

February 16, 2016

Danielle May-Cuconato
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Ms. May-Cuconato,

**Re: CRTC 2015-421-4
A Review of the policy framework
for local and community television programming**

1. ELAN would like to take advantage of this opportunity for final comments to clarify issues discussed at our oral presentation.

Objective: a stand-alone English-Quebec community channel

2. In terms of our request for a stand-alone English community channel, the OLMC in Quebec needs such a channel as we stated in our intervention. We continue to request such a channel not only in Montreal, but across Quebec. However, we “softened” our request in our oral presentation for several practical reasons.

3. We believe there is not enough programming money in the system to meet the objectives of Section 3 of the *Broadcasting Act*. Therefore, funding community or local TV from existing resources will hurt some part of an already underfunded system. The Commission has repeatedly said it will not consider new funding to support local or community TV, and believes funding local or community TV is a matter of re-allocating money from one part of the system to another part. An

OLMC community channel would require either new money or existing money that now goes to the Canada Media Fund.

4. As we stated in our intervention, we believe an OLMC community TV channel should be funded from 2% of the BDU revenues. This 2%+2% policy has been implemented in Ottawa and Moncton for the French minority. It should be implemented in Montreal. However, we are extremely reluctant to reduce BDU funding for the Canada Media Fund. Therefore, new funding from some source would be needed to replace the 2% of Videotron revenues that would otherwise go to the CMF.

5. With sufficient funding, we believe an OLMC community channel in Montreal, and across Quebec, would have the talent and resources to be a tremendous success. It would greatly add to the vitality of the OLMC. We do not believe the CRTC will institute the policies necessary to properly fund such a channel. Therefore, we need to look to alternatives.

6. Since September, Videotron has allocated 20% of the time and programming budget of MATV to English content. We believe this strategy has been successful, and should be continued with changes to MATV to make it more responsive to the community as a whole.

Governance: increasing community channel independence

7. As we stated in our intervention and our oral presentation, we believe there should be shared responsibility for the operation of the community channel between representatives of the community, and the BDU.

8. We believe this could be done with the establishment of a board of directors to oversee the community channel. Half the members of this board would be nominated by the BDU. Half would be nominated by independent community organizations operating within the territory of the channel.

9. This board would have the authority and responsibility to manage the community channel's revenues and budget. It would publish an annual report.

10. To make this transition, we suggest that the BDU and the current and future Consultative Committees be tasked with identifying independent community organizations which would constitute a representative and diverse interim board. The BDU and the interim board would assure the creation of a governance structure for the community channel including public membership, Annual General Meetings and a transparent nominating process, all of which would be implemented within a fixed delay. In the case of Montreal, 20% of the community board members should be OLMC representatives chosen by the umbrella OLMC organization- the Quebec Community Groups Network.

11. In addition to the board of directors to oversee the channel, there should be a consultative or advisory programming committee. This Committee would ensure that access programming represents the various elements of the community.

12. Finally, we believe the existing management and staff of the channel should remain in place subject to normal oversight by the board of directors.

Reaching out: extending English-language community TV across Quebec

13. On January 26, Commissioner Simpson asked us about the needs of the official language minority communities outside Montreal.¹We proposed making English content available on different platforms, and through different distributors- including Videotron and Bell- to reach as many Anglophones throughout Quebec as possible. Instead of speaking of a 'channel,' which does not exist and is unlikely to exist, we used the term 'service' to indicate the content being created by Videotron and Bell, which can be made available to other regions and a larger audience.

¹2584 COMMISSIONER SIMPSON: And if they were to do that, if they were to participate in this to create an English channel to satisfy the 250,000 Anglophones in the rest of the province, are you proposing that this channel, which right now you're saying would be a Videotron product, would the idea then that it 'be carried on all BDUs throughout Quebec so that five would have to carry it?

2585 MR. RODGERS: Sure.

2586 COMMISSIONER SIMPSON: TCF and so on?

2587 MR. RODGERS: There is the linear aspect, but a lot of people are accessing their content through mobile devices, from platforms. From a community point of view, what we're most interested in is creation of quality content. So whether that's through Videotron, Bell, CBC, National Film Board, it then becomes available to the public via various platforms. I mean that's a service, so now we're talking about a service rather than a channel. But for us, getting the quality content to create about different, you know, fascinating people and stories, making it available is the first priority.

14. On January 29th, Quebecor appeared before the Commission. Commissioner Dupras asked if they could extend English-language service to the official language minorities across Quebec. Videotron manager Steve Desgagnés said:

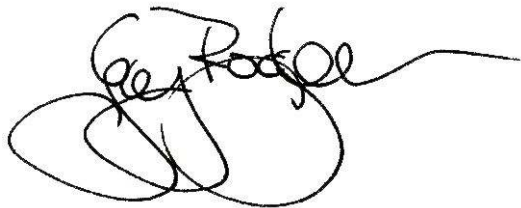
- C'est quelque chose qu'on peut examiner, oui.²

15. We welcome this opportunity to examine this issue. We would like to participate in any study of this question by Videotron, and we would like to ensure consultation includes members of the OLMCs to be served outside Montreal.

16. We also believe that this 'community' content should be available to the community without restriction or with minimal restriction. Bell has been making its community content available on-line to all, not just Bell subscribers. We would like to see Videotron and other BDUs make their community content available on-line with unrestricted access, after the shortest possible exclusivity period.

16. Thank you for giving us this opportunity to make our views known in this important, and wide-ranging, policy review.

Yours truly,

A handwritten signature in black ink, appearing to read "Guy Rodgers", with a long horizontal line extending to the right.

Guy Rodgers
Executive Director
English-language Arts Network

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²7766 CONSEILLER DUPRAS: O.k.

7767 J'en ai une autre ici que j'allais oublier là. Est-ce que vous entendez faire la même chose que Montréal?

7768 Peut-être pour ce qui est de l'accès aux minorités-là dans d'autres régions au Québec-là. Je pense aux Cantons de l'Est là, dans l'Outaouais, d'offrir un espace peut-être un peu plus important à la minorité officielle?

7769 M. DESGAGNÉS: Parlez-vous au niveau linguistique?

7770 CONSEILLER DUPRAS: Oui, c'est ça.

7771 M. DESGAGNÉS: C'est quelque chose qu'on peut examiner, oui.

7772 CONSEILLER DUPRAS: O.k.