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March 13, 2019

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

Dear Mr. Doucet,

Re: New information filed by Allarco Entertainment Ltd. regarding its application to renew the broadcasting licence of Super Channel application # 2017-0743-1

A: Introduction

1. The Documentary Organization of Canada/Association des documentariste du Canada (DOC) is submitting its comments with respect to Broadcasting Notice of Consultation CRTC 2018 – 488.
2. DOC is the collective voice of independent documentary filmmakers across Canada, a national non-profit arts service organization representing over 750 directors, producers and craftspeople from all provinces and regions of the country working in the documentary genre. DOC advocates on behalf of its members to foster an environment conducive to documentary production and strives to strengthen the sector within the broader film and television production industry. In so doing, DOC seeks to ensure that viewers in Canada and abroad have access to high quality, original programs reflective of current Canadian events, lives and values.
3. Documentary programs, created by Canadians for Canada and for the world, have been at the heart of our film & video culture for at least 70 years. From the beginnings of the CBC and the NFB to today's multi platform digital environment, documentaries have revealed and explained Canadians and Canadian sensibilities to the world and the world to Canada.
4. With support from consumers, governments and the regulator, Canadian documentary producers are continuing this critical role for Canadians – a role that clearly fulfils each part of Section 3 (1) (i) of the Broadcasting Act.

5. DOC appreciates the opportunity to provide its comments with respect to the new information filed by Allarco in response to various interventions filed with respect to the application for renewal of the broadcasting licence for Super Channel.

B: Comments

1. DOC has reviewed the comments filed by Allarco in response to interventions by various interested parties, including DOC. It appreciates that Allarco has now committed to maintain a Canadian program expenditure (CPE) of 30% throughout any new licence term. Included in the 30% CPE is a new commitment to spend \$500,000 per year on script and concept development as well as \$500,000 per year on Regional Outreach activities. DOC considers that these commitments are appropriate, but minimal, contributions to the creation of new Canadian programs.
2. Regarding Super Channel's business practices, DOC maintains its position that any licence renewal should be subject to a condition requiring Super Channel to adhere to standard industry practices with regard to its relations with Canadian producers. Such a condition of licence should set out a specific payment schedule consistent with current industry standards. For instance,
 - a. a minimum of 25% of the licence fee to be paid upon signing of contracts
 - b. 40% of the licence fee to be paid upon commencement of principal photography
 - c. 25% of the licence to be paid upon delivery of the rough cut
 - d. 5% of licence fee to be paid upon delivery of the completed programming
 - e. 5% of the licence fee to be paid upon delivery of the final materials
3. DOC maintains, as set out in its intervention of March 19, 2018, that the Commission has full authority to impose such a requirement.
4. With respect to Super Channel's possible non-compliance with its conditions of licence # 5, 6, 7 & 8, DOC supports the analysis filed by the CMPA. If the Commission agrees that the licensee has failed to comply with some or all of conditions then a short term licence renewal is warranted.
5. DOC appreciates the opportunity to file these additional comments and re-iterates its call for an oral public hearing on this important application. DOC would like to appear at any such proceeding.

Sincerely,



Mathieu Pierre Dagonas
Executive Director | Directeur Général
Documentary Organization of Canada | Association des documentaristes du Canada