



July 27, 2007

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
Ottawa, Ontario K1A 0N2

On-line: <http://support.crtc.gc.ca>

Dear Mr. Morin,

**Broadcasting Public Notice CRTC 2007-70  
Call for comments on the Canadian Television Fund (CTF) Task Force Report**

**Introduction and Summary**

1. This is the submission of the Alliance of Canadian Cinema Television and Radio Artists (ACTRA) in the matter of Public Notice CRTC 2007-70 in reply to the Canadian Television Fund (CTF) Task Force Report released the June 29, 2007 and the Commission's Proposed Implementation Schedule in the Appendix to Broadcasting Public Notice CRTC 2007-70.
2. ACTRA participated in the CTF Task Force process and is pleased to have this opportunity to reply to the recommendations contained in the Report. ACTRA brings to this process the particular perspective of English-language performers. We believe it is essential to ensure: i) Canadian creative resources are predominantly used on the public airwaves; and ii) there is a reasonable supply of high quality English-language drama programs and series in every medium.
3. ACTRA and its predecessor organizations have represented the interests of professional performers working in the English-language media in every region of Canada for over 60 years. ACTRA's principal function is bargaining collectively on behalf of our more than 21,000 members and others, whose performances in movies, television programs, sound recordings and digital media entertain, educate and inform Canadians and global audiences.
4. ACTRA members have a vital stake in Canada's cultural future. ACTRA members benefit professionally when work opportunities are more abundant. They also believe passionately that Canada needs a strong Canadian presence wherever entertainment and information services are created and however these are provided to Canadians. They believe in the creativity of Canadians; in our capability to tell and perform our own stories.

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It is these beliefs that motivate ACTRA's participation in the CRTC public process.

5. The *Broadcasting Act* and various government and CRTC policies mandate that the broadcasting system must provide high quality Canadian programs in every medium, in every timeslot and in every genre ensuring that when Canadians turn on their television sets or use their computers to watch entertainment programs, they have a wide choice, with access to high quality Canadian dramas (including comedy and other scripted fiction programming). The broadcasting system does not currently provide such access and this is its greatest failing.
6. For the past seven years, ACTRA and its members have been leaders in the campaign to reverse the precipitous decline in the availability of domestically produced English-language television drama. We have raised this issue publicly, with politicians and with the Commission. For many more years, we have worked to increase the number, budget and quality of English-language Canadian feature films. We believe that strong actions must be taken in both fields and the current application provides opportunities.
7. Canada has the talent and the infrastructure to produce high quality drama programs and feature films that will attract large audiences. ACTRA believes strongly that the CTF is a core funding program and an essential part of the regulatory and policy framework necessary to ensure that Canadian drama programming is made for Canadian television audiences.
8. ACTRA endorses only two of the recommendations of the Task Force: i) the early revision of the broadcasting distribution regulations to require that BDU's funding obligations to the CTF be met by monthly instalments; and ii) the recommendation that the Board of Directors of CTF increase the minimum license fee to be paid by private broadcasters for CTF supported productions.
9. ACTRA rejects all other recommendations of the Task Force. Some of them are inappropriate, others are completely out of line, and all must be rejected because the CRTC does not have jurisdiction to act on them.
10. ACTRA particularly wishes to highlight the Task Force's two most egregious recommendations. The Report proposes the establishment of "a private sector funding stream" and recommends that to qualify for funding from this stream programs must achieve only 8 out of 10 Canadian content points under CAVCO guidelines, a significant amendment from current regulations requiring that programs achieve all 10 content points. ACTRA suggests these recommendations are beyond the mandate of the Task Force and beyond the jurisdiction of the CRTC to implement. Further, discussion of such recommendation is more appropriately within the purview of the Standing Committee on Canadian Heritage which could review them only at the direction of the Minister of Canadian Heritage or Parliament.

### **Importance of the CTF**

11. Culture is central to our quality of life. It defines who we are as individuals and who we are as a nation. Culture is pervasive, it affects how we live, eat, dress and carry on our daily social rituals, how we do business, what we value and how we interact with others. There are a broad range of programs and policies that support arts and culture in Canada and long-term and stable funding is essential to our cultural development. Canadians are,

and should be, proud of what our artists have accomplished domestically and internationally. Canadians believe that support for arts and culture is both desirable and in the best interests of all Canadians.

