

February 26, 2014

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

Dear Mr. Traversy:

1. I am writing in opposition to Rogers Group Licence Renewal Application 2014-26
2. I am requesting to appear in person at the April 8th hearings or by video conference if the hearings are not held in Vancouver
3. Unifor Local 830M represents the Unionized employees at Citytv (CKVU) and OMNI BC (CHNM)
4. OMNI BC's operation employees joined our local when OMNI was relocated to Citytv's building in September 2010. We signed up OMNI's editorial employees this past spring and were granted a certificate by the CIRB on May 14th, 2013, this group was successfully negotiated into our Collective Agreement in the fall of 2013
5. Since signing on the air in 1976 with CKVU and 2003 with CHNM both stations have been controlled by multiple owners. Both stations have hit historic lows in local programming commitments under Rogers ownership
6. In 2001 CHUM Television purchased CKVU from Canwest for \$175 million and was rebranded Citytv Vancouver
7. In 2005 Citytv Vancouver had 111 unionized employees involved in locally produced programming and television operations that included daily news programs Breakfast Television, Citypulse at 6 PM & 11PM, City Cooks daily at 11, weekly magazine programs Ethnosonic and Diversecity
8. In 2004 Channel M employed over 120 employees involved in locally produced programming and television operations that included 3-hour daily prime time news in Cantonese, Mandarin and Punjabi (one hour each), plus weekly news in Tagalog and Korean (30m each), daily Chai Time (30m) and weekly Mandarin Magazine (60m), plus other life style shows such as FLOW YOGA, FUSION FARE in English for at least 3-4 seasons. All on-air promos were locally produced
9. In July 2006 Citytv Vancouver was sold to CTV Globemedia as part of CHUM televisions sale and 300 employees were laid off across Canada as part of a restructuring that shut down virtually all local daily programming in Winnipeg, Calgary, Edmonton and Vancouver, with the exception of the morning show, Breakfast Television

10. In 2007 Rogers Broadcasting purchased Citytv Vancouver as part of a series of station acquisitions and later that year purchased Channel M, CHNM, and rebranded the station OMNI BC
11. During CRTC hearings into these purchases Rogers assured the Commission they were intent on growing their broadcast operations with a commitment to local programming
12. Since Rogers took control of Citytv Vancouver our membership numbers have plummeted from 2005 numbers and today we have fewer than 60 members involved in locally produced programming and television operations
13. Over at OMNI BC the story is even more dramatic where only 35 people are involved in local ethnic programming
14. During a public hearing into the sale of Channel M on March 5th, 2008, Rogers gave many assurances they had no plans to reduce staffing levels at either Citytv Vancouver or at Channel M. To direct questions about employment levels from the Commission,
 1. Rogers executive Leslie Sole stated, "it is our intention that the people that are working at Channel M right now are needed, all and every one of them, and that with our new obligations to a new and revitalized City TV Vancouver, that for a period of time for our stations in British Columbia I think job losses are not likely on the horizon and, on the contrary, I think that to put Channel M online to meet some of the obligations for our renewal on City TV that we are likely looking at a modest increase in employment"
 2. Rogers executive Renato Zane in that same hearing stated: "it is not our intention to change any of the staff structure. We are very impressed. We look forward to possibly enhancing that in the future"
 3. Zane went on to say " the OMNI newsroom consists of 42 editorial staff, not counting the camera people or the editors or the studio people. We plan to hire about 20 people in Alberta and we currently have a staff of three people working for OMNI Alberta. It's very hard when you walk through that highly efficient, hardworking newsroom to imagine fewer people doing the work they do. Again, our purpose is not to cost-cut or reduce staff with some of these ideas. Our focus is on local service and we firmly believe that. What we are talking about is an enhancement to the kind of content that would be available to viewers in the Lower Mainland. And you cannot have good content without the right people in place. So it would be hard to imagine a smaller newsroom here in Vancouver"
15. Rogers went on to reduce programming and staffing levels at both Citytv and OMNI. For instance OMNI BC currently only has 4 people working on both local Chinese language shows and only one Chinese language field reporter at OMNI BC

