

FILED ELECTRONICALLY

October 27, 2010

Mr. Robert A. Morin
Secretary General,
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Re: Broadcasting Notice of Consultation CRTC 2010-715, Application No. 2010-1379-7: Application by Bluepoint Investments Inc. for authority to acquire from Saskatchewan Communications Network Corporation, the assets of Saskatchewan Communications Network (SCN)

Dear Mr. Morin,

1. The DOCUMENTARY ORGANIZATION OF CANADA | L'ASSOCIATION DES DOCUMENTARISTES DU CANADA (DOC) is the collective voice of independent documentary filmmakers across Canada. DOC is a national non-profit arts service association representing over 800 directors, producers and craftspeople in the documentary community, from all provinces and regions of our nation. DOC advocates on behalf of its members to foster an environment conducive to documentary production, and strives to strengthen the sector within the broader film production industry.
 2. DOC's membership has a strong relationship with SCN, and so we were troubled at the prospect of its closure, and relieved to learn that it would remain open. DOC strongly supports Bluepoint Investment Inc.'s (Bluepoint) application to acquire the licence of the Saskatchewan Communications Network from the Saskatchewan government.
- SCN's contributions**
3. Over the last 20 years, SCN has been a cornerstone of regional and educational programming for Saskatchewan. It is a key driver of independent documentary production in the West and across Canada. It has triggered millions of dollars of economic growth in the film and television production community. According to SCN's programming department, every dollar invested by SCN triggered a 6-9X economic multiplier. As such, SCN has acted as a watershed for economic activity, regional representation, and cultural production.
 4. SCN is an integral part of the documentary production community and has nurtured new talent. Many of Canada's internationally acclaimed documentarians got their start at SCN. As a small broadcaster, it has provided critical

opportunities for emerging filmmakers who have then gone on to become award-winning producers.

- Daniel Cross of Eyesteelfilm made his first three films with the support of SCN licence fees.
- Anand Ramayaa got his start at SCN. Anand has produced Gemini-awarded programs such as the *Wapos Bay* children's series, and the *Cosmic Current* documentary that also received the National Film Board's Reel Diversity award.
- Ian Toews, producer of the arts and nature documentary series, *Landscape as Muse*, began his career with SCN's help.
- Chris Triffo, the president of Partners in Motion, launched his career at SCN. Partners in Motion is a multi-dimensional, multi-purpose entertainment entity engaged in the development, production and distribution of comprehensive, award-winning media programming distributed in more than 150 countries and 30 languages.
- Lori Kuffner, president of Cooper Rock Pictures Inc, started filmmaking at SCN. The productions of Cooper Rock Pictures have been broadcast around the world and have triggered funding from broadcasters all across Canada.

5. SCN continues to be a nexus point for new and emerging talent: Steve Suderman, producer of *Overland*, and Ben Lies, producer of *The Regina Riot*, recently made their first features with SCN licence fees and support.
6. Although SCN is not the largest broadcaster in Canada, its licence fees have contributed to the production and success of many famous and internationally acclaimed documentaries: *The Corporation*, *McLuhan's Wake*, *A Promise to the Dead*, and *Citizen Black*. Many other popular documentary series and features could not have been made without the support of SCN including: *Mad Cow Sacred Cow*, *Silent Bombs: All for the Motherland*, *A Few Good Men and Women*, *Radical Dreamer*, and *One Year and 40 Acres*.
7. SCN is an entry point to the industry and also an investment partner for large projects. SCN's licence fees by themselves cannot trigger major funds, but it has worked with other educational broadcasters to access funds such as the Rogers Documentary Fund, and the (then) CTF, which has brought millions of dollars of production investment into Saskatchewan. These contributions have created regional stories about Saskatchewan, but also international trans-media projects such as *Inside Disaster*. As for pan-Canadian stories, SCN has been a strategic link between Eastern and Western Canadian Educational Broadcasters to create cross Canada broadcasts of documentary films, which would not have been otherwise broadcast by national broadcasters.

8. With the consolidation of media properties, and the reduction in documentary commissioning, Canada's current documentary production financing model is being eroded as the number of broadcast licencing windows dwindles. Fewer broadcasters are able to provide sufficient licence fees for documentary production. Already in 2010, producers could not find broadcasters for their projects funded by the POV fund. In this landscape, smaller broadcasters such as SCN, continue to commission POV and auteur documentaries addressing themes that are international, as well as regional and Canadian, in scope. SCN actively contributes to the health of the Canadian documentary community through its continued support for documentary production, and as an arena where new producers can innovate and launch their careers in the media production industry.

Bluepoint's Programming Strategy

Exhibition of Canadian Content

9. Bluepoint plans to maintain SCN's educational mandate, but proposes to derive its revenues from advertising. In order to attract advertisers, Bluepoint will air popular programming during prime time. However, Bluepoint has also indicated that it will maintain its Canadian content quotas: 60% of all content overall must be Canadian, and 50% in prime time must be Canadian. Given the restrictions of maintaining an educational mandate and the inherent programming the mandate entails, DOC is certain that SCN will do its best to strike a balance between its commercial needs and its conditions of licence.

Regional and Canadian Content Expenditures

10. DOC is pleased that Bluepoint plans to spend on average \$1.75 million per year on Saskatchewan-based production. This commitment counters the trend toward centralization that has emerged over the last 10 years. The presence of a broadcasting commissioning department in Saskatchewan supports production, but having a broadcaster located in the region and dedicated to Saskatchewan programming is ideal. Saskatchewan has an emerging film and television production industry that requires such stable commitments to ensure its growth. Saskatchewan-based productions also trigger funding from across Canada through partnerships with other broadcasters. The annual programming commitments will exploit the great talent of Saskatchewan's film and television industry, while encouraging further investment in the province.
11. SCN's track record also shows that it has often commissioned productions in other provinces by teaming up with Knowledge Network and TVO. DOC expects this practice to be maintained allowing SCN to make the most of the funding opportunities across the country.

Digital Programming Expenditures


12. As digital and emerging media revolutionize business models and create new markets for broadcasters and producers, DOC welcomes Bluepoint's strategy to spend \$1 million per year on digital media. Across the country, Canadians are accessing content through digital platforms, and using interactive digital media to tell stories. Bluepoint's programming expenditures on digital media will allow for Saskatchewan to represent itself to Saskatchewan and the world in new and innovative forms.

13. In addition, Bluepoint's commitment to digital media allows for SCN to support digital media components for independent producers by offering licence fees that can trigger CMF funding for digital components. Moreover, SCN can provide financing to support applications to CMF's experimental stream. This will contribute to the growth of interactive digital media industry in the region, and foster new investment for digital media in the region.

Conclusion

14. Bluepoint's strategy for the operation of SCN supports regional production as well as documentary production, which currently lack strong support from other major players. DOC fully endorses this transfer of the licence, and hopes that the Commission will share that view. The revitalization of SCN is good for Saskatchewan, independent production, regional representation, and documentary production community all across Canada.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Christou', is written below a horizontal line.

John Christou
Chair

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