

March 5th, 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: Blue Ant Television General Partnership’s Broadcasting Licence Renewal Application for A.Side (formerly AUX TV); Makeful TV (formerly BITE Television); travel + escape; Cottage Life (formerly Bold); BBC Earth (formerly radX); Love Nature (formerly Oasis HD); HIFI (formerly Treasure HD) (Application no. 2017–0841–3) and SN Channel General Partnership’s Broadcasting Licence Renewal Application for Smithsonian Channel (formerly eqhd) (Application no. 2017–0842–1) – Supplementary Intervention from the Canadian Media Producers Association

1. The Canadian Media Producers Association (CMPA) is pleased to provide further comments with respect to the broadcasting licence renewal applications for Blue Ant Television General Partnership’s discretionary services A.Side; Makeful TV; travel + escape; Cottage Life; BBC Earth; Love Nature; and HIFI (Application no. 2017–0841–3) and SN Channel General Partnership’s discretionary service Smithsonian Channel (Application no. 2017–0842–1) (hereinafter collectively referred to as “Blue Ant Television” when referring to the Applicants and “Blue Ant Group” when referring to the group–based licence). These comments are provided in addition to our original intervention in the above–noted applications and do not in any way replace those submissions.
2. In the CMPA’s original intervention, we state that we are unable to recommend an actual figure for a program of national interest (PNI) requirement for the discretionary services in

the Blue Ant Group in the new licence term because Blue Ant Television's annual PNI reports appear to be incorrect but that the Commission should impose a PNI requirement based on the Blue Ant Group's historical levels in accordance with Broadcasting Regulatory Policy 2010-167 and the Broadcasting Regulatory Policy 2015-86 (the "Create Policy").¹

3. We are providing this supplementary intervention in order to comment on Blue Ant Television's recently revised annual PNI reports for the broadcast years 2013-14, 2014-15, and 2015-16. The revised PNI reports demonstrate that the total three-year average PNI for the eight discretionary services in the Blue Ant Group is 16.8%.² For all of the same reasons provided in our original intervention, we urge the Commission to impose a PNI closer to the Blue Ant Group's actual PNI expenditures over the last three years (i.e. 16.8%).
4. The CMPA appreciates the opportunity to provide further comments regarding the broadcasting licence renewal applications for the Blue Ant Group 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. Astrid Zimmer, Senior Legal Counsel, Blue Ant Media Inc.,
astrid.zimmer@blueantmedia.ca

Encl.

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¹ Create Policy, para. 217.

² Please refer to "Appendix A - The Boon Dog Report on Historical PNI for the Blue Ant Group." We note that the revised PNI reports are based on a cash commitment basis and not an accrual basis.

