

Parrsboro Radio Society
PO Box 729, 396 Main St., Apt #2
Parrsboro, NS B0M 1S0

To: CRTC

Re: Application 2016-0994-2 – Licence renewal – CICR-FM Parrsboro, NS

My name is Alain Couture and was very recently appointed to a directorship on the board. One of my tasks that the chairperson has assigned me, is to assist Mr Robinson in completing the information requested in your letter of March 9th, 2017. To this end I've been working to meet the deadline of March 31st on all aspects. I've already submitted financial statements for 2013-2014/2014-2015/2015-2016 as a separate submission. With our treasurer's, Bill Connors, passing; we have been struggling to replace him. Furthermore while we have had some excellent volunteers jump into the gap, they have also had medical health issues for themselves or their families. Hopefully, I'll be able to fill this gap shortly and all necessary information forwarded to you within the allotted time frames.

Point 2: Programming Broadcast – In the renewal application we note that the total number of hours of programming to be broadcast each broadcast week is 80 hours. We also note that in your licence renewal and in the report filed 21 December 2015, the number of hours of programming broadcast each broadcast week was 126 hours.

Response: The station is a 24/7 station and indeed the scheduled live programming is normally 126 hours per week. There was a misunderstanding, and the 80 hours was an absolute minimum target for live programming during any given week. The only time that the station may be off the air is during technical maintenance or system failure. Both of these events are kept to the absolute minimum and infrequent.

Point 4: Annual Returns –

Response: Submitted separately as an XCEL Doc. 2013-2014/2014-2015/2015-2016.

Point 6: a) Please explain why the licensee failed to submit the audio files and other material when initially requested by the Commission despite the station's measures put in place and outlined in its report filed 21 December 2015, under "responsibilities for the implementation of regulatory requirements"?

Response: After discussion with some of the board members, it is apparent that there was/is a gross misunderstanding on the issue of logs. It was originally understood that the audio files and logs were indeed what was submitted and we were not aware of a paper log requirement. We have now printed off and reviewed the Radio Regulations, 1986 as well as the amendments of Broadcasting Regulatory Policy CRTC 2015-524. We are now reviewing the Station Self-Assessment Report and plan on implementing this report shortly after all the volunteers have been made aware of the document and we've been able to ensure they understand the requirements.

b) Please elaborate on why measures put in place to ensure CICR-FM's full compliance with its regulatory obligations in the current licence term seem to have failed? Please explain why measures meant to be reviewed by a panel weekly to ensure CICR-FM's compliance were not successful?

Response: As mentioned above, there obviously has been a misunderstanding on the requirement for logs. Measures had been put in place and Mr Robinson and Mr Gillis were meeting weekly to ensure the logs were being kept – digital logs along with the audio files. Obviously, there was something amiss in that you require the Station Assessment Report completed weekly and made available when requested by the Commission. We were not aware of this report and after reviewing the amendment of 2015-524 we note and appreciate our regulatory requirements. The weekly panel is expanding its parameters to ensure these paper copies are kept. We will be reviewing this requirement with all the volunteers to ensure the information is available for the review panel.

c) Please confirm that the measures outlined in your reply dated 18 August 2016, have been put in place.

Response: Yes and as mentioned above the misunderstandings have been corrected. We are constantly reviewing our equipment to ensure that all necessary backups and copies are kept in compliance with the Commission instructions. This being said however, we do occasionally find ourselves with instances where we did not foresee consequences of failure. As failures do occur, we do review the instance and attempt to correct it so it doesn't have again. Having worked 40 years with Foreign Affairs Canada in the IT section, Mr Robinson, Mr Gillies and I work together reviewing and keeping on top of these issues.

d) Please elaborate on why you believe these new measures are satisfactory and will ensure CICR-FM's full compliance with its regulatory obligations in the next licence term where other previous measures appear to have failed?

Response: As a full volunteer Radio Station, it is unfortunate that volunteers do indeed come and go. As such the knowledge history also comes and goes. At times our concentration is focused on volunteer training. At other times our concentration is focused on equipment issues. Volunteer training involves learning all aspects of the radio station (or at least an awareness of aspects of the radio station). While we have put new measures in place, we do not plan on living in the past and will be reviewing measures to ensure they are still effective for the future. We realize our strength lies in what the future brings. We must meet that challenge.

e) Please indicate how these measures are reviewed to ensure that they are sufficient to ensure your station's compliance and how often is this review performed.

