



27 February 2026

Filed online

Marc Morin
Secretary General
CRTC

Ottawa, ON K1A 0N2

Dear Secretary General,

Re: Québecor Média inc., Groupe TVA inc., Part 1 Application 2026-0033-7 (CFCM-DT Québec), (Montréal, 4 February 2026) – Procedural request

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 and telecommunications.
2. FRPC has reviewed the above-noted application by Québecor Média inc., Groupe TVA inc. (Québecor) regarding CFCM-DT, posted by the CRTC on 13 February 2026.
3. Québecor is asking¹ the CRTC to amend a condition of service that the Commission first imposed on CFCM-DT Québec in 2017² and, following an application made by Québecor in May 2023, it also amended in May 2024.³
4. In approving Québecor's 2023 request to reduce CFCM-DT Québec's local programming from 18 to 16 hours per week, the CRTC explained that the programming changes "should have a modest impact on the Québec station's overall programming" and "will give the licensee greater flexibility while maintaining the number of hours of local news produced by the section".⁴ The CRTC's decision stated that the changes it was approving "will also

¹ Québecor, *Objet: Demande de la Partie 1 – Modification des conditions de licence applicables à la station CFCM-DT Québec de Groupe TVA inc.*, (Montréal, 4 February 2026), DM#4960766.

² *Quebecor Media Inc. – Group-based licence renewals for French-language television stations and services*, Broadcasting Decision CRTC 2017-147 (Ottawa, 15 May 2017), at Appendix 2 (Terms, conditions of licence, expectations and encouragements applicable to TVA Group's network and television stations), paragraph 31.

³ *CFCM-DT Québec – Licence amendment*, Broadcasting Decision CRTC 2024-104 (Ottawa, 13 May 2024), at paragraph 60.

⁴ *Ibid.*, "Summary".

enable it [the station] to maintain a production center in Québec, including the presence of journalists and editorial decision-making.”⁵

5. FRPC is asking that the Commission obtain clarifications from Québecor about its 4 February 2026 application, that the CRTC reconsider its decision granting confidentiality to certain information in the application and that it seek additional information for the public record.

I. Request for clarification regarding Québecor’s application

6. The *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure (Rules)* empower the Commission to exercise the powers set out in the *Rules* on its own initiative or at the request of a party or an interested person.”⁶ They enable the CRTC to require an applicant to “to provide information, particulars or documents that it considers necessary” so that the Commission may “reach a full and satisfactory understanding of the subject matter of the proceeding”.⁷ The *Rules* also require the Commission to make available “any information submitted ... in the course of proceedings before it to the extent that the information is not designated as confidential”.⁸

A. Impact on programming of approving application

7. Québecor’s 4 February 2026 application asks the CRTC to reduce its local programming from 16 hours in each broadcast week, to “at least 8 hours of local programming per week”. Table 1, below, summarizes the CRTC changes referenced in Québecor’s application.

Table 1

2017-147, App. 3, para. 31:	2024-104, para. 61:	Proposal (2026)⁹
a. The licensee shall broadcast at least 18 hours of local programming in each broadcast week, of which	(a) The licensee shall broadcast at least 16 hours of local programming in each broadcast week, of which	(a) the licensee shall broadcast at least 8 hours of local programming in each broadcast week, of which
i. at least 5 hours and 30 minutes shall be local news produced in Québec, including two local newscast [<i>sic</i>] on the weekends;	(i) at least 9 hours shall be programming that focuses specifically on the Québec region and that may be broadcast on the TVA network, including at least 5 hours and 30 minutes of newscast [<i>sic</i>] produced in Québec;	(i) at least 5 hours and 30 minutes shall be local newscasts produced in Québec
ii. at least 3 hours and 30 minutes shall be other programs		

⁵ *CFCM-DT Québec – Licence amendment*, Broadcasting Decision CRTC 2024-104 (Ottawa, 13 May 2024), “Summary”.

⁶ *CRTC Rules of Practice and Procedure*, s. 5(1): “The Commission may exercise any of its powers under these Rules at the request of a party or interested person or on its own initiative.”

⁷ *Rules*, s. 28(1):

The Commission may require a party

(a) to provide information, particulars or documents that it considers necessary to enable the Commission to reach a full and satisfactory understanding of the subject matter of the proceeding; or

(b) to make written or oral representations on any matter related to the proceeding.

⁸ *Rules*, s. 30: “In broadcasting matters, the Commission must make available for public inspection any information submitted to the Commission in the course of proceedings before it to the extent that the information is not designated as confidential.”

⁹ Translation by FRPC.

