



January 11, 2019

The Broadcasting and Telecommunications Legislative Review Panel
c/o Innovation, Science and Economic Development Canada
235 Queen Street, 1st Floor
Ottawa, Ontario K1A 0H5

Dear Panel Chair and Panel Members:

Re: Review of the Canadian Communications Legislative Framework

1. Cable Public Affairs Channel Inc./La chaîne d'affaires publiques par câble inc. ("CPAC") is pleased to have this opportunity to submit comments in the review of Canada's communications legislative framework. In this submission, we will focus on the important role that CPAC plays in supporting Canada's democratic life and institutions and how that role is currently reflected in the *Broadcasting Act* – and may continue to be so in the future.
2. As the Legislative Review Panel carries out its work, Canadians are about to be immersed in a federal election campaign. Voters will want to hear from leaders and candidates and parties for themselves. Direct access to information will be as important for Canadians in this election as it has ever been.
3. Canadian democracy scores highly in international comparisons.¹ However, it has also been noted that democracies around the world are under threat, and that overall the world is experiencing a "democracy recession". Canada is by no means immune to the threats faced by open societies and democratic institutions including the dissemination of false and misleading news, the possibility of foreign and domestic interference, cyber attacks and more. The content offered to Canadians by our broadcasting system is critical to ensure Canadians have access to reliable, timely and balanced information.
4. As always, CPAC will offer direct and unfiltered access to the events, debates and discussions that shape Canada's democratic and political life. Millions of Canadians will choose to watch CPAC's coverage because of its depth, reliability and accessibility. They will find it on our TV channel and on all of our digital platforms, which continue to build impressive audiences. As we know from past elections, CPAC's importance to Canadians will only continue to grow as the vote draws closer. When democracy is in the spotlight, CPAC shines.

¹ Economist Intelligence Unit, *Democracy Index 2017: Free speech under attack*. Canada ranks sixth in the world based on the five categories evaluated in the index: electoral process and

Executive Summary

5. CPAC launched as an initiative of the Canadian cable industry in 1992 when CBC/SRC announced that it would no longer distribute Parliamentary proceedings. CPAC has always operated as a non-profit service, without advertising. CPAC is widely distributed throughout Canada, in English and French, as a basic television service.
6. CPAC's coverage of Parliamentary proceedings is core to CPAC's mandate. CPAC also offers a wide range of other public affairs programming including analytical programs and many hours of long-form content that would otherwise not be available to Canadians. CPAC provides Canadians with a window into the workings of Canadian democracy.
7. CPAC is principally a television service but it also has a significant digital presence on other platforms, including thousands of hours of archived content – often with contextual information focused on aspects of Canadian democracy. CPAC's initiatives Route338.ca and the Democracy Project are examples of these initiatives.
8. Many of the *Broadcasting Act's* existing policy objectives reflect principles that are elemental to Canada's democracy. This includes the recognition of the freedom of expression, the need to reflect Canadian society, the need to present a diversity of views with respect to issues of public concern, and the role of the broadcasting system in making up the cultural, political, social and economic fabric of Canada. It is important that these or similar principles continue to be set out in the *Broadcasting Act*. As the communications environment continues to evolve, Canadians will continue to need access to meaningful and reliable content about their democracy and its institutions.
9. Current legislative provisions have ensured that Canadians have access to trusted, quality and accurate news and information programming. Any new legislative approach will need to be adapted to the rapidly emerging and more competitive digital environment. However, features from the existing approach, such as the indirect regulation of content, support for professionally administered standards, and the presence of a diversity of voices, will continue to be relevant. In addition, new initiatives, such as the recently announced proposed federal tax credit for news programming, will need to be properly framed to reflect the full range of news and information services that will be affected by the digital shift.

CPAC's Programming

10. CPAC's programming service is well known to Canadians as the source of consistent, comprehensive and commercial-free programming, offered simultaneously in both official languages, about Canada's democratic life.
 11. Our programming is rich and varied and strives to provide Canadians with the raw, unfiltered content of our democracy in action. We also offer programming that contextualizes that content within the framework of Canada's democratic institutions, their development and function, and the events – large and small, current and historical – that shape Canada's political and public spheres.
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12. CPAC's programming includes:

- daily, live, complete, unedited, gavel-to-gavel coverage of the proceedings of the House of Commons when the House is sitting, together with a repeat broadcast of each day's Question Period;
- extensive gavel-to-gavel coverage of Parliamentary committees, including Committees of the House of Commons and the Senate of Canada, as provided to CPAC by the House of Commons and Senate;
- comprehensive daily public affairs programming providing in-depth coverage and analysis of those proceedings, as well as events affecting Canadian political life, as represented by our flag ship programs, *Prime Time Politics* and *l'Essentiel*, and our weekly international affairs program *Perspective* (the only in-depth, Canadian program on television today focused on world events), which draws on footage and expertise provided by media partners from across Canada and around the world;
- in-depth documentaries focused on the key individuals, events, issues and institutions that inform Canadian democracy such as our various series: *The Prime Ministers*; *The Premiers*; *Inside the Supreme Court of Canada*; *Inside the House of Commons*; *Inside the Senate*; *Pillars of Democracy: The Right to Die*; and *Unmasking Influenza*, to name only a few of the documentaries we have produced and broadcast over the years;
- our weekly program, *Outburst*, that speaks directly with Canadians and invites them to share their opinions, ideas and stories on important public policy issues and events;
- extensive and wide-reaching coverage of numerous debates, conferences, speeches, political conventions and other public events that make up, in many ways, the day-to-day discourse of civil society that feeds Canada's political life; and
- coverage of formal public hearings and events such as important cases heard by the Supreme Court of Canada, administrative tribunals such as the CRTC, and Commissions of Inquiry including, most recently, comprehensive coverage of the *National Inquiry into Missing and Murdered Indigenous Women and Girls*.

The type of content that CPAC provides is the opposite of the "false news" and one-sided programming that is of increasing public concern.

13. Through CPAC, Canadians see what was said, exactly as it was said. For example, our coverage of the *Inquiry into Missing and Murdered Indigenous Women and Girls* included every moment of the public inquiry from all locations where it appeared in Canada, all streamed live and archived on cpac.ca, and also made available on CPAC



television for scheduled viewing. Other media may have reported on the Inquiry, but none offered Canadians everywhere with access to the entire proceedings, in both official languages, from end to end.

14. In providing the coverage that we do, CPAC follows clear programming principles that have guided our content since our launch and which are intended to create a neutral, objective and respectful space for the presentation of differing views on matters of public concern. We showcase and foster civil, informed and wide-reaching discussion in all of our programming. Canadians make up their own minds about important issues. CPAC is there to give them a direct and unfiltered view into the democratic life of the country.
15. CPAC is principally a broadcast service. CPAC is offered to Canadians as a part of the basic service by almost all Canadian broadcasting distribution undertakings ("BDUs"). CPAC's broadcast presence supports a significant digital presence on other platforms, as well – including for access outside Canada by Canadian citizens living abroad.² We offer live coverage of Canada's Parliament on the web on cpac.ca (and on mobile services) and maintain an extensive archive of almost all of the programming we broadcast – as well as other Parliamentary content. Our Internet presence includes our separate dedicated House of Commons and Senate Portals. The Senate Portal will soon provide Canadians with direct access to live proceedings from the Senate Chamber (which is expected to be initiated by the Senate this year).
16. We offer substantial educational content for citizens and educators. This content focuses on the workings of Canada's democratic institutions and the information Canadians need to make informed democratic choices. For example, in 2017 CPAC launched CPAC Route338.ca, a comprehensive digital information source that is a virtual road trip across Canada. CPAC Route338.ca is an interactive experience designed to further engage and educate Canadians in the democratic process with dedicated pages for each of Canada's 338 federal ridings featuring photos, fast facts and a brief bio for every MP as well as pages for every Senator. Route338.ca, together with the Royal Canadian Geographical Society, has created a series of giant democracy floor maps and learning tools for use in schools, which serve as an entry point to Route338.ca. This resource is continuously updated and educators and democratic representatives alike have recognized its value.
17. Similarly, CPAC has launched a new initiative, the Democracy Project, which aims to promote political literacy leading up to the next Canadian federal election in October of 2019. This project, which is headed by CPAC, will gather and curate content from a host of media, institutions and broadly based public policy organizations to provide rigorous, compelling and platform-agnostic content touching on issues affecting our democracy. Content will include signature events like town halls from across the country, in-depth interviews with original thinkers, short-form video content from diverse perspectives, and

² Access to meaningful content about Canada's democracy is becoming even more relevant with the restoration of voting rights to expatriate Canadians with the passage of Bill C-76, *An Act to amend the Canadian Elections Act and other Acts to make certain consequential amendments*.



archival content, linking to issues of today. Content will be offered on CPAC's television service, as well as through our digital platforms.

