

Comments on Broadcast Notice of Consultation 2015-421

1. On September 19th, 1992 I began working for CKVU. At the time I had worked at various TV stations across Western Canada and for the previous three years had been working for CTV National News out of their Toronto bureau. The move back to BC was exciting for me because I wanted to shoot local news in my home province of BC. Much has changed in the television industry over the past 23 years and I hope my comments will assist the Commission in developing a vision for the future of television that still supports the creation of local programming for Vancouverites and British Columbians.
2. I am requesting to appear in front of the Commission during your January hearings.
3. Over the years CKVU has produced some of Canada's most interesting local and innovative programming. In its early years VU-13 aired a full range of local programming, which included the two hour Vancouver Show, several hours of local news programming throughout the day, and a local sports show called Sports Page, which highlight both professional and amateur local sporting events. At the time this single TV station employed almost 200 people.
4. Fast forward to September of 2015, having been owned by Canwest, CHUM and now Rogers; CKVU, CITY Vancouver and the multicultural station CHNM, OMNI BC employ less than 50 people and air only one daily local program on CITY, Breakfast TV, and three studio based community affairs programs, in language, on OMNI BC.
5. These employment numbers are best explained by an analysis of the union's membership lists over the years (attached). You can see who did what, then and now. Some changes have been due to technological change and centralized master control operations. However many of the staff reductions have been made possible by simply producing fewer hours of local programming requiring fewer employees.
6. In 2004 at CKVU the Company had already centralized master control to Victoria, then soon after to Calgary. There was local evening news, late night news, and weekend newscasts being produced. At this time there were 30 members working in field news operations, 15 members working in inside news operations, 20 members worked in station operations and another 25 members worked in either promotions, traffic or sales.

7. In 2006 at CKVU the evening and weekend newscasts were eliminated by CHUM (in Toronto) , leaving Breakfast Television as the main local programming. At this time there were 18 members working in field news operations, 10 members working in inside news operations, 18 members working in station operations and another 25 members worked in either promotions, traffic or sales.
8. In 2007 Roger's also owned CHNM and rebranded it from Channel M to OMNI BC. It operated out of a Chinatown studio location. At that time, according to the attached employee list, there were 19 employees working in field news operations, 24 employees working in inside news operations, 18 employees working in station operations and another 25 employees worked in either promotions, traffic or sales.
9. Rogers no longer has dozens of creative content professionals telling hundreds of stories a week within our communities. Instead they have a handful of people maintaining a bare bones operation. One field reporter at CITY in Vancouver who spends most of his day reporting live segments from a location outside the scene of the latest news event. All language news on OMNI BC has been eliminated, replaced by a half hour studio based talk shows.
10. In fact, following this latest restructuring by Rogers, many members of the community have commented that both CITY and OMNI are on life support, waiting for the outcome of these hearings to shut down local operations or reduce them to simple news bureaus, feeding into Toronto based national operations.
11. In May of 2015, following a major staff restructuring, Rogers has only 13 members working in field news operations, 4 members working in inside news operations, 9 members working in station operations and another 11 members worked in either promotions, traffic or sales. This is a combined number for both of their local television operations, CKVU and CHNM.
12. As the Local Union President representing members at both CITY and OMNI operations, I have made several interventions to the Commission advocating for more local programming at both stations over the past decade.
13. I'm including two interventions that capture some of my frustration in the CRTC's apparent unwillingness to hold Rogers to a higher standard for local programming requirements by conditions of licence. Why is the

CRTC allowing broadcasters to game the system, by making commitments to local programming on the public record during the application process only to turn their backs on those commitments once granted their broadcast licence? How does this serve the public interest? How does this serve the interest of a million people in Vancouver?

14. CRTC 2010-952, during this application, Rogers created several local programs including a noon news show and a daily afternoon news entertainment show. Both were shut down within months of getting their licence renewal.

15. CRTC 2014-26, during this application much was discussed of the importance of local multi cultural programming on Rogers' OMNI operations. All local news operations were shut down within months of the licence renewal.

16. It is with these previous comments in mind that I will attempt to comment on the Commissions questions as they relate to the future of local programming.

Q1. How should local programming be defined? How should local news be defined?

17. Local programming should be defined as being reflective of the local community it serves and should be created by people who live in the community and are employed by the broadcast licence holder. Local news should be defined in a similar way and should also require daily 24/7 coverage, be original and produced in-house by the broadcast licence holder.

Q2. Should the regulatory approach focus on local news programming, or should it include other types of local programming?

18. Local news programming should be at the core of any regulatory approach and should include a wide perspective of the local community. Additional locally originated programming that provides a full view of local cultural, sporting and entertainment events should also be expected outside of daily, original, in-house, local news programming.

Q3. What role should the community element play in providing local programming?

19. To be clear, many television stations in Canada are already controlled at central hubs – not from local communities. What this really means is that local stations really have no easy way of broadcasting over their own transmitters.
20. The community should be at the core of all local programming for it to be relevant and reflective. Members of the community should be the camera operators, editors, reporters, writers, assignment editors and hosts who are involved in the production of local programming.
21. This is why members of the community must be the camera operators, editors, reporters, writers, assignment editors and hosts who are involved in the production of local programming.
22. Hollowing out stations because technology enables this to happen puts technology, not Parliament and not the CRTC, in charge.

