



September 9, 2013

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

Re: Broadcasting Notice of Consultation CRTC 2013-394

Call for comments on the terms and conditions of distribution for Canadian Category C national news specialty services

Dear Mr. Traversy:

1. The Canadian Media Guild (CMG) is a union that represents 6,000 workers in the media sector. Our members work at CBC/Radio-Canada, Thomson Reuters, TFO, TVO, APTN, ZoomerMedia, Canadian Press, Shaw Media, and private radio.
2. We are pleased to respond to the call for comments on the Commission's preliminary proposal for governing Canadian Category C national news specialty services as laid out in [Broadcasting Notice of Consultation CRTC 2013-394](#).
3. We agree with the Commission's stated view that national news services are "vital" in achieving the objectives of the *Broadcasting Act* by "help[ing] Canadians participate fully in the democratic, economic, social and cultural life of their country, their regions, their provinces and neighbourhoods."¹
4. While technological changes are offering Canadians increased options for obtaining information, we know television remains a major source of news for citizens across the country: according to a survey conducted last year by Ipsos Reid for The Canadian Journalism Foundation, 74 % of us still watch a newscast on television always or sometimes.² Given the essential role played by the country's national TV news services, we believe the Commission should go even further to strengthen these services so they can continue to meet the information needs of Canadians.
5. The CMG recommends that in the context of this consultation, the CRTC should:
 - clarify further the investment in newsgathering, coverage across Canada, and infrastructure that all-news TV services must meet in order to be classified as national news services
 - commit to comprehensive news reporting on all news channels and to equitable treatment for new entrants as future applications for all-news services are presented

¹Broadcasting Notice of Consultation CRTC 2013-394
Call for comments on the terms and conditions of distribution for Canadian Category C national specialty services
<http://www.crtc.gc.ca/eng/archive/2013/2013-394.htm> (parag. 10)

² Poll conducted by Ipsos Reid on behalf of The Canadian Journalism Foundation, Results published on October 17, 2012
<http://www.newswire.ca/en/story/1054503/despite-growth-in-digital-media-canadian-news-seekers-still-rely-on-traditional-sources-for-daily-news>

- state how any decision arising from this consultation will fit into the planned review of the television broadcast system expected this fall, and commit to review any decisions that conflict with the outcomes of the later proceeding

Developing a common understanding of national news services

6. The *Broadcasting Act* states that “the Canadian broadcasting system (...) should [offer] information and analysis concerning Canada and other countries from a Canadian point of view (*Broadcasting Act*, section 3(1)(d)(ii)³; and that “the programming originated by broadcasting undertakings should be of high standard”(*Broadcasting Act*, section 3(1)(g).⁴
7. In Broadcasting Regulatory Policy CRTC 2009-562, the Commission referred to criteria for a common and standard nature of service definition for national TV news services, focusing on language (English or French); frequency of updated news reports; advertising limits; closed-captioning; adherence to codes of ethics and membership in the Canadian Broadcast Standards Council.⁵
8. The CMG believes the above criteria are necessary but not sufficient for achieving the objective the Commission has stated it is seeking from this consultation which is to “ensure a healthy and diverse range of Canadian news programming within the Canadian broadcasting system,” and to provide “Canadians with a reasonable opportunity to be exposed to the expression of differing views on matters of public concern.”
9. We agree with a major study published by the Federal Communications Commission in the United States in 2011 entitled *The Information Needs of Communities* which recommends that “When foundations, entrepreneurs, citizens or policy makers attempt to assess the information health of a community, they should look not only at abundance of media outlets, diversity of voices and competition, but also at reportorial resources including full-time reporting, producing and editing staff.⁶ **(the emphasis is ours)**
10. Preliminary CMG research looking at corporate announcements indicates that in Canada 3,400 jobs have been cut in the broadcasting system over the past five years. This couldn’t but have negatively impacted newsgathering, reporting and ultimately the information Canadians receive.
11. It is interesting to note that the current Pew Research Centre’s State of the News Media report indicates that in late 2012 in the U.S. cable news universe, “over all, commentary and opinion are far more prevalent on the air throughout the day (63% of the airtime) than straight news reporting (37%).” The report also finds that coverage of live events and live reports dropped in daytime programming from 33% of available airtime in 2007 to 23% in 2012. And the airtime dedicated to interviews—which generally cost less to produce—rose from 39% to 51%.⁷

³ *Broadcasting Act*, Broadcasting policy for Canada
<http://laws-lois.justice.gc.ca/eng/acts/B-9.01/page-2.html#docCont>

⁴ *Broadcasting Act*, Broadcasting policy for Canada
<http://laws-lois.justice.gc.ca/eng/acts/B-9.01/page-2.html#docCont>

⁵ Broadcasting Regulatory Policy CRTC 2009-562
Conditions of licence for competitive Canadian specialty services operating in the genres of mainstream sports and national news
<http://www.crtc.gc.ca/eng/archive/2009/2009-562.htm>

⁶ Steven Waldman and the working group on Information Needs of Communities,
“Information Needs of Communities – The changing Media Landscape in a Broadband Age”, Federal Communications Commission, (July, 2011), p. 345
<http://www.fcc.gov/info-needs-communities>

⁷ Mark Jurkowitz, Paul Hitlin, Amy Mitchell, Laura Santhanam, Steve Adams, Monica Anderson, and Nancy Vogt of Pew Research Center, “The Changing TV News Landscape” The State of the News Media 2013
Pew Research Center’s Project for Excellence in Journalism
<http://stateofthemediamedia.org/2013/special-reports-landing-page/the-changing-tv-news-landscape/>