12. Canada needs a television and film industry so we can tell Canadian stories. So we can communicate with one another across this vast expanse of land and build an understanding of what it is to be Canadian. We need Canadian stories to help us understand our place in the world community and to contribute to a new global citizenship. Artists want to celebrate Canadian successes and explore our failures, to teach new citizens and future generations about Canadian values, traditions and history, through movies, television programs and digital media.
13. The Canadian Television Fund (CTF) plays a pivotal role in supporting the creation and broadcasting, in peak viewing hours, of high quality, distinctively Canadian television programs. Since its creation in 1996, the CTF has supported over 4,000 projects, producing more than 20,894 hours of new Canadian television programming in the four genres: drama, documentary, children's and youth, variety/performing arts; in both official languages and in first nations languages. Drama programs funded include: *Degrassi: The Next Generation*, *The Collector*, *Corner Gas*, *DaVinci's Inquest*, *Les Bougons*, *Francoeur* and *Vice cache* to name but a few of the many high quality programs produced with CTF funding.
14. The CTF is a public fund from a partnership between the government and the industry, with contributions by the Government of Canada, cable companies and direct-to-home satellite service providers. With an annual budget of approximately \$250 million, its role is to assist the creation and broadcast in peak viewing hours of high-quality, culturally-significant Canadian television programs in both official languages.
15. The CTF is an independent, non-profit corporation, governed by a Board of Directors comprised of independent advisors, industry representatives (broadcasters, producers, distributors), and representatives of the Department of Canadian Heritage.
16. In June 2005, the Government extended its funding commitment of \$100 million to the CTF for 2006-2007. Applicants can apply for funding through either of the Fund's two separate funding streams: the Broadcaster Performance Envelope Stream or the Special Initiatives Funding Stream.
17. Past experience reveals how important the CTF is to our domestic television industry. In the 2003, government announced in the federal budget that it would extend the CTF, but at reduced levels, falling from \$100 million to \$87.5 million in 2003-04 and \$62 million in 2004-05. This exacerbated an already precarious existence for Canadian television drama producers, for Canadian performing artists and for other creators. The industry was thrown into turmoil, with predictions of massive drops in the number of productions. A disaster in the television industry was averted when the Government reversed its decision and the returned its CTF funding to \$100 million annually for the next two years.
18. Had the government not restored the CTF, the consequences would have been far reaching. A Nordicity Group study commissioned by the CFTPA estimated that the reduction in the CTF would have caused the loss of 2,400 jobs for Canadians, a loss of 277 hours of production and \$88 million of lost production activity.
19. Funding of Canadian television drama production is an investment for all Canadians. After sleeping and working, watching television is the chosen activity of most Canadians and drama remains the most popular choice of programs. According to data gathered by

Statistics Canada, Canadians spend on average, 21.4 hours each week watching television, and 2002 BBM figures indicate that 70% of that time watching drama. Unfortunately, Canadians generally cannot choose to watch Canadian dramas due to their unavailability.

20. On those few occasions where we do have access to it, television drama allows the creativity of our writers and directors to be brought to life by Canadian performing artists and to be shared by Canadians across the country. Television drama is the most powerful medium in which we can see ourselves and our values, in which we can learn about our history, in which we can be challenged to think about what we can become. Television drama reinforces our cultural and national identity. Indeed, television drama is the most pervasive medium for telling stories in the early years of the 21<sup>st</sup> Century.
21. The CTF is critical if Canadian-produced programs, especially dramas written, directed and performed by Canadians, are to continue to be available to Canadian audiences. The nurturing of Canada's cultural industries for both economic and social reasons has been a long-standing objective of the federal government. Adequate, stable and long-term funding of the CTF is essential to economic growth and job creation in television production.
22. Many other countries support television drama productions. European governments of all political stripes support domestic television productions through policies, regulations and direct funding from the tax base. The United States and India are likely the only countries that do not directly fund domestic television productions because historically their domestic markets have been large enough to sustain a viable industry. The fact is that in many countries where the government provides direct funding for domestic production, such as the United Kingdom, Germany, France and Australia, many of the most popular television drama series are domestically produced, with domestic artists in all key roles.
23. Canadian drama is produced across Canada and contributes significantly to local economies through job creation and spending. CTF-funding plays a critical role in financing these productions. Stable and long-term funding of television production will encourage continued investment in the infrastructure, including studios and other facilities. Without a thriving domestic production industry, making films and television remains vulnerable to external economic forces and this can result in fewer and less rewarding acting jobs for Canadian performers as foreign-service productions favour foreign actors for principal roles.
24. ACTRA recognizes that direct funding through the CTF alone will not solve the problem of ensuring a steady supply of domestic television drama productions. The Canadian Radio-television and Telecommunications Commission (CRTC) must implement effective content and investment regulations, such as the proposal put forward by ACTRA and others that private broadcasters be required to allocate 7% of their gross advertising revenues to drama, complemented by incentives that will reward broadcasters that exceed this level. This 7% minimum level of support would finally ensure that Canada's private conventional broadcasters play a role in curtailling the current drama decline. Spending on Canadian drama would increase from \$71 million in 2006 to \$130-134 million in 2009 if such a measure were put in place by the CRTC.
25. As part of the package of regulations and policies, adequate, stable and long-term funding for the CTF is essential to finance distinctly Canadian productions.

