

Citizen Involvement during the CRTC's Let's Talk TV Consultation

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ABSTRACT *The authors analyze citizen engagement efforts undertaken by the Canadian Radio-television and Telecommunications Commission (CRTC) between 2013 and 2015, under the aegis of the Let's Talk TV (LTTV) initiative. They explore whether and how input provided by citizen-consumers during LTTV demonstrates activism through engagements in policy discussions. The article first delineates the timing and scope of activities conducted by the Canadian regulator to involve individual Canadians in reshaping digital television services. The CRTC's early decisions are then compared to the authors' analyses of input from hundreds of people invited to answer the CRTC's general questions online. Comparing the decisions made to date with citizen-consumer responses, the article points to contradictions and disconnects between the authors' findings and the CRTC's initial decisions.*

KEYWORDS *Broadcasting policy; Regulation/CRTC; Television/cable television; Convergence; Citizen-consumer activism*

RÉSUMÉ *Les auteures analysent les efforts entrepris par le Conseil de la radiodiffusion et des télécommunications canadiennes (CRTC) entre 2013 et 2015 pour augmenter la participation citoyenne dans le contexte de l'initiative Parlons télé. Les auteures explorent si et comment les contributions faites par les citoyens-consommateurs pendant cette initiative démontrent une certaine mesure d'activisme du fait que ceux-ci prennent part à la discussion de politiques. Cet article décrit d'abord l'opportunité et l'envergure des activités menées par l'organisme réglementaire pour impliquer les Canadiens dans la réforme des services télévisuels numériques. Les auteures comparent ensuite les décisions initiales du CRTC aux résultats d'une analyse de données qu'elles ont menée sur les réponses faites par des centaines de citoyens-consommateurs à des questions d'ordre général posées en ligne par le CRTC. En comparant les décisions de cet organisme avec les réponses des citoyens, l'article relève des contradictions et des écarts entre les résultats de l'analyse de données et les premières décisions du CRTC.*

MOTS CLÉS *Politique de radiodiffusion; Réglementation/CRTC; Télévision/câblodistribution; Convergence; Activisme du citoyen-consommateur*

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Introduction

This article investigates a dialogue between Canadians and the Canadian Radio-television and Telecommunications Commission (CRTC) about the future of television in Canada. The CRTC, Canada's independent regulator of broadcasting and telecommunications, engaged directly with citizen-consumers during its 2013–2015 Let's Talk TV (LTTV) consultations. Conducted on the public record, the consultations provided opportunities for civic activism in regulatory decision-making regarding the digital media distribution system in Canada. We were interested to know whether the comprehensive call to action by the CRTC in 2013—for citizen-consumers to provide input into how television services are delivered today—generated a significant activist response about the types of media content Canadians wanted to see produced and how they wanted it to be distributed. In our view, the input provided by Canadians during LTTV demonstrates activism through engagements in policy discussions. We were also interested to know whether and how this activism in policy development affected CRTC decisions about the types of media content and distribution options that Canadians want. To find out, we analyzed citizen-consumer responses to the CRTC and compared these to policy decisions made by the CRTC during LTTV.

Methodologically, we start with an overview of the CRTC's LTTV timeline and activities. We delineate six key stakeholder groups and then examine the involvement of a single group, citizen-consumers, through an analysis of their feedback to the CRTC. We also draw on recent statistics concerning Canadians' online participation and traditional media consumption, specifically the demand for media content (e.g., CRTC, 2015a).

The theoretical perspective we develop mobilizes three trajectories of communication, policy, and technology scholarship. First, we bring together research on citizen rights in the communication context and on current media production and distribution practices, to explore what is meant by citizen-consumer, activism, media content, and distribution. Secondly, we examine what is meant by "access" and "affordability" as key foundations for citizen use of today's communications technology and develop ideas about digital media consumption (Middleton, 2011; Moll & Shade 2011; Raboy & Shtern, 2010). Finally, we draw on research from the field of media production studies (e.g., Jenkins, Ford, & Green, 2013; Luka, 2015; Williams, 2010) to suggest connections between citizen-consumer activism and the evolving challenges of collaborative distribution.

We use this tripartite approach because policy research and advocacy in the Canadian telecommunications and broadcasting system is an important form of activism for scholars as well as citizen-consumers. Our own experiences in policy activism—through interventions at the CRTC, as policymakers on governance boards in the sector, and as media producers—suggest how crucial it is to assess whether and how citizen-consumers assert their points of view in the regulatory context, and whether this provides openings for activism within the telecommunications and broadcasting system. We also consider whether citizen-consumers support the idea that a coordinated digital media distribution system is desirable. For example, we analyze how the right to communicate (Raboy & Shtern, 2010) and to access software, hardware, and services (Moll & Shade, 2011), along with calls for a national digital strategy

(Middleton, 2015), can help uncover the potential for innovative content distribution systems and strategies.

