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Corner Brook, NL
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December 12, 2023

Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A 0N2

RE: Bay of Islands Radio Inc. – Request for exemption - Broadcasting Information Bulletin
2023-278

To Whom It May Concern,

Bay of Islands Radio Inc. (BOIR) is requesting an exemption in reference to Broadcasting Information Bulletin 2023-278, which defers new radio applications to the CRTC for a two-year period. We respectfully ask that the Commission consider what we feel are exceptional circumstances that require this application to be examined in a time sensitive manner, outlined below. To give context, the purpose of this application is to convert the existing low-power community FM license of CKVB-FM Corner Brook to a high-power license and relocate the transmitter site.

First and foremost, I would like to stress that the future of our radio station depends on the approval of this application. If this application were to be deferred for approximately two years, I am not optimistic that the station would be able to remain broadcasting at its current level, both from a financial and technical standpoint.

While CKVB-FM's low-power license has proven to be a major stepping block in the development of our community radio station since first becoming licensed in 2016, the relevance and demand for community-based media has grown quite dramatically in our region since then, to the point where our signal simply cannot provide the service people need, nor is it strong enough to viably sell advertising that will support the continued operational costs of the station. Due to the power and location of CKVB-FM's transmitter, it can only be received in the immediate Corner Brook area. Inside most buildings, the signal is very poor and cannot be received at all. There is also a large portion of our audience in the outer Bay of Islands and Humber Valley that cannot receive the FM signal as it stands. Our biggest challenge right now is not being able to reach the people we need to. The reality is that many potential advertisers cite this as a reason to not advertise on our station. These advertising dollars allow us to pay staff and keep the lights on. Without signal improvement, it will be very difficult to surpass the \$60,000-70,000 mark for local advertising revenue, leaving the station in a precarious position without significant cuts. We feel the values submitted in Section 3.1 of Form 114 are very

achievable, and allows the station to become self-sufficient after most government funding agreements expire after Year 2.

The recent demand for improved local radio access in our area is due to the closure of virtually all other media outlets in Western Newfoundland. When we first received our CRTC license, Corner Brook had a daily newspaper, two commercial radio stations, a local CBC morning show and a vibrant community television channel with paid talent. Over the past 7 years, all these outlets have either dwindled to almost no local presence or cease to exist entirely. In fact, since 2022, CKVB-FM is the only local radio station remaining in Corner Brook – a station that had no paid staff until this year. In March 2023, we hired a journalist under the Local Journalism Initiative (LJI) program, formally recognizing that Corner Brook was a “news desert.” Around the same time, the provincial government approved a three-year funding agreement to hire four additional staff in order to improve local radio programming and become a self-sustainable employer.

The desire to grow our signal is not something new, but something the station has been working on for about 2 years. In an unfortunate coincidence, the same time we planned on submitting this application is the same time the CRTC announced its pause on radio applications. In the past year, we have worked with our local municipality to obtain a parcel of land for a new transmitter site, paid to have the land professionally surveyed, worked with the hydro company to connect power, and hired an engineer to complete the required ISED technical brief – all in anticipation of this application. This work has meant a significant financial and time investment for our very small station, which is another reason why we feel this demonstrates an exceptional circumstance. Waiting two additional years would mean doing much of this work over again, including things like permits and engineering costs. The ISED engineering brief alone would cost the station over \$5,000 to re-do, which would be necessary after a two year period. Waiting is simply not a feasible option.

Another issue we feel meets the CRTC’s definition of an exceptional circumstance is the issues we face at our present transmitter site. The property is in very poor condition and is not owned by Bay of Islands Radio Inc. In several areas of the building, the roof has already started to decay and is leaking, which poses the risk of damage to our transmitting equipment and could result in being off-the-air. The building’s electrical is also not up to standard and is missing many safety aspects such as proper grounding and emergency power. Due to the age and condition of this building, we feel the only option is to move sooner rather than later.

We have also appended additional documentation to support our claim that this situation should fall under an exceptional circumstance, including financial information and photos.

As a news organization, we appreciate the importance surrounding Bill C-18, however the very Bill that is meant to support organizations like us will cause detrimental harm to our station if this application is deferred by two years.

I would like to thank the Commission for their consideration of this request and once again express the importance of this application.