## **CTF Governance**

26. ACTRA concurs that the Board of Directors of CTF is not properly structured to ensure that the public interest is protected. However, we believe that the missing element is representation on the Board from Canada's creative community: the screenwriters, directors and performers of Canadian productions. We know the industry, what makes a successful production and what doesn't work. Furthermore, in our community, you can find skilled and knowledgeable professionals who would have no conflict of interest in the decisions being made.
27. The Task Force, however, was fixated on conflict of interest in its report despite its own acknowledgement that... "No instances of actual conflict were presented, a fact attributed in large part to the efficacy of the conflict of interest provisions that have been implemented by the Board."
28. The unsubstantiated concerns of conflict of interest of industry stakeholders on the CTF Board could be resolved easily through representation by their trade associations. This is a proposal that ACTRA and others have made in the past and one that could be easily implemented without increasing the size of the CTF board.
29. However, a greater failure, ignored by the Task Force, is that the Board remains without any representation of the creative community, despite a commitment from the Department of Canadian Heritage and its minister in a letter sent in July 2005 that: "The voice of creators will be added to the Board."

## **BDU Regulations**

30. The first mandate of the Task Force was "to develop a consensus to resolve the concerns raised by stakeholders or, failing that, to set out possible options to resolve any remaining issues." It is therefore fitting to address the only area where the Task Force came close to achieving consensus: namely its recommendation that "the CRTC ... amend its BDU Regulations to require contributions on a monthly basis".
31. ACTRA welcomes the Task force's recognition of the need to resolve the crisis precipitated by Shaw Communications and Quebecor last winter. However, ACTRA believes this matter continues to be urgent and therefore urges the Commission to act immediately to amend its regulations to require monthly payments. Everyone agreed, it is within the mandate of the CRTC, and there is no justification to delay this amendment until December 2007.
32. The CRTC should act immediately to amend its BDU *Regulations*, particularly given the fact that as recently as June 2007, Shaw Cable stated publicly it might again decide to withhold its monthly payments to the CTF if it is not satisfied with the Task Force's recommendations or, presumably, if they are not implemented rapidly enough.

## **All CTF Resources are Public Funds**

33. ACTRA categorically rejects the Task Force recommendation that the CTF be split into two streams and that a "market-oriented private sector funding stream (be created), including simple and flexible program guidelines".

34. The contribution made by Broadcast Distribution Undertakings to the CTF is neither “private” nor “voluntary.” As the Task Force itself explains, BDUs benefited when the CRTC authorized a time-limited increase in subscriber fees. When this increase was due to end, the Commission ruled that BDUs could retain one-half of the increase permanently, as long as the remaining one-half was used to support Canadian productions. This money is thus public money, fees collected from millions of Canadian subscribers. This money cannot be diverted to meet the private interests of BDUs or broadcasters. It either must be spent along with the government allocation in the public interest, through the CTF, or returned (along with the 50% retained by BDUs) to subscribers.
35. The Task Force’s treatment of the BDU obligation as private money to be used for private benefit is a fundamental flaw in its Report. This proposed re-allocation of public money to private broadcasters to meet their private interests would be a fundamental change to the mandate of the CTF and would severely limit its usefulness as an instrument of cultural policy to implement the objectives of the *Broadcasting Act*.

