



Sent via Intervention Form

18 November 2024

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

Re: Reply comments of the Canadian Association of Broadcasters with respect to Broadcasting Notice of Consultation CRTC [2024-202](#)
Call for comments – Guidelines regarding consultation and engagement practices in proceedings relating to official language minority communities and official languages

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 stations serving official language minority communities (OLMCs), the Canadian Association of Broadcasters (CAB) is pleased to provide its reply comments on the above noted consultation process.
2. Having reviewed the record, the CAB urges the Commission to find the delicate balance between supporting OLMCs and French-language speakers and ensuring the timely release of important decisions. We fully respect that under the revised *Broadcasting Act* (the Act) and the government's direction to the CRTC, as well as the recently updated *Official Languages Act*, the Commission must consult with OLMCs on broadcasting matters that impact them. At the same time, we are sensitive to any additional burden that additional consultation may impose, and the risks of extending the timeframes on important processes to implement the Act, bring foreign streamers into the framework, and recalibrate the obligations of Canadian radio and television stations and services.
3. Despite comments to the contrary, the CAB agrees with those parties that argued that the feedback of OLMCs/French-speakers can be properly canvassed as part of the Commission's existing practices and procedures, particularly given the important outreach work the Commission is doing to ensure OLMC groups are aware of proceedings that may impact them.

4. Further, if and as necessary, the Commission already has mechanisms in place to consider requests for an extension of time, with such extensions applying fairly to all parties.¹
5. Several OLMC groups have also recommended additional consultation over-and-above the Commission's formal consultation processes. We are concerned that this will result in consultation paralysis, especially if such additional consultation opportunities are created for every special interest group. While we agree that the Commission needs to be made aware of the unique and specific concerns of a variety of interest groups (including private broadcasters), it cannot spend all of its time engaging with and consulting both formally and informally with each and every one and still be able to issue decisions on a timely basis.
6. The Commission's planned engagement strategy, as set out in the appendix in the notice, including the creation of a contact list of interested parties and the existing CRTC-OLMC Discussion Group, will be sufficient to ensure that OLMCs and French-speaking minorities are aware of CRTC processes and can participate in them fully, without additional processes and separate deadlines.
7. All of which is respectfully submitted.

Yours sincerely,



Kevin Desjardins
President
Canadian Association of Broadcasters

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¹ We would also like to dispel the myth that private broadcasters have significantly greater resources at their disposal to participate in regulatory proceedings. While some of the larger broadcaster certainly have staff with regulatory expertise, the vast majority of radio and television stations do not, and the CAB itself has a very small team.