In the final section of the article, we briefly review how television and digital media content is currently delivered to people. We contextualize our preliminary analysis of the LTTV consultation process with data about Canadian internet and mobile media use for television consumption. We then analyze the citizen-consumer feedback provided to the CRTC prior to the formal LTTV hearings, singling out contradictions between this feedback, with its emphasis on media content, and the decisions made by the CRTC through 2016, which address industry structure rather than audience needs. It is precisely at these points of tension that we find an activist civic dialogue emerging, indicating that input on policy options can make a meaningful difference in the decision-making process at the CRTC.

Methodology

A tremendous amount of data was generated by the CRTC and participants during the consultation, and although this data is publicly available on the CRTC website, it is not easily scraped or analyzed.¹ We used custom code to “scrape” (digitally collect) the large data sets we used. In addition, we employed standardized manual sampling processes of those data sets and output raw data for analysis in Excel and NVivo. We undertook a content analysis from this combination sample of data, drawn from citizen-consumer input generated in the first and third phases of the consultation, incorporating purposive and cross-sectional strategies and triangulating early with later comments.²

More than 10,000 Canadians responded to the CRTC’s invitation to provide feedback during the three phases of LTTV. In October and November 2013, during the first phase of direct feedback, this feedback included letters, emails, and online submissions from 238 Canadians, consisting of mostly a page or less. We conducted a manual content analysis of these responses in fall 2014, generating more than a dozen subthemes under the general headings provided by the CRTC’s initial questions (quoted below and tabulated in Tables 1 and 2). In the second phase, the CRTC conducted research by telephone and online, for which individual responses are not available. In the third phase of feedback solicited by the CRTC, from June to October of 2014, 2,397 individuals and 153 companies provided input. We captured all 2,397 individual responses and determined they were mainly from stakeholder Group Six, namely citizen-consumers.³ We then conducted an in-depth content analysis of a sample of 18 percent of this group (434 individuals, or every fifth entry) to verify and augment the results of the initial 238 submissions. Furthermore, from October 2013 to January 2014 (Phase One), 28 groups provided 39 documents during “Flash!” conferences, involving several hundred citizen-consumers, creative workers, students, and others from multiple stakeholder groups (CRTC, 2014a).

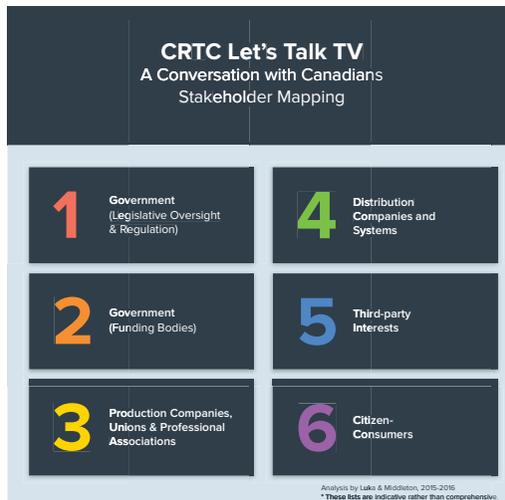
Eight reports were commissioned by the CRTC, primarily during Phase Two. One report identified a general set of themes generated by 801 respondents to the telephone survey in April 2014 (CRTC, 2014b). Four reports in May 2014 were based on responses to the “Choicebook” (internet survey) generated responses from a self-selected group of 6,068 people plus a demographically representative group of 1,252 people (CRTC, 2014c). Further, 109 companies and 11 individuals presented at the formal

hearings in September 2014, of which 110 provided documentation that remained on the public record.⁴

Understanding the breadth of participants involved in the CRTC LTTV process was crucial for verifying our findings, and for comparing different points of view among varying levels, types, and timing of contributions. Yin (2009) suggests that understanding breadth as well as depth is an important feature of an in-depth case study. Our desire to make visible the complexity of the consultation undertaken by the CRTC to enable increased citizen involvement is reflected in our first two steps: we developed a stakeholder map (groups identified in Figure 1) and a comprehensive timeline of the LTTV processes (phases identified in Figure 2).