### **CTF Program Guidelines**

36. ACTRA’s 21,000 members are justifiably horrified by the Task Force recommendation that more than half the CTF funds should be diverted to a “separate stream,” access to which would be open to productions that achieve only 8-out-of-10 Canadian content points. With this recommendation the Task Force has told the 21,000 members of ACTRA and the thousands of members of Union des Artistes that they are not good enough to play the lead roles in Canadian television dramas financed by public funds. The Task Force has labeled the creative contributors to Canadian dramas, the screenwriters, directors and lead performers, as second-best and expendable, in the misguided, unsubstantiated and foolish notion that this would bring audience success.
37. ACTRA will vigorously oppose all efforts to reduce from 10 the number of Cancon points that a production must obtain in order to qualify for funding from the CTF, whether those funds come from contributions made by BDUs or the Department of Canadian Heritage.
38. The problem of Canadian television drama is not a lack of talent. The problems are that our producers are so busy trying to put together the deal, our broadcasters do not properly schedule and promote Canadian drama because they make more money and create more shareholder value by hawking popular American shows, our industry does not spend enough on script and concept development, and our broadcast regulatory authority has refused to implement the necessary policies and requirements contrary to its responsibility under the *Broadcasting Act*.
39. Mark Dillon wrote the following passage in the July 23, 2007 edition of *Playback*, which encapsulates the reason the CTF Task force’s recommendation that calls for reducing the number of Canadian content points from 10 out of 10 to 8 out of 10 for a CTF funded Canadian production is so misguided and inappropriate.

*At first blush, one might think it could only be better for global sales, especially for shows featuring recognizable Hollywood performers.*

*Shawn Williamson, producer with B.C.’s Brightlight Pictures, tells Playback that reducing Cancon criteria would make it “easier for us to package things that are going to be more palatable, if we can attract talent that’s already known internationally.”*

*File that under prevailing wisdom. But is it true?*

*Let's look at the two top-rated Canuck dramas, as listed in the CFTPA's Profile 2007: Degrassi: The Next Generation and Instant Star, both from Toronto's Epitome Pictures and both made with CTF cash. Both are 10 out of 10 shows, and both continue to enjoy successful runs at home and abroad. In the eyes of U.S. broadcaster The N, these entirely Canadian-made shows can do no wrong. If we jump over to comedy, CBC's CTF-supported Little Mosque on the Prairie has had no problem garnering international attention, which, more recently, has translated into international sales....*

*... Cinema needs stars. TV makes them. Top U.S. shows like CSI and Grey's Anatomy came out of the gate with no real stars and have dominated the ratings. It is the writers and showrunners of these and other hit series that are the true behind-the-scenes stars of TV.*

*If Canadian shows require Hollywood talent, they don't have to look very far, because Hollywood is full of working Canucks who straddle the border, whether it's the directors of Degrassi or Little Mosque thesp Carlo Rota, who pulls double duty on 24. Sure, if a Canadian show could land a star of the caliber of say, George Clooney, or one of Hollywood's top scribes, no doubt that would lead to a boost in a show's ratings. But how many shows reliant on CTF cash could afford them?*

*CTF-supported shows could only bring in mid-level foreign talent on par with so many Canadians who are currently not working.*

*All of which makes one wonder, who is pushing this agenda, because it's not the cure-all it might initially seem?*

40. Mr. Dillon puts forward the fundamental proposition: Canada has the talent to make dramas that will attract a strong audience so there is no reason to change the 10 out of 10 requirement.
41. One must ask: on what evidence did the Task Force come to the conclusion that the use of second-rate non-Canadian artists would increase audiences? The evidence that would substantiate this Task Force recommendation will never be known because there was no record in this "behind closed doors" consultation. What we do know is that no similar recommendation was proposed by the Senate Committee on Transport and Communications in its report, *The Challenges ahead for the Canadian Television Fund* released May 7, 2007. A change of guidelines to regress from 10-out-of-10, to 8-out-of-10 Cancon points is not among the five recommendations in the report. For that matter, the issue of the so-called "complexity and restrictiveness" of the CTF program guidelines did not surface in the Senate committee report or in the eight concerns raised by Shaw and Videotron set out in that report.
42. In March 2007, the Standing Committee on Canadian Heritage released its report on the crisis facing the CTF called, *The Funding Crisis of the Canadian Television Fund*. The Heritage Committee's report offers six very good recommendations (which the Task Force should have repeated in its own report) none of which even touch on the programming guidelines as an issue worthy of review and change. Furthermore, there is no reference to programming guidelines in the body of the Heritage Committee report or in the

supplementary opinions of the members of the Bloc Quebecois or the Conservative Party of Canada annexed to that report.

