



**Canadian
Association of
Broadcasters**

**L'Association
canadienne des
radiodiffuseurs**

December 6, 2005

Sent via email

Ms. Diane Rhéaume
Secretary General
Canadian Radio-television
and Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Ms. Rhéaume:

Re: Broadcasting Public Notice CRTC 2005-100: Application No. 2005-0917-7 by Jim Pattison Broadcast Group Limited Partnership to amend the licence of CFJC-TV Kamloops (PN 2005-100)

1. The Canadian Association of Broadcasters (CAB) – the national voice of Canada’s private broadcasters, representing the vast majority of Canadian programming services, including private television and radio stations, networks and specialty, pay and pay-per-view television services – is pleased to submit this intervention concerning the above-noted application.
2. The applicant, Jim Pattison Broadcast Group Limited Partnership (JPBG) proposes to disaffiliate its television programming undertaking CFJC-TV Kamloops from the English-language television network of the Canadian Broadcasting Corporation (CBC), effective January 2, 2006.
3. The current situation of conventional television is such that there is cause for concern about the continued provision of local programming, particularly in small and medium-sized markets. In the past, affiliation of local stations with the CBC network has been a contributing element in the provision of local programming. In some communities, affiliation continues to bring benefits in this regard; in others, it may be that disaffiliation has become a necessary step to sustain local service.

4. The provision of local programming is central to the achievement of the objectives of the *Broadcasting Act*. In numerous proceedings over the years, the CAB has consistently recognized the importance of local reflection and has advocated measures that support the ability of privately owned conventional television broadcasters to serve their communities. For example:

The provision of local service is the foundation of the broadcasting business. To be relevant and successful, private broadcasters must address the needs and interests of their local viewers and listeners.¹

...the Commission should use the opportunity of this licence renewal hearing ...with a view to examining what additional measures should be adopted by the Commission to ensure the continued provision of local and regional television services in all markets currently being served.²

5. This application by JPBG is premised on the particular circumstances of the Kamloops market, as described in the application, and is intended to provide CFJC-TV Kamloops with the necessary tools and resources to continue to provide a high level of local service to its viewers.
6. Given these circumstances, and taking into account the fact that both JPBG and the CBC have reached agreement on the proposed disaffiliation, the CAB submits that approval of the application to disaffiliate CFJC-TV from the CBC English-language television network is warranted and in the public interest.

Yours sincerely,



David Keeble
Senior Vice-President
Policy and Regulatory Affairs

c.c. CFJC Television (via email rarnish@cfjctv.com)

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¹CAB submission to the House of Commons Standing committee on Canadian Heritage with respect to: *A Study on the State of the Canadian Broadcasting System*, paragraph 109, September 10, 2001.

² CAB interventions re the licence renewal applications of Bell ExpressVu and Star Choice, September 25, 2005.