

February 15, 2018

Filed via Intervention/Comment/Answer Form

Mr. Claude Doucet
Secretary General
Canadian Radio–television and
Telecommunications Commission
Ottawa, Ontario K1A 0N2

Dear Mr. Doucet:

Re: Knowledge Network Corporation Broadcasting Licence Renewal Application for Knowledge (formerly CKNO–TV Knowledge Network) (Application no. 2017–0837–2) – Intervention from the Canadian Media Producers Association

1. The Canadian Media Producers Association (CMPA) is pleased to provide the following comments with respect to the broadcasting licence renewal application for Knowledge Network Corporation Broadcasting’s (“Knowledge Network”) television service Knowledge (Application no. 2017–0837–2). The CMPA supports the renewal of the licence for Knowledge Network’s provincial educational broadcaster for British Columbia, subject to the following comments.
2. The CMPA is the country’s leading member–based advocacy organization for independent producers. We represent hundreds of companies engaged in the development and distribution of English–language content made for television, cinema, and digital media channels. The CMPA works to promote the continued success of the Canadian production sector and to ensure a future for the diverse content made by Canadians for both domestic and international audiences.
3. Knowledge Network has requested an amendment to its condition of licence (COL) related to the exhibition of Canadian content. The Commission determined in Broadcasting Regulatory

Policy CRTC 2015–86 (the “Create Policy”) that, in the new licence term, conventional television stations shall devote 50% of the evening broadcast period to Canadian programs with no additional obligations for the broadcast day.¹ Currently Knowledge adheres to the standard COL for conventional television stations requiring it to devote no less than 55% of the broadcast year and 50% of the evening broadcast period to the broadcasting of Canadian programs. However, Knowledge Network has asked for an exception to the Create Policy in order to devote 40% of the broadcast day to Canadian programs. In practice, this request means that Knowledge would be required to broadcast 7.2 hours of Canadian programming over the course of the broadcast day instead of the standard requirement for television stations of 3 hours in the evening broadcast period.²

4. While Knowledge Network’s request represents a reduced requirement from its current COL, the CMPA recognizes that this publicly-funded broadcaster makes important contributions to Canadian programming and reinvests its revenues into programming. The CMPA submits that educational broadcasters hold a special place in the broadcasting system by providing programming largely aimed at Canada’s children, which supports the objectives of Canada’s broadcasting policy relating to children’s programming,³ and should be held to higher standards than other television stations. That being true, the Commission determined it may grant exceptions in its approach to the exhibition of Canadian programming in certain circumstances,⁴ and we submit this request from a publicly-funded educational broadcaster presents such a circumstance. Accordingly, the CMPA supports Knowledge Network’s proposal to devote 40% of the broadcast day to the broadcasting of Canadian programs.

¹ Create Policy, para. 193.

² Pursuant to sections 2 and 4 of the *Television Broadcasting Regulations, 1987*, 40% of the “broadcast day” (18 hours) is 7.2 hours and 50% of the “evening broadcast period” (6 hours) is 3 hours.

³ *Broadcasting Act*, ss. 3(1)(d)(iii) and 3(1)(i)(i).

⁴ Create Policy, para. 196.



5. The CMPA appreciates the opportunity to share our comments regarding Knowledge Network's application in this proceeding. Should the Commission require any additional information regarding this intervention, please do not hesitate to contact me directly.

Sincerely,

[Filed Electronically]

Kelsey McLaren
Director, Regulatory
kelsey.mclaren@cmpa.ca

cc. Rudy Buttignol, President and CEO, Knowledge Network Corporation,
rudyb@knowledge.ca

***** END OF DOCUMENT *****

