

Vista Radio Ltd.

Appendix 1 - Supplementary Brief

An Application for a new English-Language FM Radio Station to
serve Yellowknife

May 13 2024

A. Introduction and Summary

1. CJCD-FM (*True North FM*) is an award-winning local radio station serving the residents of Yellowknife since 1979 and Hay River since 1986. With a deep history in these communities and a demonstrated commitment to professional management and journalistic standards, *True North FM* and *MyTrueNorthNow.com* are trusted news sources, combining timely, knowledgeable and innovative approaches to the coverage of local news and information with on-going support for community organizations, events and for local musical artists.
2. In *Broadcasting Decision CRTC 2023-33 Findings regarding market capacity in the Yellowknife radio market*, the Commission concluded that the market of Yellowknife, Northwest Territories could not support an additional commercial radio station at that time. We believe that was the correct decision. Since then, there has been no improvement in the indicators on which the Commission based its decision. In fact, the wildfires have made the situation worse. The available evidence continues to show that the Yellowknife radio market does not have the capacity to support an additional radio station. As such, the licensing of an additional commercial radio station at this time must inevitably have a significant negative impact on the ability of *True North FM* to continue to offer its award-winning local radio service and consequently, on local listeners in Yellowknife and Hay River.
3. If notwithstanding this, the Commission concludes that it would nonetheless be in the public interest to licence an additional commercial radio station to serve Yellowknife, we believe that the public interest would be best served by the approval of this application which we are filing in response to *Broadcasting Notice of Consultation CRTC 2024-57 Call for applications – Radio station to serve Yellowknife, Northwest Territories*.
4. By this application, Vista Radio Ltd. (“Vista”) is seeking authority to operate a new commercial FM radio station offering a HOT AC format on FM frequency 96.5 to serve listeners in Yellowknife, Northwest Territories. Our proposed new radio station (CJYK-FM) will build on our deep knowledge of the local community and demonstrated commitment to

professional management and journalistic standards, increasing the diversity of music, news and information in this market and providing additional support for Canadian musical talent. CJK-FM will benefit from operating synergies with *True North FM* thereby allowing this new radio station to deliver a high-quality local radio service on a financially sustainable basis with a much-reduced negative impact on other local stations compared to the impact of the licensing a new standalone radio station.

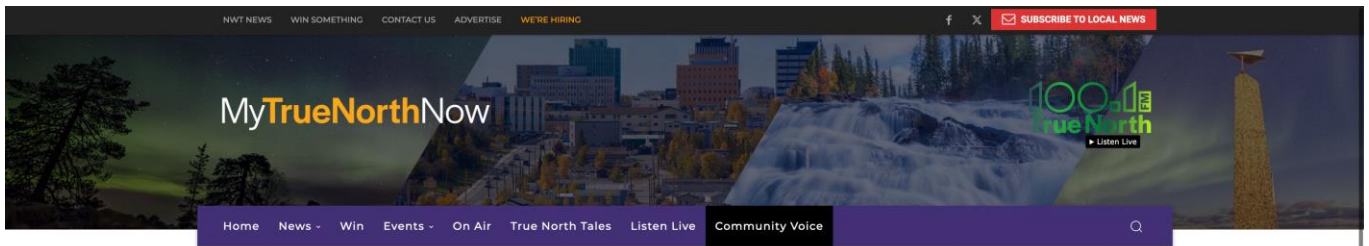
B. Vista: The Applicant

5. Vista is a privately-owned radio broadcasting company with a strong, committed Canadian owner who has demonstrated a willingness to invest long term in the broadcasting industry and the communities its radio stations and local news web sites serve.

6. Vista currently owns and operates 51 radio stations in smaller communities in Ontario, Alberta, British Columbia and the Northwest Territories, many of which are first service markets. While some broadcasters have chosen to respond to the economic challenges currently facing the industry by decreasing headcount, consolidating operations, de-localizing services and in some cases exiting the industry entirely, Vista has been determined to remain invested in our local radio teams and their local communities and to increase our investments to bring our excellent local radio services to other smaller and mid-sized communities where possible. To that end, we currently have an application before the Commission in which we are seeking authority to acquire from Bell Media a number of radio stations in smaller communities in British Columbia where we plan to reinvigorate the local news resources.