43. One would have expected that what the Task Force seems to have identified as an enormous and obvious problem with the CTF would have been raised in either or both of these parliamentary processes.
44. ACTRA fundamentally believes that an important step in reviving Canada's electronic culture is to redefine a Canadian program. Canadian-ness is not defined by the content of a project. Certainly, we want Canadian story lines and locations. But, Canadian creators must be free to tell whatever stories they want. What determines Canadian-ness is whether or not the production is created by Canadians. If it is produced, written, directed and performed by Canadians; if the cinematographer, editor, costume designer, technicians and narrator are Canadian; if the post production work is done by Canadian artists; the project will look and feel Canadian, regardless of what the story is about, or where it is set.
45. The use of Canadians in our own productions should be the norm, and the use of artists from elsewhere should occur only in the most exceptional circumstances, particularly where the Canadian public is footing most of the bill.

## **New Media**

46. ACTRA considers that the Task Force's conclusions and recommendations about program rights and the funding of New Media projects are inappropriate, and beyond CRTC jurisdiction. Given that the Task Force recognized that the CTF is under-resourced, it is difficult to understand the logic in recommending that the fund be diluted by \$25 million to subsidize the production of content for "new media" particularly since the CRTC is now committed to reviewing its new media Exemption Order.
47. In theory, Canada's broadcast regulatory system is to be technology neutral, but ACTRA believes the New Media Exemption Order CRTC-1999-97 works against that principle by trying to carve out particular technologies for special treatment. This approach is being overtaken by technological developments. The purpose of the Exemption Order was to permit these uses to grow and develop without regulatory impediments, particularly because they represented only a small corner of the Internet.
48. ACTRA and others told the Commission that technology would quickly develop beyond that rudimentary level, but these views were ignored as speculative. Now, many Canadians have wireless or cabled broadband connections, the technology permits transmission of digital quality audio and video, and many people purchase goods and services through it. In addition, the computer will soon become an integral part of the home entertainment system, moving us rapidly into an era in which there is complete interconnectivity and the "Internet" will be indistinguishable from broadcasting. However, as contemplated by the New Media Exemption Order, the Internet was an open and public system, not a closed system where individuals subscribed to broadcasting services.
49. In its 1999 New Media decision, the CRTC stated that some of what was taking place on the Internet was broadcasting and it left open the possibility that it would decide in future to regulate new media. ACTRA believes it is an appropriate and timely opportunity for the CRTC to do precisely that – and it should do so before trying to address issues concerning



funding of new media productions. While ACTRA is not opposed to the allocation of appropriate public funds for new media productions, the first step is for the CRTC to develop appropriate regulations for the Internet and other computer networks and to marry that to a separate stream of funding. It is not appropriate to apply funding for television productions to new media production.

### **Proposed CRTC Process**

50. The process set out by the CRTC for the Task Force is a concern for ACTRA. Given there is no record of the closed door meetings with interested parties, the recommendations of the Task Force are unsubstantiated. Thus, we believe the process is contrary to the principles of transparency and accountability, and the rules of natural justice.
51. Adoption of the Task Force Report recommendations by the CRTC, if it has the authority to do so, would lead to fundamental changes in the role of the CTF as an instrument of government policy to achieve the objectives of the *Broadcasting Act*. If such sweeping changes occur without fair, open, transparent and public hearings, they would be invalid.
52. ACTRA believes that CRTC only has jurisdiction to proceed immediately with the process required to amend its BDU Regulations to prevent the Canadian television production industry from being held hostage again by any BDU. The CRTC's failure to act promptly to remedy the *Regulations* could mean new and perhaps even more dangerous attacks from companies which have benefited greatly from their protected status.
53. ACTRA recommends that the CRTC set aside all other recommendations made by the Task Force until the issues they address have been subject to a process that meets the requirements of openness, accountability, fairness and public interest and that clearly aims to achieve Parliament's key objectives for Canada's broadcasting system.

