

July 27, 2007

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

Dear Mr. Morin,

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

Attached please find CBC/Radio-Canada's comments in regard to Broadcasting
Public Notice CRTC 2007-70: *Call for comments on the Canadian Television
Fund Task Force Report*.

Sincerely,



Bev Kirshenblatt
Senior Director, Regulatory Affairs
CBC/Radio-Canada



**Call for Comments on the Canadian
Television Fund (CTF)
Task Force Report**

Broadcasting Public Notice CRTC 2007-70

Comments of CBC/Radio-Canada
27 July 2007

Executive Summary

The CTF has become an important element in the Canadian broadcasting system. The monies administered by the CTF enable independent producers to provide a wide range of high quality, distinctively Canadian programming. This programming represents a diversity of Canadian voices and perspectives that might not otherwise reach Canadians.

In CBC/Radio-Canada's submission, the Task Force's proposal to split the CTF into two streams would undermine the efficiency and effectiveness of the CTF and have serious negative implications for the independent production sector and for CBC/Radio-Canada. The opportunities for independent producers would be narrowed and the diversity of programming available to Canadians would shrink. The Commission should not adopt this recommendation of the Task Force.

Similarly, the suggestion implicit in the framework proposed by the Task Force Report, that the CBC/Radio-Canada 37% envelope be eliminated should also be rejected. The Corporation's status as Canada's national public broadcaster and its central role in providing Canadian programming to Canadians in prime time, including diverse, independently produced programming strongly supports the continuation of the CBC/Radio-Canada envelope.

CBC/Radio-Canada supports improved communication and accountability for the CTF, but recommends that it be viewed from the broader perspective of accountability to the public by an institution with a public service mandate. Annual reports should be made publicly available by the CTF on its website. No further accountability or reporting measures should be required.

Finally, BDUs should not be granted special status with respect to the CTF. In particular, the Task Force's suggestions with respect to board representation should be rejected. Either all interested parties should have board

representation or none should. CBC/Radio-Canada submits that an independent, neutral board is the best approach.

I. Introduction

1 The Canadian Broadcasting Corporation/Radio-Canada (“CBC/Radio-Canada”) is pleased to provide the following comments on the report of the CRTC’s Task Force on the Canadian Television Fund (CTF).

2 As the Commission is aware, the CTF was established to support the production of high quality, distinctively Canadian programming by independent production companies. This focus on independent production was in furtherance of section 3(1)(i)(v) of the Broadcasting Act which states:

3(1)(i) the programming provided by the Canadian broadcasting system should ... (v) include a significant contribution from the Canadian independent production sector.

3 As the Commission is also aware, a significant proportion of the CTF’s funds are allocated to independent production companies producing programs for CBC/Radio-Canada. The Corporation airs more Canadian programming and, specifically, more CTF-funded programming than any other broadcaster in the country.

4 CBC/Radio-Canada is highly dependent on the independent production sector and on CTF funding to fulfil its broad statutory mandate under the Broadcasting Act. Indeed, since it has been a clear statement of government policy to support the independent production sector, CBC/Radio-Canada has re-organised itself accordingly to maximise its involvement with the sector and maximise the benefits of the CTF.

5 Given CBC/Radio-Canada’s position as a key platform for independently produced Canadian programming, the Task Force report is a matter of serious concern to the Corporation. Changes to the CTF could materially affect the ability of independent producers to work with CBC/Radio-Canada. This could have an adverse effect on both independent producers and on the Corporation.

6 The Commission has a statutory obligation under section 5(1) of the Broadcasting Act to regulate so as to achieve the policy objectives set out in section 3 of the Act. In addition to section 3(1)(i)(v) which focuses on the importance of the independent production sector, those policy objectives identify the need for CBC/Radio-Canada to provide a wide range of programming that reflects Canada to Canadians in all their diversity. Section 3(1)(i) also specifies that the programming provided by the Canadian broadcasting system should be “varied and comprehensive” and “be drawn from local, regional, national and international sources”. In light of the nature and purpose of the CTF, CBC/Radio-Canada submits that these objectives should guide the Commission’s response to the Task Force report.

7 The Corporation believes several of the key proposals in the Task Force report do not accord with the section 3(1) policy objectives. Specifically, CBC/Radio-Canada disagrees with the Task Force’s proposal to split the CTF into two streams and with the resulting elimination of CBC/Radio-Canada’s 37% overall funding envelope.

