



NCRA-ANREC
325 Dalhousie, Suite 230
Ottawa, Ontario, K1N 7G2

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

**Re: Broadcasting Notice of Consultation CRTC 2010-146-2
Addition of Document to Item 1 (CKLN)**

April 15, 2010

Dear Secretary General,

1. Further to our intervention in support of CKLN submitted earlier in this proceeding, the National Campus and Community Radio Association/ l'Association nationale des radios étudiantes et communautaires (NCRA/ ANREC) would like to provide additional comments on the document added to Item 1.
2. We understand from the Notice of Consultation and from the Commission's letter to CKLN dated 9 April 2010 that CKLN may have failed to comply with section 8 of the Regulations, which pertains to logs and records.
3. We wish to inform the Commission that CKLN representatives took the proactive steps of contacting the NCRA/ANREC upon receipt of the Commission's 9 April 2010 letter, sending us a copy of the letter, and requesting advice and assistance. CKLN's request states that they are "more than willing to receive instruction, training and advice" to learn how to bring their logs and records into compliance. In response, we have provided practical suggestions and we committed to obtaining and providing sample logs and records to CKLN that illustrate full compliance. We have also offered to review CKLN's revised logs and records to

provide feedback. We believe CKLN's response to the Commission's letter illustrates a genuine desire to adhere to all regulations, and to make improvements wherever necessary to ensure the continued existence of CKLN.

4. During the past year, in conducting increased outreach to our member stations, the NCRA/ANREC has become aware that many of our member stations are unclear about their regulatory responsibilities. CKLN is not alone in this regard. We noted this concern during the recent Campus and Community Radio Policy Review proceeding, and we committed to assisting member stations to make improvements in these areas.
5. In addition to the assistance we already provide through our staff and External Policy Committee, we also identified this problem as sufficiently serious that we applied for funding through Canada Summer Jobs several months ago for a Regulations Officer position. Although we have not yet received final approval, CSJ recently contacted us to confirm that we would be willing to hire a student for a 6-week period during summer 2010 to perform these duties. We believe this is an indication that approval is imminent.
6. Among the tasks and responsibilities included in our application for this position are: "inform membership of relevant regulations, contact stations about their particular situation, and collect and share tools for compliance and reports (log forms, programmer instructions, training materials, etc.)." We expect to be able to provide a heightened level of support to stations like CKLN as a result of this funding.
7. The NCRA/ANREC asks the Commission to recognize that the people who are attempting to re-build CKLN are predominantly volunteers without significant regulatory expertise. Although this does not excuse them from complying with the Regulations and Commission policies, they appear to be amenable to education and support, and they are dedicated to ensuring full compliance and addressing any areas of non-compliance that remain.
8. The NCRA/ANREC notes that although CKLN will continue to face significant challenges as they move forward, the efforts of those who are currently involved should be commended. They are working extremely hard under difficult conditions, they are prepared to acknowledge problems that have occurred and continue to occur, and they are dedicated to ensuring that CKLN can retain its broadcasting licence. They have been in contact with the NCRA/ANREC frequently during the past several months to request information, resources and assistance to determine how best to address the Commission's concerns, including those concerns expressed in the 9 April 2010 letter.
9. We also acknowledge that despite the efforts of CKLN's current leadership, a group of dissenting former staff and volunteers remains dissatisfied with their decisions. The internal disputes at CKLN were protracted, complex, and based on a long and confusing history. Unresolved, the situation would surely have led to

the complete dissolution of the station, and the disappearance of a long broadcasting history and a valuable community resource. None of the possible solutions to this dispute would have satisfied all of the hundreds of previous staff and volunteers of CKLN. Even at the best of times, volunteer organizations are rarely perfect and often contentious.

10. We encourage the Commission to put this into perspective, and to focus on the positive developments that have occurred in recent months. We further encourage the Commission to work with CKLN's current leadership to look constructively upon CKLN's future, and avoid allowing problems that may have occurred in the past to overshadow the station's future potential.

11. We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Freya Zaltz". The signature is written in a cursive, flowing style.

Freya Zaltz
NCRA/ANREC
Director of Regulatory Affairs

cc: CKLN