



Sent via Intervention Form

6 July 2026

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

**Re: Comments of the Canadian Association of Broadcasters with respect to
Broadcasting Notice of Consultation CRTC [2026-115](#)**

Call for comments – Renewing radio licences for indefinite terms

1. The Canadian Association of Broadcasters (CAB) is the national voice of Canadian privately-owned and operated broadcasters. Representing small, medium and large radio and television stations across the country, and national discretionary services, the CAB advocates for a modern, thriving, and competitive broadcasting system that serves all Canadians.
2. Since its founding in 1926, the 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 committed to delivering high-quality Canadian content, supporting local news and journalism, and reflecting the voices and stories of communities across the country.
3. As the broadcasting landscape evolves, the CAB advocates for fair and forward-looking policies that ensure the sustainability of Canadian broadcasters, promoting innovation, and strengthening our identity and culture.
4. With these broad objectives in mind, the CAB provides the following comments on the Commission's proposal to implement indefinite radio licence terms.

Indefinite licensing is a positive but limited modernization

5. The CAB supports the Commission's proposal to renew all commercial radio licences for indefinite licence terms. This proposal represents a logical modernization of the licensing framework and aligns the Commission's licensing practices with the amended *Broadcasting Act* (the Act). It also recognizes the Commission's ability to impose and amend conditions of service independently of licence renewal proceedings, as well as removing a process whose original regulatory purpose has largely been superseded.
6. Under this new approach, the Commission will retain broad authority to monitor compliance, conduct audits, request information, and initiate public proceedings where circumstances warrant. Conditions of service may be imposed, amended, or removed independently of licence renewal cycles. In these circumstances, recurring licence renewals no longer serve the same regulatory function they once did.
7. While we support indefinite licence terms, CAB members have indicated that the practical benefit for broadcasters is likely to be modest, given that the Commission had already previously streamlined renewal proceedings. Recent radio licence renewals had become largely administrative processes, particularly where there were no significant compliance concerns or proposed amendments requiring substantive review. As a result, renewal processes were not a significant burden for our members.
8. The most significant sources of regulatory burden facing broadcasters today arise elsewhere.
9. Broadcasters continue to devote considerable resources to a variety of reporting, filing, approval, and compliance requirements. While detailed performance evaluations appear to be paused for the moment, they have raised considerable concern for our members in the past as being too rigid and too exacting. The cumulative impact of these obligations exceeds the burden associated with licence renewal proceedings themselves.
10. Therefore, we believe that this proceeding should be viewed as one step in a broader regulatory modernization effort. Additional opportunities remain to reduce unnecessary burden and improve regulatory efficiency across the broadcasting system. The Commission should continue reviewing existing regulatory requirements through the lens of necessity, efficiency, and proportionality. Requirements that no longer meaningfully advance policy objectives, or whose administrative costs outweigh their benefits, should be simplified, streamlined, or eliminated.
11. As a result, broadcasters would be able to devote more resources to local programming, journalism, innovation, technological investment, and service to Canadian audiences.

The Commission's focus on reduced red tape is welcome

12. In that context, the CAB commends the Commission for the increasing attention it is devoting to reducing regulatory burden and increasing administrative efficiency.
13. In particular, we welcome the Commission's new practice of expressly considering administrative burden and implementation impacts in its public consultations. The inclusion of burden-reduction considerations in proceedings such as this one represents an important and positive development.
14. The CAB also welcomes the Commission's broader red tape reduction initiatives¹ and its commitment to reviewing outdated processes, duplicative requirements, and inefficient administrative practices. These efforts reflect an understanding that effective regulation is measured by how regulatory requirements meaningfully advance policy objectives while minimizing unnecessary costs for regulated parties.
15. The CAB has previously identified a number of administrative reforms that could deliver meaningful efficiencies for both broadcasters and the Commission. These recommendations were grounded in the practical experience of broadcasters operating under increasing financial pressures and facing growing demands for information, reporting, and compliance documentation.
16. Among the areas that warrant further review are:
 - the number and complexity of recurring reporting requirements and duplicative information requests across multiple reports and filings;
 - radio performance evaluation procedures;
 - Canadian Content Development reporting and audit requirements and the need to modernize the Commission's Data Collection System; and
 - the timeliness and efficiency of Part 1 applications and ownership transactions.
17. The CAB is not suggesting that regulatory oversight be weakened. Rather, consistent with section 5(2)(g) of the Broadcasting Act, the Commission should continue moving toward a more risk-based, proportionate, and outcomes-focused approach that concentrates resources on matters of genuine policy significance while reducing administrative effort that provides limited regulatory value. The continued examination of reporting, compliance, and administrative processes through this lens would yield substantially greater benefits than those associated with licence renewal reform alone.
18. The CAB stands ready to work collaboratively with Commission staff to identify additional opportunities for modernization and burden reduction that maintain effective oversight while allowing broadcasters to devote more resources to serving Canadian audiences.

¹ As set out in the CRTC's [Red Tape Reduction Progress Report](#), 23 April 2026.

Conclusion

19. The CAB supports the Commission's proposal and commends its growing focus on regulatory efficiency and burden reduction.
20. Effective compliance oversight does not depend on fixed licence terms. The Commission retains extensive authority to monitor compliance, request information, conduct audits, and take appropriate regulatory action as necessary. Indeed, the current framework allows compliance matters to be addressed when they arise rather than waiting for a scheduled licence renewal proceeding.
21. The transition to indefinite licensing should therefore be viewed as a modernization of administrative processes rather than a reduction in regulatory accountability.
22. Indefinite licensing is a sensible modernization that should be one step in a broader effort to ensure that regulatory requirements remain efficient, proportionate, and focused on outcomes. While the practical burden reduction of indefinite licence terms for broadcasters may be limited given the Commission's previous efforts to streamline licence renewals, the proposal nevertheless represents a sensible and constructive modernization of the regulatory framework.
23. The CAB encourages the Commission to continue pursuing broader regulatory modernization initiatives, to deliver meaningful reductions in administrative burden while maintaining effective oversight and advance the objectives of the broadcasting policy for Canada.
24. The CAB appreciates the opportunity to participate in this proceeding.

Yours sincerely,

[Original signed by]

Kevin Desjardins
President | Canadian Association of Broadcasters

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