The stakeholder mapping we undertook enumerates the complexity of the current Canadian telecommunications and broadcasting system. Although the full details are provided here, Figure 1 identifies the six core groups within the system: 1) Federal bodies responsible for legislative oversight and regulation; 2) Federal and provincial funding bodies and agencies; 3) Production companies, unions, and professional associations; 4) Distribution companies and systems including cable, satellite, and over-the-top services; 5) Third-party interests including business analysts, public interest groups, and universities and colleges in Canada; and 6) Citizen-consumers. To build the map, we distilled our own experiences with these organizations as producers, academics, and policymakers, including through interventions at the CRTC or involvement in other policymaking bodies. We also examined the lists of participants in the LTTV consultations and added names of additional specific funding agencies and other organizations even if they had not participated directly in LTTV. Individual and organizational names were grouped by function and, particularly in the case of stakeholder Groups Five and Six, because they were engaged as critics or activists or had the potential to be. The full map suggests the potential for activist work among policymakers, production companies, broadcasters, unions, and others.

Figure 1



For our analysis of the LTTV, we developed a timeline to show the times and ways these stakeholder groups actually came into contact with one another and the CRTC.

Figure 2



The colour key (Figure 2) for the LTTV timeline summarizes the general types of activities involved in the consultation (see online version for colour key). The full timeline shows more than 50 activities and events related to the consultation and enumerates the massive sets of data generated by the CRTC. This timeline is important because it highlights how stakeholders interacted with the CRTC and each other during this period. There are three points in time that reflect particularly intensive intersections of input or dialogue, which can be seen by observing how many groups of stakeholders were involved. The first is during Phase One “Flash!” conferences (CRTC, 2014a), which involved using toolkits developed by the CRTC to structure workshops that gathered initial written or video-recorded input from funders, academics, production companies, and other stakeholders between October and December 2013. The second and most significant crossroads was during Phase Three interventions from June to October 2014, when most of the stakeholder groups not only provided a range of input, but their feedback may also have helped to shape decisions by the CRTC. The final opportunity for input came during the last part of Phase Three: the formal hearings in September 2014.

In the discussion below, we focus on two sets of data from stakeholder Group Six: input from 238 citizen-consumer respondents during Phase One (there were 21 other responses from companies or organizations, for a total of 259 responses), and input from 2,397 respondents during Phase Three. We highlight these two phases because they concentrate on citizen-consumers and comprise early input that may have shaped later research and decision-making during LTTV. However, we also argue that the density of the regulatory process, as shown by the sheer number of input activities, can clearly be regarded as a set of impediments for the citizen-consumer stakeholders (Group Six) to engage in activism. This is consistent with the experiences of intensely interested and knowledgeable participants such as producers, set designers, actors

(Group Three), and academics (Group Five, e.g., Shepherd, Taylor, & Middleton, 2014). First, however, to better understand the relationship of citizen-consumers to activist engagement with the CRTC about media content, we define the terms “citizen-consumers,” “media content,” and the “distribution system.”

Civic engagement in policy development and production practices as activism

Throughout the 2000s, the concept of the citizen-consumer was fleshed out and refined in the context of communications and media policy research, as scholars and regulators addressed the growing uptake and use of the internet, accessed through fixed and mobile broadband networks (Castells, Fernández-Ardèvol, Linchuan Qiu, & Sey, 2006; Lunt & Livingstone, 2011; Moll & Shade, 2011). For our purposes, and in line with regulatory language in North America, “citizen-consumers” means individuals who are able to conduct business, enjoy entertainment, and access government services on the internet, using the internet to engage in society as both citizens and consumers (Federal Communications Commission, 2010; Government of Canada, 2014). We use the term “media content” in the way that scholars and industry professionals are familiar with, but recognize that it is not always the way that people think about it. “Content” indicates that the programming and media services that the media industry and its funders finance and distribute through delivery systems, such as television networks, is meant to travel across a delivery system of “platforms” (i.e., viewing or listening devices). The Canadian “distribution system” itself refers to a not-always cohesive combination of public and commercial distribution infrastructures, channels, and strategies for delivering digital media content online as well as over-the-air and via cable and satellite services.

In Canada, a significant stream of scholarship began to emerge by 2005 that asked how information and communications technology (ICT) capacity-building practices connect with the public interest in the digital age (Clement, Gurstein, Longford, Moll, & Shade, 2012; Middleton, 2007; Middleton, Clement, Crow, & Longford, 2008; Middleton & Crow, 2008; Moll, 2011; Raboy & Shtern, 2010). For instance, work conducted for the Community Wireless Infrastructure Research Project (Bryne Potter & Clement, 2007; Middleton et al., 2008) sought to understand what infrastructure was needed for people to mobilize technology in their everyday world and to identify deficiencies. These assessments of whether and how hardware, software, and services together ensured a digital environment to meet the public’s needs considered characteristics such as accessibility and affordability, which were emphasized by the CRTC in the LTTV consultation.

