



August 17, 2005

By e-mail: [procedure@crtc.gc.ca](mailto:procedure@crtc.gc.ca)

Ms. Diane Rhéaume  
*Secretary General*

Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario  
K1A 0N2

Dear Ms. Rhéaume,

**Re: Application by CTV Specialty Television Inc. to amend the licence of the national specialty programming undertaking known as The Comedy Network – Broadcasting Public Notice CRTC 2005-66 – Item 3**

1. This is the Writers Guild of Canada's written intervention regarding CTV Specialty Television's application to amend the Comedy network's conditions of licence.
2. The Writers Guild of Canada (the WGC) is the national association representing more than 1,800 screenwriters working in English-language film, television, radio and multimedia production in Canada. Screenwriters are the primary creators of Canadian productions; they are the voices that ensure our national identity is preserved. WGC members are the creators of Canadian stories including feature films like *Mambo Italiano*, indigenous dramatic series such as *DaVinci's Inquest* and *Corner Gas*, the popular mini-series *Trudeau* and *H<sub>2</sub>O* and renowned children's programming like the *Degrassi* series. The WGC is committed to building a vibrant industry showcasing Canadian imagination and talent.
3. The WGC has reviewed the detailed analysis prepared by the Directors Guild of Canada (DGC) concerning PN 2005-66, item 3, and endorses its comments and recommendations.
4. Concurring with the DGC, the WGC supports CTV Specialty Television Inc. (CTV) application to amend the The Comedy Network (TCN) licence to add categories 7(c) (specials, mini-series, made-for-TV feature films) and 7(d) (theatrical feature films aired on television) as eligible programming. The WGC also supports the applicant's proposal that TCN's broadcasting licence be amended to implement the

Commission's English-language Canadian television drama incentives policy set out in Broadcasting Public Notice CRTC 2004-93.

5. As a founding member of the Canadian Coalition of Audio-visual Unions (CCAU), the WGC has long advocated that broadcasters should more fully support Canadian dramatic programming. The WGC and the CCAU have filed a number of briefs with the CRTC demonstrating the recent downturn in Canadian dramatic production and calling for more private sector support for drama. The WGC supports the current CTV application before the Commission as it would increase TCN's commitment to the development, production and broadcast of Canadian drama.
6. Indigenous dramatic 10 point programs, written, directed and performed by Canadians, are the most expensive type of programming to make in Canada costing on average \$1.16 million per hour according to WGC statistics. The reasons for this include the limited Canadian market, lack of foreign pre-sales and low broadcast licence fees. This means that all private support for indigenous 10 point drama is needed, including broadcast windows financed by Canadian specialty services.
7. The WGC also supports TCN's proposal that the service's licence be amended to permit it to access the CRTC's drama incentives policy.
8. As stated previously in WGC, DGC and CCAU submissions to the CRTC, we also urge the Commission to cease the practice of allowing pay and specialty services to count CTF licence fee top-ups as programming expenditures. This practice undermines support for the production of new Canadian programming by reducing the total dollar amount available to finance programming. In order to remedy this, the WGC supports the DGC's recommendation that the CRTC issue a circular disallowing the use of the licence fee top-up as a credit towards spending by any broadcaster, effective January 1, 2006, or at the time of their next renewal, whichever comes first.

We thank you for this opportunity to provide you with our comments

Sincerely,



Maureen Parker  
Executive Director

- cc. Pamela Brand, Executive Director, Directors Guild of Canada  
Rebecca Schechter, President, Writers Guild of Canada  
Gail Martiri, Director of Policy, Writers Guild of Canada  
Ed Robinson, President & General Manager of The Comedy Network,  
CTV Television Inc. via fax (416) 332-4580