8 CBC/Radio-Canada strongly recognizes the importance of audience-focused programming and the need for Canadian programs that appeal to large, mainstream audiences. In fact, CBC Television has placed a major emphasis on developing and airing fresh, new programs - such as *Little Mosque on the Prairie* – which are targeted at general audiences. Similarly, French Television has had considerable audience success with such recent programs as *La Galère*. These successes, combined with our other unique and less audience-focused programming reflect the true nature and programming balance of a national public broadcaster.

9 As the White Paper issued by the UK government on the BBC concluded, all public broadcasters must find this balance and focus on light entertainment as well as drama and serious programming in order to fulfil their roles. Addressing audiences is a key part of this process. The Broadcasting Act defines the mandate of CBC/Radio-Canada as ‘to inform, enlighten and

entertain'. While audience must not be the sole criteria for determining the success of a program (as it is with the advertising-driven private sector) it is and must be recognized as an important measurement of program success.

10 It would simply be foolhardy and inconsistent with the objectives of the Broadcasting Act to ghetto-ise CBC/Radio-Canada programming activities by assigning its CTF funds primarily to a stream designed for programs that meet various public policy objectives but do not attract many viewers. It would be equally foolhardy to require CBC/Radio-Canada to compete for its share of CTF funding on the basis of ratings and return on investment exactly like commercial broadcasters who are driven solely by the bottom line.

11 It is important to recognize that the nature of the target audience varies with the nature of the programming and that the audience need not always be mainstream or large. That is what diversity of voices is all about. It is also important to recognize that, in all cases, reaching and connecting with the intended audience is a critical cultural and social objective under the Broadcasting Act; namely, bringing Canadian programming to Canadians.

12 In order to achieve that objective, independent production aired on CBC/Radio-Canada must have access to assured funding from the CTF. Reserving 37% of the overall funds for CBC/Radio-Canada-shown programming ensures an appropriate mix of programming fare, as also required by the Act, and ensures that this programming is provided in deep prime-time where only the public broadcaster has the shelf-space.

13 The Corporation is very concerned that if the CTF were to be split as proposed by the Task Force with the majority of funds allocated on the basis of ratings success this would result in a narrowing of programming opportunities for independent producers. Those independent producers who preferred to focus on edgy, niche or high-risk innovative projects could face extremely difficult financial and artistic choices. The long-term implications for the

breadth and strength of the independent production sector could be very negative.

14 Furthermore, changes to the CTF that would limit the ability of independent producers to work with CBC/Radio-Canada could seriously undermine the ability of the Corporation to fulfil its statutory mandate. Under the requirements of the Broadcasting Act, CBC/Radio-Canada must provide a wide range of diverse programming meeting the needs and interests of all Canadians, including both mainstream and niche audiences. The Task Force's proposed splitting of the Fund would create an extremely difficult challenge for the Corporation in meeting these requirements.

15 The Task Force Report is wholly unclear as to the level and type of access independent production intended for broadcast on CBC/Radio-Canada would achieve via the private sector funding stream. Further, if CBC/Radio-Canada's participation in the CTF was to be circumscribed to a greater or lesser degree to the Government portion of the Fund, the company would be limited in its ability to pursue independent production of more popular programming and mainstream audiences. CBC/Radio-Canada's pursuit of its broad programming mandate would be compromised, and again we would fall far short of meeting the requirements of the Act.

16 In the following sections CBC/Radio-Canada reviews briefly the nature and purpose of the CTF and then discusses three issues raised by the Task Force report: 1) the possibility of splitting the CTF into two separate funding streams; 2) the possible elimination of the CBC/Radio-Canada envelope; and 3) possible changes to CTF accountability.

II. The Nature and Purpose of the CTF

17 As noted in the Task Force report, the CTF is the successor to the Cable Production Fund (CPF) which was established in 1994 in response to a

proposal by the cable industry which permitted cable BDUs to retain 50% of capex rate increases - which would otherwise have been rolled back - in exchange for paying the other 50% into the CPF. The funding of the CPF was, therefore, a commitment which resulted in a net financial gain for cable BDUs.

18 In 1995 the Governor in Council issued a Direction to the CRTC requiring that DTH BDUs also pay into an independent production fund. These payments constituted a basic part of the DTH BDUs overall contribution to the Canadian broadcasting system, in this case by supporting programming created by the independent production sector.