Response: We admit we have been remiss in reviewing various measures for the station. Your letter has been instrumental in us searching out regulations which we had failed to strictly adhere to albeit in spirit or practice. This is being corrected and we trust with your guidance that full compliance will be the order of the day very very soon.

7. In light of this, please respond to the following:

a) Volunteer Orientation Booklet – Have you developed the Volunteer Orientation Booklet?

Response: Our Program Director who was responsible for training, introduction and policy for volunteers is no longer at the station and has resigned from the board. As such, those roles have been

re-assigned. You will note that Mr Robinson is presently Technical Director, Station Manager and Program Manager. As a volunteer, these roles place a great deal of responsibility and effort on one person. The Volunteer Orientation Booklet has not been forgotten but unfortunately is not completed as yet, nor at this time can we give you a time line for its completion. With two new directors coming on board, it is hoped that these directors will be able to assist Mr Robinson and lighten his load a bit.

b) Volunteer Orientation Booklet – You have indicated that the Director, President and Volunteer will be required to sign a form that will be placed in the volunteer's personal file. Are the Director and President in charge of volunteers' on-going training and supervision?

Response: The Program Director is normally responsible for the volunteers' training and supervision. The board Chairperson (President) would also sign and acknowledge any form that is filed at the station. The issue of a signed form is under review with the Orientation Booklet.

c) Internal Policy and Management practices / Procedure Manual – Has this Procedure Manual been implemented? If yes, please provide a copy of this manual.

Have volunteers been made aware of this? How? And, who enforces the internal policy and practices?

d) Job description for each volunteer position – Who is in charge of training volunteers on their specific job descriptions? Please elaborate on how volunteers are made aware of Regulations, policies and CICR-FM's condition of licence?

Response: As already mentioned the Program Director is normally responsible for the volunteers. With the departure of our Program Director, Mr Robinson is/has been reviewing various policies and practices. All these items/booklets/information notices must also be approved by the Station's Board before implementation. Has the manual been completed – no. Do we hope to have it completed soon – yes. At present time, all volunteers that start at the station are instructed in their role and various rules and regulations. Most of this training is verbally but they are also show various documents to review. On the issue of job descriptions. There are no job descriptions at this time. All/all volunteers to come into the station are trained in all aspects of the station both as helpers (under the direct supervision of a more senior volunteer) or on air after the appropriate training. As volunteers become more involved with the station, more information is imparted and more responsibility is given. This is an education curve.

Point 9: Please comment on the possibility that the Commission decide **not/not** to renew CICR-FM's licence.

Response: Parrsboro Radio Society is an entirely volunteer community radio station located in a small town which has recently amalgamated with the Municipality of Cumberland County. As such it is the only radio station in the area and covers a broadcast area of Parrsboro and a few outlying communities such as Lakelands, CrossRoads, and Wharton. We further cover via internet communities such as Advocate Harbour, Port Greville, Fraserville, Five Islands, etc. Loss of our licence would remove not only the music component to the communities but an Emergency Measures information service. Our communities consist of a more mature audience and as such so do our volunteers. While we continue our efforts to attract the younger generation, our main audience remains in the more mature category. As such our ability to maintain and fulfill all the requirements of the regulations in a timely manner remains our challenge but with the measures our board is/has put in place and the full understanding

and cooperation of our volunteers will enable us to meet this requirement very very shortly. We trust that you will understand our issues and work with us to ensure that we understand and comply with all your requirements in order for this community to continue to listen to their radio station and participate in its programming choices.

9. b) Comment on the possibility of a short-term renewal.

Response: We understand these implications and are willing to meet any restrictions you place on our licence although we hope that this is not necessary. The imposition of a condition to broadcast a condition of non-compliance is doable but not desirable. Yes, our board is aware of all these facts and would consent to any restrictions you may set. We would however stress our interest in understanding all your regulations and working with your staff to become compliant but most importantly working with your staff to ensure we can meet or exceed the requirement to remain compliant in future.

I realize that this submission may not address all your concerns and questions in your letter but rest assured we are working and reviewing your letter. We feel by repeated review, we can use this letter as a reminder and a template to ensure compliance in future. We trust that as we put in place all the points mentioned in your letter, we will be a much strongly radio station which provides a superior program to our community listeners.

Alain R Couture
Director