



Sent via Intervention Form

21 July 2026

Marc Morin
Secretary General
Canadian Radio-television and
Telecommunications Commission
Gatineau, QC K1A 0N2

**Re: Reply comments of the Canadian Association of Broadcasters with respect to
Call for comments – Renewing radio licences for indefinite terms**
Broadcasting Notice of Consultation CRTC [2026-115](#)

1. As the national voice of small, medium and large Canadian privately-owned and controlled radio, TV and discretionary broadcasters, the Canadian Association of Broadcasters (CAB) is pleased to provide its reply comments on the Commission's proposal to renew all commercial radio licences for indefinite terms.
2. The record of this proceeding demonstrates broad support for the Commission's proposal. In addition to the CAB, numerous commercial broadcasters filed interventions endorsing indefinite licence terms. They recognized the proposal as a practical modernization of the licensing framework and highlighted the value and importance of decreased regulatory and administrative burden for their operations.
3. Despite the concerns raised by a couple of parties, we remain convinced that this change is appropriate. None of the opposing interventions identifies a regulatory function that can only be achieved through fixed-term licences. Rather, their concerns relate primarily to compliance and enforcement – areas the Commission has already acknowledged will continue to be addressed through other regulatory tools.
4. The Commission will retain full discretion to monitor compliance, conduct audits, request information, and initiate public proceedings when circumstances warrant such action. Further, the implication that indefinite terms will somehow result in increased non-compliance is unsupported by any evidence. As the CAB has previously noted, instances of non-compliance are generally inadvertent and readily corrected. As described in *Modernization of radio processes*, Broadcasting Regulatory Policy CRTC [2025-265](#), short-term licence renewals were a blunt instrument – the Commission has a range of other, more practical tools at its disposal to address recurring or more serious compliance concerns, including the possibility of licence suspension or even revocation.

5. More importantly, under this proposal, the Commission will be able to address consumer complaints or compliance concerns when they arise, rather than waiting for a renewal process. In fact, such an approach will likely improve compliance by allowing issues to be identified and addressed more quickly.
6. We also note the Commission's intent to examine issues regarding compliance in a separate public process, with a view to updating the Commission's monitoring and compliance framework. We look forward to contributing to that process once it is launched.
7. As the Commission develops its new compliance framework, we encourage it to consider comments filed as part of the *Modernization of radio processes* proceeding, as well as the comments of Vista Radio in the present proceeding:

We encourage the Commission to consider further modernization of its reporting and compliance processes, including greater use of existing broadcast metadata, playlist information and automated reporting tools. Where information is already available through station systems or industry standard data sources, the Commission should explore ways to reduce duplicative manual filing and reporting requirements.

8. The CAB also supports the recommendations filed by the Alliance de radios communautaires du Canada regarding greater transparency around compliance monitoring, appropriate opportunities to correct minor instances of non-compliance, and additional support for smaller broadcasters. These practical suggestions merit careful consideration.
9. Finally, as we recommended in our initial submission and as numerous operators of commercial radio stations emphasized, we encourage the Commission to view indefinite licensing as one element of a broader modernization agenda. We urge the Commission to take all possible steps to streamline reporting requirements, simplify compliance review processes, and reduce unnecessary administrative burden to enable broadcasters to devote their resources to programming, journalism and serving their communities.
10. All of which is respectfully submitted.

Yours sincerely,

[Original signed by]

Kevin Desjardins
President | Canadian Association of Broadcasters

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