Arguing for the right to communicate, Raboy and Shtern (2010) articulate a specific set of relationships among citizen-consumers, government policymakers, and public and private corporations that provide media content, services, and capacity to various civic and consumer audiences and clients. The right to communicate emerges from Canadian communication history and policy and speaks to how Canadians access communication tools and networks. The legislative framework within which this concept operates includes the Canadian Charter of Rights and Freedoms (Constitution Act, 1982), the Telecommunications Act (1993), the Broadcasting Act (1991), and the work of the CRTC. The research we conducted for this article continues in the same vein as these examples, by focusing attention on civic engagement in policy develop-

ment vis-à-vis critical media issues in the country. But we also connect civic engagement in policymaking to civic engagement in production practices (e.g., via co-creation), media consumption patterns, and the fracturing distribution system. Most of these activities were of significant concern during the LTTV consultations.

By 2010, media production practices regularly incorporated “user-generated [media] content [UGC]” (Burgess, 2011). UGC is media produced by citizen-consumers without the traditional, prior agreement, participation, funding, or endorsement of broadcasters (Group Four) or production companies, unions, and associations (Group Three). Although such content may or may not be activist in subject matter, the UGC form itself disrupts traditional modes of production (Jenkins, 2008; Luka, 2014), opening up the established, corporatized production system to activist forms of production by citizen-consumers, often by fan groups or artists. Production studies research has, to a lesser degree, explored “co-creative” (Bennett & Strange, 2011) practices that bring together stakeholder Groups Three, Four, and Six over shared distribution of digital media. These practices have been variously described as emerging from cultural citizenship (Urrichio, 2004), architectures of participation (Bennett, 2011), convergence culture (Jenkins, 2008), produsage (Bruns, 2008; Lind, 2012), and creative citizenship (Luka, 2014). Consequently, by 2010, the global collision of media business management tactics and digital media production and consumption, including the open source and digital commons movements (e.g., Powell, 2007, 2008; Rushkoff, 2003; Tapscott & Williams, 2008), suggests a decisive shift toward two-way *distribution* (in addition to production) processes involving subsets of citizen-consumer audiences (stakeholder Group Six), production companies (Group Three), and broadcasters (Group Four).

For example, during the transition to digital television in the early 2000s at the Canadian Broadcasting Corporation (CBC), the use of creative citizenship strategies at CBC ArtSpots (Luka, 2014, 2015) meant that the artists and creative workers involved were citizen-consumers who were occupied as activists to generate new forms of collaborative cultural production *and* distribution. They produced and distributed videos and website content at the CBC in new ways, including as exhibition materials, interventions in commercial TV time slots and online that were neither PSAs, nor artist videos, nor UGC, nor commercial promotional items, nor regularly scheduled programming content, but sometimes seemed to be all of these. Similarly, Strange (2011) offers an analysis of nascent activist attempts by creative workers to assert control over digital media distribution, through their efforts to develop “content-agnostic,” multi-platform media content at the British Broadcasting Corporation (Group Four), sometimes in opposition to and sometimes in concert with production companies (Group Three). This is not the first time that evolving modes of industrial delivery have been discussed in relation to how they change content production; in the early 1990s, in the monograph *Television*, Williams (2010) described similar historical developments. During LTTV, by asking Canadians how they wanted their television distributed to them, the CRTC was asking how to accommodate and support the ways in which “new” production practices had already disrupted the traditional distribution system, but not asking what content Canadians wanted and how they wanted it. As we show below, however, Canadians chose to talk about both content *and* distribution.

Distribution system options

As the market has inched its way toward a splintered distribution system, in which audiences view content across a wide range of platforms and devices, a gap has emerged in both scholarly research and industry wisdom. Some theorists who attempt to cross over between these spheres, such as Jenkins, Ford, and Green (2013), articulate ways to bridge this gap in terms such as “spreadable media,” which seeks to have audiences become the backbone of a distribution system on the internet, and encourages broadcasters, corporations, and citizen-consumers alike to upload and download media content. More traditional communication and media experts, such as Grant and Buchanan (2010) or Raboy and Shtern (2010), hint at the possibilities afforded by the notion of a coordinated national distribution framework or utility via concepts such as the right to communicate or public broadcasting itself. They do not, however, engage with how to integrate the hardware, software, services—and the stakeholder groups shown in Figure 1—which would be required to realize such a structure. Community (digital) access programs (such as C@P in Canada⁵ and MuniNetworks.org in the U.S.) allude to possible tactics for connecting hardware and communities, including collective investments in wiring or transmission capabilities. However, global corporate consolidation critiques (e.g., McChesney, 2013) and assessments of the shifting sands of transmission capacities combine with an often-too-narrow emphasis on hardware as broadband infrastructure or the slowly dying demand for extant services such as cable or satellite TV. For example, Taylor (2013) enumerates how corporations acquire wide swaths of spectrum when it is repurposed from supporting distribution via over-the-air television to distribution via subscription mobile services. And “how to cut the cord” discussions proliferated in the media throughout 2015 (see Kirk, 2015; Satell, 2015).