2017-147, App. 3, para. 31:	2024-104, para. 61:	Proposal (2026) ⁹
that focus specifically on the Québec region that may be broadcast on the TVA network; and	and	
iii. at least 3 hours and 30 minutes shall be locally reflective news in each broadcasting week.	(ii) at least 3 hours and 30 minutes shall be locally reflective news in each broadcasting week.	(ii) at least 3 hours and 30 minutes shall be locally reflective news in each broadcasting week

8. Québecor's application appears to be asking the CRTC to permit it to reduce the local weekly programming at CFCM-DT Québec by half (from 16 hours to 8 hours).¹⁰
9. Québecor states at Section 3(c) of Form 301, however, that the application's approval will not result in any programming changes:

e. Si cette modification est approuvée, entraînera-t-elle des changements de programmation ?
Non

10. So that the public and other interested parties may understand why Québecor is seeking the CRTC's approval on an urgent and accelerated basis¹¹ of an application that would not result in any programming changes on CFCM-DT Québec,¹² and to enable them to make informed comments about the application, FRPC requests that the CRTC ask Québecor to

Request A(i): clarify its position that a 50% reduction in local programming hours per week does not involve a change in the programming of CFCM-DT Québec.

B. *Impact on financial projections*

11. Québecor's public Part 1 application states that the amendments it seeks are necessary "pour assurer la viabilité à long terme de la station".¹³ It also states that its application is "l'option la moins dommageable identifiée par Groupe TVA, concerne la réduction du niveau de production de la station pour répondre à l'explosion des coûts"¹⁴
12. Québecor's Form 301 states, however, that approval of its application will not affect either its existing financial projections or the financial viability of CFCM-DT:

¹⁰ Québecor, *Objet : Demande de la Partie 1 – Modification des conditions de licence applicables à la station CFCM-DT Québec de Groupe TVA inc.*, DM#4960766, paragraphs 30 and 34.

¹¹ *Ibid.*, paragraphs 2, 8, 29, 34 and 35: "le besoin urgent", "de façon urgente", "de façon urgente", "l'urgence d'agir" and "traiter la présente demande de manière accélérée".

¹² See e.g. CRTC *Re procedural request regarding Call for comments on the Commission's policies relating to Certified Independent Production Funds (BNoC 2015-467) – Request for financial information related to OLMCs* (OLMCs), (Ottawa, 24 December 2015).

¹³ Québecor, *Objet : Demande de la Partie 1 – Modification des conditions de licence applicables à la station CFCM-DT Québec de Groupe TVA inc.*, DM#4960766, paragraph 11.

¹⁴ *Ibid.* 22.

Québecor, Formulaire 301 – Demandes de modifications – Télévision	Form 301 - Amendment requests – Television [English-language Form 301]
<p>4. Analyse et considérations financières</p> <p>4.1 La modification proposée aura-t-elle un impact sur les projections financières existantes ?</p> <p>Non</p> <p>4.2 Pensez-vous que la modification que vous proposez est nécessaire à la viabilité financière de votre entreprise ?</p> <p>Non</p>	<p>4. Financial analysis and considerations</p> <p>4.1 Will the proposed amendment(s) result in a change to existing financial projections?</p> <p>English-language translation: <i>No</i></p> <p>4.2 Do you consider that your proposed amendment is necessary for the financial viability of your station?</p> <p>English-language translation: <i>No</i></p>

13. Québecor’s Part 1 application also does not include supplementary documents describing the financial implications of the CRTC’s approval or denial of its application, such as a three-year forecast of the impact of approval (or denial) on the financial position of either Québecor or CFCM-DT Québec. In 2022 the CRTC’s staff requested additional information from an applicant seeking technical amendments to rebroadcasting transmitters’ contours. The staff’s letter stated that

... it is the responsibility of an applicant to submit a complete application that includes all relevant information and provides the necessary supporting documentation. Further, it is important for an applicant to demonstrate the existence of a technical or economic need justifying the proposed amendments. Additionally, an applicant must clearly explain how the approval of the proposed solution(s) would resolve the ... issues described in the application.¹⁵

14. Québecor’s application states that it is simply asking for flexibility to adapt its programming efficaciously to Québec audience’ expectations.¹⁶ In its 2022 letter the CRTC’s staff noted the applicant in that proceeding had made a statement to the effect that local communities had expressed interest in a “better and clearer signal”;¹⁷ the letter asked the applicant for “documentation to substantiate the public interest support from these communities”.¹⁸

15. To help the public and other interested parties understand and evaluate the changes Québecor wishes to make to meet audience’ expectations, to enable all parties to understand the implications of the CRTC’s approving or denying Québecor’s application in light of its statement that the CRTC’s approval of the application is unnecessary to CFCM-DT Québec’s viability and will not affect Québecor’s existing financial projections, and to enable all parties to make informed comments about the application, FRPC requests that the CRTC ask Québecor to

¹⁵ Senior Analyst, Radio Policy & Applications, Broadcasting, CRTC, *Re: Broadcasting Part 1 applications 2022-0056-7, 2022-0055-9, 2022-0054-1, 2022-0053-3, 2022-0052-5, 2022-0051-7, 2022-0050-0, and 2022-0048-4 – CIAM Media & Radio Broadcasting Association*, (Ottawa, 28 June 2022).

