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Mr. Robert Morin

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

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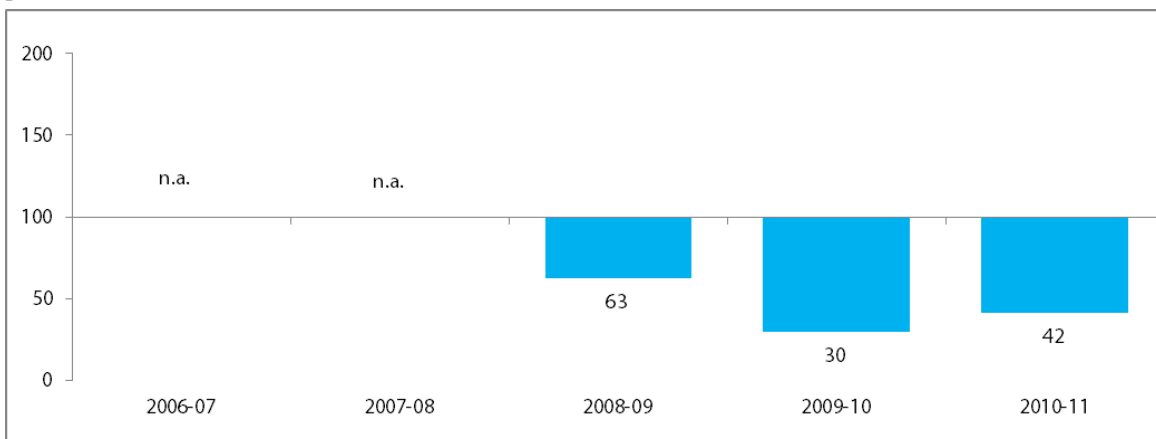
**Re: Broadcasting Notice of Consultation CRTC 2012-379:
Licence renewals for the Canadian Broadcasting Corporation's French- and English-
language services**

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1. On Screen Manitoba (OSM) wishes to take this opportunity to provide the following comments regarding the Broadcasting Notice of Consultation CRTC 2012-379: Licence renewals for the Canadian Broadcasting Corporation's French- and English-language services (CBC/SRC).
 2. Compte tenu du rôle important que la CBC/SRC joue dans le système canadien de la radiodiffusion, On Screen Manitoba souhaite comparaître à l'audience qui se tiendra à compter du 19 novembre 2012.
 3. Établie en 1987, On Screen Manitoba est l'association professionnelle de l'ensemble de l'industrie de production des médias de l'écran. Nos membres comprennent des scénaristes, des réalisateurs, des producteurs, des guildes, des syndicats, des fournisseurs de services, des festivals de film et autres organismes et individus ayant un intérêt dans ce secteur au Manitoba. Ceci représente plus de 40 compagnies de production et fournisseurs de service, soit quelque 1500 individus.
 4. Parmi nos membres se trouvent des individus des milieux anglophone, francophone, autochtone et multiculturel. On Screen Manitoba croit que la diversité linguistique et culturelle de la production indépendante au Manitoba est un atout qui assure l'équilibre du système de la radiodiffusion au Canada.
 5. On Screen Manitoba supports CBC/SRC's licence renewal for a five-year term provided there are conditions of licence (COLs) established that require annual transparent reporting in regard to clearly defined minimum targets. Those targets should demonstrate CBC/SRC's commitment to develop, produce and distribute independently produced original Canadian programming, in all genres and formats, from all regions of Canada, and in both official languages.