19 In 1996 the Minister of Canadian Heritage announced the creation of the Canadian Television and Cable Production Fund (CTCPF), subsequently renamed the CTF, which consolidated the funding from BDU operations into the CPF with an annual contribution by the Government, including monies previously allocated to Telefilm's Broadcast Development Fund.

20 Among other things, the consolidation of these monies was intended to achieve greater efficiencies by lowering overhead and permitting coordinated funding of independent television productions. The importance of this goal was echoed by the Commission in Call for comments on a proposal to direct programming contributions by Broadcasting Distribution Undertakings to the Canada Television and Cable Production Fund, Public Notice CRTC 1997-27, 11 March 1997 where the Commission emphasized the importance of a single fund:

Having considered the views expressed, the Commission is of the opinion that the administration of distributors' contributions by a single fund would reduce overhead expenses and would maximize the impact of that fund on the Canadian film and television industries.

21 In 1998, the CRTC revised the Broadcasting Distribution Regulations (BDU Regulations) and made CTF funds flowing from BDU operations a

fundamental part of the BDUs' overall regulatory contribution to the Canadian broadcasting system.

22 Oversight of the CTF rests with the Department of Canadian Heritage (DCH) and the terms of that oversight are set out in the Contribution Agreement between DCH and the CTF.¹ The following objectives have been given to the CTF under the existing Contribution Agreement²:

- Support the creation of high quality, distinctively Canadian television programming in drama, documentary, children's and youth, variety and performing arts programming
- Allocate one-third of its resources to French-language programming and two-thirds to English language programming
- Support the production of Aboriginal language programming
- Support the production of programming produced by francophone producers based outside Quebec
- Allocate 37% of its resources to programs licensed by the CBC/Radio-Canada
- Spend a minimum percentage of its revenues on the development of television programming
- Ensure that the programming it supports is produced in all regions of the country
- Support language versioning
- Develop a mechanism that enhances access to the CTF by programs supported by educational broadcasters

23 The Contribution Agreement also states that the monies paid into the CTF from the Government and from BDUs must be pooled and must be

¹ The CRTC transferred oversight of the Cable Production Fund (the 1994 predecessor to the CTF) to the Department of Canadian Heritage, in Public Notice 1996-159, Transfer of the Oversight of the Cable Production Fund, 20 December 1996.

² CTF Presentation to the Parliamentary Standing Committee on Canadian Heritage, February 8, 2007.

allocated in accordance with program guidelines based on the objectives mentioned above.³

24 In summary, the CTF is a consolidated fund that combines Government monies with funds flowing from BDU operations required under the BDU Regulations. The combination of these monies into a single fund is intended to ensure greater efficiency and effectiveness by lowering overhead and permitting more focused support for independent television production. The central objective of the CTF is to promote independent production of high quality, distinctively Canadian programming in a number of key areas. This objective furthers the overriding goals of the *Broadcasting Act* to ensure that the Canadian broadcasting system incorporates a diversity of voices and to enable access to the system by all Canadians.

III. The Task Force Proposals

25 The CRTC established a Task Force to review issues related to the CTF in response to the withholding by Shaw Communications and Quebecor of CTF funding from their respective operations as required under the BDU Regulations. In light of the potentially devastating impact these types of unilateral actions could in the future have on the Canadian production community, CBC/Radio-Canada supports the Task Force report's recommendation to amend the BDU Regulations to make monthly payment obligations a regulatory requirement.

26 The Task Force's report recommends a number of fundamental changes to the CTF, including structural changes to the management of funding. In these comments, CBC/Radio-Canada focuses on three aspects of the Task Force's report: 1) the possible splitting of the CTF into two separate funding streams; 2) the possible elimination of the CBC/Radio-Canada envelope; and 3) possible changes to CTF accountability.

³ Task Force Report at page 7.

1) The Splitting of the CTF

27 The Task Force has proposed that the CTF be split into two funding streams. The first stream would comprise funding flowing from BDU operations while the Government funds would constitute the second stream. The two streams would remain within the CTF but would be administered separately on the basis of distinct objectives and criteria.