¹⁶ Québecor, *Objet : Demande de la Partie 1 – Modification des conditions de licence applicables à la station CFCM-DT Québec de Groupe TVA inc.*, DM#4960766, paragraph 31.

¹⁷ Senior Analyst, Radio Policy & Applications, Broadcasting, CRTC, *Re: Broadcasting Part 1 applications 2022-0056-7, 2022-0055-9, 2022-0054-1, 2022-0053-3, 2022-0052-5, 2022-0051-7, 2022-0050-0, and 2022-0048-4 – CIAM Media & Radio Broadcasting Association*, (Ottawa, 28 June 2022).

¹⁸ *Ibid.*

Request B(i): provide documentation substantiating the expectations of CFCM-DT Québec’s audience,

Request B(ii): clarify the date of the “existing financial projections” that will not change if its application is approved,

Request B(iii): confirm that approval of its application is unnecessary to the financial viability of CFCM-DT Québec and

Request B(iv): provide separate three-year financial projections based on two different assumptions: that the CRTC approves the application and that it denies the application.

16. Insofar as financial projections are concerned, Broadcasting and Telecom Information Bulletin CRTC 2010-961 set out “a list of examples that can generally be designated as confidential” under the *Rules of Practice and Procedure*. The *Disclosure Guidelines* set out in the 2010-961 Appendix provide that financial projections and assumptions regarding the years remaining in the current or prospective licence term of the operations that are the subject of an amendment application are not confidential, but public. BTIB 2010-961 explains that in case such as this application, the applicant “can confirm its designation of the information as confidential, in which case ... it is not considered by the Commission.”

C. *Impact on human resources*

17. In Broadcasting Decision CRTC 2024-104 the CRTC expressed its sensitivity to the potential impact on staff of reducing local weekly programming from 18 to 16 hours but noted that Québecor’s maintaining a production centre in Québec would ensure that the program-production staff remain at the station:

53. The Commission is sensitive to ... the ... concerns about the possibility that the removal of weekend newscasts may cause the station to reduce staff on weekends. However, the Commission notes that TVA is not proposing to change the total number of hours of news produced in Québec, since the current requirement to broadcast at least five hours and 30 minutes of news produced in Québec per broadcast week would be maintained.

54. Therefore, should the request be approved, TVA would still be required to maintain a production centre in Québec, including the presence of journalists and editorial decision-making, which would ensure that the staff working on program production would remain at the Québec station.

55. The Commission also notes that, in the event that TVA were to replace the newscasts produced by the Québec station on the weekends with another type of programming or news from the TVA network, the licensee would nonetheless have to compensate for the broadcast of newscasts produced in Québec on the weekends by the broadcast of a greater number of hours of news produced in Québec during the week.

56. In light of the above, the Commission is of the view that the removal of the requirement to broadcast two newscasts produced in Québec on the weekends on CFCM-DT would have a limited impact on news programming and on the

workforce of the Québec station, while providing the licensee with certain relief enabling it to cope with a difficult financial situation. ...

....

18. Québecor's current application states that the least damaging option that it has identified for CFCM-DT Québec concerns the reduction of the station's program production,¹⁹ suggesting that Québecor had considered other options before settling on that set out in its application.
19. To enable members of the public and other parties to evaluate the advantages and disadvantages of approving or denying Québecor's application in light of the CRTC's rationale in Decision CRTC 2024-104, and to make informed comments about the application, FRPC requests that the CRTC ask Québecor to

Request C(i): clarify the impact on the CFCM-DT Québec workforce if the CRTC approves its application

Request C(ii): set out details of the other options it considered before settling on the changes it proposes in its current application.

II. Request that Commission reconsider grant of confidentiality

20. On 4 February 2026 Québecor asked the CRTC to grant confidentiality to the "CONF-Demande de la Partie 1 – CFCM" document.²⁰ The CRTC apparently granted this request as and Québecor has redacted four terms from the public version of its application:

Pour l'année 2024-2025, la station a ainsi dû conjuguer avec des recettes de seulement #CONFIDENTIEL#, largement en dessous de ses dépenses de programmation et de production de #CONFIDENTIEL#, auxquels s'ajoutent environ #CONFIDENTIEL# d'autres dépenses d'exploitation. Or, face à des pertes annuelles de près #CONFIDENTIEL#, et ce, malgré les mesures d'atténuation adoptées jusqu'à présent, la station n'a d'autres choix que de poursuivre sa réflexion sur la manière de continuer à remplir sa mission et à répondre aux besoins et attentes de ses téléspectateurs, tout en assurant sa viabilité à plus long terme.²¹

[bold font added]

¹⁹ Québecor, *Objet : Demande de la Partie 1 – Modification des conditions de licence applicables à la station CFCM-DT Québec de Groupe TVA inc.*, DM#4960766, paragraph 22: "En l'espèce, l'option la moins dommageable identifiée par Groupe TVA, concerne la réduction du niveau de production de la station pour répondre à l'explosion des coûts, d'où la présente demande de réduction du nombre d'heures de programmation locale."

