file anything remotely resembling television logs.
6. In fact, to the CMF's comments that they need this detailed information for their monitoring of long-term trends, and so on, we question how such analysis will be possible (or valid) without the same level of data from online undertakings. Moreover, we are uncertain why the Commission would continue to require the provision of detailed data for monitoring and research activities that do not fall under its own responsibilities. Neither CMF nor Medistats is mandated by the CRTC to conduct such analysis. Although Medistats states in its intervention that it uses CRTC logs to conduct "independent verification" of content exhibition data, there is no need for such verification if the CRTC is already satisfied with broadcasters' compliance.
7. Moreover, broadcasters' regulatory obligations should not be driven by third-party organizations' desire for more and more data for their own policy purposes. For example, the data published by Numeris is more than sufficient to assess the performance of CMF-funded programming. In addition, as noted in our application, much of this data is available in other reports and via other means. For example, we understand that Canadian broadcasters already provide Numeris with weekly programming data detailing all programs broadcast on their channels, including program genre. While CMF emphasized the importance of genre and country-of-origin data and the need for such data to be tracked by Mediastats, this information can already be cross-referenced from various other sources, including via the annual production reports also filed with the Commission. For example, the category (genre) of each Canadian program broadcast on linear services is already available in the annual production reports. Mediastats could therefore combine Numeris performance data with information from these reports to continue tracking the type and origin (Canadian or non-Canadian) of the programming being viewed, without relying on CRTC logs.
8. With respect to the concern that annual obligations cannot be measured on a monthly basis, we respectfully disagree. We believe a sample of one month would be more than sufficient to determine whether a station/service is on track or not. If it is not, additional verification could be required, for example, the licensee could be required to submit information for additional months. The Commission has successfully relied on just such a sample approach in the radio industry for many years.

9. In sum, we urge the Commission to undertake a deep and thorough review of all aspects of its reporting requirements with a view to meaningfully reducing the administrative burden it imposes on Canadian broadcasters. We highly recommend that you apply a “utility lens” or, as suggested by Corus Entertainment, a “prism of policy necessity” to all reporting requirements. The Commission must be confident that the information it is collecting is actually imperative to the supervision of the broadcasting system and it must explore whether there are better, more efficient, less onerous ways to track and analyze performance.
10. Finally, the Commission must act now. Canadian broadcasters are facing existential challenges **today** and cannot wait until the Commission has finished its multiple processes to modernize the Canadian broadcasting system. One simple and impactful change it can make now is to no longer require the monthly filing of minute-by-minute data and adopt an audit-based approach similar to the approach used in the review of Canadian radio stations.
11. To address any remaining concerns, we would be happy to work with the Commission and organizations like Mediastats to find workable solutions, including, for example, through some kind of working group as recommended by the CMF.
12. All of which is respectfully submitted.

Yours sincerely,

*[Original signed by]*

Kevin Desjardins  
President | Canadian Association of Broadcasters

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