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## Filed Electronically

**February 1, 2010**

Robert A. Morin  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
1 Promenade du Portage  
Gatineau, Quebec  
K1A 0N2

Dear Mr. Morin:

**Re: Review of Community Television Policy Framework  
Broadcasting Notice of Consultation CRTC 2009-661**

*You can't participate if you don't know what's going on. You can't have real community, and you can't have real democracy, if you don't have communications. Telile Community TV's role is to make sure that people here do know what's going on, and do know how they can participate. That's what Telile is all about.*

*Silver Donald Cameron, Telile's founding Chairman.*

1. Telile: Isle Madame Community Television Association/ Association Télévision Communautaire de l'Isle Madame ("Telile") is pleased to have this opportunity to participate in the Commission's review of its community television policy framework.
2. Telile operates an English- and French-language remote community-based television station, broadcasting over-the-air, and serving the communities in and around Isle Madame, Nova Scotia. We are not a cable community channel. We were licensed by the CRTC in *Broadcasting Decision CRTC 2002-322*. As far as we know, we are one of very few, "remote" over-the-air community television services licensed by the CRTC under its existing policy framework for community-based media, as set out in *Broadcasting Public Notice CRTC 2002-61*.<sup>1</sup>

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<sup>1</sup> Please note, we have used the term "remote" to describe our service and community in keeping with the CRTC definition for that term. A "remote" community, for CRTC purposes, is a community in which there is no competing regional or local television service, or local community cable channel. We don't consider Isle Madame necessarily to be "remote" in any other sense. A better description might be "rural" or "coastal".

## Executive Summary

3. Telile was established in 1993 to serve the numerous communities in and around Isle Madame. We went “on the air” as a community channel in 1994. In the early 1990s our communities faced an economic calamity: the collapse of the ground fishery. Our traditional industry, represented by the Richmond Fisheries plant in the historic town of Petit de Grat was, literally, bulldozed into the ground. Petit de Grat had been a fishing centre for more than 400 years. The shock to our community cannot be understated.
4. Almost 20 years have passed since then. In some ways, Telile is now fairly well established. We play a very important role in our community. Through our programming, we provide the only local television content about Isle Madame and the surrounding area. Our programming, as a whole, reflects the diverse population of our community and the varying interests of our viewers. Our French-language programming is the only French-language programming by and about the historic Acadian population on Isle Madame. We represent, in a very tangible way, our cultural heritage, and our hopes for developing this culture in the future.
5. We bring the perspective to this proceeding, therefore, of a stand-alone community television station of the type that the CRTC’s existing community television policy was intended to encourage. We hope to assist the CRTC to understand how our type of community television works, how our own objectives fit within the Commission’s objectives for this sector, and how the Commission’s policies can be reshaped to better meet its objectives.
6. Specifically, in this submission we address the following points:
  - The CRTC’s objectives for the community sector should include:
    - ensuring the *sustainability* of community television controlled at the local level, and
    - the extension of the community sector from a secure base in broadcasting into new distribution models, including new media.
  - In our experience, locally-owned and operated community television, in smaller remote communities can have a profound impact on those communities. This impact is far greater than what a cable community channel could achieve – at least in our area.
  - The Local Program Improvement Fund should, beyond any doubt, be used to assist in the production of local programming by community broadcasters. This assistance would be especially important in communities served by remote community-based undertakings, where there is no other source for local programming.
  - The allocation of a small envelope from the existing LPIF to support community broadcasting in remote areas, as defined by the CRTC, would have no appreciable impact on the local private broadcasters that now access the fund, but it would have a huge impact on small community television broadcasters like

Telile. Even if only 1% of the LPIF were directed to this use, the impact would still be substantial.

- The CRTC's policies should encourage greater co-operation between large multi-system cable ownership groups and small community television services. Without this kind of co-operation, the local diversity we provide will not reach its potential and, in some instances, may even be hard-pressed to survive.
- New media does present opportunities for Telile in the longer run. We view new media as an alternate platform to make our content available to a wider audience. New media is not, however, an alternative to television and cable distribution. It is a resource to be exploited and developed from a solid broadcasting base.

