CAB | ACR

Sent via Email

13 November 2025

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Re: Call to action – *Recommendations of the Canadian Association of Broadcasters for administrative changes that will reduce red tape*

Since its founding in 1926, the Canadian Association of Broadcasters (CAB) has been a trusted leader in policy development, regulatory affairs, and public dialogue, working closely with government, regulators, and industry stakeholders. Our members are private radio and television stations and services, who are committed to delivering high-quality Canadian content, supporting local news and journalism, and reflecting the voices and stories of communities from coast to coast to coast.

As the broadcasting landscape evolves, the CAB is championing fair and forward-looking policies that ensure Canadian broadcasters can thrive in a digital age, protecting the sustainability of local media, promoting innovation, and strengthening Canadian identity and culture.

Today, as the national voice of Canadian privately-owned and operated broadcasters, representing small, medium and large radio and television stations, and discretionary services across the country, the CAB is calling upon the Commission to **take action and make six meaningful changes to its regulatory practices and procedures**.

Consistent with section 5(2)(g) of the *Broadcasting Act*, these changes are designed to reduce the administrative burden faced by Canadian broadcasters and permit them to dedicated more of their increasingly scarce resources to responding to audiences, serving their communities, and continuing to contribute to Canadian programming, including providing vital and trusted news and information programming.

Our proposed changes build on the baby-steps announced by the Commission its *Red Tape Reduction Progress Report* and in *Modernizing of radio processes*, Broadcasting Regulatory Policy CRTC 2025-265 (Radio modernization policy). While the changes announced in the Radio modernization policy were a step in the right direction, they do not go nearly far enough.

The measures will alleviate dated requirements that no longer meaningfully contribute to broadcasting policy objectives and demand a disproportionate number of resources from both regulated operators and the Commission alike. The latter should be of particular interest to the Commission at this stage, given broader Government of Canada efforts to streamline operations across federal government departments and agencies.

Red tape reduction and radio modernization

We read with a great deal of interest the CRTC's *Red Tape Reduction Progress Report*, in which the Commission stated that it was focused on *"cutting red tape including complicated or outdated process, unnecessary, duplicative or overly burdensome rules, or inefficient or unpredictable regulatory administration or service delivery."* We are particularly interested in the Commission's commitment to take *"a strategic and streamlined approach to the amount and type of information that stakeholders must provide."*

We understand that the Commission believes its Radio modernization policy is an important piece in its red tape reduction efforts. However, we believe a great deal more is required as licence renewal proceedings were the least of our concerns. Indeed, we urge the Commission to ramp up the internal review of processes and systems alluded to in that policy.

To assist the Commission in that review and in its broader red-tape reduction efforts, we recommend the following six administrative changes, to modernize regulatory practices and procedures of the CRTC, and to set Canadian broadcasters up for success.

1. Reduce reporting burden

Canadian broadcasters are required to submit dozens of reports to the Commission on a monthly and annual basis, many of which are duplicative or overlap to a considerable extent. Many of these reporting requirements were set up in response to an issue of the day, but their continued relevance or necessity has never been reassessed. The Commission must thoroughly reexamine its myriad reporting requirements to determine which are actually necessary for the supervision of the broadcasting system today, and which the Commission actually uses and reviews.

Among the numerous reports Canadian broadcasters are currently required to file, are the following:

- Dozens of annual financial reports ("annual returns") – many of which are duplicative – certain large groups also must submit *aggregated* annual returns
- Multiple ownership reports
- Annual television programming log evaluation reports
- Monthly programming logs (for television)
- Local news audits for television
- Independent production report
- Regional production reports and plans
- Women in production report
- Emerging and Indigenous artist reporting (for radio)
- Tangible benefits reports and additional post ownership transaction reports
- Emergency alert testing reports
- Annual Digital Media Survey
- Accessibility plans and progress reports
- Cultural diversity annual reports
- DV exemption reports (certain groups)
- CC reports on quality and accuracy rates
- Alcohol advertising reports
- Monthly 120-days reports (for dispute resolution)

It is clear that the Commission does not have the resources to review each and every one of these reports – no more so can broadcasters afford to complete these reports each year (or each month) for them only to be shelved once filed with the Commission. This long list needs to be rationalized, streamlined and ultimately reduced to only those reports the Commission actually needs and actually reviews.

As elaborated on under point 5, below, the annual return forms themselves also need to be rationalized and modernized. The CRTC relies on archaic excel files that create significant operational challenges for broadcasters.

2. Eliminate monthly logs for television

Television broadcasters are currently required to submit detailed program logs on a monthly basis, which provide comprehensive information on every minute broadcast, and include information on advertising, programming genre, and captioning, and other details. While these reports are the primary mechanism for checking compliance with Cancon exhibition requirements, the monitoring of other elements through program logs is no longer required:

- Since advertising is no longer subject to limits, there is no need to monitor its duration.
- Since the Commission no longer regulates the genre of Canadian television services, there is no need for detailed minute-by-minute information by program genre.
- And finally, monthly logs are not the best or only way to measure captioning and described video obligations, particularly since captioning is required for 100% of programming.

Further, we note that much of the information collected in monthly logs is also provided in annual regional and independent production reports (multiple different reports, in fact). As noted above, such reporting must be rationalized and consolidated so that broadcasters are not preparing multiple different reports with essentially the same information.

Of particular concern with respect to the television logs is the unavailability (or untimeliness) of "C-numbers," the mechanism by which programs are identified as Canadian or not. C-number are provided to certified Canadian productions by either the CRTC or by CAVCO. The absence of a C-number, however, prevents broadcasters from filing logs as a result of "error" reports automatically generated by the Commission's log reporting system. In many cases, C-numbers are not available to broadcasters at the time the programs are aired, and in some cases, this is due to backlogs in the Commission's own processes.