7. All our local radio teams on their own initiative and through company-wide programs seek out opportunities to provide fund-raising and promotional support for important local charitable and community groups. For example, all our radio stations participate in the *Vista Community Voices* program whereby the local radio team in conjunction with a local business provide a local charitable organization with free on-air promotional support.¹

¹ See for example: <https://www.mytruenorthnow.com/61346/on-air/the-true-north-fm-community-voice-fund/>



Home - On Air - The True North FM Community Voice Fund

The True North FM Community Voice Fund



There are dozens of amazing charitable and non-profit organizations who provide important services to the Yellowknife and Hay River communities and we want to help. We believe that if we share the stories of need and promote the great work you do, this community will respond.

100.1 True North FM is proud to establish the **The True North FM Community Voice Fund**.

Each month through this initiative, one non-profit organization from Yellowknife or Hay River will receive a FREE ONE MONTH ADVERTISING PROGRAM. The organization will be able to use this air time to share their stories, promote their initiatives, and raise awareness of their cause. So we hope you can take advantage of this opportunity to reach thousands of people all over the Northwest Territories.

[Make Your Nomination Today »](#)

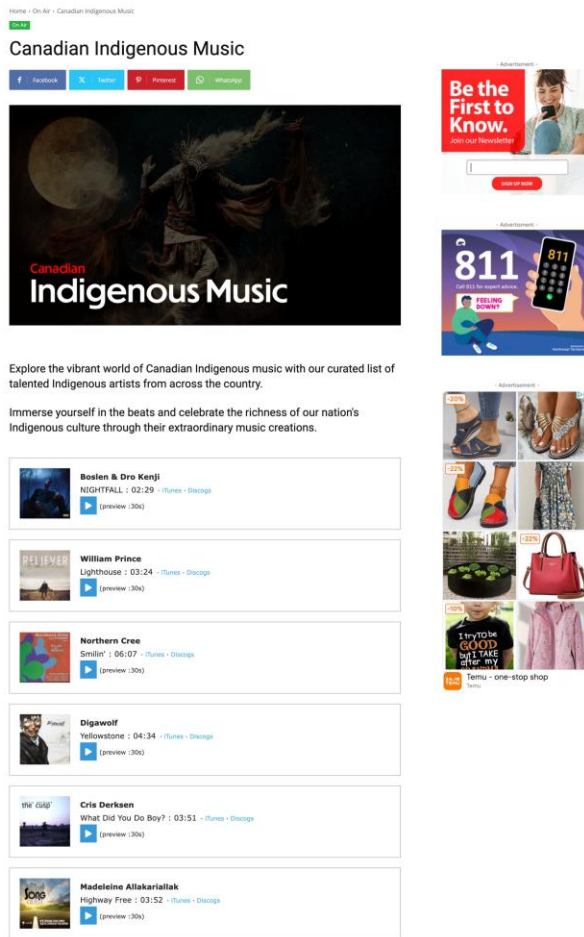


Screenshot of our Community Voice Fund page on our website

Link: <https://www.mytruenorthnow.com/61346/on-air/the-true-north-fm-community-voice-fund/>

8. Our commitment to supporting Canadian musical artists extends well beyond the regulatory requirements established by the Commission. All our radio stations are strong and enthusiastic supporters of live performances by local musicians. We sponsor music festivals and develop on-air content features to help talented local musicians build a profile.
9. We are active supporters of Indigenous musical artists. All our local radio station portals feature a Canadian Indigenous Music link, taking listeners to a curated list of musical selections by talented Canadian Indigenous recording artists.²

² <https://www.mytruenorthnow.com/67273/on-air/canadian-indigenous-music/>



Screenshot of our Canadian Indigenous Music page on our website

Link: <https://www.mytruenorthnow.com/67273/on-air/canadian-indigenous-music/>

10. As part of our ongoing commitment to supporting Indigenous music artists, Vista is developing an Indigenous Incubator program undertaken in conjunction with the Vista Launchpad program. Beginning with the promotion of local artists in Yellowknife, we aim to provide a platform for these talented individuals to showcase their work. As these artists

progress in their careers, their music will be shared with a much larger audience regionally and nationally with their music being added across all Vista radio stations. This ecosystem not only supports the Indigenous music business model but also provides a sustainable pathway for artists to monetize their music through SOCAN fees. Our initiative aligns seamlessly with the Government of Canada's commitment to supporting business opportunities within the Indigenous economy, as announced in Budget 2024. Statistical data has validated that successful businesses within Indigenous communities lead to positive social outcomes.