12. In a related analysis, Pew Research also found that viewers report an increasing lack of depth in some of their news content with 61 % saying they noticed that stories were less complete.⁸
13. Our view is that market forces are not enough to ensure citizens get the news and information they need. If we want TV news to survive and to continue serving Canadians, we must create the conditions for it.
14. In response to CRTC 2010-649, the CMG supported Sun TV News application with conditions. At that time, we recommended that the CRTC hold a policy hearing to examine the definition of news and news balance. We proposed that this would be an opportunity for the CRTC to obtain views and research on matters related to broadcast news in general. We felt it would also be an opportunity to examine news in the context of the major changes in the broadcasting industry over recent decades such as integration and consolidation of ownership.⁹ Today we would add to that factors such as technological advancements and significant staff reductions.
15. The Commission has explained that “national” in “national news services” refers to the content of the news and not to the manner in which the news is distributed¹⁰. This criterion involves having resources that are set up to cover and report the news across the country.
16. **Therefore, the CMG renews our recommendation that the Commission hold a policy hearing to obtain views and research on matters related to broadcast news in general** ahead of next group licensing proceedings. This would be an opportunity to develop a consensus on what Canadians should expect in terms of all-news TV services that are national, report the news, and offer a wide range of views on their public airwaves. The initiative would also help design an effective mechanism that ensures Canadians receive from their all-news TV services the accurate information they need to participate effectively in debates on issues of public concern.
17. At the same time, this hearing would allow the CRTC to determine what resource investments are required for national licensed all-news TV services to meet the information needs of Canadians. The review we are recommending is particularly important in the context of continuing reduction in staffing in the industry. We recommend that the Commission set up such a hearing as a stand-alone initiative or as part of the upcoming review of Canada’s broadcast system.

Comprehensive news reporting and a diversity of perspectives

18. In the call for comments, the Commission states it seeks to “ensure a healthy and diverse range of Canadian news programming within the Canadian broadcasting system” and adds that “greater and more equitable access to such programming is crucial to providing Canadians with a reasonable opportunity to be exposed to the expression of differing views on matters of public concern.”
19. We believe there must be a robust foundation of actual news, accurate information and reporting available to citizens on all national news channels to serve the public policy objective of informing Canadians.

⁸ Jodi Enda and Amy Mitchell of the Pew Research Center, “Americans Show Signs of Leaving a News Outlet, Citing Less Information”, The State of the News Media 2013
<http://stateofthemediamedia.org/2013/special-reports-landing-page/citing-reduced-quality-many-americans-abandon-news-outlets/>

⁹ CMG comments on CRTC 2010-649 – Sun TV News application
<http://www.cmg.ca/CRTCSunTVNews.pdf>

¹⁰ Broadcasting Regulatory Policy CRTC 2009-562
Conditions of licence for competitive Canadian specialty services operating in the genres of mainstream sports and national news (para. 39-40)
<http://www.crtc.gc.ca/eng/archive/2009/2009-562.htm>

20. In the preamble to its Code of Ethics, the Radio Television Digital News Association of Canada (RTDNA Canada) states that “The members of RTDNA Canada recognize the responsibility of electronic journalists to promote and to protect the freedom to report independently about matters of public interest and to present a wide range of expressions, opinions and ideas.”¹¹ **(the emphasis is ours)**
21. In its Journalistic Standards and Practices, the CBC states the following regarding accuracy: “We seek out the truth in all matters of public interest. We invest our time and our skills to learn, understand and clearly explain the facts to our audience.”¹²
22. The CMG believes once the conditions of comprehensive news reporting are satisfied on an all-news channel, there is room for increased diversity of views.
23. **The CMG recommends that any new policy adopted by the Commission regarding Canadian national all-news TV services should** (a) ensure those services have laid the ground for delivering news, accurate information and a range of views to Canadians (b) establish a process for the CRTC to consider applications for new specialty news channels with the aim of treating them equitably and offering them the same benefits within any television news service framework.

Potential impacts of the fall broadcast system review

24. In June of this year, CRTC Chair Jean-Pierre Blais announced that the Commission plans to widely consult Canadians and industry on the country’s broadcast system.¹³ Although we don’t have details on the fall review, it is fair to think that such a major review is likely to include national all-news services that are the subject of this consultation.
25. **Therefore, the CMG recommends that irrespective of the decisions that come out of the current consultation, the Commission commit to giving national all-news TV services** the attention they require as part of the more elaborate review of Canada’s broadcasting system that has been announced for this fall.
26. We request to appear at a public hearing to further explain our recommendations and to respond to any information that emerges in the meantime.

Respectfully submitted,

Jeanne d’Arc Umurungi
Canadian Media Guild
310 Front St. West, Suite 810
Toronto, ON M5V 3B5
jeannedarc@cmg.ca
Tel.: 416-591-5333, ext. 243

End of document

¹¹ Radio Television Digital News Association of Canada, Code of Ethics, Preamble
<http://www.cbsc.ca/english/codes/rtnda.php#Article5a>

¹² CBC Journalistic Standards and Practices
<http://www.cbc.radio-canada.ca/en/reporting-to-canadians/acts-and-policies/programming/journalism/>

¹³ Chairman Jean-Pierre Blais’ speech at the Banff World Media Festival, Banff, Alberta, June 12, 2013
<http://www.crtc.gc.ca/eng/com200/2013/s130612.htm>