6. Trade (TOT) discussions are taking place between CBC and the CMPA and between the APTFQ and Radio-Canada and On Screen Manitoba looks forward to the TOT being included as a COL in the current licence renewal process.
7. We appreciate the CBC/SRC for proposing to move the overall Canadian content exhibition obligation that was set as an expectation in 2000 to a COL in 2012.
8. On Screen Manitoba also appreciates CBC/SRC's proposed COL that would require a minimum of 7 hours of Programs of national interest (PNI) during peak viewing time with 75% to be produced by independent Canadian producers.
9. Despite these positive steps, On Screen Manitoba is gravely concerned by CBC/SRC's proposal to eliminate several crucial obligations and commitments including:
 - To acquire at least 50% of programming (other than news, public affairs and sports) from independent sources;
 - To broadcast a minimum of 15 hours/week of Canadian programs for children aged 2 to 11 years;
 - To broadcast a minimum of 5 hours of programs for youth aged 12 to 17;
 - To invest in the production and acquisition of feature films (both documentary and fiction);
 - To broadcast programming drawn from and reflecting all regions of Canada.
10. *Avec une population aussi diversifiée que sa géographie, le Canada a reconnu depuis longue date le rôle essentiel que les systèmes de communications, et leur contenu, jouent en engendrant un sens d'appartenance et de connexion chez ses citoyens. La politique des communications au Canada, ainsi que ses pratiques, sont basées sur des principes qui garantissent aux Canadiens l'accès à du contenu qui reflète les intérêts du Nord, du milieu rural et des centres urbains ainsi que les réalités culturelles des communautés autochtones, francophones, anglophones et multiculturelles.*
11. The principles above are clearly stated in the Broadcasting Act along with the important role independent producers play in ensuring the diversity of voice on Canadian airwaves. In section 3.1 (d) the Act notes that employment opportunities arising from the Broadcast system should also reflect these principles of diversity; and further, in section 3.1 (l) (ii) the Act states that programming "should be drawn from local, regional, national and international sources" and 3.1 (l) (v) "include a significant contribution from the Canadian independent production sector".
12. The Canadian Broadcasting Corporation/*La Société Radio-Canada* (CBC/SRC), as Canada's national public Broadcaster, plays a key role in the Canadian broadcasting system. Its legislated mandate states that it's programming should "reflect Canada and its regions to national and regional audiences, while serving the special needs of those regions."
13. Over the past few years, On Screen Manitoba and other industry associations that represent regional producers such as the Alberta Media Producers Association (AMPIA) and the *Alliance des producteurs Francophones du Canada* (APFC) have brought to the attention of the CRTC their concern regarding the centralization of decision-making in the Canadian broadcasting system and the potential loss of diversity of voice on the airwaves. A concern that is shared with the Commission; and one that CBC/SRC is mandated to avoid.

14. On Screen Manitoba applauds the CBC for stating its commitment to reflecting Canadians from all regions of the country in both official languages in its 2015 Strategic Action Plan; however, we are gravely concerned that CBC/SRC Licence renewal proposal that calls for the elimination of minimum targets for genres, for regional production and for annual reporting.
15. Without any means to measure CBC/SRC's activity – how will the Canadian public and industry stakeholders measure CBC/SRC's capacity to deliver on its mandate? Minimum targets and transparent reporting allow independent producers and the Canadian citizens to better understand CBC/SRC's valuable and unique role as the national public broadcaster and to join in celebrating CBC/SRC's success.
16. This past year On Screen Manitoba along with AMPIA and the Saskatchewan Media Industry Production Association (SMPIA) commissioned Nordicity to carry out a study examining public funding expenditures on production in the three Prairie Provinces. We asked Nordicity to look at expenditures by several public funding sources for production including: Telefilm, the Canada Media Fund (CMF), the NFB, APTN and CBC/SRC. The results of this study point towards a systemic underrepresentation of the Prairie Provinces when considering total production in relation to the proportion of the Canadian population living in those provinces with the exception of APTN and CMF support for francophone production. Francophone production is discussed below.
17. While each province recognizes that CBC/Radio-Canada has licenced some production in each of those provinces from 2006 through to 2011, there is a strong sense that CBC/Radio-Canada is not actively engaging with independent producers in all regions of Canada.
18. Of particular relevance to our intervention on the licence renewal for CBC/SRC, the study suggests that Manitoba, a region recognized for its production excellence (19 Gemini Awards with 73 nominations and 4 Genie Awards with 19 nominations since 2005 alone), received no more than 63% of its population share of total CBC/Radio-Canada Licence Fees in 2008-09 and since that date has seen that share decline to 30% in 2009-10 with a small rise to 42% in 2010-11. Below is an excerpt from the draft analysis.