11. Furthermore, Vista Radio is excited to unveil a new software platform that will revolutionize out-of-studio broadcasts, providing greater mobility and flexibility. Our strategy includes an increase in 'live' broadcasts from within Indigenous communities in the Yellowknife and NWT area, allowing us to broadly share Indigenous voices, culture, art, and live music and events on air. This initiative aims to enhance access for these communities while promoting culture and language preservation. By increasing accessibility and representation, Vista reaffirms its commitment to true reconciliation and fostering a more inclusive media landscape.
12. As the Commission knows, while we operate stations in many smaller, challenging markets, Vista is a well-managed, financially successful radio broadcasting company with a progressive diversity policy. Half of all management positions in the company are held by women, including cluster managers who are responsible for multiple stations. Vista is committed to providing all staff with ongoing access to training programs and opportunities for career advancement.

C. True North FM

13. *True North FM* is the only commercial English language radio station licensed to serve Yellowknife and Hay River. The station was licensed to serve Yellowknife in 1979 and was given approval to establish a re-transmitter (CJCD-FM-1) in Hay River in 1986. In 1997, the station received approval to convert to an FM radio station. In 2007, the station was acquired by Vista.

14. *True North FM* has a long history in, and deep commitment to the communities that it is licensed to serve. It is a trusted news source, providing reliable news and information throughout the day, allowing charitable and community groups to promote their operations and offering elected officials opportunities to present information on important public policy issues through regularly scheduled program features such as *Minute with the Mayor*. The station has covered every major news event in the region from the Giant Mine bombing and murders to the Arctic Winter Games to the recent Hay River flooding and of course, the pandemic and the wildfire emergency.

15. During the pandemic, *True North FM* provided government and other health spokespeople with extensive access to communicate important information and instructions. The station also continued to support important charitable and community-based initiatives. For example, *True North FM* continued to undertake its annual signature charitable initiatives to support local food banks and other community organizations, such as *Stuff the Bus* in Yellowknife which has been running for 20 years and *Fill a Ford* in Hay River now approaching 10 years. As well, the station provided free promotional support for local businesses, representing more than \$1.2 million of in-kind value, along with promotional support for other initiatives to support the local economy such as the NWT Tourism “stay-cation” program, Rotary Days and the Spring Trade show.

16. Throughout the wildfire emergency, *True North FM* and *MyTrueNorthNow.com* played a central role in ensuring that local residents had up-to-the-minute information on the progress of the fires and on necessary measures to ensure their safety. As a multi-station radio broadcasting company, we were able to direct substantial additional news resources to the wildfire emergency, more than tripling our regular news coverage and continuing to provide detailed coverage and important information even after local radio staff were forced to evacuate.

17. *True North FM* ran detailed news reports three times per hour, providing government

officials and first responders with regular opportunities to communicate with local residents. Detailed information was available 24/7 on our social media channels. As the fires progressed from community to community, we worked closely with government officials and community service organizations to support the evacuation efforts and to ensure that those in need had access to necessary goods and services.

18. Our staff continued to work from the studio in Yellowknife until they were forced to evacuate, providing extensive local coverage and setting in place the resources required to continue to provide excellent local coverage from our sister station in Grande Prairie. Our Program Director departed the city after the evacuation deadline and only after he was confident that the arrangement to provide local coverage from Grande Prairie was working effectively. That on air and online news coverage provided essential and continuous content for nearly a month to those essential workers who remained in Yellowknife and those evacuated who were streaming *True North FM* remotely.
19. In Hay River, we proceeded with our plan to replace and relocate the aging transmitter for CJCD-FM-1 even as the wildfires were raging nearby. This initiative ensured that the residents of this community and the surrounding area continued to have reliable access to important local news and information throughout the wildfire emergency.
20. Shortly before the wildfire emergency, we invested \$40,000 to improve the reliability of the *True North FM* transmission facilities, including the facilities in Hay River, as noted above. These improvements proved to be essential during the fires.
21. Before the evacuation order was lifted, *True North FM* created the Wildfire Relief Fund with the Salvation Army as we expected that many people who returned to Yellowknife would need food and other supplies. This fund received promotion on all 48 Vista radio stations and 37 community portals across Canada and was nationally recognized by Broadcast Dialogue as the best small market Community Service Initiative in Canada for 2023.