Complicating this, in today’s environment, both individuals and broadcasters can function as narrowcast distributors, aggregating user-generated or co-creative content as well as traditionally licensed content (Burgess, 2011; Luka, 2015). Marketing strategies include programming online distribution platforms first or exclusively, including international online-only over-the-top (OTT) subscriber services such as Netflix; or Web-only series funded by the Canada Media Fund (Canadian Heritage Evaluation Services Directorate, 2015) or appearing on YouTube channels. But the surge in online and OTT programming is quite different than ongoing, highly lucrative traditional strategies used by Canadian broadcasters such as the acquisition and broadcasting of programs like *Amazing Race Canada* or *The Big Bang Theory* (two popular programs on television at the time of writing; Numeris, 2015). The OTT approach “piggybacks” on previous decades of TV programming that is inexpensive to license, and on the ongoing success of the still-profitable commercial broadcast acquisition and distribution system, which continues to maximize audiences for advertisers and revenue for broadcasters by producing a growing rather than shrinking amount of media content each year. As we show below, by focusing on choice rather than on content and a coordinated distribution system for citizen-consumers during the LTTV process, the CRTC may be less able to think through the needs of an updated distribution milieu, including how a comprehensive national digital strategy (addressing affordability and availability of digital media and internet TV) could facilitate the navigation of that terrain.

Changing media consumption patterns in Canada

Whereas early internet TV focused on short items (e.g., commercial-length videos), today's audiences binge watch enormous amounts of sophisticated, professionally produced dramatic and documentary programming (content) with high production values, including using OTT services such as Netflix, which started its streaming service in the U.S. in 2007 (Pallotta & Stelter, 2015; Shaw, 2015). In Canada, according to the CRTC, "Netflix subscription rates among the 18–34 years old age group rose from 29% in 2013 to 58% in 2014 among Anglophones, and from 7% to 24% during the same period for Francophones" (CRTC, 2015b). Telefilm Canada notes that "60% of viewers aged 15–34 use Netflix [and] 81 percent of film-viewing is done at home" (Telefilm, 2015). As of November 2015, reports the network equipment company Sandvine (2015), "Streaming has taken over the internet and now accounts for more than 70 per cent of North American downloads at peak times, up from less than 35 per cent in 2010." Of this, Netflix accounts for 37 percent of the traffic and YouTube for 17.9 percent (Canadian Press, 2015; Sandvine, 2015). Moreover, 85 percent of millennials watch television live—they simply do so on a variety of devices, not just on a traditional television in the living room (Numeris, 2015). The general trend is clear: "In 2015, Canadians 18 years[+] ... watched 7 hours of Internet TV ... weekly, compared to 1.5 hours in 2008. [They also] ... watched 27.4 hours of traditional television per week during the 2013–2014 broadcast year, compared to 28.5 hours in 2010–2011" (CRTC, 2015a).

For distribution companies, and Canadian policymakers, the key issue here is whether—and if so, how quickly—digital media consumption will progress to a broadband-based digital environment in which distribution is not necessarily mediated by broadcasters. We have some indication of this trend from three other sets of statistics, specifically the increasing use of mobile devices for internet video consumption, the multi-platform delivery of audio services, and the use of the internet overall. By 2014, 27 percent of Francophones watched video on their phones, compared to 38 percent of Anglophones, and a quarter of Anglophones and Francophones were watching internet video on tablets (CRTC, 2015a, Table 5.5.9). Consumption of multiple audio services provides another compelling dynamic: "In 2014, 52% of Canadians streamed music videos on YouTube, 22% streamed AM/FM radio online, 18% streamed personalized online music [e.g., Google Play, Apple Music], and 21% listened to podcasts" (CRTC, 2015a). Comparable data from other nations suggests that Canada ranks at the top of the list in terms of how much content is accessed online and for how many hours (Comscore, 2015; World Internet Statistics, 2015). Finally, more than 80 percent of the population use the internet from home and 96 percent of Canadian households currently have access to broadband networks offering download speeds of 5 Mbps or more (CRTC, 2015a). Canadians are moving to digital media consumption and, as shown below through an analysis of feedback to the LTTV process, citizen-consumers, media content providers, and policymakers are deeply concerned about this transition.

