



April 28, 2021

Mr. Claude Doucet
Secretary General
CRTC
Ottawa, Ontario

Re: Commercial radio policy framework review: ensuring Canadian creators not at risk of losing their livelihoods.

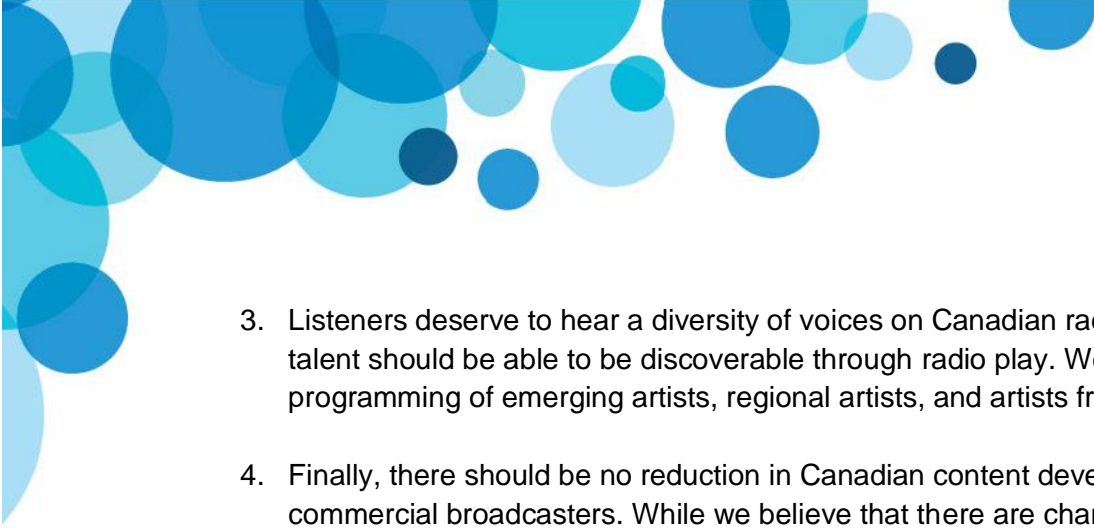
MusicNL provides a proactive voice fostering the growth and development of Newfoundland and Labrador's music community in support of a viable industry the world stage.

Our Mandate:

- Address key issues affecting the Newfoundland & Labrador music industry in order to implement positive change by presenting a strong voice to government, business and the community at large;
- Increase awareness locally, nationally and internationally of provincially produced music as a unique, creative and viable industry with significant impact on the economy, and
- Create and encourage opportunities for our membership that will stimulate growth in the industry.

Commercial radio is important to all stakeholders in Canada's music industry, including songwriters, publishers, artists, labels, and the teams around them. We wish to reiterate that it is critical that the commercial radio policy be updated in a number of ways:

1. A modernized version of MAPL to better reflect modern songwriting is necessary to better meet the goals of the Broadcasting Act. We believe that the proposal put forth in our initial joint submission with our music industry colleagues is a stronger solution.
2. We disagree with CAB's assertion that fewer regulatory obligations for radio will result in better outcomes. Maintaining the 35% Canadian content exhibition requirement is critical and any reduction in exhibition requirements would have a significant (and direct) negative impact on the royalties received by songwriters and music publishers and on the discoverability of Canadian songs and artists by the public.

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3. Listeners deserve to hear a diversity of voices on Canadian radio, and that Canada talent should be able to be discoverable through radio play. We support the programming of emerging artists, regional artists, and artists from equity seeking groups.
 4. Finally, there should be no reduction in Canadian content development obligations from commercial broadcasters. While we believe that there are changes that should be made to discretionary allocations (as noted in our joint submission), CCD funding has and can continue to make a significant contribution to the development of Canadian artists. We do not believe that reductions in CCD contributions from broadcasters are warranted at this time and that the current formula for calculating CCD allows for sufficient flexibility to account for financial fluctuations.

As the Commission considers the submissions received throughout this process, we urge the Commission to consider the key role that radio plays for Canada's music industry, including its creator community and MPC members.



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