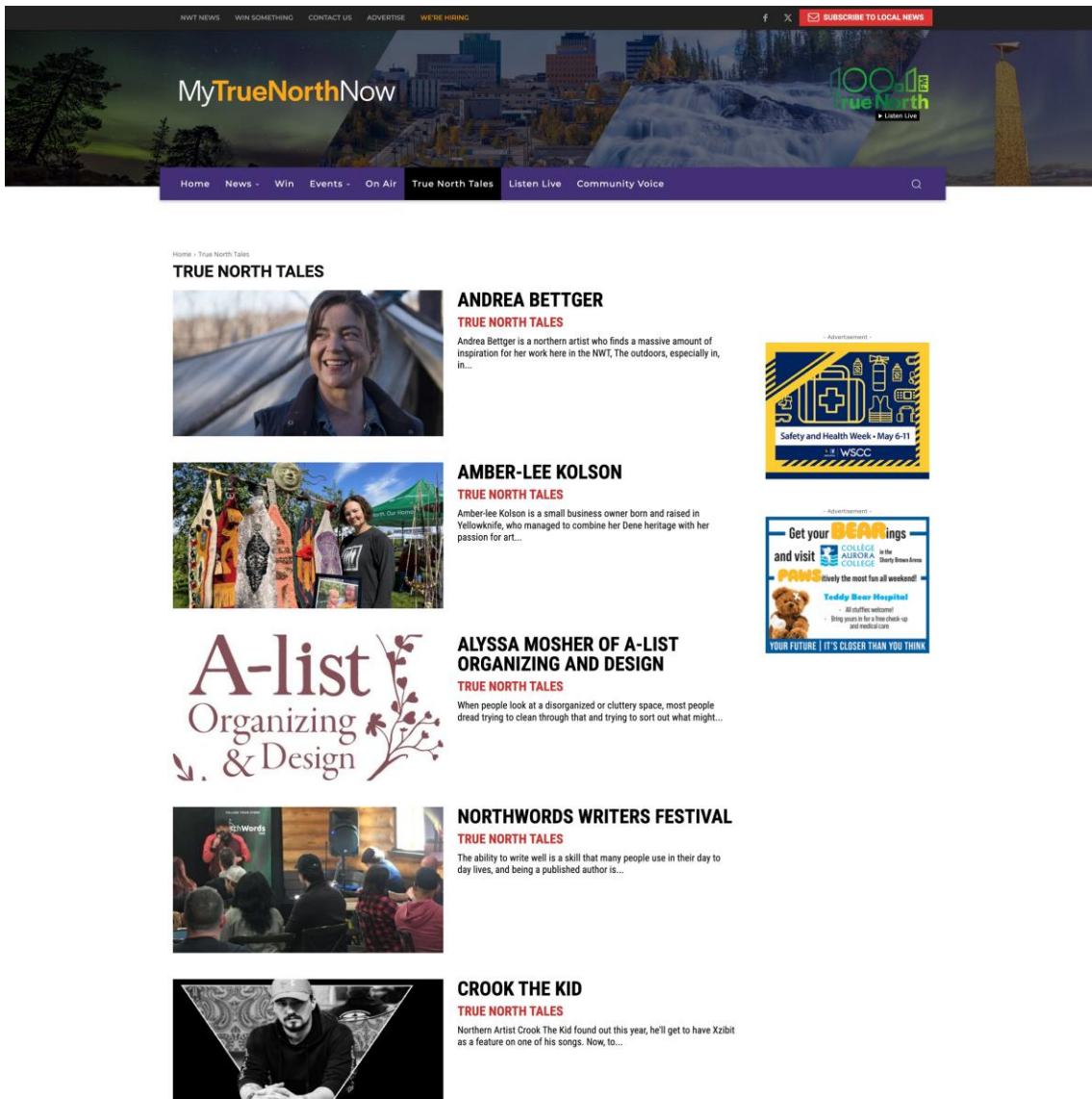
22. Following the devastating impact of the fires and the evacuation, *True North FM* and *MyTrueNorthNow* initiated a plan to rejuvenate the local Yellowknife economy. Named "Recover Together," this initiative offered local businesses a complimentary advertising package without any obligations to aid them in rebuilding their operations. Originally slated to span three months until the close of 2023, the plan garnered enthusiastic reception from the local business community and partners. Following discussion with local partners, it was evident that additional support was both welcomed and necessary to sustain the recovery efforts. Consequently, the initiative was extended for an additional three months at the outset of 2024. In total, *True North FM* and *MyTrueNorthNow* contributed over \$400,000 in free advertising to bolster the local economy's recovery.



