



Sent via Intervention Form

25 June 2024

Marc Morin
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

**Re: Comments of the Canadian Association of Broadcasters with respect to
Online News Notice of Consultation CRTC 2024-111
*Call for comments – Proposed Cost Recovery Regulations***

1. As the national voice of small, medium and large Canadian privately-owned and controlled radio, TV and discretionary broadcasters both independent and vertically integrated, including those operating under 9.1(1)(h) distribution orders, the Canadian Association of Broadcasters (CAB) is pleased to provide its comments on the Commission's proposed *Cost Recovery Regulations* (the Regulations).
2. The CAB is writing to support the Commission's proposals.
3. Under section 81 of the *Online News Act* (the Act), the Commission has the authority to make regulations regarding the charges payable by operators to recover its costs associated with the administration of the Act. Operators are defined as an individual or entity that operates a digital news intermediary, which in turn is defined as:

an online communications platform, including a search engine or social media service, that is subject to the legislative authority of Parliament and that makes news content produced by news outlets available to persons in Canada.
4. It is clear that Parliament intended for operators and not news businesses, to cover the costs incurred by the Commission in relation to the administration of the Act. We acknowledge and appreciate the Commission's clear statement that no charges will be collected from news businesses.

5. That said, on behalf of its members, the CAB is seeking reassurance that none of the fees broadcasters pay under the *Broadcasting Fees Regulations* will be used to fund work undertaken in relation to the *Online News Act*.
6. Finally, we recognize that the proposed model for calculating initial amounts and annual adjustments is based on the Commission's longstanding approach to the collection of broadcasting fees. We agree that revenue is a reasonable proxy for determining the allocation of costs amongst operators. And we support the Commission's intent for the new regime to be in place by 1 April 2025, in time for its implementation in the 2025-26 fiscal year.
7. All of which is respectfully submitted.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Desjardins', with a stylized flourish at the end.

Kevin Desjardins
President

*** End of document ***