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March 6, 2019

Mr. Claude Doucet
Secretary General,
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mr. Doucet,

Re: Broadcasting Notice of Consultation CRTC 2018-488: Call for comments on a production report to be completed annually by large English- and French- language ownership groups

A: Introduction

1. The Documentary Organization of Canada/Association des documentariste du Canada (DOC) is submitting its comments with respect to Broadcasting Notice of Consultation CRTC 2018 – 488.
2. DOC is the collective voice of independent documentary filmmakers across Canada, a national non-profit arts service organization representing over 750 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.
3. Documentary programs, created by Canadians for Canada and for the world, have been at the heart of our film & video culture for at least 70 years. From the beginnings of the

CBC and the NFB to today's multi platform digital environment, documentaries have revealed and explained Canadians and Canadian sensibilities to the world and the world to Canada.

4. With support from consumers, governments and the regulator, Canadian documentary producers are continuing this critical role for Canadians – a role that clearly fulfils each part of Section 3 (1) (i) of the Broadcasting Act.
5. DOC appreciates that the Commission has recognized that the large group television licensees must provide the Commission and the Canadian public with annual, detailed reports setting out how they have contributed to the creation and distribution of original Canadian programming. These reports must also be in a consistent format so that both the Commission and interested parties are able to determine how the system as a whole is performing as well as how individual groups are meeting their obligations.

B: Comments

1. The Commission has proposed to add to the creative roles identified in Broadcasting Decisions 2017-143 and 2017-148 the role of “show runner”. DOC supports the inclusion of the “show-runner” and adding this role to the production information report.
2. With respect to the information proposed by the Commission in the appendices attached to BNC CRTC 2018-488, DOC is generally pleased with format and extent of the information being requested. We note that while Appendix 4 seeks appropriate information regarding programs of national interest (PNI) there is no specific table that demonstrates how the licensee has met its PNI conditions of licence. This information can be extracted from Appendix 4 as long as the information is submitted in a common format accessible by the public. The Commission needs to be clear as to what this format must be.
3. In Appendix 4 the Commission seeks, for each production, information as to whether the producer is an “independent producer”, an “affiliated producer” or it is an “in-house” production. DOC considers that it is vital that the Commission clearly define these terms so that interested parties are able to check the accuracy of the information submitted. Further, DOC requests that parties have an opportunity to comment on the Commission's proposed definitions prior to the publication of the final Production Report.
4. Also in Appendix 4, under Producer Information, there is a column headed “Region”. It is not clear to DOC whether this is seeking the region where the production company is

head quartered or the region where the production took place. DOC considers that it is important for the public to know where the production company is based as well as where the principal photography took place. This is particularly relevant with respect to projects produced by indigenous producers where it will be important to understand which first nations are being reflected on television.

5. DOC notes that in Appendix 1 the territories (Yukon, NWT and Nunavut) are included with the British Columbia region. This is not a useful or appropriate way understanding the reality of Canada. DOC proposes that there be a separate region for “Territories” with sub-headings for Nunavut, NWT and Yukon.
6. DOC recognizes the critical importance of the information being sought in this Production Report. DOC, therefore, considers it appropriate that, following its consideration of the comments received in this proceeding and prior to publishing the final report, parties be provided the opportunity to submit a final round of written comments.

Sincerely,

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

Mathieu Pierre Dagonas
Executive Director | Directeur Général
Documentary Organization of Canada | Association des documentaristes du Canada