Index of Manitoba's share of CBC/Radio-Canada broadcast licence fees for independent production*



Source: Manitoba Film & Music, CRTC and Statistics Canada

* An index value of 100 implies that a particular jurisdiction's share is in proportion to its share of Canada's population.

n.a. - data not available

19. On Screen Manitoba joins the CMPA in firmly opposing CBC/SRC proposal to have all programming and reporting obligations removed. During the 2000 licencing process several COLs were established to ensure CBC/SRC met its regional production commitments. These included:
- The broadcast of 6 hours of priority programming/week where principal photography occurs at least 150 km away from Toronto;
 - Annually reporting of the number of hours of regionally-produced priority programming broadcast on the network during peak time including how many hours were independently produced, a list of qualifying programs, the categories for qualifying programs, the production location of the qualifying programs and the name of the production company;
 - The number of hours of non-news programming produced in the regions and broadcast on non-network time and a separate list of network broadcasts throughout the broadcast day.
20. These conditions represent a bare minimum of targets for supporting regional production and a straightforward, transparent reporting process that would allow the average Canadian living in any region of Canada a practical measurement of CBC/Radio-Canada's legislated mandate to reflect programming produced in all regions of Canada.
21. On Screen Manitoba is not seeking an envelope approach to allocating scarce development and production dollars. The writers, directors and producers that we represent expect to compete with the best story pitches from across the country; but in order to combat the human propensity to work with what and who is familiar, and geographically near, we strongly urge the CRTC to require as a COL that CBC/Radio-Canada maintain the regional production targets established in 2000 and require that through an annual, transparent reporting process, CBC/SRC demonstrate an increase in development and production spending in all regions of Canada.
22. Further, we, like the Alberta Media Industry Association (AMPIA) urge the CRTC to establish a COL that requires CBC/SRC to meet a minimum target of original programming in all genres by independent producers living and working in smaller centres to be commissioned by regional CBC/SRC stations. Regionally commissioned works (whether intended for regional or national audiences) serve to develop writers, directors and producers in all provinces and territories.
23. In its 2015 Strategic Plan the CBC/SRC states its intention to reinforce regional production in terms of format and genre. A specific target would ensure CBC/SRC is actively engaged in augmenting local and regional production.
24. *Dans les communautés de langues officielles en situation minoritaire (CLOSM), les stations régionales de Radio-Canada sont souvent les seules stations dans le bouquet de base des câblodiffuseurs à offrir une programmation locale en français. Depuis quelques années, Radio-Canada a réussi à consolider son rôle et son action dans la francophonie canadienne et, tout comme l'APFC, On Screen Manitoba reconnaît les efforts déployés par Radio-Canada à cette fin.*
25. *En ce qui concerne notre étude sur les dépenses d'ordre public faites pour soutenir la production indépendante francophone dans les provinces des Prairies, le Manitoba semble être surreprésenté en ce qui concerne le FMC. Mais, il faut comprendre que, parmi les provinces des Prairies, seul le Manitoba a des maisons de production francophones (bien qu'il y a des francophones et des franco-parlants en Alberta et en Saskatchewan). Il faut aussi reconnaître que produire une émission pour un*

auditoire de 1000 personnes coûte aussi cher que de produire pour un auditoire d'un million et le Manitoba produit des émissions en français qui sont vues partout au pays.

