



February 27, 2013

Filed Electronically

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

Dear Mr. Traversy:

Re: Broadcasting Notice of Consultation CRTC 2013-19-1 and 2013-19, Item #17 – Application by Aboriginal Peoples Television Network (APTN) to renew the broadcasting licence for the French- and English-language satellite-to-cable undertaking for APTN and application to renew the order for mandatory distribution of APTN on the digital basic service pursuant to section 9(1)(h) of the *Broadcasting Act* (Application 2012-0993-2)

Introduction

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. The WGC supports the above-referenced application, subject to the comments in this intervention. The WGC wishes to appear at the public hearing scheduled to commence on April 23, 2013 in order to further elaborate on the following issues from the perspective of English-language screenwriters.

APTN Makes a Significant Contribution to the Canadian Broadcasting System

3. The WGC submits that APTN makes a significant contribution to the Canadian broadcasting system that warrants renewal of its licence for a seven-year term and continued mandatory distribution on the digital basic service pursuant to section 9(1)(h) of the *Broadcasting Act*.

4. APTN can be considered a model Canadian broadcaster for its performance with respect to funding and exhibiting Canadian programming over its current licence term. Specifically, the broadcaster should be commended for increasing its Canadian content exhibition level to 75% from 70% during the licence term and for achieving an impressive 80% Canadian content level in 2012. At the time of filing its licence renewal application, APTN was spending 57% of its previous year's gross revenue on Canadian programming and 35% on programs of national interest.
5. Should its application be approved in its entirety, APTN projects that it will spend 70% of its gross revenue on Canadian programming and 46% of its gross revenue on programs of national interest over the new licence term. These levels would dwarf those of the large broadcast groups, which have far greater resources.
6. The WGC is pleased that APTN spent \$1,093,000 on program development in 2011, double its licence commitment to spend \$500,000 per year on development. We fully support APTN's commitment to spend a minimum of \$1 million per year on program development during the new licence term, and we encourage it to exceed this level as resources permit.
7. The WGC supports APTN's detailed plans for the new licence term, which is based on the following three-part strategy:
 - 1) Engage and serve, as a priority, the growing younger Aboriginal population;
 - 2) Solidify APTN's position as a national network in a competitive broadcasting environment; and
 - 3) Position APTN for a multi-platform future.
8. Should APTN receive a wholesale rate increase we would encourage it to direct all of the additional funds to create more and higher quality original Canadian programming, including drama and comedy. Specifically, we support the following additional APTN proposals for the new licence term:
 - Maintain a Canadian content level of 75%;
 - Broadcast 8 hours a week on average of programs that were included in the former priority programming category (i.e., drama and comedy, long-form documentary, music and dance, variety, entertainment magazine or awards shows, and regionally-produced programs other than news, analysis and interpretation, or sports);
 - Increasingly become the lead broadcaster on program commissions rather than a financing partner and second/third-window broadcaster;
 - Commission programming with larger production budgets and more episodes per season (for series); and
 - Commission movies-of-the-week based on novels and plays by Aboriginal writers.

Conclusion

9. The WGC supports the renewal of APTN's licence for a seven-year term and the broadcaster's request for continued mandatory distribution on the digital basic service pursuant to section 9(1)(h) of the *Broadcasting Act*. APTN has made, and continues to make, significant contributions to the Canadian broadcasting system that warrant approval of its application.
10. We thank the Commission for the opportunity to provide our comments related to APTN's application, and look forward to elaborating on them at the public hearing.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Maureen Parker', with a stylized, cursive script.

Maureen Parker
Executive Director

c.c.: National Council, WGC
Jean Larose, Chief Executive Officer, APTN

*** End of Document ***