



On Screen Manitoba

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Submitted electronically

Mr. John Traversy,

September 21, 2012

Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, ON K1A 0N2

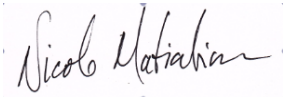
Re: Broadcasting Notice of Consultation CRTC 2012-370 regarding the acquisition of Astral Media Inc by BCE Inc.

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1. On Screen Manitoba wishes to provide final comments on the acquisition of Astral Media Inc. (Astral) by BCE Inc (Bell).
 2. *En tant que l'association professionnelle de l'industrie de production des médias au Manitoba, On Screen Manitoba croit que la diversité linguistique et culturelle de la production indépendante au Manitoba est un atout qui enrichi le système de la radiodiffusion au Canada.*
 3. The diversity of voice is a fundamental tenet of the Canadian Broadcasting Act and On Screen Manitoba urges the Commission to send a clear message of the importance it places on diversity of voice in imposing conditions of license (COL) should the sale of Astral to Bell be approved.
 4. We believe that the Bell purchase of Astral represents a prime opportunity for the Commission to incentivize production in all regions of Canada. As we stated at the hearing on September 13, 2012, we believe that a COL that requires tangible benefits be spent in the regions first would contribute to strengthen regional production and ensure a diversity of voice within a highly concentrated ownership structure.
 5. As we mentioned in our presentation, the initial results of a study that we commissioned regarding public funding in the prairie region points to a systemic under-representation of regional production. Directing tangible benefits to regions outside of the large metropolis of Toronto and Montreal, which already receive the lion's share of production investment for English and French language markets respectively, would serve to increase production opportunities nationally. In addition, investment outside of the already busy centres of Toronto and Montreal would mitigate any concerns about "flooding" the market with production. There is no shortage of creative production talent in all regions of Canada.

6. On Screen Manitoba wishes to reiterate the importance of establishing a condition of licence (COL) that will ensure that should the sale of Astral to Bell be approved, at minimum 85% of the tangible benefits should be directed to support the production of original Canadian content in both official languages, in all regions of Canada.
7. Further, we believe that tangible benefits should be spent incrementally over the licence period awarded and that the Commission should establish and implement a stringent reporting process that demonstrates incrementality; as well as development and production expenditures in both official languages, in all regions of Canada.
8. In our view, and in light of the rapid evolution of digital technology and its impact on the Canadian media landscape, it seems both reasonable and appropriate to uphold the Commission's recently established group renewal five-year licence period.
9. In regard to determining the most reasonable approach to splitting the tangible benefits between English and French language markets, On Screen Manitoba would support a 50/50 split; but urges the Commission to put in place COLs that incentivize regional production in both official languages.
10. Further we believe that in light of Astral's strong commitment to supporting the production of original Canadian children's programming and feature films in both documentary and fiction genres; that this transaction represents an opportune time for the Commission to require a concentration of tangible benefits towards these formats.
11. On Screen Manitoba applauds Bell for its commitment to continue:
 - to support original Canadian programming in both official languages;
 - to uphold the terms of trade agreements established with both Bell and Astral; and,
 - to maintain the PNI levels established for Astral and Bell during the Group Licence Renewals earlier this year.
12. On Screen Manitoba rejects Bell's proposal to allocate \$40M of tangible benefits on private non-broadcast improvements to Northwestel's wireless communications infrastructure. We also reject Bell's proposal to use \$20M of tangible benefits to create a new news service. Further, tangible benefits and social benefits should be treated as separate issues. Tangible benefits should be allocated to on screen benefits -- to the development and production of original Canadian content.
13. In its application to the CRTC Bell purports to become "a leading national media player in both languages and on multiple digital platforms". This represents an important opportunity for the Commission to give priority to the development and production of meaningful Canadian content in both official languages, in all regions of Canada through incentivizing the incremental, documented disbursement of tangible benefits to producers who live and work in outside of major metropolitan centres.

14. Finally, On Screen Manitoba notes that Bell's benefits proposal has changed from the initial written proposal; and, should there be additional changes in their final comments due September 28, 2012, we would appreciate an opportunity to reply to those changes.

Sincerely,

A handwritten signature in black ink that reads "Nicole Matiation". The signature is written in a cursive style and is enclosed within a thin black rectangular border.

Nicole Matiation,
Executive Director, On Screen Manitoba

cc. bell.regulatory@bell.ca

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