28 The Task Force recommended that the BDU stream be a market-oriented, funding stream that would include the key criteria of audience success and investment return:

The CRTC should undertake a public review leading to the establishment of a clear statement of the objectives for BDU contributions to the CTF and the BDU Regulations should be amended so that sections 29 and 44 include a description of the objectives of the private sector funding stream to which monies must be contributed. The Task Force proposes the following as draft objectives:

- Qualifying Canadian programming must meet a minimum of 8/10 points using the CAVCO scale, be broadcast in prime time, and continue to fall within the CTF's traditional genres of drama, children's and youth, documentary and variety/performing arts programming;
- Audience success must be the primary criteria for continued funding; and
- Actual and potential return on investment must be a factor in allocating funding while taking into account the different realities of English and French markets.⁴

29 The Government stream would be administered separately and would focus on the policy objectives set out in the DCH/CTF Contribution Agreement or such other objectives as might be established by the Government.

⁴ Task Force Report at page 21.

30 CBC/Radio-Canada is deeply concerned by the Task Force's proposed splitting of the CTF for three reasons.

31 First, one of the basic reasons for the creation of the CTF was to achieve greater efficiency and effectiveness in providing support for independent television productions. As noted above, this rationale was specifically endorsed by the Commission:

Having considered the views expressed, the Commission is of the opinion that the administration of distributors' contributions by a single fund would reduce overhead expenses and would maximize the impact of that fund on the Canadian film and television industries.

32 In CBC/Radio-Canada's respectful submission, the splitting of the CTF into two separate streams (with the Government stream including the production streams for Aboriginal programming and French language production outside Quebec) would create an additional layer of administration and seriously reduce the efficiencies achieved by combining the Cable Production Fund and Telefilm monies. The administration of two distinct funding streams with two distinct sets of application rules and criteria would inevitably result in money being spent on overhead which previously would have been spent on programming.

33 Independent producers and broadcasters would also face increased administrative costs, as they would have to understand and keep track of two application processes and make decisions as to which funding stream to apply for.

34 In CBC/Radio-Canada's view, the introduction of these types of increased costs and administrative inefficiencies raises serious doubts about the merit of the Task Force's proposal.

35 The second problem with the Task Force's proposal to split the CTF relates to the narrowing of opportunities for independent producers. The funds flowing from BDU operations are the largest part of the CTF and likely the only

part to increase in the future. If a BDU stream were created and dedicated to funding mainstream, ratings-driven programs this would significantly narrow the funding opportunities for independent producers for other types of programming.

36 Those independent producers who focus on edgy, niche or experimental programming would face seriously diminished funding support. There can be little doubt that this would represent a significant financial challenge to many production companies and would likely drive some of them out of business.

37 On the other hand, those independent producers who targeted the proposed ratings-focused BDU stream would have a significant incentive to go with the safest proposals they could devise. Applicants would have to show that their proposals were mainstream and likely to achieve high ratings. The incentive to stick with proven formats and formula would be large.

38 Under the Task Force's proposal the opportunity and incentives for diversity and innovation would diminish. Unique and diverse voices would lose access to the Canadian broadcasting system. And, Canadians' viewing choices would shrink.

39 The third problem with the Task Force's proposal flows directly from the previous point. If opportunities for independent producers were to narrow, then the ability of CBC/Radio-Canada to fulfil its statutory mandate would be seriously compromised.

40 The Corporation is required by the Broadcasting Act to provide a wide range of programming in both English and French for all Canadians. CBC/Radio-Canada relies heavily on independent producers in order to meet this goal.

41 If the CTF were split as proposed by the Task Force then the funding for independently produced niche and diverse programming would decline significantly and CBC/Radio-Canada would lose access to an important range

of programming. There is no other source for such programming in Canada. Consequently, CBC/Radio-Canada could not provide the full range of programming required by the Broadcasting Act.

42 Conversely, if CBC/Radio-Canada's participation in the CTF was to be circumscribed to a greater or lesser degree to the Government portion of the Fund and the Corporation limited in its ability to pursue more popular programming and mainstream audiences, then CBC/Radio-Canada's pursuit of its broad mandate would also be compromised. Again, Canadian audiences and the independent production sector would suffer and the Corporation would fall short of meeting the requirements of the Act.