7. Telile wishes to appear at the CRTC's hearing to consider its community television policies. We know that many members of our community have shown their interest in this proceeding through their direct participation. We owe it to our community, and to ourselves, to do our best to make the Commission fully aware that well-framed policies will have an enormous impact on local, community broadcasting.

### **Telile: Who we are and what we do**

#### *Origins and Service Area*

8. Telile was formed in 1993 by forward-looking members of our community as part of an economic development and diversification initiative. At the time, our island and the surrounding communities were in crisis due to the collapse of the cod fishery and other ground fish stocks. Telile was established to help create our own opportunities in new industries. It was also formed as an end in itself: to build a better informed and more self-aware community, with more control over its own future.
9. We are located on Isle Madame, which is a series of small islands at the South East corner of Cape Breton Island:



10. Telile operated originally as a cable community channel, feeding programming into the cable systems operated by Rush Communications. In early 2000, Telile came to the conclusion that we needed to have an over-the-air presence – and more control over the distribution of our own programming. We applied to the CRTC and were licensed to

operate a “full power” television station broadcasting on channel 10 with an effective radiated power of 450 watts to serve Isle Madame and its surrounding communities. After we were licensed by the CRTC we got to work and our transmitter began operating in 2003. We’ve been on-the-air continuously since then.

11. The following map is roughly equivalent to the area served by our over-the-air signal.



The total population within our broadcast area is approximately 4,500. The town of Louisdale, while not on Isle Madame proper, is very much a part of our community. Our broadcast signal also reaches into other parts of Richmond County including Lower River, St. Peter's, River Bourgeois and L'Ardoise.

12. The larger towns in our service area, including Arichat, West Arichat, D'Escousse, Petit de Grat and Louisdale have cable service. The population is more widely dispersed, however, so our over-the-air signal is essential to provide service for the entire area.
13. We are distributed on channel 4 by our local cable operator. In addition, Seaside Communications, which operates the system in the nearby community of St. Peters, distributes our signal on channel 5 in that community and up the eastern coast of Cape Breton Island including Louisbourg and Glace Bay-New Waterford. In total, we estimate that we reach about 12,000 households in Eastern Cape Breton Island.
14. Isle Madame is home to both the French and English language. A large proportion of our population has Acadian roots and French is spoken here in some communities as the day-to-day language. There has been some erosion of the language, but there is hope for the future with the creation of a French-language school system in Nova Scotia and on Isle Madame. A French-language community radio station was recently licensed to serve Isle Madame and the surrounding area.

### *Programming*

15. Telile plays a vital role in the community. We broadcast programming every day. Telile publishes a TV guide monthly which includes six to nine new programs each month. The programs vary from week to week and include:
  - *Telile Today* (our flagship program) in which host Rhonda LeBlanc interviews notable people and visits various historic, economic or environment sites of interest in our community,
  - taped events and drama productions (usually in French) at École Beau-Port and Felix Marchand Elementary School,
  - concerts in community halls,
  - footage from the local Historical Society,
  - monthly municipal council meetings and debates from the Provincial House of Assembly,
  - local drama productions produced for television (in French), (including *Notre Cabane sur l'Île Madame* and *Hortense à Chéticamp*).
  - election coverage including a hosted candidates' debate held in front of a live audience, and political air time provided to each candidate to expand on their platforms,
  - some programming that we receive from other community channels (usually in French),
  - our weekly Bingo fundraising broadcast (which is a community event in itself),
  - religious programming, especially around the Christmas and Easter season (which is especially important for older members of our community, who are sometimes unable to participate personally in those services for health reasons),
  - guest speakers with an educational message on, for example, genealogy, grief and grieving and environmental issues, and
  - a monthly program hosted by our provincial MLA to update constituents on provincial services and political issues.
  
16. When we are not broadcasting programming, we provide a continuous scroll. Information on the scroll is updated daily and includes community events, meetings, dances, public service announcements, for sale/for rent notices, directory of information, community bingo and card plays, fund raisers, birth and birthday announcements, thank you's, lost and found, etc. Our particular area does not have a daily newspaper (the closest daily in Cape Breton is published in Sydney), so the scroll provides very relevant information to our community.

