



Canadian Association of Broadcasters
Association canadienne des radiodiffuseurs

September 5, 2008

Via Epass

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

Dear Mr. Morin:

**Re: Broadcasting Public Notice CRTC 2008-58:
Notice of Consultation: call for comments on proposed amendments to the criteria of
the Certified Independent Production Funds policy for broadcasting distribution
undertakings**

1. The Canadian Association of Broadcasters (CAB) is the national voice of Canada's private broadcasters, representing the vast majority of Canadian programming services, including private radio and television stations, networks, specialty, pay and pay-per-view services. The goal of the CAB is to represent and advance the interests of Canada's private broadcasters in the social, cultural and economic fabric of the country.
2. The CAB is pleased to submit these comments in response to the above-noted Public Notice (the Notice).
3. In the Notice, the Commission proposes to allow certified independent production funds to support new media projects that would benefit licensed broadcasters. To that end the Commission proposes that the current requirement that a production receiving funding obtain a broadcast licence fee will not apply where a licensed broadcaster has provided evidence in writing of how a production, a new media project or other project will support broadcast programming policy objectives.
4. The CAB supports this proposal. As the Commission pointed out in the Notice, the CAB supported the recommendation from the CRTC Task Force on the Canadian Television Fund that the Commission amend its policy with respect to certified independent production funds to provide such funds with greater flexibility to support new media projects. Since only the

regulated broadcasting system contributes to certified independent production funds, the CAB's support for this Task Force recommendation was conditional on funding being tied to support for new media content produced for the regulated broadcasting sector.

5. The CAB is pleased to see that the proposal outlined in the Notice is consistent with the terms of the Association's support for the Task Force's recommendation. It is for this reason that the CAB supports the Commission's proposal.
6. The CAB notes the CFTPA's concern, as acknowledged in the Notice, that allowing funding from certified independent production funds to be allocated to new media projects could result in less financial support for Canadian television programming. The CAB submits that, by tying funding eligibility to content produced for regulated broadcasters, the Commission's proposal will assist broadcasters in extending and promoting their Canadian television programming through other platforms. This support will help to maximize the cross-platform exposure of such programming to Canadian audiences, which will benefit the Canadian broadcasting system.
7. Subject to a review of the submissions of other parties in response to the Notice, the CAB would not at this time support any other changes to the Commission's policy for certified independent production funds.

Sincerely,

Original signed by

Jay Thomson
Vice-President, Regulatory and Policy

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