



**Canadian
Association of
Broadcasters**

**L'Association
canadienne des
radiodiffuseurs**

July 6, 2007

Via e-pass

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

Dear Mr. Morin:

Re: Diversity in Radio – Reporting Requirements for Small Radio Operators

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 television and radio stations, networks and specialty, pay and pay-per-view television services. The CAB is pleased to provide its proposal regarding diversity reporting for small commercial radio broadcasters.

Background

2. The CAB filed two documents relating to diversity in the context of the Commercial Radio Policy Hearing last year – 1) a set of best practices for diversity in radio and 2) a reporting template that licensees will use to report on their diversity initiatives.
3. In *Commercial Radio Policy 2006* the CRTC approved the CAB's proposed best practices subject to some minor clarifications which were submitted on March 15th and determined that the CAB's annual reporting template was best suited to large commercial radio groups only. A copy of the proposed reporting template is attached.
4. Moreover, the CRTC noted the concerns raised during the Commercial Radio Policy hearing regarding the specific circumstances and challenges of small commercial radio operators – such as limited human resources and reporting capacity – and requested the CAB to develop a specific approach to diversity for small radio operators.

5. Accordingly, the CAB sought and received input from the Diversity in Radio Working Group, the Small Market Advisory Group and the Independent Radio Caucus on the following issues:
 - a. The criteria the Commission should use to determine which radio licensees should be considered "small" and why;
 - b. The appropriate reporting mechanisms for such stations; and
 - c. The frequency of reporting.

Definition of Small Commercial Radio Stations

6. A small commercial radio station, for the purpose of reporting on diversity, is a station that is not majority owned and operated by a one of the large corporate radio groups, namely: Rogers, Standard, Corus, CTVglobemedia, and Astral.
7. The rationale for this definition is that larger corporate groups have the means, size and employment structure to support more involved/aggressive diversity plans which require considerable human and financial resources. Larger employment groups have more available resources and are therefore better equipped to effectively plan a strategic approach to advancing diversity than an ownership group that holds two or four licences,.
8. However, even small radio corporate groups that hold a number of radio licences often do not have formal human resources departments or the infrastructure in place to commit to a large scale approach to the implementation of the diversity best practices. More often, these corporate groups are operating stations in a variety of small markets across the country where the majority of their workforce reside. This adds a further layer of complexity and difficulty in harnessing resources towards a collective diversity goal.
9. For these reasons, extremely small corporate radio groups, including single station owners, may require even more flexibility in diversity reporting than what is being proposed by the CAB for small commercial radio operators, and should be considered on a case by case basis upon application by the licensee.

Reporting Mechanism for Small Commercial Radio Stations

10. All CAB radio members are required to adhere to the Diversity in Radio best practices filed and approved in the last review of Commercial Radio.
11. The radio best practices are divided into the following categories:
 - Industry Commitment
 - Application and Implementation
 - Corporate Accountability
 - Programming

- News and Information Programming
- Recruitment, Hiring and Retention
- Internship, Mentoring and Scholarships
- Community and Industry Outreach
- Internal Communications

12. The radio best practices and reporting template were designed for use by all radio broadcasters, large and small. However, the CAB agrees with the Commission that a unique approach is appropriate for the implementation of these best practices by small commercial radio operators.
13. Accordingly, in order to provide a flexible and manageable approach to the implementation of the above-noted diversity best practices by small commercial radio operators, the CAB proposes a phased-in or staggered approach to implementation that would require small radio stations to adhere to the first two categories of best practices, industry commitment and application and implementation, and be given the flexibility to focus on a minimum of any three of the remaining seven categories of best practices over a five year to seven year period depending on the number of licences involved and the employment levels of the small corporate radio group.
14. For example, all small commercial radio groups, as defined above, would be required to file a diversity best practices implementation plan with the Commission that includes a commitment to reporting on the implementation of a minimum of three categories of best practices of the licensee's choosing such as, programming, news and information programming, and community and industry outreach, for implementation over a five to seven year period. In addition, in order to assure the Commission that small radio licensees are committed to advancing diversity within their stations and markets, these licensees would also commit to the eventual implement of all the diversity best practices in their initial implementation plans. Corporate radio groups holding more than one radio licence would only be required to file one diversity implementation plan for all of their stations.
15. After the expiration of the first five to seven year diversity implementation term, small radio groups would then be required to file a second diversity implementation plan that focuses on the implementation of the remaining categories of best practices while still maintaining any on-going or long-term diversity projects and initiatives that have been put in place as a result of their original diversity implementation plan.
16. In order to facilitate the implementation of their diversity initiatives, small radio operators, upon application, should be granted an exemption to the Commission's new CCD policy that requires 60% of CCD funding to be directed to FACTOR and MusicAction in order to provide these licensees with more flexibility in targeting their CCD contributions to diversity-related music and spoken-word initiatives in their local communities.

17. The above approach ensures the implementation of all the diversity best practices while also recognizing that small radio groups, given their limited resources, will need more time to develop and implement their plans.