18. CPAC's programming, and its accessibility through the basic television service and on digital platforms is especially valuable in Canada today. Canada is one of the world's most diverse societies – and becoming more diverse by the day, with most permanent residents choosing to become Canadian citizens once they become eligible. CPAC's democratic and educational tools, web and television coverage are attracting growing participation. For example, thousands of schoolchildren have physically explored the Route338.ca democracy map in schools over the past 18 months, bringing their parents and local elected representatives into their exploration.
19. CPAC is a deep resource for all Canadians to educate, inform and enlighten themselves about our country and our democracy.

CPAC's Origins

20. CPAC launched in 1992, the year after the enactment of the new *Broadcasting Act*, as a form of partnership between Canada's cable industry and the House of Commons as represented by the Board of Internal Economy of the House of Commons, the Speaker and the House of Commons Broadcasting Service. At that time, the Canadian Broadcasting Corporation/Radio-Canada had announced that it would no longer fund the national distribution of House of Commons proceedings. Canada's cable industry stepped forward to ensure a continuation of that vital service. In 1993, the CRTC authorized CPAC to provide complementary public affairs programming to Canadians in both official languages as an enhancement to the Parliamentary service.
21. CPAC has been distributed as a basic service to Canadians since it launched in 1992. While BDUs distributed CPAC's service on a voluntary basis for a decade, in 2002, the Commission first mandated the distribution of proceedings of the House of Commons (in both official languages) through amendments to the Broadcasting Distribution Regulations. Shortly after, the Commission released *Distribution Order 2002-1* to ensure that the distribution status of CPAC's licensed public affairs programming mirrored the status of the exempt Parliamentary programming offered by CPAC.
22. In 2005, the Governor-in-Council solidified this approach to CPAC's distribution by issuing a Direction under section 26 of the *Broadcasting Act* requiring that most larger BDUs reserve two video channels for the distribution of the licensed and exempt programming services provided by CPAC (one in English and one in French) and that at least one of these channels be on the basic service. The CRTC has supplemented this requirement by mandating the basic distribution of an additional auxiliary audio channel in the minority language for CPAC. Since this time, CPAC's distribution status has



remained largely unchanged. CPAC's broadcasting licence was recently renewed in August 2018 for a further five-year term ending in 2023.³

23. CPAC has provided Canadians with continuous, reliable and in-depth coverage of the key events of Canadian democracy for twenty-six years. Over that time period, CPAC has always been made widely available to Canadians as a basic service and we have expanded to other digital platforms. CPAC has always, and continues to operate as a non-profit service with the ongoing support of the leading companies in Canada's cable industry.

Review of the Broadcasting Act

24. Since its launch in 1992, CPAC has always been closely associated with the workings of Canadian democracy and the role that broadcasting plays as the window for Canadians to see, for themselves, the work of their elected representatives. In fact, well before CPAC's launch, Parliamentarians themselves recognized the importance of providing Canadians with a window into the House of Commons.

Parliament represents the people: its business is the nation's business; and one of its prime responsibilities is to inform the people. The people therefore have a right to see their Parliament in action and through television coverage this right could become a reality for all the people from coast to coast. Through television the public gallery of the House of Commons could be extended to the farthest limits of the nation. The bond between Parliament and the electorate would be strengthened because the House of Commons would be brought into the homes of all who wished to tune in to its proceedings. We are sometimes warned that we are living at a time when all the apparatus of mass suggestion works against democratic education and the unencumbered operation of the democratic process. The televising of Parliament would establish a counterweight and, in the words of the late Aneurin Bevan, encourage "intelligent communication between the House of Commons and the electorate as a whole."⁴

25. More recently, the CRTC has recognized CPAC's role in providing Parliamentary coverage and related public affairs programming. For example, as noted above, in 2002 the CRTC made the distribution of proceedings of the House of Commons mandatory for all but the smallest BDUs serving fewer than 2,000 subscribers and having a capacity of

³ See *Broadcasting Decision CRTC 2018-329*. The current version of the distribution order for CPAC is *Broadcasting Order CRTC 2018-330*.