17. Telile broadcasts in both official languages. Approximately 25% of our content is in French.
18. Since Telile first went on air in 1994, we discovered that people felt validated when they saw themselves on TV. It made residents realize that our culture and people, and the place in which we live, are as interesting and important as any other. Our many local viewers also feel connected to Telile, they can call and request their favourite programs and speak to us to offer their opinion or concerns. Because we are so involved in different aspects of the community we have also become a bit of a Community Directory; people regularly call us for phone numbers, contact information or questions on how to match their need with someone's skill.

#### *Facilities and Staff*

19. The support that we have received from our community has been reflected, as well, by various levels of government and other contributors. In 2008, Telile was able to relocate to a newly built studio facility in Arichat. The facility includes two studios, a control room, an edit suite, and offices.
20. This building was built with the support of Enterprise Cape Breton/ACOA, the Province of Nova Scotia and local businesses. CBC also donated surplus equipment that would have cost us \$40,000 to buy new. Due to this support, Telile now pays a monthly mortgage payment instead of rent and we have a new facility and the technology to allow us to improve our productions over time. At our Open House in April 2008, a manager from CBC Halifax said the facility is superior to many of the regional CBC stations.
21. Telile is operated by a staff of three full time employees, supplemented by casual labour and summer students. Many of our productions feature local talent and volunteer contributions. For example, our drama productions are written and acted locally on a volunteer basis. Members of the Telile Society also occasionally volunteer in both productions and administrative tasks as needed. Other residents will call with programming ideas and agree to act as "researcher" or "Production Assistant" and help us find photos, information or contacts to make the program as good as it can be. We also accept "amateur footage"; we will edit the donated footage and re-broadcast it to our viewers.

#### *Finances*

22. Telile is a non-profit corporation. Our annual gross revenue is in the neighbourhood of \$375,000. We do not receive any operating grants. All of our revenue is raised by us, and all of it is used to support our operations.
23. Our most important revenue source is our weekly televised bingo game, which accounts for the bulk – around 90% – of our revenue. It is important to keep in mind, though, that the cost to generate this revenue is significant. When the costs associated with operating our bingo game are factored in, the free cash available for our other television operations (including staffing, debt service, administration, and all other costs) is around \$185,000 each year.

24. Diversification and growth of revenue sources is one of our key objectives. Telile does include advertising in our on-air scroll, and we have also generated some revenue through sales of our productions. Revenue from these sources is modest. We believe, though, that there is potential for growth from advertising sales, in particular, in the future, if we had “seed money” or increased revenue from other sources to produce higher quality productions that can attract sponsors.

### **The Commission’s Objectives for Community Television**

25. We have reviewed carefully the Commission’s 2002 policy for community television and the current notice of consultation. The Commission has posed a number of questions regarding what its objectives should be for community television.
26. In 2002, it seems, the Commission’s preoccupation was to encourage the production of *more* local programming, and to encourage the entrance of a greater diversity of voices. Based on that policy, the Commission introduced new models for community television, including the notion of licensed stand-alone community broadcasters.
27. We are not sure that the Commission’s policy has achieved its objectives. Our impression is that the new policy did not result in significantly more stand-alone community services being licensed. Consequently, we do not believe that the policy has led to more locally-produced and locally-reflective community programming, or in the creation of a greater diversity of voices in the broadcasting system.
28. In Telile’s case, it may be worth noting that our plans to launch an over-the-air service pre-dated the Commission’s revised policy. We had already come to the conclusion, due to the relatively limited cable coverage in our area, that an over-the-air service would better serve our population. Also, an over-the-air service gave us the technical means to become masters of our programming in its entirety – without relying on a cable intermediary. In other words, the CRTC’s policy did not lead to our launch as an independent over-the-air service, it just happened to coincide with that launch.
29. We are, of course, thankful that the Commission’s policy does allow for services like ours. Obviously, we believe that local community television has a huge role to play in areas that do not have any other source of local television. But, the Commission’s policies do not provide a means to ensure that community television *is sustainable*.
30. We think that this represents a gap in the Commission’s policy. The Commission has put in place a framework that *allows* for more community television services, but the policy does not provide a *means* for the establishment and sustainability of those services. It seems likely that many prospective services have considered whether they could survive if they established a community television service, and have concluded that they could not.
31. In our case, the launch of our stand-alone community television service was part of a concerted strategy in our community and it became a key part of our overall plan for economic development following the collapse of the fisheries. If we hadn’t been focused on our plan, and had within our community a group of leaders that saw the value in having our own communications infrastructure, Telile would not have launched, and it definitely would not have launched as a stand-alone service. We appreciate that the

Commission's policy permitted this to happen, but it would not be accurate to say that the Commission's policy actually *encouraged* it.