As with radio logs, the back-and-forth efforts to file program logs and respond to (automatically generated) error reports are incredibly time-consuming.

We believe the Commission must reconsider whether monthly logs are even necessary. As noted above, much of the information collected by these reports is already collected through other means (or could be).

Instead, we recommend that the Commission explore a limited audit-based approach, similar to the one it has adopted for radio, while remaining sensitive to the unique qualities of television scheduling. For example, broadcasters could be called upon to provide a report for a specific month.I If any issues are identified, broadcasters could be invited to engage in dialog with the Commission, or submit a report for another month during the year.

Failing that, the Commission must update the log filing system to reduce the complexity of the reporting requirements and permit filing even without C-numbers. This, of course, assumes that the Commission will continue to impose exhibition requirements, a matter that is currently up for review.

3. Streamline radio performance evaluations

While the Commission announced in its Radio modernization policy that it will implement a “gradual compliance approach,” it is not clear to us that this will actually reduce the burden associated with performance evaluations for radio stations.

The experience of our members has been picayune reviews of their logs, where Commission analysts use stopwatches to make painstaking calculations on seconds of music, advertising, promos, and so on, challenge music experts on the theme of montages, and disqualify Canadian songs that (for example) start before midnight but end after.

Such reviews also result in detailed back-and-forth, and, increasingly, demands to provide ‘evidence’ (e.g. passports) that songs are Canadian – even for songs that have long been considered Canadian.

The amount of time and effort required to deal with these review processes and respond to detailed questions is substantial, and especially burdensome to small and medium-sized stations that do not have the resources to be able to handle such evaluation efforts, especially given increased financial challenges.

We recommend an even more gradual approach to performance evaluation, starting with exempting good performers from review for a period of time. In the Radio modernization policy, the Commission stated that it will now issue a “warning letter” and initiate dialog. We believe this should be the second step, not the first. If there is a potential problem, the Commission should issue some form of notification, but require no additional effort until the next evaluation, at which point, if necessary, a dialog could begin.

The Commission must also simplify the Cancon reporting requirements – it is unclear why the Commission needs multiple reports in addition to audio recordings, including a music list, a self-assessment report, detailed program logs, as well as detailed descriptions of how the licensee meets its various conditions of service.

4. Simplify CCD reporting requirements

In the past, the Commission has required proof of CCD payments in the forms of receipts along with other evidence. This type of ‘forensic’ requirement has frequently proven challenging for radio stations, particularly where they have supported smaller groups or festivals who are unable to issue receipts or where receipts are demanded years after the event has taken place.

Noting that some radio stations have recommended that there be no CCD requirements going forward, the CAB recommends that (if they remain in place) the Commission streamline its CCD reporting and audit (proof of payment) requirements.

5. Update the Data Collection System

The Commission introduced the Data Collection System (DCS) in 2004 to facilitate the collection of information from Canadian broadcasters. At the time, it was a modern solution for the gathering of large amounts of data from the industry. Over time, as policies and regulations have changed or priorities have shifted, the amount of information gathered via DCS has increased exponentially. However, the technological capabilities of the system have not evolved to reflect the changes in the volume or nature of data being collected, nor has the system been updated in any meaningful way to take advantage of modern digital technologies.

In 2022, several of our members grouped together to identify challenges with the Commission's DCS and propose solutions. They provided a detailed examination of issues with DCS, which we are attaching to this letter.

We urge the Commission to take steps to modernize DCS, decrease duplication, and simplify the financial reporting process, including through changes discussed in the attachment.

6. Speed up ownership applications

We understand that certain Commission practices and procedures are constrained by the *Broadcasting Act* (the Act). For example, all ownership transactions resulting in an acquisition of assets require the issuance of a new broadcasting licence. Under Section 18 of the Act, such transactions must be considered at a public hearing. For most such transactions, the Commission has adopted the practice of a "non-appearing hearing," which has contributed to more streamlined decision-making. Nevertheless, such ownership transactions still often take between 8 and 18 months.

Ownership applications must be processed more quickly. Applications that take too long have a direct and immediate financial impact on both the buyers and the sellers.

We believe the Commission can address part of the delay by modernizing its processes for the publication of ownership applications. The current approach for producing notices of public hearing were developed at a time when such notices were published on paper. In today's web-based environment, notices of consultation can be updated in real time. We recommend a Part 1-like approach to (non-appearing) ownership applications. These should be published as soon as they are complete on an ongoing basis. With non-appearing hearings scheduled virtually each month, applications could be added up to 30 days before the intervention deadline.

We also urge the Commission to revisit and update its guidance on the processing of ownership applications, as well as its ownership application forms to simplify and speed up ownership processes as much as possible, including adding to the list of applications that can be processed administratively or without public hearing.

Committed to working with you

All of these changes are proposed within the context of a broadcasting sector that demonstrates a strong culture of compliance and regulatory good faith. With the possible exception of a few bad actors, radio and television broadcasters take their obligations seriously, and work hard to remain in compliance at all times. With very few exceptions, any non-compliance is unintentional.

The Commission must redesign its monitoring practices and procedures to take the responsible and good faith behaviour of Canadian broadcasters into consideration.

The CAB is committed to working with Commission staff to explore any and all ways to reduce administrative burden for its members and other broadcasters and to help develop a proportionate oversight approach. We can sit on or moderate working groups, organize information sessions, conduct mini-surveys, whatever is necessary to support the Commission's understanding of our members' concerns and to explore solutions that will permit the Commission to exercise its supervisory responsibilities, without unduly burdening Canadian broadcasters.

We look forward to opening a dialogue with Commission staff on these proposed changes.

All of which is respectfully submitted.

Yours sincerely,

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President | Canadian Association of Broadcasters

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