Let's Talk TV

We suggested above that the significant growth of predominantly commercial online distribution platforms in the past two decades has paralleled a growth in the articulation of democratic rights around the creation and distribution of media content.

Consequently, we were interested to know whether the comprehensive call to action by the CRTC in 2013—for citizen-consumers to provide input into how television services are delivered today—generated a significant activist response about the types of media content Canadians wanted to see produced and how they wanted it to be distributed. In our view, the input provided by Canadians during LTTV demonstrates activism through policy development input from participants.

The CRTC initially asked three overarching questions in LTTV Public Process 2013-563 (CRTC, 2013). The first set of questions focused on quality, asking: “What do you think about what’s on television?” The second set of questions asked about delivery: “What do you think about how you receive television programming?” The third set asked about acquiring and viewing television services: “Do you have enough information to make informed choices and seek solutions if you’re not satisfied?” and for those with visual or hearing impairments: “How satisfied are you with the tools available to enable you to share in our television culture?” (CRTC, 2013). The questions asked citizen-consumers to become engaged in a dialogue not only with the regulator, but also with their media content and television service providers.

Notably, the majority of responses did not directly answer the questions asked in the order provided by the CRTC. Instead, respondents chose to provide narrative answers to some or all questions in their own order, often through a detailed email or online submission. A remarkable number of citizen-consumers linked the production of Canadian content to cultural identity, especially during Phase Three, and then to the need for equitable and representative local *and* national distribution systems. Table 1 presents a compilation of the themes most closely aligned to the CRTC’s first question about “what’s on TV,” arising from the sampled responses from Phases One and Three data sets. As shown in Table 1, genres, cultural identity, Canadian content (especially local content), public service, and public programming were emphasized by respondents in far greater numbers than delivery and decision-making concerns, shown in Table 2.⁶

Table 1: Responses aligned with CRTC’s question set 1

Responses	Phase One data set Oct.–Dec. 2013 (N = 238)	Phase Three data set June–Oct. 2014 (N = 434)
Better quality programs	38	7
More Canadian programs	22	113
More French-Canadian programs	20	19
More funding for CBC	4	75
Stop CBC cuts	N/A	126
More CBC programs	N/A	200
More local programs	52	N/A
More ethnic and diverse programs	13	N/A
Concerns re: lack of representation of Canadian content	N/A	120

Participants identified nine specific issues with what they saw on TV, articulating concerns about Canadian identity, culture, and content. Some responses noted multiple concerns (e.g., “More Canadian programs” and “Stop CBC cuts”). However, in later decisions, the CRTC only obliquely addresses these citizen-consumer requests for more Canadian content when it focuses on marketing Canadian programming, which it labels as “discoverability,” rather than on creation or distribution. For example, in Broadcasting Regulatory Policy 2015-86, titled “Create,” the CRTC states:

[F]or Canadian-made programming to succeed, it must be widely available and visible. Canadians need more opportunities to discover Canadian-made programming on multiple platforms. In this respect, the Commission will host a summit to engage directly with stakeholders to discuss ways to work together to develop strategies and mechanisms to improve the discoverability and promotion of Canadian programs. The Commission is also providing additional tools to incent the promotion of Canadian programming. (CRTC, 2015f, p. 4)

Here, the CRTC seems to argue that there is a great deal of high-quality Canadian programming available (see also CRTC, 2015a; Littleton, 2015; Pallota & Stelter, 2015), but that it is simply not reaching its market(s). The citizen-consumer feedback seems to agree that distribution may be inadequate across the partly commercial and partly public broadcasting system (including conventional, cable, OTT, and digital services). The CRTC does not, however, choose to address specific citizen-consumer concerns about fostering a programming environment that supports and reflects Canadian themes (i.e., not only programs made in Canada, but also the CBC, etc., as shown in Table 1). Rather, the CRTC emphasizes the need for a coordinated national marketing strategy (“discoverability”) and then prioritizes that strategy (i.e., the “Discoverability Summit,” co-hosted by the National Film Board). Between December 2015 and May 2016, the CRTC convened three discoverability meetings involving industry, creative sector union, consumer advocacy, and academic networks to discuss the challenge of a coordinated national strategy.⁷