32. We believe, therefore, that, going forward, the Commission's policy should have, as an objective, ensuring that locally controlled community television is secure and sustainable.
33. In addition, any undertaking operating in the communications sector must be aware of developments in new media. The Commission's community policy should, therefore, also contemplate the role that new media can play in the community sector. We believe that one of the Commission's objectives should be to support the extension of the community sector from a secure base in broadcasting into new distribution models, including new media. We discuss new media and its significance to Telile in more detail below.

### **The Role of Community-Owned Local Television vs. the Cable Community Channel**

34. The Commission's policy review is naturally focusing on different aspects of cable community channels. Telile does not operate as a cable community channel. While there are undoubtedly great advantages to the cable community channel for many small communities, we believe that the better model for community expression in smaller and remote communities, *if it can be supported by the community*, is the stand-alone model that Telile is developing. The CRTC's policy should, therefore, continue to encourage the establishment of locally-owned and operated, stand alone, over-the-air community television stations.
35. There are clear advantages to this model of community ownership in comparison to the cable community channel model:
  - The ability to control our own content and to have control over our own fate was central to the decision taken by Telile to operate a stand-alone service. Previous cable operators had been helpful to Telile in the early days, and that was appreciated, but in the end we needed to control our own service, rather than be the "good will" gesture of a local business.
  - In remote areas, such as ours, cable coverage is not universal and even in areas that have cable service, many individuals choose the satellite alternative or choose not to subscribe to any service. Therefore, if the community television broadcaster is to provide service to the entire community, it has to be delivered over-the-air. Internet delivery is still not feasible throughout our service area and, in any event, is not as attractive an alternative than over-the-air transmission.
  - Over-the-air transmission allows us to deliver our signal into adjacent communities without their own community-owned channel that are served by different cable operators. There would have been no technical means to have shared our signal with the neighbouring cable operator in St. Peters, for example, before we began to transmit off air and, in any event, there would have been little incentive on the part of the cable operator to carry the cable channel of a neighbouring (unrelated) cable operator.

- By operating our own service we have far more control over what happens in the future. While our local cable operator, Rush Communications, was helpful when we first began producing community programming (beyond a doubt) some questions began to arise: Who owned the programming we produced? Who should sell the airtime (to the extent there was advertising or air time to be sold)? Was there a secure future for Telile as a service provider to the cable system – as opposed to the other way around? What would happen if the cable system were sold or, worse, went out of business or stopped service to some communities? We were uneasy with the possible answers to these questions. Taking more control over our own future and the delivery of our own programming became a natural development.
  - The impact on the community of having our own, independent, television station has, we believe, been substantial. We have enjoyed wide support throughout Isle Madame and from all levels of government for our plans to create a modern, secure base for television programming in our community. People fully understand the significance of having a stand-alone television service – independent from the business of operating a cable system. Our community is proud of our achievement to launch and sustain Telile, and this pride has helped us to look forward through very difficult economic times.
36. We feel strongly, therefore, that the Commission’s policy should continue to support and encourage the growth of community-owned stand-alone television services. In our area, there is no alternative to provide any other local programming. In this setting, in particular, local television should, wherever possible, have a greater presence than a channel on a cable system, and more control over its own fate than a local cable operator – no matter how well intentioned – can offer.

### **Local Programming Improvement Fund**

37. The CRTC has asked for comments on whether the Local Programming Improvement Fund (“LPIF”) should be used to fund the production of community programming on community owned stations. We believe strongly that it should – at least in the case of communities in which there is no alternative source of local programming to take advantage of the LPIF.
38. We understand that the LPIF is currently distributing the estimated amount of \$100 million to a select number of conventional television stations in non-metropolitan markets (having fewer than 1 million people).<sup>2</sup> Reviewing the CRTC’s list of television stations that are eligible to receive funding, it appears that each of CBC, CTV and CanWest Global are eligible to receive some funding in the province of Nova Scotia.
39. Obviously, the province relies on these stations for a level of coverage of news and events. Respectfully, however, we do not believe that these stations provide a consistent level of “local” programming in our province (other than in respect to the Halifax/Dartmouth area). Rather, this programming is more accurately described as regional programming, some of which is “fed” by bureaus located in different areas of the province.

