



**On Screen Manitoba**

003-100 Arthur Street  
Winnipeg MB R3B 1H3  
P 204.927.5898  
info@onscreenmanitoba.com  
www.onscreenmanitoba.com

**Submitted electronically**

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

May 30, 2012

**Re: Broadcasting Notice of Consultation CRTC 2012-81 ("BNC 2012-81")  
Call for comments on a revised licensing framework for pay-per-view ("PPV") services**

- 
1. On Screen Manitoba wishes to comment on the Call for comments on a revised licensing framework for pay-per-view ("PPV") services (CRTC 2012-81).
  2. *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.*
  3. *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.*
  4. On Screen Manitoba is concerned by the erosion of support for Canadian feature films through the Canadian broadcast system, and this, despite increased demand for feature films through V.O.D. services. CTAM released a study earlier this year that demonstrated the increased use of V.O.D. services generally, and in particular, the increased demand for feature film through V.O.D. services (70% compared to 50% in 2010)<sup>1</sup>.
  5. In past presentations (during the group renewal licence hearings and the more recent LPIF hearings), On Screen Manitoba noted that we believe a public process is needed to examine the diminishing support for the production and presentation of Canadian features. We believe that feature films play an important role in the Canadian broadcast system as they contribute to ensuring a diversity of voice in terms of genre, subject matter, cultural and linguistic realities. Manitoba feature filmmakers have been recognized in prestigious

---

<sup>1</sup> <http://www.cartt.ca/news/12990/Cable-Telecom/Movies-TV-series-lead-surg-ing-video-on-demand-viewership-CTAM-Canada-report.html>.

film festivals such as TIFF, Berlin, Cannes and Sundance. We want to ensure that Canadian features created from across the country and garnering international acclaim are available to more Canadians on all broadcast platforms.

6. On Screen Manitoba supports the CMPA's position that the PPV and VOD frameworks should be aligned; and that the VOD framework, although just two years old is already outdated. We strongly agree with the CMPA that the VOD framework and the PPV framework need to be modified to increase VOD and PPV support for Canadian feature films production and presentation.
7. On Screen Manitoba supports the position of Telefilm Canada that PPV services play a crucial role in delivering Canadian content and Canadian feature films in particular to audiences. In the Call for Comments 2012-81, the Commission notes that PPV services have grown from 2008 to 2010 both in terms of audience demand and profit. In light of the important role that PPV services play in providing a platform of choice for Canadian viewers combined with an increased profit margin for PPV, On Screen Manitoba believes that at the very least PPV services should be required to continue to meet current minimum levels of Canadian content and this in both English and French language services.
8. As we have noted in past submissions and is commonly accepted – Canadian audiences want content that is accessible everywhere, anytime. In light of Canadians shifting viewing patterns and emerging on demand content distribution systems, the use of and the profits of PPV and VOD services can be expected to grow. On Screen Manitoba echoes the CMPA in its call for a public process to examine PPV and VOD licensing frameworks to ensure that PPV and VOD service providers increase their financial support of the production, promotion and presentation of Canadian feature films as a condition of license.
9. *En sommaire, On Screen Manitoba soutient une approche au cadre d'attribution de licences aux services de télévision à la carte et des services de vidéos sur demande qui soutiendra d'avantage la production, la distribution et la promotion des longues métrages canadiens, produits en région comme aux grands centres urbain et issus de milieu anglophone, francophone, autochtone ou multiculturel, ainsi que leur l'accès par des services en anglais ou en français.*
10. On Screen Manitoba appreciates the opportunity to provide its comments to the Commission. A copy of this intervention has been provided to the applicants in accordance with the Commission's directives on procedure.

Sincerely,

*[Original signed by]*

Nicole Matiation, Executive Director, On Screen Manitoba

**\*\*\* End of Document \*\*\***