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Mr. John Traversy
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario K1A 0N2

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**Re: Broadcasting Notice of Consultation CRTC 2011-788:
Review of Local Programming Improvement Fund**

1. On Screen Manitoba wishes to take this opportunity to provide the following comments regarding the Broadcasting Notice of Consultation CRTC 2011-788: Review of Local Programming Improvement Fund (LPIF).
2. Étant donné l'importance de la programmation locale en région et étant donné les défis tout particuliers liés au système de radiodiffusion de langue française, **On Screen Manitoba (OSM) souhaite comparaître à l'audience qui se tiendra à compter du 16 avril prochain.**
3. 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 service, 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 quelques 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. *Avec son peuple aussi diversifié 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.*
6. 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”.

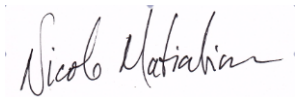
7. The principle objectives of the LPIF are firmly rooted in the Canadian Broadcasting Act. Renewal of the LPIF with some modifications represents an ideal opportunity to respond to growing concerns with regard to the centralization and vertical integration of broadcasters in large metropolises notably Toronto and Montreal (2009-406 point 50). 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 francophone du Canada* (APFC) have brought to the attention of the CRTC their concern regarding centralization and vertical integration; and the potential loss of diversity of voice on the airwaves. A concern shared with the Commission.
8. We believe that a careful examination of the definition of local programming should be considered within the context of the present consultation. According to Broadcasting Regulatory Policy 2009-406 point 42, “Local programming is defined as programming produced by local stations with local personnel **or programming produced by locally-based independent producers** that reflects the particular needs and interests of the market's residents.” Local independent producers have a clearly defined role in the production of local programming and to ensure a diversity of voice.
9. The first objective of the LPIF is “to ensure that viewers in smaller Canadian markets continue to receive a diversity of local programming – particularly local news programming”. Based on available reports, our own observations of local programming in Manitoba and discussions with colleagues in other non-metropolitan areas, it is apparent that the LPIF has successfully ensured the maintenance and in some francophone communities, at least, an increase in local news programming and coverage of local events.
10. *Nous constatons que les sept stations régionales de Radio-Canada situées à l'extérieur du Québec diffusent des journaux télévisés 7 jours sur 7. Également la SRC a embauché des chroniqueurs culturels de façon plus systématique et a pu diffuser des magazines culturels produits en région de façon plus régulière. Soulignons encore que ce fonds a permis la production et la diffusion d'émissions, de projets ou d'événements rassembleurs et significatifs pour les CLOSM francophones. On peut penser à la diffusion du Gala des prix Trille Or à Ottawa, du spectacle Les rencontres qui chantent et la soirée Les Éloizes pour n'en nommer que quelques-unes.*
11. *Avec l'APFC, On Screen Manitoba souligne l'engagement de Télé Inter-Rives Ltée, propriétaire des stations CIMT-TV (TVA), CHAU-TV (TVA), CKRT-TV (SRC) et CFTF-TV (V) qui desservent les régions du Bas Saint-Laurent, Charlevoix, la Côte-Nord, la Gaspésie et les francophones du Nouveau-Brunswick. Télé-Inter Rives démontre clairement que l'utilisation de ce fonds a été optimale et à contribué à augmenter considérablement le volume d'heures de production à travers diverses initiatives : par exemple, l'ouverture d'un bureau de journalistes à Edmonton et Rimouski ou encore l'embauche de journaliste supplémentaire dans la Baie-des-Chaleurs.*
12. *Tout en étant un objectif important du FAPL, la programmation de nouvelles et événements locaux, ne garantit pas pour autant une amélioration de la qualité et la diversité de la programmation locale. Ce deuxième objectif du FAPL reflète très nettement les principes de bases du système de la radiodiffusion au Canada.*

13. Certainly we believe that local programming should include news programming; however, OSM contends that to ensure a diversity of voice all genres should be represented in local programming including (but not limited to) features and series that represent documentary, fiction and children's programming. Our observations of English-language programming in Manitoba confirm that LPIF funding has been used to maintain news programming and coverage of local events.
14. On Screen Manitoba has reviewed the Notice of Consultation along with the related documents and we wish to underline the fact that it is not possible to make a detailed, precise analysis of the success of the Local Programming Improvement Fund (LPIF) due to the lack of data available. Despite the limited data available, OSM notes that the LPIF has ensured the maintenance of minimum levels of local programming in the non-metropolitan areas; however, we are concerned that there is little or no transparency as to how LPIF funds have been spent by the Stations who have benefitted from the funding.
15. The fund dispersed significant amounts of funding \$100M in 2009-10 and \$106M in 2010-11; we believe that the public should have access to how the funds were spent locally. With the information currently available it is not evident that the LPIF was used to augment spending on local programming as set out in Broadcasting Regulatory Notice 2009-406. For example what percentage was used to create new programming such as cultural magazines, documentaries, fiction series? What percentage was used to hire new reporters to increase the quality and efficiency of covering local news stories.
16. We are encouraged by the Commission's report in 2011-788 that "35% of reporting stations used the LPIF funding to begin or expand the Broadcast of locally focused magazine series, documentaries and reality television". This represents some first step towards diversity of genre; however, we note that it does not include all genres and it does not represent all communities. It is our position that all communities should benefit from access to high quality local programming in all genres.
17. We are also encouraged by the Commission's report in 2011-788 that "25% of reporting stations reported using LPIF funding to purchase at least some of their programming from local independent producers"; however, this statement is vague in that it provides no detail on the amount of funding used to acquire programs from independent producers nor the number of hours of programming provided by independent producers.
18. While we believe that the LPIF has been effective in meeting some aspects of its objectives; we note that there is insufficient data to fully analyse the success of the LPIF. The lack of availability and transparency in reporting creates a situation where it is impossible to determine whether the LPIF has in fact resulted in increased spending on local news programming and local event coverage or indeed what amount of funding has been directed towards independent producers to create local content whether documentary or fiction.
19. In order to truly assess the efficiency of the LPIF On Screen Manitoba urges the Commission to adopt a transparent and detailed reporting process for stations that benefit from the LPIF. We agree with the APFC and the APFTQ that reporting should be annual and include:

- a. **A public report detailing the use of the funds received along with a list of programs used to accumulate the minimal weekly number of hours of local programming by each station benefitting from LPIF. The list should include the following information:**
- **Title of the program**
 - **Type of program**
 - **Number of episodes and length of the show**
 - **Certification number (BCPAC/CRTC)**
 - **Name and address of the production company**
 - **Locations where primary shooting took place**
 - **date of broadcast**
 - **Number of broadcast slots per year**
 - **Brief description of the content as it pertains to local programming**
- b. **An annual public report published by the LPIF stating funding amounts accorded to broadcasters by group and type of program.**
20. 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. On Screen Manitoba urges the Commission to return to the initial intent of the LPIF – that it should be used to augment the quantity, quality and diversity of Canadian programming produced in and reflecting the reality of Canadian citizens living in small market and non-metropolitan centres with consideration for the specificities of both Anglophone and Francophone markets.
21. 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.
22. OSM believes that in this period of rapid technological change innovation should be encouraged and rewarded. Further as an organization that represents small and medium size businesses and independent workers we believe that business incentives are the best means for driving change. We encourage the Commission to adopt a formula for calculating individual stations allotments that reflects the leverage of additional funds received. This would encourage broadcasters to seek opportunity to work with independent producers as commissioned projects would generate higher budgets. This in turn would lead to greater diversity and a higher quality of local programming.
23. *La diffusion de contenu produit en région est essentielle au soutien des communautés de langue officielle en situation minoritaire (CLOSM). OSM reconnaît que les Canadiens portent une grande importance à l'accès à de la programmation locale et nous croyons que les consommateurs canadiens sont suffisamment sophistiqués pour comprendre que la programmation locale va au delà des nouvelles locales.*
24. *OSM croit également que les producteurs indépendants en région jouent un rôle clé dans la production d'émissions de qualité et qu'ils contribuent de façon significative à la diversité de la programmation en onde. Étant donné que la qualité et la diversité sont deux objectifs clé du FAPL, OSM encourage fortement la Commission à dédier une portion du FAPL au soutien des émissions des producteurs indépendant locaux, et ceci dans tous les genres (documentaires, variété et fiction).*

25. We believe that independent producers living in the regions contribute efficiently and effectively to ensuring the quality and diversity of local programming in both Anglophone and Francophone communities. Their important experience working at the regional and national level could serve to ensure quality productions with a great understanding of local issues. Indeed they would be most able to create local programming that would have national appeal as they are adept at bring forward stories that reflect the local experience along with universal appeal.
26. Further, as stated above, local independent producers have access to production incentives that leverage higher budgets for individual programs. In essence the LPIF funds could be leveraged through these incentives resulting in a higher volume of local programming while ensuring a high quality and diversity of programming.
27. We believe that the LPIF should be maintained with the modifications we have suggested; however, In the event the Commission chooses not to maintain the LPIF, we agree with DOC Canada that the funds should be reallocated to an existing fund that could then continue to administer funding to local programming initiatives; however, we wish to reiterate that OSM believes the LPIF should be maintained with modifications to the reporting mechanism and a clear directive on the percentage of LPIF funding that should be allocated to programs acquired from local independent producers.
28. Finally, On Screen Manitoba notes with interest the intervention provided by the CMPA. The data they present in regard to the important and recognized role that broadcast system plays in the financing, distribution and marketing of feature films is of great interest. We have noted in past interventions our concern with regard to the erosion of support for feature films within the Canadian Broadcast system and we, like the CMPA, urge the Commission to hold consultations regarding this issue.
29. ***En résumé,** On Screen Manitoba croit que le FAPL jouent un rôle essentiel dans le maintien de la programmation locale, très chère axu Canadiens. Mais nous croyons que le FAPL sera d'autant plus efficace à livrer une diversité de programmation locale avec la mise en place d'uen formule d'allocation qui récompensera les diffuseurs qui, par le biais des émissions réalisées par des producteurs indépendants locaux, augmentent le nombre d'heures de programmation locale tout en maintenant la qualité et la diversité de genres. Nous croyons également que le processus d'évaluation du FAPL bénéficiera d'une approche plus transparente et qui inclut des rapports détaillés annuels publiés par le FAPL ainsi que par les diffuseurs qui en bénéficient.*
30. On Screen Manitoba appreciates the opportunity to provide its comments to the Commission.

Sincerely,



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

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