16. I think it is important to consider that Rogers is a very successful company in no small part because it has repeatedly convinced the Commission that it is a strong Canadian company with a broad range of broadcasting operations, cable and internet distribution and telecommunications services. If Rogers can so easily give up its commitments with these licenses, can the Commission expect them to carry out their commitments for other licenses?
17. Rogers has no plans to have daily news coverage in either of its Alberta OMNI operations even though they intend on continuing to broadcast national programming and receive revenues from both Calgary and Edmonton. The Commission should suspend CJCO & CJEO licences until Rogers commits to providing those communities with the local daily ethnic programming they promised when the licences were granted only six years ago (CRTC Decision 2007-166)
18. What qualifies as local programming? On January 24th and 27th, 2014, Breakfast Television set an alarming precedent when BT broadcast both days with very little local content, instead Rogers used BT morning shows across the country to promote CITY's coverage of the Grammy Awards Show with many segments being hosted by Toronto hosts in Los Angeles. If this format was accepted by the Commission as "local programming" this would allow Rogers to dramatically reduce their Western Canadian operations in Winnipeg, Calgary, Edmonton and Vancouver and use robotic cameras and small news bureaus to do a national show with local "lipstick"
19. Conditions of licence that require local journalist and camera operators feet on the street are essential to reflect the local community
20. OMNI BC's Victoria bureau should be a condition of licence
21. While it may be true many new Canadians use the internet to stream video in their native language, that only proves there is an opportunity to use the internet to attract those new "eyeballs" to the local ethnic programming that is exclusive to OMNI.
22. In fact if on-line delivery is really such a threat to Rogers Over The Air broadcast operation, who else is in such a good position to take on that challenge; where else in the world is a broadcaster also involved in distribution and telecommunications?
23. Rogers has already invested in the ability to produce daily local programming at both CITY and OMNI, doesn't it make sense to use other delivery systems like the internet and on-demand to get the most out of that investment in local daily programming?
24. Rogers should stop using the future as an excuse to reduce programming and staffing costs; Rogers needs to invest in the future and use the group of experienced, creative content professionals already on staff to build that road to the

future. It was an entrepreneur like Ted Rogers who had the foresight to grow this company from a radio model to television. Now is the time for Rogers current leaders to invest in the future

25. In Rogers submission they indicate status quo programming levels at OMNI in Vancouver in the application document (DM#2043927 - 2013-1770-2 - Ethnic - Programming Strategy and Amendments to Conditions of Licence), but contradict this programming commitment with the schedule (DM#2054283 - 2013-1770-2) for OMNI BC. This clearly demonstrates a strong justification for local ethnic programming commitments to be a condition of licence.
26. During Rogers last group licence application, 2010-1253-3, Rogers committed to producing a noon news program on Citytv in Vancouver called Lunch TV and a unique comedy-news hybrid show called City News The List; both of these shows only ran for a short time after the Citytv licence was granted. They were then taken off the air. This is an example of why it is so important to have local programming commitments to be a condition of licence,
27. In their previous licence application Rogers stated:
 1. To date, Citytv has made a number of operational changes and implemented new programming strategies aimed at enhancing its local presence and attracting local audiences.
 - In Toronto, we extended our daily local news programming by one hour, five days a week, with the launch of *CityNews at 5*,
 - In Vancouver, we have recently launched *Lunch TV*, a new hour long local news and information program. We will also soon launch *CityNews, The List*, a daily news program with a distinctive twist on local, regional, national and international stories of interest to people living in Vancouver and The Lower Mainland.
28. Rogers Santa Clause Parade did not have a Chinese language program in 2013, apparently due to low staffing levels with their Chinese language group
29. I question the merits of Rogers plan to replace advisory boards from the multicultural communities with Rogers employees, Community Liaison Officers, who are also involved in negotiating contracts with third language producers. The CRTC should require Rogers reinstates Advisory Boards; these boards should contain at least one representative from the employees involved in producing ethnic and third language programming on OMNI

30. It seems to be the old story of "the emperor has no clothes" Rogers secures a local Over The Air (OTA) broadcast licence based on an expression to restore and secure local programming, then proceeds to reduce its costs at those operations by reducing the staff involved in producing that same local programming
31. At the same time that Rogers is reducing its staff involved in local third language news to save a bit of money; Rogers same broadcast division has spent 5 billion dollars to secure broadcast rights for the NHL
32. Rogers continues to under perform in terms of local daily programming compared to Rogers local operations at City in Toronto and does nothing to answer serious questions related to local programming in western Canada identified by the CRTC in Broadcast Decision 2007-360
 1. Paragraph 23 of the CRTC's Decision (2007-360) reads: *In light of Rogers Media's statement that it will make "localness" a defining element of the programming offered by the Citytv stations, the Commission directs the applicant, at licence renewal, to review its strategy for local news on the Citytv stations in western Canada.*
 2. Conditions of approval, expectations: *To demonstrate in concrete fashion how the Citytv stations will meet the "localness" objective, and particularly to review its strategy for local news on the Citytv stations in western Canada.*
33. Rogers has done nothing in this application to answer the Commission's important questions in Broadcasting Decision 2013-657 related to OMNI television's apparent lack of plans for local ethnic programming
34. In conclusion our Local membership wants to work with Rogers to live up to their localness commitment and improve and expand their local programming to British Columbians

Regards,

Steve Hawkins
Local President, Unifor830M