Frequency of Reporting for Small Commercial Radio Stations

18. Based on the phased-in approach outlined above, the CAB proposes that small radio groups would be required to report on their progress in implementing their diversity plans after the first five to seven year implementation term.
19. Small radio groups would then receive Commission feedback on their report prior to developing their next diversity implementation plan for the remaining categories of best practices.
20. The CAB believes the approach outlined above meets the Commission's diversity objectives while still providing flexibility to smaller players in the radio sector. If you have any questions please do not hesitate to contact Susan Wheeler, Vice-President, Regulatory and Programming at swheeler@cab-acr.ca or (613) 233-4035 ext. 320.

Sincerely,

Original signed by

Glenn O'Farrell
President and CEO

Cc: Martine Vallée, Director, English Pay, Specialty & Social Policy, Broadcasting, CRTC
Jane Britten, Senior Policy Analyst, Social Issues, CRTC

Annual Report to CRTC on Diversity in Radio

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| <p>CORPORATE ACCOUNTABILITY</p> | |
| <p>Each corporate group or radio licensee, as appropriate, is accountable to meeting diversity commitments. Each corporate groups or radio licensee will monitor and report on diversity initiatives on an annual basis.</p> | <ol style="list-style-type: none"> 1. What senior executive is responsible, at the corporate level, for establishing diversity goals and measuring progress on those goals? 2. What goals have been identified for station managers to implement at a station level? 3. Please describe the system you have implemented for ensuring that progress on diversity goals is monitored. |
| <p>PROGRAMMING</p> | |
| <p>Each station or corporate group will ensure that on-air talent reflects the diversity of the community that the station serves.</p> <p>Each station or corporate groups will ensure that programming reflects the diversity of a station’s audience, and that guests/experts/commentators from diverse backgrounds are chosen to appear on or participate in programming, providing expertise on a wide range of topics.</p> <p>Programming may include spoken word, music, and talk – both station produced and acquired.</p> <p>Reporting in this section will vary, as appropriate, by station format.</p> <p>Note: do not report on News in this section.</p> | <ol style="list-style-type: none"> 1. Please describe the initiatives you have in place to ensure on-air talent reflects the diversity of your audience. 2. Describe how you ensure that your programs reflect and include aboriginal people, people with disabilities, and visible minorities. 3. How do you include people from diverse backgrounds as commentators/guests/experts on shows, and ensure that they are not used solely as commentators/experts on their own race/culture? 4. Describe any new initiatives in place to increase the reflection and portrayal of aboriginal people, people with disabilities, and visible minorities. |

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| <p>NEWS AND INFORMATION PROGRAMMING</p> | |
| <p>Each station or corporate groups will ensure it reflects and portrays diversity in its news coverage.</p> <p>In this section, information should be provided about mechanisms in place to assess progress on diversity goals.</p> | <ol style="list-style-type: none"> 1. How do you ensure diversity in your news coverage? 2. How do you ensure diversity in the experts and commentators used for news stories? How do you ensure that they do not only comment on issues specific to their cultural backgrounds? |
| <p>RECRUITMENT, HIRING AND RETENTION</p> | |
| <p>Each station or corporate group will ensure diversity in the workforce.</p> | <ol style="list-style-type: none"> 1. Describe any initiatives you've developed to ensure diversity in your workforce, such as: outreach to diverse communities to recruit diverse applicants for jobs; mentorship programs; etc. 2. What programs have you implemented to ensure the retention of people from diverse backgrounds? 3. What staff training have you provided on issues relating to diversity (such as formal presentations conducted by experts in this area, and updates to employee representatives regarding the implementation of employment equity)? |
| <p>INTERNSHIP, MENTORING AND SCHOLARSHIPS</p> | |
| | <ol style="list-style-type: none"> 1. Describe any initiatives you've developed to ensure diversity in your future workforce, such as: finding interns from diverse cultural groups; mentorship programs; scholarships etc. |

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| <p>COMMUNITY AND INDUSTRY OUTREACH</p> | |
| <p>Radio stations are intensively local services with strong ties to their communities.</p> <p>Each station or corporate group supports diverse organizations in their respective community, and receives input and feedback from the community with respect to the inclusion and reflection of cultural diversity.</p> | <ol style="list-style-type: none"> 1. Please provide information about any initiatives you may be involved in to promote and support diversity within your community. 2. Describe any formalized community consultations you've conducted to solicit feedback and input from community leaders, organizations, students and members of the public. 3. Describe how you receive feedback from your audience, particularly in relation to diversity, and how you use that feedback. 4. Please provide information about any initiatives you may be involved with to promote diversity in the broadcast industry as a whole. |
| <p>INTERNAL COMMUNICATION</p> | |
| <p>Each station or corporate group will ensure that diversity commitments are communicated within each station or corporate group to all staff members.</p> | <ol style="list-style-type: none"> 1. Describe how diversity objectives and information are communicated between your corporate headquarters and individual stations, and to all staff. 2. How is staff involved in planning methods to increase the inclusion and representation of diversity in all areas of station operation, as appropriate? |