- 26. Cette étude démontre la réussite des programmes de soutien à la production indépendante à l'extérieur du Québec. Le secteur de la production télévisuelle au Manitoba inclut plusieurs structures bilingues et/ou francophones dont deux maisons de production qui produisent du documentaire, de la fiction, des séries, et des émissions jeunesse. Selon statistiques Canada, la population francophone au Manitoba en 2009-10 est presque 50,000 représentant .7% de la population francophone du Canada.. Un simple recensement des membres d'On Screen Manitoba indique qu'environ 5% des professionnels de la production des médias au Manitoba est bilingue (anglais-français) – dont plusieurs scénaristes-réalisateurs.*
- 27. La production indépendante francophone hors Québec s'est développée dans les 15 dernières années et qui a contribué de façon concrète à l'économie du Manitoba et au renforcement identitaire des franco-canadiens en général. Entre 1997 et 2011, Les Productions Rivard ont produit ou coproduit plus de 600 heures de télévision et ils estiment avoir contribué \$55M à l'économie du Manitoba en emplois, en honoraires et achat de services et matières.*
- 28. Ceci ne représente qu'un exemple de la contribution importante des producteurs indépendants francophones à la diversité des voix sur les ondes canadiennes. Pourquoi la SRC voudrait reculer devant un tel succès en réduisant son engagement auprès de la production francophone en région? Nous reconnaissons volontiers les modifications importantes que l'ère numérique a apportées au secteur télévisuel ainsi que les défis des compressions budgétaires auxquels fait face la CBC/SRC.*
- 29. Ces pressions sont les mêmes que celles ressenties par les producteurs indépendants francophones du Canada. Admettons que ces mêmes défis représentent des opportunités pour renouveler la production et les liens entre l'auditoire et le contenu. Il faut une certaine flexibilité pour s'adapter rapidement aux exigences d'un auditoire mobile, mais sans objectifs clairs, ni mesures transparentes annuelles, nous ne pourrions pas établir un plan d'action pour l'avenir et nous mettrions en danger les acquis fragiles en ce qui concerne la production francophone au Canada. C'est pourquoi nous appuyons la demande d'une entente formelle entre l'Alliance des producteurs francophone du Canada et la SRC.*
- 30. Nous nous joignons à l'APFC pour souligner le rôle essentiel des producteurs indépendants dans le système de la radiodiffusion au Canada, tel que cité dans l'Acte de la radiodiffusion. On ne peut pas refléter l'ensemble de la francophonie canadienne sans l'implication active et réelle des producteurs francophones vivant et oeuvrant hors Québec.*
- 31. Les producteurs indépendants contribuent à stimuler des communautés francophones en situation minoritaire en ce qui concerne l'économie, la langue, la vie culturelle et l'identité nationale. Ce rôle important et le besoin de mesures particulières pour assurer la participation des producteurs francophones indépendants du Canada est reconnu par le Fonds de médias du Canada (FMC) dans le Programme de production de langue française en milieu minoritaire (PLFUMM) dédié à la production indépendante francophone à l'extérieur du Québec. Depuis 2009, près de \$10M ont été investis dans la production francophone hors Québec. La SRC a clairement le mandat de faire fructifier ces fonds en partenariat avec des producteurs indépendants franco-canadiens vivant et oeuvrant à l'extérieur du Québec.*

