



March 22, 2013

Filed Electronically

Mr. John Traversy
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mr. Traversy:

Re: Part 1 Application filed by Bell Media Inc. seeking amendments to certain conditions of licence of the national English-language specialty Category A service known as The Comedy Network (Application 2013-0320-6)

1. The Writers Guild of Canada (the WGC) is the national association representing more than 2,200 professional screenwriters working in English-language film, television, radio, and digital media production in Canada. The WGC is actively involved in advocating for a strong and vibrant Canadian broadcasting system containing high-quality Canadian programming. While the WGC's mandate is to represent our members, in advocating a strong Canadian broadcasting system that offers Canadians a variety of programming, we also play a role in balancing competing interests in the broadcasting system.
2. Bell Media is seeking the following changes to The Comedy Network's conditions of licence (COLs):
 - the elimination of the restriction that all category 7(c) [drama and comedy – specials, mini-series, and made-for-TV feature films] and 7(d) [drama and comedy – theatrical feature films aired on TV] programming broadcast on the service be Canadian [COL 2(f)];
 - increase the allowable amount of category 7(e) [drama and comedy – animated television programs and films] programming broadcast on the service from 10% per broadcast day to 25% per broadcast month [COL 2(h)]; and
 - reduce the Canadian content requirements of the service to no less than 55% of the broadcast day and no less than 50% of the evening period (COL 3).
3. The WGC strongly opposes the above-referenced application and urges the CRTC to deny it in its entirety.

4. We have reviewed the opposing intervention of the Canadian Media Production Association (CMPA) related to Bell Media's application and wish to echo the points made by the CMPA therein. We fully support the CMPA's intervention and agree that Bell Media has failed to demonstrate why the Commission should now reverse its previous (and recent) decisions with respect to each of Bell Media's licence amendment requests for The Comedy Network.
5. The WGC agrees with past pronouncements made by the Commission that specific licence requirements related to programming are best examined at licence renewal time, when they can be considered in the context of the broadcast ownership group's other programming services.
6. The WGC also wishes to state for the record its profound disappointment that some broadcasters continue to file licence amendment applications with the Commission within a short period of time after licence renewal, even though the broadcaster agreed to abide by existing conditions of licence when it filed its licence renewal application or the Commission denied the same (or a similar) licence amendment request as part of the renewal process. This places an unnecessary burden on industry stakeholders with limited resources, such as the WGC, to intervene on such applications.
7. We encourage the CRTC to send a signal to Bell Media, and all broadcasters in general, that it will not consider licence amendment requests so soon after licence renewal.
8. The WGC thanks the CRTC for the opportunity to provide our comments related to Bell Media's application and we urge the Commission to deny it in its entirety.

Yours very truly,



Maureen Parker
Executive Director

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