⁴ *Second Report*, Standing Committee on Procedure and Organization. *House of Commons Journals*, June 30, 1972, page 473 (28th Parliament, 4th Session). [Available at parl.canadiana.ca]

less than 550 MHz. In doing so, the Commission stated that the distribution of televised proceedings was "vital to the public interest".⁵

26. It is from this perspective that CPAC wishes to comment on two of the areas for discussion set out by the Panel in its consultation document – these relate, first, to the broadcasting policy objectives set out in the *Broadcasting Act* and, second, the relationship between the *Broadcasting Act* and democracy, news and citizenship.

Broadcasting Policy Objectives

27. The Panel has posed the following questions regarding section 3(1) of the *Broadcasting Act*:
- 9.1 *How can the objectives of the Broadcasting Act be adapted to ensure that they are relevant in today's more open, global, and competitive environment?*
- 9.2 *Should certain objectives be prioritized? If so, which ones? What should be added?*
- 9.3 *What might a new approach to achieving the Act's policy objectives in a modern legislative context look like?*
28. An underlying principle in the *Broadcasting Act*, whether made explicit or not, is that the broadcasting system plays a direct role in preserving and enhancing Canada's democracy. This is made clearest, we believe, firstly, in section 2(3) of the Act which establishes, as an overriding interpretative principle, that

This Act shall be construed and applied in a manner that is consistent with the freedom of expression and journalistic, creative and programming independence enjoyed by broadcasting undertakings.

There is a bright line to be drawn – the Act makes this clear – between a regulatory system that promotes the freedom of expression and supports an independent media and a system which could seek to regulate content in its own right by favouring some voices or messages and discouraging others. The Economist's influential annual *Democracy Index* report places the freedom of expression at the centre of democratic values:

Freedom of speech, access to information and a free media are necessary for good governance because these freedoms enable voters to follow, question, criticise and exercise control over their elected representatives and the government... It is through the exchange of ideas, discussion, debate and argument that society

⁵See *Broadcasting Public Notice CRTC 2001-115* and *Broadcasting Public Notice CRTC 2002-72*.

establishes the values in which it believes. Free speech is therefore the most important liberty on which all others depend.⁶

The recognition of the freedom of expression should underpin Canada's communications legislative framework.

29. In addition to recognizing the centrality of free speech, other broadcasting policy objectives in the Act point to the fundamental importance of a healthy broadcasting system to Canadian democracy. Section 3(1)(d)(i) states that the broadcasting system should "serve to safeguard, enrich and strengthen the cultural, political, social and economic fabric of Canada". Section 3(1)(b) states that the broadcasting system as a whole is a "public service essential to the maintenance and enhancement of national identity and cultural sovereignty".
30. Other provisions in the *Broadcasting Act* similarly speak to democratic principles. For example, the objectives include:
 - encouraging a "wide range of programming" offering "information and analysis concerning Canada and other countries from a Canadian point of view"⁷
 - requiring that programming be of a high standard;⁸
 - ensuring the system provides educational programming;⁹ and
 - providing a reasonable opportunity for the public to be exposed to the expression of differing views on matters of public concern.¹⁰
31. The Act seeks to be inclusive of all Canadians, stating explicitly that a range of services should be offered in English and French¹¹, the system should reflect the circumstances and aspirations of "Canadian men, women and children", equal rights, Canada's multicultural society, and the special place of Indigenous peoples within that society.¹²
32. Without minimising any of the other important objectives set out in the Act, these particular provisions speak to the nature of Canadian society and the role that broadcasting should play in a healthy, functioning democracy in Canada.

⁶ *Democracy Index 2017*, page 43. (See note 1.)

⁷ 3(1)d(ii)

⁸ 3(1)(g)

⁹ 3(1)(i)(iii)

¹⁰ 3(1)(i)(iv)

¹¹ 3(1)(k)

¹² 3(1)(d)



33. Looking forward, CPAC believes that it is important that these or similar principles continue to be set out in the *Broadcasting Act* even as the communications environment itself becomes more open, global and competitive. It may even be appropriate to be more specific about the role of the broadcasting system, and of the programming available to Canadians, to reflect and enhance Canadian democratic values.
34. The provision of in-depth coverage of Canadian democratic institutions will become even more important in the future with the erosion of boundaries and borders in the communications environment. The Panel has identified this issue in its discussion paper:

The free flow and exchange of information supports the democratic process and democratic institutions, and Canadians are increasingly exercising their citizenry through digital participation. However, the proliferation of false or misleading information presents new challenges. In this context, independent, trusted, accurate, diverse, as well as local and Canadian sources of news and information are essential for an informed citizenry, civic participation, and democratic process.