32. *L'industrie de la production francophone hors Québec est arrivée à une étape clé de son développement. Après 15 ans d'investissement de la part des producteurs, scénaristes et réalisateurs francophones dans toutes les régions du Canada avec l'appui des pourvoyeurs de fonds publics et la collaboration des télédiffuseurs publics comme privés, nous voyons aujourd'hui sur les écrans l'expression de l'identité des francophones et des franco-parlants de toutes les régions du Canada.*
33. *Nous croyons qu'il faut une condition de licence (CDL) qui établit des niveaux minimaux de ressources consacrées à la production indépendante de l'extérieur du Québec sur tous leurs services télévisuels et numériques. De paire avec cette CDL on demande également qu'un processus de rapports annuels de données quantifiables et transparentes (comme celui qu'on demande pour la CBC) soit mis en place. Dans cette perspective, nous appuyons la suggestion de l'APFC que la SRC et ARTV s'engagent à maintenir les niveaux de ressources consacrées à la production indépendante de l'extérieur du Québec au niveau réel de 2011-12.*
34. *Tout comme l'APFC, on souligne l'engagement des producteurs indépendants et des organismes qui les appuient à collaborer avec la SRC afin d'établir des niveaux minimaux de production indépendants hors Québec. Tous les partenaires du système de la radiodiffusion doivent s'adapter aux défis de l'ère numérique et aux défis des compressions budgétaires tout en réalisant de façon concrète leur mandat respectif.*
35. As the national public broadcaster CBC/SRC plays a unique role in the Canadian Broadcast system and while it is true that the global media landscape is changing rapidly due to evolving digital technology and CBC/SRC has faced budgetary compressions in 2000 and again in recent years; it is still mandated to reflect original Canadian production from all regions of Canada in both official languages.
36. In taking an innovative and leadership role in developing and utilizing a multiplatform approach, CBC/SRC has demonstrated that it has the necessary flexibility to adapt to the demands of Canadian audiences to access content anywhere, anytime. In its submissions to the CRTC CBC/SRC offers several examples, in both French and English of how it has maximized online, television and radio audiences – using each platform to support the other while offering rich content on each platform. This success demonstrates CBC/SRC's innovative adaptation to the digital media landscape – it attests to its potential to develop and deliver original Canadian programming in meaningful ways for modern audiences.
37. CBC/SRC, states in its application that it is seeing increased audiences on all platforms and this with the minimum targets and reporting requirements established in 2000. As the national public broadcaster, CBC/SRC is mandated to provide distinctly Canadian programming, to foster a sense of national identity. Currently established targets and a transparent reporting process will not hinder that mandate; in fact, with strong implementation of targets and reporting mechanisms by the CRTC, CBC/SRC will more easily be able to demonstrate its success to Canadian citizens.
38. On Screen Manitoba considers CBC/SRC to be a key partner in the Canadian Broadcast system, along with independent Canadian producers who live and work in all regions of Canada and in both official languages. As the national public broadcaster CBC/SRC has the opportunity to be a leader in the development and delivery of original Canadian programming; but its request for significantly reduced targets and the removal of annual reporting does not reflect its potential to lead.

39. As CBC/SRC states in its application for licence renewal, national public broadcasters play a unique role in any broadcast system; in the Canadian broadcast system, CBC/SRC has a legislated mandate to reflect all regions of Canada and to support the production original independent Canadian content. With that mandate comes financial support from the Government of Canada and while On Screen Manitoba is dismayed by recent reductions to CBC/SRC's budgets; we do not believe that eliminating minimum targets and transparent annual reporting is an acceptable response.
40. CBC/SRC asks for mandatory distribution access yet does not want to set minimum obligations. With public funding and mandatory distribution access come certain responsibilities and obligations. We are confident that the CRTC will apply appropriate regulatory tools to ensure Canadian citizens have access to transparent annual reports that will allow them to see that CBC/SRC's carries out its mandate efficiently, regularly exceeding minimum targets.
41. We believe that the CRTC also has a role to play in ensuring that this licence renewal process results in COL's that clearly establish reasonable targets for minimum levels of original Canadian programming in all genres and formats (and in both official languages) that are demonstrated through annual transparent reporting processes.
42. We are very concerned that CBC's proposed elimination of the 50% target of original Canadian programming from independent sources will result in very few hours of independent Canadian programming indeed. Without the 50% target, 7 hours of PNI with 75% sourced from independent producers translates into just 5.3 hours. When compared to a 24-hour broadcast day without a 50% target for independently sourced Canadian programming that 5.3 hours only represents 3% of the broadcast day. This is clearly insufficient for a national public broadcaster mandated to give priority to original Canadian productions and to source a significant volume of that from independent Canadian producers.
43. Canadian Communications policy places the principle of diversity of voice at its centre. This is a policy that has effectively fostered a sense of identity in a country with a diverse population scattered across a large territory, two official languages and a challenging physical geography. The policy also identifies original Canadian programming created by independent producers from all regions of Canada as the means for ensuring diversity of voice and this with the expectation that programming will represent all genres and formats and "be varied and comprehensive, providing a balance of information, enlightenment and entertainment for men, women and children of all ages, interests and tastes" (Canadian Broadcasting Act 3.1(I)(i)).
44. In view of the above, On Screen Manitoba is alarmed by CBC/SRC's proposal to eliminate minimum targets for children's and youth programming. The CMPA compiled CBC annual reports to discover that although CBC was exceeding the expectation to provide 15 hours per week of programming for children ages 2 to 11 years, providing 28.5 hours/week on average; however, only one of these was original Canadian programming. In regard to the 12 to 17 year old age group, where there was an expectation for 5 hours per week of Canadian programming, CBC has simply reduced this to an average of 30 minutes / week in 2010 and to just 8 minutes in 2011.
45. CBC/SRC has an essential role to play in creating a sense of connection, engagement and understanding of Canadian society in regard to Canadians of all ages. CBC/SRC has an obligation to ensure young audiences are informed, enlightened and entertained within a Canadian context -- they are the Canadian storytellers, creators and audiences of tomorrow. We join the CMPA in calling

