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June 27, 2017

Ms. Judith LaRoque
Interim Chair
Canadian Radio-Television and Telecommunications Commission
Ottawa, Ontario, K1A 0N2

Dear Ms. LaRoque,

Re: CRTC 2017-160
Renewal of the broadcasting licences for terrestrial broadcasting distribution undertakings that will expire in May 2018

I Introduction

1. The Documentary Organization of Canada/Association des documentaristes du Canada (DOC) is submitting its comments with the respect to the licence renewal applications of certain terrestrial broadcasting distribution undertakings.
2. DOC is the collective voice of independent documentary filmmakers across Canada, a national non-profit arts service organization representing over 700 directors, producers and craftspeople from all provinces and regions of the country working in the documentary genre. 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 and television production industry. In so doing, DOC seeks to ensure that viewers in Canada and abroad have access to high quality, original programs reflective of current Canadian events, lives and values.

II General Comments

1. DOC wishes to stress the importance of funding from the Canadian Media Fund to independent Canadian documentary producers. In 2015-16, English language documentaries received 24% of CMF funds. French language documentaries received 23%. It is critical for DOC that in renewing the licences for terrestrial BDUs, the Commission ensures that there is no diminution in the contributions from terrestrial BDUs to the CMF. In this regard, DOC notes and

supports the Commission's strong action with respect to those BDUs who were shown to have failed to live up to their regulatory requirements. Effective monitoring of licensee's performance is an essential part of a healthy regulatory regime, as is rapid enforcement.

2. DOC also notes that part of the terrestrial BDUs contribution to Canadian programming can be directed to local programming. These contributions can benefit DOC members who work with local and regional broadcasters. Again, it is important that the Commission ensure in this proceeding that there is no reduction in the licensee's requirements to support local programming.

III Conclusion

1. DOC appreciates this opportunity to comment on this proceeding. DOC does not request to appear during the oral phase of the hearing.

Thank you for giving our comments due consideration.

Sincerely,



Judy Gladstone
Executive Director

cc. Nadine Pequenezza, Chair, Board
Joanne Levy, Chair, Advocacy Committee