

Filed Electronically

14 June 2024

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

Dear Mr. Morin:

Re: Call for comments regarding proposed CRTC orders imposing conditions of service and expenditure requirements relating to base contributions applicable to online undertakings carrying on audio-visual activities - Broadcasting Regulatory Policy CRTC 2024-121 (BRP 2024-121)

1. These are the comments of the Documentary Organization of Canada (DOC) regarding the above-noted matter. DOC appreciates the opportunity to file these comments. The Documentary Organization of Canada (DOC) is the collective voice of Canada's independent documentary creators. Founded in 1983, DOC has grown to 1,200 members across six chapters from coast to coast. DOC's mandate is to advocate for an equitable, sustainable environment for documentary production and to strengthen the sector within the broader cultural industry.
2. DOC applauds the CRTC for its landmark policy decision set out in BRP 2024-121 which will help set the course toward a thriving future for Canadian culture. This newly released policy determination requires online undertakings to contribute 5% of their previous year's annual revenues to Canadian and Indigenous content. Nurturing Canadian and Indigenous content creators by providing funding for their home-grown content provides tremendous benefits to Canadians, Indigenous creators, and the global audiences who appreciate our work.
3. While BRP 2024-121 is an important and historic Commission ruling, DOC is very concerned that there is no mention of documentaries in this policy determination, or their importance to our cultural landscape. Indeed, BRP 2024-121 sets out no specific

requirements to support the development, creation and production of this important form of Canadian and Indigenous cultural expression.

4. Regarding the Commission's call for comments on proposed Conditions of Service set out in BRP 2024-121, DOC respectfully proposes the following two recommendations that relate to online undertakings providing audio-visual services:
 - i) Include in Condition of Service #1(a) a requirement that the 1.5% incentive must be spent on original certified Canadian content in accordance with the definition used by the Canada Media Fund that is content in need of regulatory support, including long-form documentary productions.
 - ii) To ensure stable and predictable funding for the important funds identified in BRP 2024-121, as well as ensure contribution payments are made on a timely basis, amend Condition of Service #1 to require online-undertakings to make their required contributions on a monthly basis, starting in the month of September, rather than by the end of each broadcast year as currently proposed in the draft Conditions of Service. This is consistent with the Commission's approach in the *Broadcast Distribution Regulations* which requires broadcasting distribution undertakings to make their contributions to production funds on a monthly basis starting in the month of September during each broadcast year.
5. DOC appreciates the opportunity to file these comments. We look forward to reviewing the public record in this proceeding and providing updated comments by **2 July 2024**.

All of which is respectfully submitted.

Sincerely,



Sarah Spring
Executive Director, Documentary Organization of Canada