



Canadian  
Association of  
Broadcasters

L'Association  
canadienne des  
radiodiffuseurs

November 19, 2004

Mr. Larry Shaw  
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Telecommunication Policy  
Industry Canada  
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Gentlemen:

Re: **Industry Canada Notice No. DGTP-007-04 – “Proposed Clarification to the Government Satellite-use Policy for the Delivery of Broadcasting Services”**

On 30 October 2004, Industry Canada published the above-mentioned **Canada Gazette** Notice, proposing an amendment to the existing federal government policy concerning the use of Canadian satellite transmission facilities for the delivery of satellite broadcasting services to the public.

The Canadian Association of Broadcasters (CAB) notes that a very short deadline has been set for the filing of responses to this Gazette notice. As you know, Industry Canada generally allows 60-120 days for the filing of public comments on policy and regulatory matters. The present notice provides only 21 working days.

The CAB's annual convention, which commences on 28 November, creates time pressures that make it difficult for our management and boards of directors to devote the time necessary to develop an Association position on the proposed policy amendment. Moreover, a number of CAB members – both TV and radio – have told us that they need more time to evaluate the potential impact and develop their own positions.

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The CAB believes that this proposed policy change has the potential to reach well beyond the present case (subscription radio) and requires careful, deliberate consideration by Canada's broadcasters before they can file comments with Industry Canada.

In view of this, and considering the upcoming holiday season, we are requesting that the comment period for DGTP-007-04 be extended to at least 14 January 2005. This extension should enable private broadcasters to provide appropriate and well-considered advice to the Department on this important policy issue.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'D. Keeble', written in a cursive style.

David Keeble  
Senior Vice-President, Policy & Regulatory Affairs