

February 1, 2010

Mr. Robert A. Morin  
Secretary General,  
Canadian Radio-television and  
Telecommunications Commission  
Central Building, Les Terrasses de la Chaudière 1  
Promenade du Portage  
Gatineau, Quebec K1A 0N2

**Re: Broadcasting Notice of Consultation CRTC 2009-661, Community  
Television Policy Review**

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. We are writing to the Commission to support the intervention of the Canadian Association of Community Television Users and Stations (CACTUS), but we have some reservations. We believe that the majority of the submission has merit, however there are some points with which we disagree and would like to express our concerns regarding community television policy in that context.

**Community Television and Documentaries**

3. Since its inception, community television has fostered Canadian information and documentary programming talent. Before the revisiting of community television by the Commission in 1997, many regional community television stations created long-form journalistic documentaries. The content in these documentary programs was locally relevant and usually not commercially viable. Community television provided an outlet for public participation and niche programming outside of the private and public conventional services.

4. However, following the reevaluation of the policy in 1997 and the subsequent changes to the operation of the community channels, BDUs started to streamline costs and production, resulting in a reduction in informational programming of local relevance. By allowing the BDUs to make use of the channels for their competitive advantage, the BDUs chose to standardize programs according to their vision and not the communities. Meanwhile, the Commission had not instituted any kind of financial return or requests for financial returns from the BDUs by which the operation of the community channels could be held publicly accountable.

5. Presently, there are fewer and fewer places for future Canadians, especially documentarians, to learn the skills necessary to develop, produce, commission, and program television programming. Community television provides an environment that fosters these talents without the risk of financial loss. As the broadcasting license hearings of 2009 highlighted, it is becoming increasingly difficult for private conventional and public conventional broadcasters to produce local content. Community television is one of the last places for local programming of an informational nature. In a broadcasting system where local programming is in crisis, as is documentary programming, allowing for one tier of the system to operate unmonitored and not for its intended purpose is a great loss for the Canadian public.

### **CACTUS' Intervention**

6. DOC agrees with CACTUS that if the BDUs are not held accountable for the \$108M they spend on community television, the system is not operating for its maximum efficacy and purpose. DOC supports the proposal that the BDUs provide annual reports to the Commission outlining their expenditures on programming and how the community uses the station, similar to the way the private OTA broadcasters do. The BDUs could file annual reports that delineate how the community is taking part in the operation of the channel and how it is living up to community television policy. Such measures would increase the accountability of the BDUs and allow for increased public scrutiny of the channels that are for its use.

7. Furthermore, in order for the Canadian public to take full advantage of the digital frontier, the services provided by the BDUs for community broadcasting should include training and access for new media and other digital platforms. The community will be able to take advantage of the synergies developed by the BDUs over the last 10 years to further community involvement and professional development.

8. We see merit in a fund that provides support for community programming, whether accessible by community groups or local independent producers. Given the severe reduction in local programming by local conventional TV stations, many trained production personnel are without work and have no access to opportunities to continue to make vibrant local programming. This is indeed an area where community channels could provide valuable support. However, without further details, at this time DOC is not prepared to support the CACTUS proposal for the creation of a community access media fund (CAMF) and for handing over effective control to the communities rather than the BDUs. Presently, we find the plan for community control is vague and requires further thought, and the details of the operation of the CAMF are not sufficiently described. DOC would be pleased to provide further comments in this area should more information become available. We do endorse increased monitoring of the BDUs operations of the community stations as well as the continued involvement of the local community in the programming operations.

9. DOC also supports the CACTUS proposal to set up multi-platform community access production centres that would be within reach of every Canadian: a place where culture and the arts can be showcased without time limits, and without discrimination against smaller, less known or alternative voices and forms of expression.

10. Finally, we support the proposition that the distribution of community television, whether over the air, on cable, the Internet, or on satellite, needs to be protected, so that communities can participate in broadcasting regardless of the technology. We are keenly aware of the difficulties for Canadian culture and the arts to get adequate time and coverage by the broadcasting system that is said to belong to all Canadians.

Thank you for this opportunity to comment on these issues

Sincerely,

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

John Christou  
DOC National Chair