35. When Canadians can access instantly a wide range of content from around the world – and including content from any number of dubious or misleading sources – it becomes even more critical to ensure that our own system is providing accurate, truthful and complete information to Canadians. We believe that this is the role that CPAC and other Canadian broadcasters currently play and should continue to do so in the future. It is appropriate that objectives that expressly recognize this important role be set out in any updated communications legislation.

Democracy, News and Citizenship

36. In addition to examining the overall objectives set out in the *Broadcasting Act*, the Panel has posed questions directed specifically to the provision of news and information programming and its continuing viability:
- 11.1 Are current legislative provisions sufficient to ensure the provision of trusted, accurate, and quality news and information?*
- 11.2 Are there specific changes that should be made to legislation to ensure the continuing viability of local news?*
37. These questions are intimately related to the concern noted above regarding the proliferation of digital voices and content – sometimes intentionally false or misleading content. Together with the rise of this type of content – much but not all of which is widely distributed through social media – traditional news sources, such as newspapers and broadcast media, are under pressure as business models sap resources from that sector and direct it to large, and still growing, digital platforms.



38. The *Broadcasting Act* does not directly regulate the quality or content of news and information. Rather, the Act contains numerous objectives speaking to the need for programming content that is informative, educational, from local, national and international sources, and of high standard. The Act also enables the Commission to make regulations respecting *standards* for programs, but does not indicate in which areas these standards would apply.¹³ At the same time, the Act explicitly recognizes the freedom of expression and the journalistic and creative independent of broadcasting undertakings.
39. The Commission has set out certain basic regulatory requirements for most programming services in its various regulatory instruments. For example, the *Discretionary Service Regulations*, which apply to CPAC and other licensed discretionary services, includes the following basic provisions governing restricted programming content:
3. A licensee shall not broadcast programming that contains
 - (a) anything that contravenes an Act of Parliament or of the legislature of a province;
 - (b) any abusive comment or abusive pictorial representation that, when taken in context, tends to or is likely to expose an individual or a group or class of individuals to hatred or contempt on the basis of race, national or ethnic origin, colour, religion, sex, sexual orientation, age or mental or physical disability; or
 - (c) any false or misleading news.
40. These provisions reflect the Commission's exercise of jurisdiction over programming matters that raise important legal questions regarding the regulation of speech. It is notable that paragraphs 3(b) and (c), for example, echo laws affecting other types of media that have either been struck down (in the case of section 181 of the *Criminal Code*¹⁴) or repealed (section 13 of the *Canadian Human Rights Act*¹⁵). Notwithstanding

¹³ 10(1)(c).

¹⁴ Section 181 contained the prohibition on spreading false news. This provision was struck down by the Supreme Court of Canada in *R. v Zundel* [1992] 2 SCR 731.

¹⁵ Section 13 of the *Canadian Human Rights Act* had determined that it was a discriminatory practice to communicate by telecommunications "any matter that is likely to expose a person or persons to hatred or contempt by reason of the fact that that person or those persons are identifiable on the basis of a prohibited ground of discrimination." This provision, which was generally understood to be meant to capture Internet communications, was repealed in 2013. The provision, by its terms, did not apply to broadcast undertakings.

the controversy surrounding the regulation of speech in other areas, the Commission has maintained these general provisions in its regulatory framework.¹⁶

41. Although the Commission has the ability to assume jurisdiction over questions of speech in the sphere of broadcasting, the Commission has used this power sparingly. Instead, the Commission, with the active participation of responsible journalists, broadcasters and other media companies, has supported and recognized the work of independent groups such as the Canadian Broadcast Standards Council (CBSC), which administers the Radio and Television News Directors of Canada (RTNDA) Code of (Journalistic) Ethics.
42. This provides an arm's length mechanism by which broadcasters that are members of the CBSC self-administer ethical journalistic standards in the public interest. In a few instances, the Commission has intervened in broadcasting matters in response to complaints that have escalated beyond industry self-regulation, or using its licensing powers (at the time of licence renewal or in response to specific complaints) where certain undertakings or programs have consistently breached these general standards, or failed to achieve the high standard for programming envisioned in the *Broadcasting Act*. These instances are, however, infrequent and usually arise only after the failure of industry self-regulation, or the refusal of a broadcaster to abide by the industry-established standards.¹⁷
43. In addition, the Commission's licensing policies address issues such as the ownership of multiple news voices in the same market¹⁸, the distribution of national news services¹⁹, the provision of minimum levels and funding for local news content,²⁰ and the support of certain point-of-view programming such as long-form documentaries through general spending obligations imposed on broadcasters.²¹ While news and information content is regulated *directly* by the Commission only in extraordinary circumstances, its policy