### **Does the CRTC have jurisdiction to make the all changes recommended in the Task Force report?**

54. ACTRA submits that the CRTC has the regulatory power only to amend its regulations to require BDU's to make monthly payments into the CTF or to increase the percentage. Beyond that, the CRTC does not have jurisdiction. A July 2005 letter for the Department of Canadian Heritage to the Chair of the CTF states:

*Public Policy direction will emanate exclusively from the Minister and the Department of Canadian Heritage to the CTF Corporation under one contribution agreement between the Department and the CTF Corporation.*

55. This letter further states that in respect to the governance of the CTF:

*The overall proposal must be approved by Cabinet before implementation.*

56. The production of Canadian drama has been supported by federal subsidy programs since 1984. Ten years later the program administered by Telefilm Canada was supplemented by the newly created Cable Production Fund. Since 1996, the two subsidy programs funds have been combined into a single integrated entity, now called the CTF.
57. Funding for the CTF depends on the CRTC and the government. The CRTC requires that Broadcast Distribution Undertakings contribute a percentage of their revenue to the CTF.

The contribution from the government is dependent on the continuance of annual federal budget commitments.

58. The 2003 Lincoln Report recognized the importance of the CTF to the development and production of Canadian programming. At page 169 it reported:

*The Committee also notes that the Canadian Television Fund (CTF)...has become a key element in the financing of many Canadian productions. Indeed, Professor Catherine Murray's examination of the Fund concluded that:*

*"Among all financing instruments to promote Canadian production, the CTF is the...most cultural in its objectives." Witnesses often noted, however, that uncertainty over the government's intentions for the CTF discourages planning and investment. The Committee sees it as imperative that support targeting the funds...be stable... The Committee is also of the view that a refocused CTF should receive increased and stable funding.*

59. In its first response to the Lincoln Report, the Department of Canadian Heritage also supported the CTF and stated that this fund can play an integral role in the creation of Canadian programming. It also found that the CTF must prove its worth and should support productions that attract growing Canadian audiences. In its second response to the Lincoln Report, issued in March 2005, the Department recognized the CTF as an essential component of the Canadian broadcasting system and the most appropriate tool to support the development of Canadian television programming.
60. The government undertook in this second response to take four steps to improve the CTF:
- the government will work with Telefilm Canada and the CTF to investigate the efficiency and impact of the EIP for television;
  - the evaluation of the CTF will give particular attention to assessing the efficiency of the fund;
  - the government is working with stakeholders to bring changes to the governance and administration of the CTF by June 2005;
  - the government expects the CRTC to review its approach to handling benefits with respect to television ownership transactions with a view to channelling some of those benefits to the CTF.
61. The CRTC Task Force is at the end of a series of reviews of the CTF that have been ongoing since its inception. Many of the recommendations in its report are not novel, and have been discussed in open and transparent processes by Committees of Parliament. The distinction between those earlier inquiries and this one is that the Task Force has a much narrower jurisdictional reference. While the Task Force may recommend significant changes to the CTF, it is not within the jurisdiction of the CRTC to implement these recommendations.

## **Conclusion**

62. For cultural reasons, Canadians need to have access to an adequate supply of high-quality television drama programs and feature films available when they most often watch the medium. We have all the talent necessary to bring Canadian stories to our screens. But a survey of the audiovisual production industry in other countries, and our own history,

teaches us that market forces alone are insufficient to ensure this supply. Canada needs to have regulations, incentives and programs that offer funding to our producers. The CTF is such a program and the CRTC is the foremost public agency responsible for instituting such regulations and incentives. It is a sad comment and reflects badly on the CRTC that, more than 50 years into the television era, there are not enough popular Canadian entertainment shows on our televisions.

63. ACTRA believes the CTF Task Force report is seriously misguided and flawed. ACTRA calls on the Commission to act quickly to revise the broadcasting distribution regulations to require that BDU's funding obligations to the CTF be met by monthly instalments. ACTRA also recommends that the Board of Directors of CTF increase the minimum license fee to be paid by private broadcasters for CTF supported productions. As to the remainder of the recommendations in the Task Force report, ACTRA urges the Commission to set aside the report and the Commission's timetable in the appendix to Broadcasting Public notice CRTC 2007-70 to implement the recommendations of the report. In stead the Commission must concentrate on developing rules for private broadcasters that are necessary to complement the funding provided to the CTF.
64. We thank the CRTC for this opportunity to provide you with our comments. We look forward to participating in a second stage of this inquiry and would be pleased to appear before the Commission at a public hearing. ACTRA also looks forward to the opportunity to participate in the new media policy review.

All of which is respectfully submitted.



Stephen Waddell  
National Executive Director  
ACTRA

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