



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

British Columbia's Knowledge Network is a viewer-supported public broadcaster exploring the world through its commercial-free television and streaming services. Knowledge Network works in partnership with independent producers in British Columbia and Canada to develop and commission children's and documentary programs that educate, inform and inspire.

Our comments below focus on the idea of new, broad policy objectives for the Canadian broadcast industry that do not attempt to predict marketplace winners and losers, but rather create a fair and equitable system for Canada's broadcasting services.

1. **Tax and regulate all streaming services.** This would level the playing field with regulated broadcast services. Streaming services should be licensed, regulated and required to contribute to the Canadian broadcasting system.
2. **Remove Exhibition Requirements.** Broadcasters, no longer just linear services, are all growing their streaming platforms over the Internet. On the Internet, all programming is virtually omnipresent. Time has virtually disappeared. It no longer makes sense to require broadcasters to commit to a minimum percentage of Canadian content in prime time.
3. **Replace Canadian Content quotas with a revenue spend requirement on new Canadian programs.** Broadcasters required to spend a significant portion of their revenue on Canadian programs will be motivated to invest in marketing of those programs to maximize their discoverability by Canadians.



4. **Recognize the primacy of public broadcasting.** Public broadcasting continues to play an important role in Canada providing programming in the public interest. This should be reflected through funding mechanisms, such as the Canada Media Fund, where public broadcasters should receive priority funding.

5. **Public broadcasting in Canada is more than just the CBC/SRC.** Each provincial public service is as unique as the province it serves. Provincial public service broadcasters should be individually recognized: Société de télédiffusion du Québec (Télé-Québec), The Ontario Educational Communications Authority (OECA) (“TVO”), The Ontario French-language Educational Communications Authority (Groupe Média TFO) and Knowledge Network Corporation (British Columbia’s Knowledge Network). They are regularly overlooked and often dismissed as “ednets” in public documents. Although provincial public broadcasters are mandated through their respective provinces, they are federally regulated and play an outsized role in providing value to the greatest number of Canadians with the lowest barrier to entry. Provincial public services promote citizen engagement and democracy through quality education and information.

We appreciate the opportunity to participate in these consultations, and look forward to working with the Panel on strengthening Canada’s communication legislative framework.

Yours truly,

Rudy Buttignol, C.M.
President and CEO
Knowledge Network Corporation