23. A more detailed description of the initiatives that we undertook in response to the wildfire emergency is attached to this Supplementary Brief as Appendix A.
24. Over the past four years, *True North FM* has undertaken several important initiatives in addition to those already noted in this submission to further strengthen its news and information operations, to provide additional support for local musical artists and to further enhance its reflection of the people who call the North home.
25. *True North FM* has added a new and additional local journalist position, increased the duration and frequency of newscasts and included news packages specific to each of Yellowknife and Hay River on MyTrueNorthNow.com.
26. The station has a long history of supporting local musical artists and their live performances. It was an early supporter of *Folk on the Rocks*, the now iconic annual Northern folk festival on the shores of Long Lake outside Yellowknife. To provide further support, *True North FM* created *Homegrown Lineup*, a weekly music program featuring local musical artists and including pop, rock and original Indigenous recordings.

27. To further enhance the station’s reflection of the people in the communities that it serves, *True North FM* launched *True North Tales* which includes vignettes that take the station into the community, meeting the people, hearing their stories and bringing them to air.

28. All *True North FM* digital products including *True North Tales* is Indigenous created and Indigenous led by Ashley Roberts, the station’s Digital Director who was born in Yellowknife.



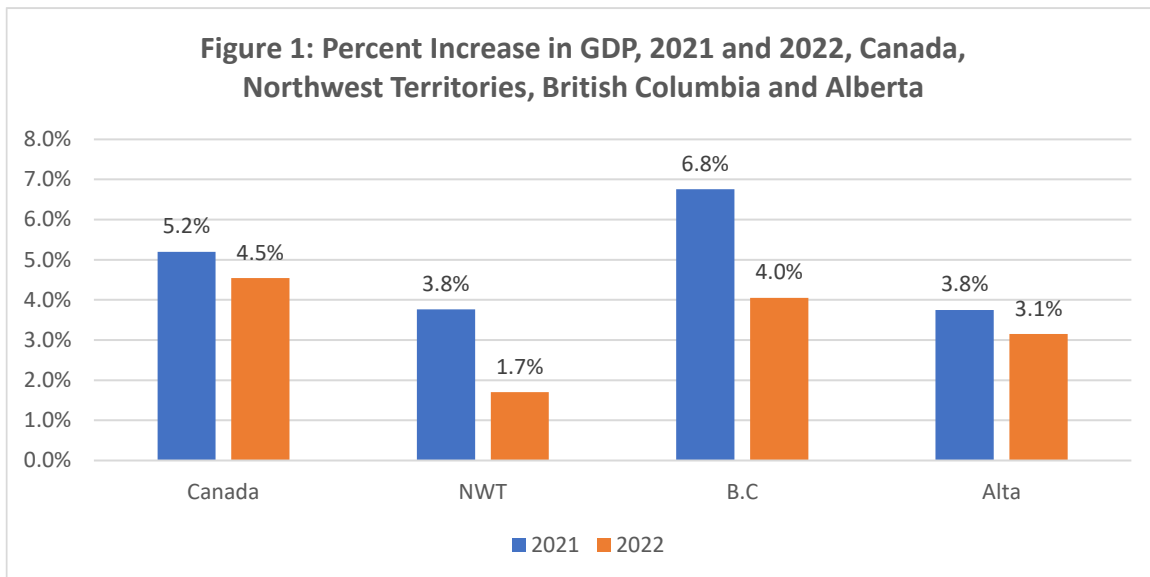
Screenshot of our True North Tales page on our website
 Link: <https://www.mytruenorthnow.com/true-north-tales/>

