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**Order Issuing a Direction to the CRTC on Implementing the Canadian
Telecommunications Policy Objectives to Promote Competition, Affordability,
Consumer Interests and Innovation**

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This is the submission of ACTRA regarding the Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation. ACTRA (Alliance of Canadian Cinema, Television and Radio Artists) brings to this process the perspective of over 25,000 professional performers working in the English-language recorded media sector in Canada. For 75 years, ACTRA has represented performers living and working in every corner of the country who are pivotal to bringing Canadian stories to life in film, television, videogames, sound recording, radio and digital media.

ACTRA believes all Canadians should have affordable access to high-quality telecommunications services, including the Internet, and thus supports the proposed policy directive made by the Honourable Navdeep Bains, Minister of Innovation, Science and Economic Development, that would require the Canadian Radio-television and Telecommunications Commission (CRTC) to consider competition, affordability, consumer interests and innovation in its telecommunications decisions.

Digital technologies are ubiquitous, and the Internet is becoming the principal vehicle through which creative works of all kinds are distributed. Music, books, magazines, movies, television and radio programs, games, podcasts and other creative works are already widely available online. Internet distribution has grown exponentially in the past decade and the growth rate continues to soar. Aside from some forms of visual arts and crafts, all other creative works can be digitized easily and quickly.

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ACTRA believes access to the Internet is essential today and supports efforts to ensure every Canadian has access to both high-quality and affordable high-speed broadband service. In addition to this Order, we recommend the government considers providing appropriate subsidies or tax incentives to ensure all Canadians can afford access to the Internet.

ACTRA, however, is disappointed the proposed policy directive has overlooked including the protection and promotion of Canadian diversity and cultural expression within the Direction's Principles (1 (a) (i) – (vii)). Cultural content must be preserved because of its irreplaceable symbolic value that nurtures the identity of diverse individuals and societies across Canada.

It is also worth noting that a variety of cultural expressions, such as music, television and film, would not be available for continuous viewing and listening without the Internet and 4G technology. Both of these developments have had a huge impact on cultural ecosystems at all levels. These technologies have allowed new players to enter the Canadian market without being integrated into the Canadian system, which has resulted in an uneven playing field in terms of discoverability and funding of local and national content. Regulations to ensure Canada's cultural sovereignty still do not apply to online programming services.

While these issues are central to the ongoing debate regarding the broadcasting sector, these services would not have been possible without the technological innovations that have taken place in the telecommunications sector. Even though the telecommunications sector does not have to address solutions for the broadcasting sector, it already contributes to the latter when it finances Canadian content through the contributions of broadcasting distribution undertakings (BDUs).

ACTRA, therefore, urges the government to include Canada's identity and cultural sovereignty as well as a specific instruction regarding the contribution to the financing of Canadian content in the founding Principles outlined in the proposed Direction to the CRTC.

ACTRA joins the Coalition for the Diversity of Cultural Expressions (CDCE) in proposing the following changes (**in bold**) to the Direction section of the proposed Order:

1. In exercising its powers and performing its duties under the Telecommunications Act, the Commission must implement the Canadian telecommunications policy objectives set out in section 7 of that Act, in accordance with the following:
 - a. The Commission, when relying on regulation, should consider how measures used can promote **cultural sovereignty**, competition, affordability, consumer interests and innovation, namely to the extent to which they
 1. **ensure that the value generated by the delivery of cultural content is shared,**
 2. encourage all forms of competition,
 3. foster affordability and lower prices, particularly when there is potential for telecommunications service providers to exercise market power,
 4. ensure that affordable access to high quality telecommunication services is available,

5. enhance and protect the rights of consumers in their relationships with telecommunications service provider,
 6. reduce barriers to entry and barriers to competition for new and smaller telecommunications service providers,
 7. enable innovation in telecommunications services, including new technologies and differentiated service offerings, and
 8. stimulate investment in research and development and in other intangible assets that support the offer and provision of telecommunications services; and
- b. the Commission, when relying on regulation, should demonstrate its compliance with this Order and should specify how the measures used can, as applicable, promote **cultural sovereignty**, competition, affordability, consumer interests and innovation.

2. In order to meet the objectives of the Telecommunications Act and to enable telecommunications carriers to assume their social responsibility and participate in the diversity of cultural expressions, the Commission will adopt a regulatory policy to establish a contribution by telecommunications carriers to the financing of Canadian content.

Thank you,

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

Stephen Waddell
National Executive Director
ACTRA