43 Therefore, in addition to creating increased costs and administrative inefficiencies, the Task Force's proposal to split the CTF into two streams would cause serious harm to the independent production sector by narrowing the opportunities available to producers. This, in turn, would result in a decrease in the diversity of voices and seriously impair the ability of CBC/Radio-Canada to provide Canadians with the full variety of programming which it is mandated to offer: diverse, serious, innovative, light, popular, and mainstream. All of this programming is an important part of the public broadcaster's current programming strategy in both English and French markets in Canada, and all of it relies heavily on the independent production sector.

44 This combined effect would run directly contrary to the objectives of the Broadcasting Act and to the Commission's statutory obligation to promote those objectives. For these reasons, CBC/Radio-Canada submits the Task Force's recommendation with regard to the splitting of the CTF funds should be rejected.

2) The Elimination of the CBC/Radio-Canada Envelope

45 Under the Contribution Agreement between DCH and the CTF, the CTF is required to allocate at least 37% of its total funds, net of administrative costs and certain special initiatives, to independent productions licensed to CBC/Radio-Canada. This requirement recognizes both the central role CBC/Radio-Canada plays as the most prominent broadcaster of Canadian content, its unique ability to air the greatest amount of this programming in deep prime time, as well as the need for a wide variety of innovative, diverse programming in order to fulfil its obligations under the Broadcasting Act.

46 The Task Force proposal does not directly address the issue of CBC/Radio-Canada's funding envelope since it does not provide any specific recommendations in respect of the terms of the Contribution Agreement, or any specific terms of access for CBC/Radio-Canada programming within the audience stream. However, it is noteworthy that the current level of DCH monies is not sufficient to fund, via the proposed Government stream, the various special initiatives, the projects licensed by CBC/Radio-Canada, and the educational broadcasters at current levels, particularly after accounting for the increased costs of administration.

47 It is therefore not at all clear how the Task Force's proposal to split the CTF would permit CBC/Radio-Canada to continue its guaranteed envelope. In this regard, it is important to recognize that funds flowing from BDU operations represent the largest part of the CTF and the only part that is certain to increase over time. Government funding is not assured beyond 2008/2009.

48 CBC/Radio-Canada considers it surprising that the Task Force would be vague on this matter and would implicitly suggest eliminating the CBC/Radio-Canada envelope in this way. The 37% envelope reflects the Corporation's historic proportion of CTF funding since 1996, which in turn, reflects CBC/Radio-Canada's position as the primary platform for independent productions.

49 Both the CTF funding from BDU operations as required under the BDU Regulations, and the Government funding of the CTF are intended to support the Canadian broadcasting system by helping to finance programming created by the independent production sector. As Canada's national public broadcaster, CBC/Radio-Canada plays a central role in the Canadian broadcasting system and airs more independently produced programming than any other broadcaster. It is natural therefore that a significant proportion of the total CTF funds would be earmarked for programming to be aired on CBC/Radio-Canada.

50 As noted above, since it has been a clear statement of government policy to support the independent production sector, CBC/Radio-Canada has organised itself to maximise its involvement with the sector and maximise the benefits of the CTF. These efforts have helped create many of the success stories of the Canadian independent production sector and provided significant benefit to the Canadian system.

51 In CBC/Radio-Canada's submission, it would be contrary to the objectives of the Broadcasting Act if the Commission were to adopt the Task Force's recommendations and thereby eliminate the CBC/Radio-Canada envelope. Such a move would compromise the Corporation's ability to fulfil the mandate set out for it by Parliament in section 3(1) of the Act. In this regard, it is important to reiterate that the Commission has a statutory obligation under section 5(1) of the Broadcasting Act to regulate so as to implement the section 3(1) objectives, including those objectives relating to the CBC/Radio-Canada.

52 For these reasons, the Corporation submits that the Commission should not accept the Task Force's recommendation to split the CTF and effectively eliminate the CBC/Radio-Canada 37% envelope. If the Commission concludes that the CTF should be split, then this should be done in a way that would ensure that the CBC/Radio-Canada envelope is preserved (e.g., an envelope would have to be established in respect of both streams).

3) Reforming CTF Accountability

53 The Task Force recommends that there be improved communications and accountability on the part of the CTF:

1. In addition to the reporting requirements set out in the Contribution Agreement with the DCH, the CTF should develop an annual public reporting mechanism with respect to all funds using BDU contributions. Such annual reports should include information setting out the objectives of the Fund and, broken out by performance envelopes, the projects receiving CTF support, the reasons why these projects were supported, and the available evidence to demonstrate the success of these projects in attracting audiences.