Table 2: Responses aligned with CRTC's question sets 2 and 3

Responses	Phase One data set Oct.–Dec. 2013 (N = 238)	Phase Three data set June–Oct. 2014 (N = 434)
Unbundle channel packages	49	17
Don't unbundle	N/A	16
Mandate a “skinny basic” content delivery service	N/A	62
Simplify, regulate, and address costs, bundling of subscription TV approaches	78	29
Improve media content delivery services (incl. breaking down monopolies)	N/A	15
Improve accessibility for hearing, sight or language challenges	N/A	14

Table 2 presents themes arising from the CRTC's second and third question sets, which asked "How to deliver TV" and "How to get information to make choices." The data in Table 2 comes from our analysis of the sampled responses from Phase One and Three data sets.

Table 2 shows that respondents in Phase One focused on answers about simplifying cost and bundling models. More nuanced responses emerge in Phase Three about unbundling channels (i.e., making it possible to buy television content without subscribing to packages of channels). Phase Three comments also take up the term "skinny basic" as used by the CRTC and ask for changes in delivery services and improvements in accessibility. In response, in Broadcasting Regulatory Policy 2015-96 (CRTC, 2015d), the CRTC addresses citizen-consumer input (and earlier government directives) asking for unbundled channels. Single-channel subscriptions would become available to all Canadians. Furthermore, the CRTC mandates a "skinny basic" cable or satellite television delivery package (an offering with few channels, which was of interest to many respondents). To strike a balance between government directives, citizen-consumer responses, and existing marketplace offerings, the CRTC asks service providers to institute "pick and pay" (individual selection of most channels) on top of continuing to bundle channels. It does not mandate pricing and so opens the door to more profitable single-channel subscription models. Finally, Broadcasting Regulatory Policy 2015-104 (CRTC, 2015e) flags the importance of increasing the level of accessibility for Canadians requiring accommodation for hearing, sight, and language, as well as overall expectations for better customer service through a wholesale and retail code of conduct for broadcasters and service providers. Notably, in the individual responses listed in Tables 1 and 2, accessibility was a minor theme, but during the Flash! conferences, this was a topic of considerable concern.

With the CRTC's emphasis on choice of, and access to, content built into the initial questions, it is not surprising to note that many comments from Canadians emphasized these qualities in their responses to how media content ought to be delivered (Table 2). What is surprising is how insistent many more respondents were about wanting more Canadian culture and programming (see Table 1). The individual responses also reinforce the existing baseline requirement in the Broadcasting Act (1991) to reflect Canadian culture and identity. With the exception of references to marketing "quality programming" in Broadcasting Regulatory Policy 2015-86 and oblique references in the "discoverability" strategy, few of the CRTC's policies issued to date seem to address the relationship of media content production or delivery as a reflection of Canadian identity and culture, a core concern of the citizen-consumer responses we analyzed.

The CRTC did not explicitly ask whether and how co-creative and co-distribution avenues would make more Canadian digital media content more accessible to Canadians. Nor did citizen-consumers identify such approaches (the "how") as important, focusing instead on "what" they wanted: Canadian content, the CBC, cultural identity, and unbundling. Interestingly, there are two regulatory policies that hint at the possibility of prioritizing collaborations, which may have come from other stakeholder responses. Broadcasting Regulatory Policy 2015-24 (CRTC, 2015g) allows broadcasters to provide local television programming on multiple platforms. Combined with

the more recent (non-LTTV) Broadcasting Regulatory Policy 2016-224 (CRTC, 2016), which rules on local and community television, it becomes possible to imagine online-only community television user-generated by community members alone or co-created together with professionals (removing the need for broadcasters to serve relatively small audiences through cable or satellite distribution). Further, in Broadcasting Regulatory Policy 2015-86 (CRTC, 2015f), there are cues about how to make the delivery system simpler and more equitable across the country. This policy moves toward the elimination of genre requirements in channel licences and requires video-on-demand to be offered to all citizen-consumers, not only cable or satellite television subscribers. However, in contrast to the feedback calling for more Canadian content, Policy 2015-86 also reduces requirements for relatively expensive Canadian content production and broadcast requirements under certain circumstances (compared to cheaper acquisition costs of non-Canadian content).

Initially, the input provided by individuals to the CRTC LTTV consultations reflected the general quality, delivery, and choice questions that the CRTC asked. By the end of the consultative process, however, it appears that citizen-consumer responses had become more activist in nature, focused on how to shift policy to foster Canadian and particularly local and culturally specific content and public service broadcasting. The CRTC addressed citizen-consumer feedback tangentially, calling for a national marketing strategy as well as ways to make the digital distribution system more equitable. In future, it will be interesting to delve into other stakeholder input to see how the CRTC's approach developed.

