

Unifor comments on the *Part I Application by the Broadcasting Participation Fund (BPF), Inc. to expand the mandate of the BPF*

Re: Part I Application by the Broadcasting Participation Fund (BPF), Inc. (2024-0355-9)

SUBMITTED VIA WEB FORM

August 6, 2024



**Randy Kitt, Director
Unifor Media Sector**

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Marc Morin
Secretary General, Corporate Services and Operations
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario
Canada, K1A 0N2

RE: Part I Application by the Broadcasting Participation Fund (BPF), Inc. (2024-0355-9)

Dear Mr. Morin,

Thank you for the opportunity to provide comment on the *Proposal to expand the mandate of the Broadcasting Participation Fund to accept applications for public interest intervenor costs in proceedings under the Online News Act (2024-0355-9)*.

Unifor is Canada's largest private sector union, with more than 320,000 members across Canada working in 20 economic sectors. Unifor is one of Canada's largest unions in the media sector, representing more than 10,000 media workers, including 5,000 members in the broadcast and film industries.

Unifor supports the Broadcasting Participation Fund's Part 1 Application to expand its mandate to include proceedings under, related to, or arising from the *Online News Act*.

The development of the *ONA* and related regulations has had a huge impact on the Canadian media landscape, and a wide variety of stakeholders has already engaged in the consultation process. However, given the crisis facing Canada's media sector, specifically related to the loss of local news, we believe there is still an ongoing need to engage with the Canadian public and seek input and feedback. The BPF's role is more important than ever, and we believe it is appropriate to expand the Fund's mandate to meet this need for public engagement.

Unifor recommendations:

1. The BPF should have access to adequate funding to meet its expanded mandate.

- In terms of securing additional funding to support this expanded mandate, Unifor respectfully recommends that the money *not* be drawn from Google’s \$100 million annual contribution. As noted in our submission for Online News Notice of Consultation CRTC 2024-143, we believe that as much money as possible from Google’s \$100 million must go directly towards supporting journalists and media workers working in Canadian newsrooms.
 - Unifor would support the establishment of separate agreements between the BPF and any digital companies either contributing under the *ONA* or receiving an exemption order from the Commission. In other words, the digital giants should be required to contribute new monies towards supporting the BPF’s expanded mandate.
2. The CRTC should schedule specific dates for the public-interest consultation portion of the overall consultation plan for the “Regulatory plan to modernize Canada’s broadcasting framework,” which is tentatively scheduled for “Fall 2024.”
- In addition, interested parties should be given 60 days notice rather than the usual 30 days, given the amount of work involved in the engagement process.
3. Any changes approved by the Commission should also allow the BPF to reimburse public-interest participants that intervened in the March 2024 ONA proceeding (BNoC 2024-55, issued 13 March 2024).

Unifor is available if you have further questions or seek additional comments.

Thank you again for the opportunity to comment on this important matter.

Sincerely,

Randy Kitt

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