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<sup>2</sup> CRTC News Release dated July 6, 2009.

40. We appreciate the financial constraints under which these stations operate. We do not mean to be critical of these stations, we just wish to point out that there are large portions of our province that do not have a source of consistent, local television programming – other than local community channels, to the extent they offer such programming.
41. There is definitely room within the LPIF envelope for a *modest* level of funding for independent community stations to provide local programming to areas that are not otherwise served by a local television service.
42. For example, based on the current number of licensed independent community stations, which are still quite few in number, approximately 1% to 2% of the total LPIF would – if it were divided among all of these independent community stations – translate into approximately \$100,000 per station per year. This amount of annual funding would likely support, in our case, either a significant amount of new programming in our traditional vein of community programming, or a bi-weekly magazine format information program focused directly on our community and the immediately surrounding areas.
43. If it were considered inappropriate to offer this level of funding to all independent community television stations, then funding could be limited to *remote* stations, where (by definition) there is no other source of local television programming.
44. As it stands now, our community receives virtually no television coverage of any extent in the area of news and information programming, except for the limited amount of such programming that we are currently able to provide (such as our all candidates' debates). A weekly information program of the type that we have in mind would transform the role and significance of television in our community and greatly increase the level of information available to our citizens.
45. LPIF funding of this sort could be made available on the basis of applications to be made by individual community television stations supported by a programming budget and clear plan for local programming. These proposals would need to demonstrate how the proposed programming would serve the target community and enhance the level of local programming. By definition, for remote stations, any new local programming would enhance the level of existing local programming.
46. This type of mechanism would give a boost to existing independent community stations, such as Telile, and would undoubtedly motivate others to explore whether a similar kind of station would be possible in their own communities. This would lead directly to the achievement of the Commission's objective of increasing the diversity of voices in the broadcasting system – and to our proposed objective of ensuring that existing community services remain sustainable.
47. From the perspective of broadcasting policy, a relatively small level of support to local independent community television broadcasting will pay great dividends. Specifically, it will lead directly to more local television programming in the most underserved communities.

## Co-operation with Larger BDUs

48. One area in which we believe the Commission's policy for community television could be adjusted relates to the relationship between small independent community television stations, such as Telile, and larger cable companies. In our case, the recent acquisition of our local cable operator by a larger multi-system operator has not been as positive an experience as it could have been.
49. As we have pointed out above, Telile is a community-based television station that was created by our community for specific reasons related to economic development and the general well-being of our community. We had hoped when the larger multiple system operator acquired the local cable company in our community that the resources available to a much larger corporate entity could be employed to support Telile, even if only indirectly. After all, Telile is an existing community television service providing local programming specifically for our community.
50. Unfortunately, this positive relationship did not materialize. Our relationship with the new cable system operator is *not*, we should stress, antagonistic – but it is not what it could be.
51. Larger multi-system operators offer their own “community” programming and their own branded community channel. They offer attractive programming, to be sure, that is not otherwise available in our region. For example, the cable community channel offers attractive regional sports programming that is, no doubt, enjoyed by many in the community.
52. We had thought that the entrance of a multi-system operator could have led, for example, to the broadcast of cable community channel programming on Telile, to joint productions between Telile and the cable community channel, and maybe to training opportunities between Telile and the cable operator. This has not materialized. Rather, the cable operator provides its cable community channel as its own service, in isolation of Telile's activities.
53. The concern that we have is that Telile risks being swamped by a much more powerful cable community channel. That channel, we note, is not local to Isle Madame. It is, rather, regional or province-wide in character.
54. We believe that the Commission should put in place specific protections so that smaller independent community channels are not swamped by regional cable community channels. Some specific protections we can think of could include:
  - requiring cable operators to demonstrate, at the time of acquisition of small systems, how they will leverage their larger resources to promote local expression within that community;
  - on a going forward basis, cable companies should work with independent community stations to ensure that community broadcasting remains viable in the community; appropriate activities could include, for example:

- program sharing arrangements;
- sharing of technical facilities and/or program feeds;
- training opportunities; and
- cross-promotional opportunities.