for a COL to maintain minimum targets for children's and youth programming in all genres and formats and in both official languages.

46. Further, while we were pleased to read that CBC values the documentary genre and intends to work more often with independent producers; we are disappointed that CBC has set no specific target in regard to the number of hours of documentary it will show in peak time. We agree with DOC Canada that min targets for documentary should set as a COL along with annual report by genre and region.
47. Another reduction in the diversity of voice is CBC's lack of commitment to feature film. On Screen Manitoba joins the CMPA is expressing shock that CBC has not met minimum targets for feature film in terms of expenditure and in the number of feature films being broadcast. The CMPA analysed Telefilm reports and the CBC's annual reports on feature films broadcast and found that CBC fell below its \$30M target for feature film expenditures by \$24M! That target was set for a five-year period and was not spent even though the licence period was extended to 12 years! The number of features broadcast on CBC has fallen sharply from 86 in 2006 to just 24 in 2011.
48. CBC as the lead broadcaster for supporting original Canadian programming and diversity of voice has a key role to play in supporting Canadian feature films. SRC has maintained a much firmer commitment to features.
49. *Nous apprécions fortement l'engagement de SRC envers les longs métrages (fiction et documentaire). Nous encourageons la Commission à établir par le biais d'une CDL des objectifs raisonnables pour CBC comme pour SRC.*
50. Canadians look to the Broadcast system for stories that reflect the Canadian perspective in all of its cultural and linguistic diversity including diversity of story-telling technique. Independent producers have access to production incentives that allow them to increase the size of production budgets to produce content that is of high quality. The award-winning Canadian drama and factual programming that is being bought around the world attests to both the efficiency and professionalism of independent producers.

Conclusion

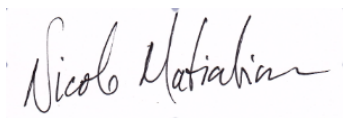
51. CBC/SRC has a legislated mandate to support original Canadian programming by independent producers who live and work in all regions of Canada, and this in both official languages. On Screen Manitoba strongly urges the CRTC to put in place COL's that provide much needed regulatory tools to ensure:
 - CBC/SRC meets its regional programming mandate, generally, and that in both official languages;
 - CBC/SRC provides annual transparent and meaningful reporting that allows Canadian citizens to see which independent productions, and which genres and formats, CBC/SRC funds in every region of Canada;
 - *Que de plus SRC assume son rôle critique comme joueur clé dans les CLOSM en ce qui concerne la langue et la culture en maintenant les mêmes niveaux d'investissement dans les productions indépendantes de tout genre (long métrage et série de documentaire, et de fiction, pour la jeunesse comme pour les adultes) à l'extérieur du Québec;*

Further On Screen Manitoba urges the Commission to require CBC/SRC to maintain all current minimum targets for original Canadian programming and to implement annual transparent

reporting mechanism that allow Canadian citizens to celebrate in CBC/SRC successful realization of its mandate to offer predominantly original Canadian programming largely sourced from independent Canadian producers in all regions of Canada and both official languages.

52. On Screen Manitoba appreciates the opportunity to provide its comments to the Commission.

Sincerely,

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

Nicole Matiation
Executive Director / *directrice générale*
On Screen Manitoba

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