Q4. Should the Commission place a greater emphasis on expenditure requirements (the amount of money spent on the programming) or on exhibition requirements (the number of hours of programming broadcast) when it comes to ensuring the presence of local programming in the broadcasting system? What other measures, if any, should be taken to ensure that appropriate amounts of locally relevant and reflective news content is made available to Canadians across the country whether through local television stations or community services?

23. Hours of original, daily, in-house local programming can be measured in many different ways. Original stories in a news program vs repeating the same stories on a “news wheel”. How many reporters, camera operators, and videographers are involved in producing original material out of locally based operations would be another measure important in determining the balance between expenditure and exhibition requirements.

Q5. Is a physical local presence still needed in the digital age? In considering this question, are studio facilities and local staff required to provide meaningful locally reflective and locally relevant programming? If so, what financial resources, infrastructure and staff are necessary?

24. A physical, local presence is essential to providing credible local programming. Employing feet on the street and bums in the seats are the only way to ensure the local community is reflected accurately in the creation of local programming. Reporters, camera operators, editors, writers, assignment editors, and hosts are all important elements in the creation of relevant local programming. Decisions made at a centralized hub are often out of touch with the realities of the local community.

Q6. Is regulatory intervention needed to foster local programming by both the private and community elements of the broadcasting system and to ensure the presence of local programming?

25. My experience is that without meaningful and specific conditions of licence, broadcasters will find a way to produce the least amount of programming required at the lowest possible cost;

26. Today's broadcasters seem to view their work as pure business, and not as a matter involving the public interest. They seem to see local programming as just one more cost that must be cut as much as possible. This is exactly what shareholders want – but is not what Parliament intended. If Parliament shared this view it would not have established the CRTC to implement a different broadcasting policy for Canada.

Q7. Should the Commission differentiate between small and large markets? Should there be a different approach for small market independent stations?

27. The Commission should consider that in order to have a range of perspectives in a large market, some subsidy may be required to ensure smaller communities in large metropolitan areas are reflected by a range of local programming. This is especially true in the creation of local multicultural programming, where some of the ethnic communities are much smaller than traditional English or French communities.

Q8. BDUs currently allocate approximately 40% of local reflection contributions to indirect costs (facilities, equipment, etc.) and 60% to programming. Is this still an appropriate allocation of costs? If not, propose an alternative allocation.

28. Most TV operations have already made the technical investment in HD, so it would seem appropriate to allow a larger % of local reflection contributions to be spent on the creative content side of local programming.

Q9. How should funding for locally relevant and locally reflective programming be allocated from the various existing funding sources to ensure the continued presence of this programming in the Canadian broadcasting system as a whole?

29. The Commission has allowed the creation of very large vertically integrated Companies, who not only own most television operations in Canada but also control their distribution. It seems these Companies should be required to contribute in a significant way to the creation of locally reflective Canadian programming in exchange for their exclusive and protected access to Canadian consumers.

Q10. How should the Commission and Canadians measure the success of proposed approaches?

30. Television is constantly changing and the Commission's ability to ensure local programming and local news are produced for consumption over multiple delivery systems, OTA or digital would be a measure of success.

31. Over the air (OTA) broadcasters have always had exclusive access to the airwaves, and this structure is still in place today (the old bridge). In exchange for this exclusive privilege broadcasters agreed to invest in a limited amount of local programming. They make money, mostly from US programs that they have the Canadian broadcast rights to.

32. In the case of Multicultural local programming, how did this important part of Canada's broadcasting future get left out of this review? Rogers Broadcasting owns five local multicultural broadcasting licences across the country and produces virtually no daily original local multicultural news programming.

33. OTA's have an advantage in the future because they are the trusted brands; this is what Rogers was purchasing when the Company bought CITY, as recently as 2007, and said although TV is old technology, broadcasting is the best way to access a mass market.

34. This is important to consider as the “new bridge” is built. OTA’s still have regulated airwaves and still have an advantage to accessing the mass market because they are “discoverable” through their traditional relationships (trusted brands). Unfortunately OTA’s are doing very little to build this “trust” with innovative new programming. They are NOT building the new bridge.
35. Broadcasters are laying people off and producing poor quality programming that is basically “dumped” onto the new delivery system like web sites or on demand cable systems. Very little investment is being made into creating unique material for this new digital world.
36. Broadcasters’ failure to invest in themselves would be entirely their business – except that Parliament has set different goals in the *Broadcasting Act*. In particular, broadcasters are supposed to STRENGTHEN the system – not perpetually weaken it.
37. The technical cost of producing material is relatively low, equipment is more accessible than ever, however the labour costs are basically the same. Content does not produce itself, creative content professionals are needed to be in place to produce the high quality programming Canadians deserve and expect.
38. Print journalism has been reduced in a largely un-regulated environment and has suffered as a result. Fewer local papers employing fewer journalists in the community, resulting in less content, with less analysis of events, and inevitably poorer journalism. This does not have to be the future for Broadcast television and with the Commissions well considered decision into the industry’s structure and governance at this important time the future can be a real win for Canadian Citizens and the Canadian Broadcast Industry.