

Friday, December 16, 2016

Danielle May-Cuconato
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Ms May-Cuconato

Re: Local 830M Final Submission to BNOC 2016-225 - Group License Hearing

I would like to thank the Commission for the opportunity to make an oral presentation to BNOC 2016-225 on December 1st, 2016.

After reviewing many of the presentations during the hearing stage I would like to make this final submission.

CITY TV 2016-0009-9

1. I am not convinced after reviewing Rogers presentation that there is enough information on the public record to make an informed decision as to what their plans are to achieve the goals of Broadcast Policy 2016-224.
2. In fact what little details were given indicated they were only prepared to spend an additional \$3 million outside of Toronto to produce 6 hours of locally relevant news programming. It is hard to believe this little funding will achieve the goals of well funded local news.
3. Rogers request to remove their requirement to provide "original" news must not be granted. We have seen Rogers repeat local programming many times over the years and count that programming as part of their locally relevant news programming. I don't believe this was the intention of Broadcast Policy 2016-225, so the original local news programming should be maintained.
4. Rogers reporting of local news content for the period October 2016 and November 2016 includes many repeat news items and likely contains Category 2b news segments from BT to come up with those numbers. Category 1 News takes significantly more resources to produce and is of much greater value to the community than Category 2b News.

How Many Reporters?

5. During my oral presentation, Commissioner Vennard asked me how many reporters I would consider should be employed to work on this new programming?
6. After consulting with many of my members we feel replacing the number of employees that were laid off last May 2015 would be a good start. This would allow Rogers to provide up to 20 editorial employees to provide locally relevant reporting on issues that are important to the people of Vancouver.
7. Sports packages and entertainment packages that are produced centrally do not contain locally relevant stories.
8. Sports reporting that is local covers collegiate, high school and lifestyle sports. The athletes that might not get coverage on Sportsnet.
9. Entertainment reporting that covers more than the latest Rogers TV series. Vancouver has a dynamic theatre, music and festival scene. We also have Canada's second largest film industry and a multi million dollar video gaming industry, all deserving of local news coverage.
10. Local municipal and provincial politics, health care issues, and crime are all "beats" that deserve more than headline treatment.
11. Additional field crews, videographers, video editors and other technicians would be required to provide high quality television that is presented when and where events happen.
12. During my written intervention I provided the number of employees who work at the other Vancouver market broadcasters, SHAW and BELL. I also provided detail membership lists that provided how many reporters worked at CKVU prior to Rogers taking control. There was also a membership list from May 2015 that detailed the list of employees that were fired, cutting overall employee numbers by half.

13. What is also of concern to my members is the CRTC decision to calculate historic spending based on the previous 12 months. At CKVU this gives an artificially low number due to the massive restructuring that left both CKVU and CHNM dramatically understaffed and incapable of providing high quality local news.

Victoria Bureau

14. Not having a reporter out of Victoria is a major deficiency. Rogers is the only Vancouver television station that doesn't have a reporter and a camera operator in the provincial capital.

OMNI BC 2016-0009-9

15. We are opposed to Rogers application to continue OMNI in BC without an OMNI Regional license (9-1-H).
16. When questioned if Rogers planned to continue doing their local current affairs programming without the 9-1-H, Ric Brace responded that they would for "a couple of years", but would review this if OMNI continued to lose money.
17. In Rogers August 25th response document they stated the following in paragraph 34: **(bold added)**
 - *Those interveners who have argued that OMNI Regional's commitments merely reflect the current conditions of licence applicable to OMNI's OTA stations have either not read our application closely or they have not examined OMNI's current conditions of licence. In our applications to operate OMNI Regional and to renew the licences of OMNI's OTA stations, we have made the following commitments, all of which exceed the current obligations established for our OTA stations:*
 - *A commitment to 80% ethnic programming (the current requirement for OMNI's OTA stations is 60%);*
 - *A commitment to broadcast 4 daily, national, 30 minute newscasts 7 days per week, in each of Italian, Mandarin, Cantonese and Punjabi languages **(there are no specific requirements for OMNI's OTA stations to provide newscasts);***

- A commitment to broadcast 6 daily, local 30 minute current affairs shows 5 days per week, in each of Mandarin, Punjabi and Cantonese language **(there are no specific requirements for OMNI's OTA stations to provide current affairs shows);**
- A commitment to produce and broadcast a weekly national cultural affairs series subtitled separately in the relevant third-language **(there is no requirement for OMNI's OTA stations to air such a program);**
- A commitment to broadcast 10 hours per week of local programming in Vancouver, Alberta and Toronto **(the current local programming requirement for OMNI's stations apply only in Calgary and Edmonton and are 3.5 hours and 1.5 hours, respectively);**
- A commitment to Canadian Programming Expenditures (CPE) of 40% and Programming of National Interest (PNI) of 2.5% **(there is no CPE or PNI requirement for OMNI's OTA stations);**
- A commitment to air 10 hours of local programming created by independent producers each week **(there is no requirement for OMNI's OTA stations to air programs created by independent producers);**
- A commitment to re-establish in-house production in all of the markets served by OMNI's OTA stations **(there is no requirement for OMNI's OTA stations do in-house productions);**
- A commitment to remove all U.S. "strip" programming that is not relevant to ethnic or third-language communities (there is no requirement for OMNI's OTA stations to eliminate U.S. strip programming);
- A commitment to limit the amount of U.S. programming exhibited on OMNI Regional to a maximum of 10% of the schedule each month (there is no requirement for OMNI's OTA stations to limit U.S.

programming); and

- *A commitment to offer 4 regional feeds that will be specifically tailored to ethnic Canadians living in B.C., the Prairies, Quebec and Eastern Canada (there is no requirement for OMNI's OTA stations to offer regional feeds).*

18. What concerns me about these statements is that Rogers does not consider even what little programming they are currently doing in Vancouver to be a condition of license. Considering this, Rogers would most likely leave Vancouver with no local programming before the end of a five year license?

OMNI Regional 2016-0377-0

19. My members enthusiastically support the granting of this mandatory carriage license.
20. Considering Rogers recent past, especially the way Rogers interpreted Broadcast Decision 2014-399 and the CRTC's resulting Decision 2016-8, we believe Rogers should be given clear conditions of license to require them to live up to the commitments they have made with this application.
21. Commitments made in paragraph 34 of their August 25th response letter should become conditions of license along with specific monetary requirements to ensure the programming is well funded and high quality.
22. In order to produce a high-quality Punjabi National News program it would require at least 20 employees. This would include journalists, assignment editors, news writers and producers, field cameras, video editors, and a scheduler/administration employee.
23. All OMNI news and current affairs programming should also be original, local, in-house programming.

OMNI's Advisory Boards

24. These boards should be restructured to live up to the goals of CRTC's Ethnic Broadcasting Policy. They should have worker representatives on them and in Toronto, Vancouver and Edmonton these representative should be chosen by the Unionized employees.
25. Minutes and agendas of these meetings should be available to the public on their web site.

Thank you for the opportunity to put these final comments on the public record.

Regards,

Stephen Hawkins

Local President, Unifor 830M

president@unifor830m.ca

604-317-2312