

May 7, 2026

Filed Electronically

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

Dear Mr. Morin:

Re: Application # 2026-0107-0: Part 1 Application for De-registration of Sony Pictures Entertainment Inc. (SPE) FAST Channels and Revocation of Base Contribution Orders

1. The Writers Guild of Canada (WGC) is the national association representing approximately 2,500 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 and Indigenous programming.
2. This Part 1 application has been filed by Sony Pictures Entertainment Inc. (SPE) to de-register seven FAST channels, as set out in the application, on the basis that none of them meet the definition of an “online undertaking” under the *Broadcasting Act* (the Act).
3. The WGC **opposes** this application.
4. The WGC has had the opportunity review the intervention of the Canadian Media Producers Association (CMPA) in this proceeding. The WGC shares the concerns of the CMPA and supports their intervention in this application.
5. In particular, the WGC agrees that: SPE’s FAST channels are not mere program suppliers and are not properly categorized as a “creator”; the statutory definition of “online undertaking” does not specify a requirement for “direct” versus “indirect” transmission of programs; and, the Commission should consider the broader consequences of the relief sought, including the impact of the group-based approach and the potential to undermine the broadcasting policy objectives of the Act.
6. We thank the Commission for the opportunity to participate in this proceeding.

Yours very truly,

A handwritten signature in black ink, appearing to be 'NM', written in a cursive style.

Neal McDougall
Assistant Executive Director, WGC

Cc: Megan Bruce, Vice-President, Sony Pictures Entertainment Inc. (megan_bruce@spe.sony.com)

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