¹⁶ See the discussion in *Broadcasting Regulatory Policy CRTC 2011-308*. The Commission stated:

The Commission notes that the current provisions on false or misleading news have existed for many years and fulfil an important purpose. In this regard, the wide reach of broadcasting means that the impact on the public of false or misleading news can be very serious. The public interest therefore requires the continuation of the prohibition as currently enacted (see paragraph 2 of the present regulatory policy). This will ensure that the Commission's regulations continue to fulfill the objectives of the *Broadcasting Act* (the Act), including the requirement set out in section 3(1)(g) of the Act that the programming originated by broadcasting undertakings be of a high standard.

¹⁷ See, for example, the Commission's decision regarding CHOI-FM Québec, *Broadcasting Decision CRTC 2004-271*.

¹⁸ *Broadcasting Public Notice CRTC 2008-4* (Diversity of Voices).

¹⁹ *Broadcasting Order CRTC 2013-735*.

²⁰ *Broadcasting Regulatory Policy CRTC 2016-224* (Policy framework for local and community television).

²¹ *Broadcasting Regulatory Policy CRTC 2015-86* (Let's Talk TV: The way forward – Creating compelling and diverse Canadian programming).



framework touches on ensuring the availability of high quality news and information programming for Canadians in numerous different ways.

44. CPAC is itself an example of the Commission's exercise of its authority to enable the delivery of the proceedings of Parliament to Canadians, together with other complementary public affairs programming. The Commission's framework has ensured that this content is made available within the broadcasting system – not only for Canadians directly, but also through the content that Canadians obtain from other media sources.
45. CPAC often functions as the originator of long-form, in-depth content that is simply not available elsewhere. CPAC's coverage of the *National Inquiry into Missing and Murdered Indigenous Women and Girls* is one example of the role CPAC plays as a content provider to other media. We play a similar role in providing extensive coverage of national conventions of federal political parties and the Assembly of First Nations. CPAC is often viewed as a *de facto* broadcaster of record and has become a valued partner for other news organizations in Canada's media environment.
46. Current legislative provisions have ensured the provision of trusted, quality and accurate news and information programming to Canadians. Any new legislative approach will need to be adapted to the rapidly emerging and more competitive digital environment. However, features from the existing approach, such as the indirect regulation of content, support for professionally administered standards, and the presence of a diversity of voices, will continue to be relevant.
47. In addition, new initiatives, such as the recently announced proposed federal tax credit for news programming, will need to be properly framed to reflect the full range of news and information services that are affected by the digital shift. CPAC recognizes that the local news environment may face particular economic challenges. However, in CPAC's experience, Canadian media operate within an interconnected network of content and newsgatherers, distributors and commentators. CPAC plays an important role within this ecosystem and helps to support a wide range of voices in local, national and international news coverage. The type of long-form content and coverage that CPAC provides is a key element of the news system in Canada.

Conclusion

48. Our comments are focused on the *Broadcasting Act*, and CPAC's role as a broadcaster in supporting and providing important information about Canada's democracy.
49. CPAC is privileged to be able to offer Canadians access to important programming that reflects – in a real and tangible way – Canada's democracy in action. From Parliamentary proceedings to political conventions, from leading cases argued in front of the Supreme Court to gavel-to-gavel coverage of Commissions of Inquiry, CPAC is there. CPAC's strives to present in-depth and informative content that is always balanced, neutral in its presentation, and scrupulously fair to different points of view.



50. The existing objectives in the *Broadcasting Act* reflect many aspects of Canadian democracy and, given the important role that information plays in our society, CPAC believes that future iterations of the Act should reflect similar fundamental principles. The *Broadcasting Act* has provided regulators with numerous tools to support a diversity of voices in Canada and high-quality news and information programming, without directly regulating content itself. A similar separation of support for news and information programming – in its diverse forms – and the regulation of content should also inform future legislative measures.
51. CPAC is pleased to have this opportunity to participate in the Panel's review of Canada's communications legislation.

Yours truly,

A handwritten signature in black ink, appearing to read 'C. Cano', is written over a light grey rectangular background.

Catherine Cano
President and General Manager

