

GIVEN THE RECENT RADIO CARLETON CKCU-FM DECISION ( DENIAL OF RENEWAL)  
WHERE DOES CFRU RADIO GRYPHON GO FROM HERE?  
the Director's assessment

The CRTC has made it clear that they have a role in mind for student and community stations, whether the stations want it or not. I believe that we are destined to fulfill the same role on a local level as does the CBC on a national level. This role concerns more imaginative and informative programs, and no advertising, although sponsorship will be allowed. I speculate that we must do so because (1) we can get funds from the university community and corporate donations which profit stations cannot, and (2) the CRTC cannot force the profit stations as much as they can us. ( It matters not that we may not be able to finance an FM station their way - they will even allow us to be non-professional in attitude, ie sloppy, as a concession) The CRTC wants local informative and imaginative programming and we student and community stations are the only ones they can persuade into it. We, of course, accept the programming ... responsibility willingly, but our request for reasonable financing has failed.

Both CKCU and CFRU made, in my opinion, excellent rational arguments in support of advertising. Our best shot didn't work because, I believe, we are not dealing with a rational issue. The CRTC would be happy if we "dramatised" a community announcement - say for a concert, but if we accepted money for that same production they would disapprove. They can no longer consider advertising as a separate program element. Therefore it is not the potential disruptive aspect of advertising, or the spending of studio time, but actually the acceptance of money. The CRTC has this irrational feeling that student and community stations should not sell air time or similar services, and no rational argument can counter it.

When the CRTC speaks of commercial pressure they do not mean an advertiser will say "... withdraw your remarks..." or "... I don't like your ..." but rather "What are your ratings?" Again it matters not that CKCU has proven otherwise. In the CRTC's experience informative and creative programs do not attract a daily large consistent audience. The CRTC feels, therefore, that any student or community station, doing what the CRTC wants, will have a poor or nil rating. A poor or nil rating might prompt an advertiser to suggest a station should play more top music hits and less jazz or radio plays, or do "something" to get a bigger audience, etc..... The CRTC obviously believes, despite all we say and all CKCU has proven, that student and community stations cannot handle the pressure. \* The CRTC believes that informative and creative programs are reasons for donations, which is actually sponsor pressure but in an acceptable manner. So by eliminating dramatised commercials the CRTC tries to prevent pressure for majority audience programming, and promote diversified programming for minority audiences. Which is what they are pressuring us to do. It all ties together in a nice neat package.

\*footnote: It would be easier to handle advertiser pressure if we could play off one advertiser against another. To do so we would need an open type commercial policy. However, with an extremely limited commercial policy the pressure could actually be greater because the advertisers, and charge per announcement, would be less.



So what to do? We have four options, all with problems.

1. We can submit an FM application as a full commercial station. We would probably require a more rigorous program schedule and more surrounding community participation than we are currently planning. We would probably also need a very good survey to support our contention that there is advertising revenue available, separate from that received by CJOY or CKLA-FM. However, since we exist on a university campus the CRTC staff may feel the application is not "acceptable" until it is non-commercial, or the CRTC could deny it just because they feel we should be non-commercial. Despite what they have said in the decision, anything is now possible in the way of decisions and reasons.
2. We could behave and rewrite the application for sponsorship only. We could also relax some of our program proposals, relax surrounding community involvement, and maintain part-time staff. The problem with this option is the unknown sponsorship revenue level. Would we even get the \$1250 we currently sell? Two Kitchener/Waterloo stations, effectively in our area, and also the McMaster station, are all in the market for corporate donations, sponsors, Wintario etc.
3. As option two above, but maintain carrier current and sell advertising on it. Problems: more annual paperwork; cannot simulcast; will require more equipment; CRTC may not allow a relaxation of carrier current programming; and, of course, the poor carrier current would be competing against our own good stereo FM.
4. Submit the FM application as currently planned, with commercial policy as is, with the hope that somehow we can convince the CRTC at a Hearing that we need the money and are worth it or capitulating at the Hearing if they insist. However, with option one above, such a commercial policy may never allow us to get a Hearing. Also, we could end up with the current proposed programming and the sponsorship-only commercial policy. If that happens, this option could cost us more than option two.

I recommend we proceed with option two.

At least if we fail at first, we can try again. Radio Carleton cannot fail, they have an FM licence to lose. They are going to have to behave. They estimate they will lose \$30,000 of their (used to be) projected revenue from advertising of \$70,000. The battle, however, is not over yet. They are seeking legal opinions, one of which is the former head of the CRTC Legal Branch. They are also exploring a legal challenge based on censorship of information (consumer information = advertising). But we cannot wait that long and if they win a change we can apply for an amendment.

Happy New Year ?

Ian McDiarmid  
Director