2. The CTF Board should devise and implement a clear communications strategy designed to ensure that contributors, government and the Canadian public are made aware of the objectives of the Fund and its progress in achieving these objectives. The Board should invest in a senior staff position to be responsible for such ongoing communications and government relations.

54 CBC/Radio-Canada agrees with the idea of improved communications and accountability for the CTF. Every institution with a public service mandate, such as the CTF, should operate in an open and transparent manner and should make public the basis for its use of funds and the results of those decisions. However, the Corporation strongly disagrees with the Task Force's suggestion that the CTF should be directly accountable to the BDUs who simply pass through the monies their subscribers pay to the CTF.

55 The monies flowing from BDUs are not charitable donations or private loans or some other voluntary financial payment. They are a regulatory requirement made pursuant to the Broadcasting Act and the BDU Regulations to ensure that BDU operations – and ultimately BDU subscribers - make an appropriate contribution to the Canadian broadcasting system. The BDUs have no claim on that money once it is paid to the CTF and no special right in respect of the CTF's allocation of CTF funds.

56 Indeed, funding to the CTF from BDU operations are in principle no different than the license fee payments all broadcasters make to the Government in support of the cost of CRTC regulation. These payments do not entitle the broadcasters to have a say in the CRTC's governance. Neither do they entitle the broadcasters to direct how the CRTC spends its operating funds or what regulatory regime the CRTC establishes. The same reasoning should be applied with respect to the CTF funding flowing from BDU operations.

57 In CBC/Radio-Canada's view, the CTF should prepare annual reports on the use of all CTF monies – whether funded by the Government or flowing from BDUs operations – and make those reports available to the general public via the CTF's website. This open and public disclosure should be all that is required of the CTF.

58 Similarly, the Task Force's proposed changes to the governance of the CTF fail to recognise the nature of the CTF funding flowing from BDU operations. Instead, the Task Force's recommendations imply that BDUs are entitled to some special status with respect to the CTF. This is incorrect. Consequently, CBC/Radio-Canada disagrees with the Task Force's suggestion that BDUs be entitled to greater CTF board representation while producers be removed from the board.

59 Like some of the other CTF participants, BDUs have conflicts of interest as a result of their own or their affiliates' broadcasting and production activities. The Corporation believes that either all interested parties should have board representation or none should. In CBC/Radio-Canada's submission the latter approach – an independent, neutral board – is the best approach.

60 Finally, CBC/Radio-Canada notes that the issue of accountability and governance of the CTF was recently addressed by the Auditor General of Canada. It is the Corporation's understanding that appropriate action was taken based on the Auditor General's recommendations. CBC/Radio-Canada

does not believe additional accountability or governance reform measures are required in the circumstances.

IV. Conclusion

61 The CTF has become an important element in the Canadian broadcasting system. The monies administered by the CTF enable independent producers to provide a wide range of high quality, distinctively Canadian programming. This programming represents a diversity of Canadian voices and perspectives that might not otherwise reach Canadians.

62 In CBC/Radio-Canada's submission, the Task Force's proposal to split the CTF into two streams would undermine the efficiency and effectiveness of the CTF and have serious negative implications for the independent production sector and for CBC/Radio-Canada. The opportunities for independent producers would be narrowed and the diversity of programming available to Canadians would shrink. The Commission should not adopt this recommendation of the Task Force.

63 Similarly, the suggestion implicit in the framework proposed by the Task Force Report, that the CBC/Radio-Canada 37% envelope be eliminated should also be rejected. The Corporation's status as Canada's national public broadcaster and its central role in providing Canadian programming to Canadians in prime time, including diverse, independently produced programming strongly supports the continuation of the CBC/Radio-Canada envelope.

64 CBC/Radio-Canada supports improved communication and accountability for the CTF, but recommends that it be viewed from the broader perspective of accountability to the public by an institution with a public service mandate. Annual reports should be made publicly available by the CTF on its website. No further accountability or reporting measures should be required.

65 Finally, BDUs should not be granted special status with respect to the CTF. In particular, the Task Force's suggestions with respect to board representation should be rejected. Either all interested parties should have board representation or none should. CBC/Radio-Canada submits that an independent, neutral board is the best approach.

66 CBC/Radio-Canada appreciates the opportunity to provide these comments on the Task Force report.

*** End of Document ***