

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

July 17, 2007

Re: CRTC 2007-5 "Diversity of Voices" Proceeding

Dear Secretary General of the Commission:

1. I'm writing in response to your recent request for comment on the diversity of voices in Canadian media. I have significant concerns about recent decisions about concentration of ownership, the exceptions that are being made to established policy, and the direction of policy that establishes a precedent for voluntary compliance with the rules and regulations that ensure the principals set out in the Broadcasting Policy for Canada.
2. Clear criteria should be established to evaluate the impact of ownership on the diversity of voices in a market. This should include public consultation and independent evaluation. Exceptions to the existing ownership rules should not be made and, retroactively, markets that are clearly suffering from a lack of diversity of voices due to concentration of ownership should be remedied with swift intervention.
3. The policies and safeguards put in place to address cross-media ownership are not enough. Vertical, horizontal, and cross-media integration most often serves the purpose of increasing corporate profits, and reducing editorial diversity; it rarely, if ever, serves the Canadian people, or the mandate set out in the Broadcast Act.
4. Finally, efforts that focus on under-represented communities – ethno-cultural, linguistic, and Aboriginal – have not gone far enough to ensure that those voices are reflected in the Canadian media ecosystem. Specifically, the programming developed by and for these groups is grossly out of sync with the size of the communities and a percentage of the Canadian population. The Commission should ensure that there is adequate and continued funding for initiatives that involve and inform the vast audience that make up Canada's cultural fabric. To achieve this, the Commission should require non-voluntary contributions to community media funds.

I am not requesting an audience at the hearing and want to ensure that these points are considered.

Best regards,

Phillip Smith,
President
Community Bandwidth
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