55. We recognize that there are few independent community television stations such as Telile in Canada. Therefore, our experiences with cable consolidation may not be widely shared by other community services. Nevertheless, it would be unfortunate – and counterproductive from a broadcasting policy perspective – if the arrival of a larger cable communications company in our community (which should, arguably, result in better service overall) were actually permitted to harm the existing community television service. The better policy would be to ensure that such consolidation results in an enhanced local community television service.

### **New Media**

56. The CRTC has posed a number of questions dealing with new media and its potential to enhance community broadcasting.
57. We do not yet provide our programming through the Internet. The principal reason for not doing so is, simply, the cost of streaming our signal or preparing digital versions of our television productions for Internet broadcast via a server.
58. The fact is that there is no “new media” alternative to the kind of programming that Telile offers now. Notwithstanding advances in digital technology, digital Internet distribution requires a technical infrastructure – not to mention staffing and other resources – that we simply do not have available to us.
59. Also, in our community, many people still do not have access to the kind of high speed Internet service that is required to download television programs from the Internet: both due to cost and technical availability. Community-based over-the-air television continues to be the most important source of community programming. For that reason, our primary focus continues to be the production and broadcast, over-the-air, of new, local television programming.
60. While the Internet presents opportunities for Telile and others to reach out to a broader audience, it is important to put the community television broadcaster first. Telile may soon have an opportunity make its programming available over the Internet. But, if Telile did not first have a secure presence on over-the-air television, it would be impossible to provide programming on the Internet.
61. We believe strongly, therefore, that Telile’s primary focus, for the immediate future, should be to continue to develop our broadcasting expertise, to provide the kind of television programming that our community needs, and to provide that programming to the most widely accessible audience we can – which for the time being is still the audience that receives us off-air and on cable.

62. We have no doubt that new media will make inroads into community broadcasting, and we are prepared to move in step with technical developments to the extent we can afford to do so. Television broadcasting remains the most direct means to provide relevant programming to our community.

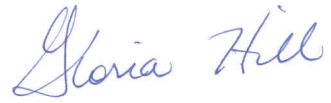
### **Service to Official Language Minority Communities**

63. The CRTC has asked for more information regarding the role that community television plays in reflecting the realities, needs and concerns of official language minority communities (“OLMCs”). As noted above, Isle Madame is home to a large Acadian population. The vitality of the French-language on Isle Madame is a key concern for many. The people of Isle Madame are making every effort to preserve and advance the French-language in our community.
64. Telile’s community television provides the only television source for French-language television programming by and about our community.
65. The CRTC has asked specifically whether “new media” presents opportunities for community broadcasting to reach OLMCs and, if so, why there is a “lack of openness” to embrace new media. We think that new media, and the Internet in particular, does present an opportunity for community broadcasting. But, first and foremost, it is important to enter the new media space from a strong footing. We are entirely open to the use of new media, and we find the connection made by the Commission between new media and increasing access to our French-language programming intriguing to contemplate. The simple fact, though, is that it costs money to exploit new media property, and, at this point, our resources are fully consumed with the production and operation of our television service.
66. Also, as noted above, given the fairly high cost and limited availability of high speed Internet service throughout our service area, we are not convinced that new media distribution will necessarily reach the audience that we wish to serve – at least not yet.
67. The simplest and most direct way in which the CRTC could encourage the production and broadcast of community programming directed to and produced by OLMCs -- in our community at least – would be to recognize this programming as being, at heart, local programming directed to a local community. Programming produced by independent community television services directed to OLMCs should be eligible for the same kind of funding for local programming that is made available to much larger commercial broadcasters and the CBC.
68. As we have outlined above, access to an extremely small proportion of available LPIF funding would have a large impact on independent community television stations. If such access were directed to OLMCs, it would allow Telile to greatly enhance our French-language programming.

**Conclusion**

69. Thank you for the opportunity to present our views.

Yours truly,

A handwritten signature in blue ink that reads "Gloria Hill". The signature is written in a cursive style with a large initial 'G' and a distinct 'H'.

Gloria Hill