



May 29, 2023

Filed Electronically

Mr. Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mr. Doucet:

Re: Broadcasting Notices CRTC 2023-138, -139 and -140 – Procedural request to extend deadlines

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 programming.
2. As stated in the Commission letter dated May 24, 2023, on May 19, the Commission received a procedural request, filed jointly by twelve groups (the Applicants), asking the Commission to extend the deadlines for the interventions, replies and final replies for the following three proceedings: Broadcasting Notice of Consultation CRTC 2023-138, Broadcasting Notice of Consultation CRTC 2023-139 and Broadcasting Notice of Consultation CRTC 2023-140. The Commission stated that it will accept comments on the procedural request and on the new proposed deadlines.
3. The WGC supports extensions to provide stakeholders with additional time to file written interventions and replies. At the same time, we believe that no extensions should result in the material extension of the November 20, 2023 public hearing date in this matter, or otherwise materially extend the timeline for the overall process for implementing Bill C-11, the *Online Streaming Act*.
4. The WGC agrees that: the timelines for these proceedings are relatively short in relation to their scope; the issues covered by them are incredibly important, wide-ranging and complex; the issues overlap across multiple CRTC proceedings that organizations may wish to comment on; and, organizations seeking to comment, such as the WGC, have limited resources. As such, we believe that extensions to provide stakeholders with additional time to file written interventions and replies would be a benefit to this process and would be in the public interest.

5. At the same time, the WGC would not support any extensions that materially postponed the November 20, 2023 public hearing date and/or the overall process of implementing the *Online Streaming Act*. As the Commission is aware, the legislative process for the *Online Streaming Act* itself has been greatly and unfortunately protracted. Bill C-11 was tabled over a year ago, in February of 2022. It was subject to a lengthy and detailed legislative process. Bill C-11 itself followed very similar legislation in the form of Bill C-10, which followed a nearly year-long course until the federal election of 2021. Prior to that, we had three major studies on the impacts of online undertakings on the Canadian broadcasting system, from 2017 through 2020, including the Commission's own report, *Harnessing Change: The Future of Programming Distribution in Canada*. Naturally, these studies were themselves preceded by the actual ongoing and growing impact of Internet-based programming services in Canada, which the Commission first formally recognized in 1999.¹
6. Meanwhile, the influence of online undertakings on the Canadian broadcasting system has proceeded apace, with ever-growing impacts on Canadian traditional broadcasters, Canadian programming, and Canadian creators.
7. As such, the WGC would naturally appreciate more time to more comprehensively and effectively participate in the public processes covered by this procedural request. We echo the Applicants' concerns about the scope of these proceedings and the time available to organizations with limited resources to participate in them. We also are concerned about further delaying what has already been an incredibly protracted process, and would not support anything that materially delays the implementation of the *Online Streaming Act* further.

Yours very truly,



Neal McDougall
Assistant Executive Director, WGC

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¹ Public Notice CRTC 1999-197

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