Future considerations

Our goals in this article included, first, to demonstrate how citizen-consumers became actively engaged in a dialogue with the CRTC during the LTTV consultations. Second, we were interested to know whether the feedback provided to the CRTC was an activist contribution to shaping Canadian programming and culture. We wanted to see how this feedback could relate not only to a national television marketing strategy, but to a comprehensive national digital distribution strategy. We discovered that as delivery systems become more complicated, commercial, and digitized, the pressing concern for Canadians is the public broadcasting system itself and the desire to easily access more Canadian and local content.

The LTTV data we analyzed suggests there is ongoing potential for the CRTC to encourage civic engagement as a form of activism among citizen-consumers. As researchers and citizen-consumers who intervene in the policymaking sphere, we are encouraged by this outcome. And, as has become even clearer from more recent feedback to the CRTC about basic obligations for internet and digital services (CRTC, 2015c), a comprehensive national digital strategy will be required to ensure that high-quality, affordable access to infrastructure is in place to meet growing expectations for emerging production and distribution approaches and to facilitate distribution of local and Canadian content. This strategy will help to make TV and other media content delivery services increasingly viable—and desirable—on smartphones, tablets, and other mobile devices as well as on traditional television screens, whose content is also now delivered through digital services.

Our analysis to date suggests that the CRTC's prioritizing of choice and genre concerns is of interest to audiences, certainly, but more tellingly, points to the challenges of addressing crucial gaps in policy directives associated with the LTTV and basic telecommunications services processes: the delivery of cultural identity and Canadian content. How this audience-centred approach to the future broadcast system will be activated by the CRTC remains to be seen. Such activation could allow potentially collaborative approaches to business model development to emerge in both the production and distribution of programming, including how Canadian identity issues and content are reflected on multiple devices in varied environments. Assuredly, Canadians, including us, appear to hope that the CRTC's convening power—and certainly its regulatory muscle—will provide the pathways needed not only for industry, but also for citizen-consumers, third parties, creative workers, and others.

Notes

1. The data is available here: <http://www.crtc.gc.ca/eng/talktv-parlonstele.htm>
2. We were fortunate to work with research assistant Catherine Fournier, who has several years of coding experience and did a great deal of the detailed work for both sample sets. First, Fournier and Luka separately scanned the initial set of data (238 respondents) to establish working iterations of the themes; Fournier allocated quotes and other content to the themes; Luka validated (or adjusted) allocations through a detailed review of all of the allocations. Middleton further reviewed the findings to check for consistency of approach. For the second set of data (434 out of 2,397 respondents), the same manual system was employed, following the custom scraping of the total set.
3. Graduate programmer Eugene Kang was hired to develop the code to respond to the categories and needs developed by the co-authors.
4. Transcripts of the LTTV (2014-190) hearings may be found at http://www.crtc.gc.ca/eng/transcripts/2014/index.htm?_ga=1.207114523.965209391.1449072689#tb09o8. The submissions by Google (<http://alphabeatic.com/wp-content/uploads/2014/09/google-letter.pdf> and <http://alphabeatic.com/wp-content/uploads/2014/09/google-presentation.pdf>) and from Netflix were struck from the CRTC's public record but can be sourced elsewhere on the internet (https://www.youtube.com/watch?v=bQSGmO8RShw&feature=youtu&_https://www.scribd.com/fullscreen/240675515?access_key=keyYTEwsNnxCHNvabBtY8oH&allow_share=true&escape=false&view_mode=scroll).
5. The federal program lasted from 1995 to 2012 (<http://www.ic.gc.ca/eic/site/cap-pac.nsf/eng/00023.html>); some provinces continued to provide hardware and broadband services in community libraries and centres (e.g., <http://www.nscap.ca>).
6. An additional subcategory of response was the observation by 11 percent of respondents (47 out of 434) that there was too much ideological interference by the Harper government. This is many more than those who were concerned about cost or those who held opposing opinions about unbundling. Also, curiously, 10 percent of respondents (42 out of 434) expressed interest in accessing American public broadcasting programming (specifically from PBS) as part of Canada's basic service provision.
7. Luka attended the May 10–11, 2016, summit and watched the livestream version of the Vancouver pre-summit ("Enroute Vancouver") on December 1, 2015, along with 124 other online participants. Enroute Montreal took place on December 3, 2015 (<http://discoverability.ca>).

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