²⁰ Québecor, *Objet : Demande de la Partie 1 – Modification des conditions de licence applicables à la station CFCM-DT Québec de Groupe TVA inc.*, DM# 4960764, page 1.

²¹ Québecor, *Objet : Demande de la Partie 1 – Modification des conditions de licence applicables à la station CFCM-DT Québec de Groupe TVA inc.*, DM#4960766, paragraph 18, highlighting added.

21. Québecor stated that disclosure of this information “could cause significant financial losses to the company and harm its competitiveness” and that disclosure was not in the public interest:

4 February 2026 (DM# 4960764)	English-language version
<p>En effet, ce document présente des données stratégiques sensibles. Il s’agit de renseignements commerciaux de nature confidentielle qui sont traités comme tels de façon constante par Groupe TVA. Nous sommes d’avis que la divulgation de ces renseignements pourrait causer des pertes financières appréciables à l’entreprise et nuire à sa compétitivité. Ainsi, la divulgation de ces informations n’est pas dans l’intérêt public. Par conséquent, ce dernier serait mieux servi si les renseignements identifiés comme tels étaient traités de façon confidentielle.</p>	<p>This document contains sensitive strategic data. It consists of confidential commercial information that is treated as such by TVA Group on an ongoing basis. We believe that disclosure of this information could cause significant financial losses to the company and harm its competitiveness. Therefore, disclosure of this information is not in the public interest. Consequently, the public interest would be better served if the information identified as such were treated as confidential.</p> <p>Translation by DeepL</p>

22. In 2022, however, the CRTC’s staff considered a similar rationale provided by Québecor in seeking confidentiality:

This is confidential business information that is treated as such on an ongoing basis by Vidéotron and TVA. We also believe that disclosure of this information would cause significant financial loss to the parties involved and would harm their competitiveness. Thus, disclosure of this information would not be in the public interest. Therefore, the public would be better served if the information identified as confidential were treated as such.²²

23. The CRTC’s staff found that Québecor did not provide

... a sufficiently specific rationale to justify that the disclosure of this information would directly cause specific harm and that such harm outweighs the public interest, nor has it explained how the information at issue meets the criteria in the appendices to Information Bulletin 2010-961.²³

24. The 2022 matter involved the disclosure of described video titles and hours and Québecor described the information that the CRTC subsequently ordered it to disclose, as “confidential business information”.

25. In the current application Québecor is asking for the CRTC’s permission to halve the hours of local programming made available by Québecor to people in the city of Québec. In 2024 the Commission described news as “a fundamental element of the broadcasting system” and stated that local television news – included in local programming - provides “timely and

²² Director, Social and Consumer Policy, Consumer and Strategic Policy, CRTC, *Re: Request for Information regarding availability of Described Video on video-on-demand Services – Request for disclosure of electronic information designated as confidential*, (Ottawa, 31 October 2022).

²³ *Ibid.*

fact-based information” to the communities served by local television programming services.²⁴

26. Disclosure of details about CFCM-DT Québec’s historic and projected news, local programming and production and other operating expenses would enable the public and other interested parties to understand and evaluate Québecor’s selection of this option, enabling them to make informed comments about the application.

Request II(i): FRPC requests that the CRTC reconsider its decision to grant confidentiality to the extent already approved and to require Québecor to disclose the evidentiary foundation of its argument that its only option is to reduce local programming in the capital of the province, rather than any other expenditures (such as foreign programming expenditures) of the company .

Request II(ii): Finally, FRPC asks that the CRTC expedite and make available its answer to this procedural request no later than 10 March 2026 – seven calendar days before interventions are now due in the proceeding. Delays past that date will render parties’ response to the Commission’s decision ineffectual.

27. Finally, and although FRPC has set out a number of specific procedural requests regarding Québecor’s application, it is unknown if the CRTC will proceed with the consultation on local news announced in its 8 November 2024 *Regulatory Plan to modernize Canada’s Broadcasting Framework*. If so, the Commission should consider suspending this application process due to prematurity.

Thank you for your consideration of this request.

Sincerely,



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²⁴ *The Path Forward – Supporting Canadian and Indigenous content through base contributions*, Broadcasting Regulatory Policy CRTC 2024-121 (Ottawa, 4 June 2024), at paragraphs 116-117.