Sincerely,

Kody Gardner

Kody Gardner
Chairperson
Bay of Islands Radio Inc.
CKVB-FM

ADDITIONAL DOCUMENTATION

PHOTOS OF EXISTING TRANSMITTER SITE OF CKVB-FM







As shown in the above photos, many areas of the ceiling are experiencing issues with water leaks and sections of drywall are starting to collapse. This poses a serious hazard to our transmission equipment located inside this building. Should water reach our equipment, not only would it take us off-the-air, but it also has the potential to damage the equipment which is valued at approximately \$25,000. On top of this, the building is around 50 years old and electrical is not up to code for today's standards. For example, none of the power outlets in the building are properly grounded which has recently caused some issues.

The local municipality presently owns the building we are located in, and is also used as a base for volunteer search & rescue, who primarily use the two garage bays. Because of the condition of the building, the municipality is not in a position to invest significant money for repairs. On top of this, the station does not pay for rent or electricity, nor does it have a formal contract for occupying the space, meaning there is no long-term security at this location. Given this, it would be inappropriate for the station to ask that issues be addressed.

Bay of Islands Radio Inc. has worked with the City of Corner Brook to acquire a plot of land that will much better serve the station and its listeners. The City recognizes the importance of community radio and signed the land over for a symbolic \$1.00 and has been very supportive in our intention to build a new transmitter site.

EVIDENCE OF EXPENSES

Bay of Islands Radio Inc. has invested a significant amount of funds into this project, with more anticipated in the near future. Below are several paid invoices reflecting the land survey and engineering brief. Beyond this, the station has also spent funds on permits and preparing the land for use, including brushcutting, road repairs, and land excavation by a contractor. These additional costs total approximately \$3,000.

While these numbers may not seem like much to some stations, for a station our size, they are quite substantial.



INVOICE

ERP Engineering
6 Pincarrow Rd
Winnipeg, Manitoba R3Y 1E1
Canada

Mobile: 2048900843
www.erpengineering.ca

BILL TO

Bay of Islands Radio Inc.
Kody Gardner
40 Brook St
PO Box 930 STN Main
Corner Brook, Newfoundland and
Labrador A2H 6J2
Canada

Invoice Number: 2023-029

Invoice Date: May 15, 2023

Payment Due: May 15, 2023

Amount Due (CAD): \$2,587.50

[Pay Securely Online](#)

Engineering Services	Quantity	Price	Amount
Engineering Services Corner Brook, NL Engineering Application for FM Technical Amendment (protected Class) (50% payment 2 of 2)	1	\$2,250.00	\$2,250.00

Subtotal: \$2,250.00

HST NL 15% (712587096RT0001): \$337.50

Total: \$2,587.50

Amount Due (CAD): \$2,587.50

[Pay Securely Online](#)



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Notes / Terms

Thank you for your business!



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6 Pincarrow Rd
Winnipeg, Manitoba R3Y 1E1
Canada

Mobile: 2048900843
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BILL TO

Bay of Islands Radio Inc.
Kody Gardner
40 Brook St
PO Box 930 STN Main
Corner Brook, Newfoundland and
Labrador A2H 6J2
Canada

Invoice Number: 2023-029

Invoice Date: April 4, 2023

Payment Due: May 4, 2023

Amount Due (CAD): **\$2,587.50**

[Pay Securely Online](#)

Engineering Services	Quantity	Price	Amount
Engineering Services Corner Brook, NL Engineering Application for FM Technical Amendment (protected Class) (50% payment 1 of 2)	1	\$2,250.00	\$2,250.00

Subtotal: \$2,250.00
HST NL 15% (712587096RT0001): \$337.50

Total: \$2,587.50

Amount Due (CAD): **\$2,587.50**

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link.waveapps.com/dzt7xh-cqf4vy

Notes / Terms

Thank you for your business!



Excavator Service

Corner Brook
[Redacted]

BILL TO
BayFM Radio

INVOICE # 1098
INVOICE DATE 18/10/2023

Invoice Total **\$ 2,305.00**

QTY	DESCRIPTION	UNIT PRICE	AMOUNT
1	Prepare transmitter site.	2,305.00	2,305.00

TERMS & CONDITIONS

Please make cheque payable to [Redacted]