D. Rationale for this Application

29. In our submission on market capacity in response to Broadcasting Notice of Consultation CRTC 2021-374, we set out the reasons why we did not believe at that Yellowknife had the capacity to support an additional commercial radio station³ and the Commission agreed.⁴

30. Since then, conditions have deteriorated further due to the wildfire emergency and other downward pressures in the local economy.

31. Recent data show that economic growth in the territorial economy continues to lag by a wide margin growth in the national economy and the economies of nearby provinces.



Source: Statistics Canada. Table 36-10-0222-01 Gross domestic product, expenditure-based, provincial and territorial, annual, Chained (2017) dollars

32. In the 2023-2024 Budget, the Government of NWT noted that while the territorial economy had recovered from the impact of the pandemic, there would continue to be significant downward pressures on growth.

³ <https://applications.crtc.gc.ca/ListeInterventionList/Default-Defaut.aspx?en=2021-374&dt=i&lang=e&S=C&PA=b&PT=nc&PST=a>

⁴ Broadcasting Decision CRTC 2023-33.

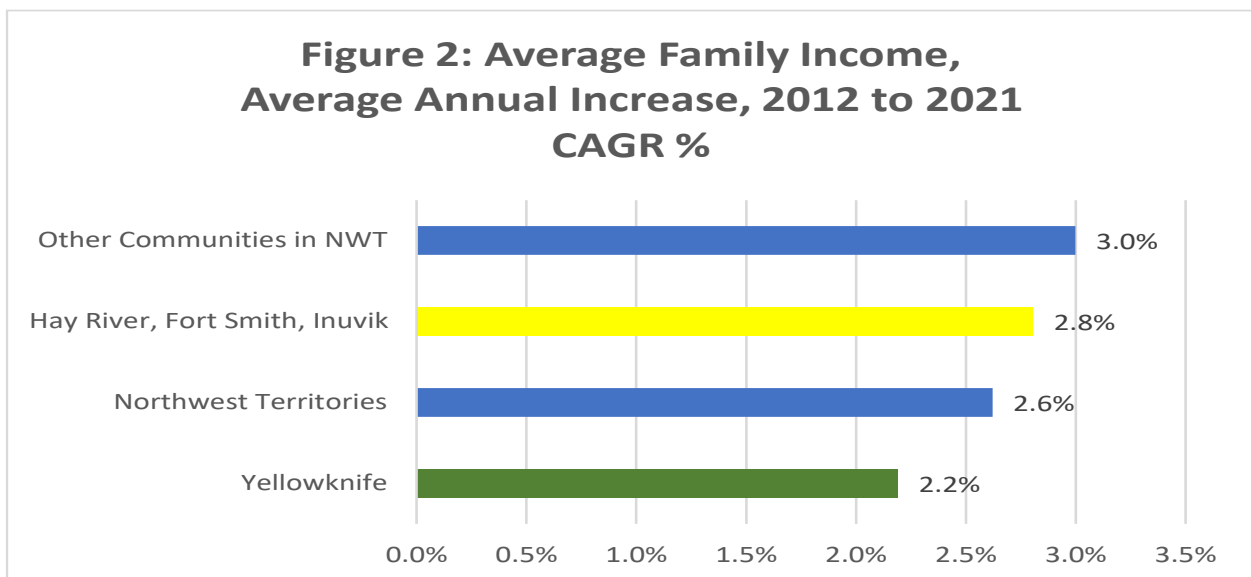
33. *“However, the recovery from the pandemic returns the economy to its pre-pandemic path of slow decline. Maturing diamond mines, labour shortages, and a lack of economic diversification will continue to dampen economic growth. These challenges are heightened by high inflation and higher interest rates. Most pressing is the lack of workers that is putting a brake on private sector activity, as well as the impending closure of the Diavik diamond mine. There are currently no other projects on the horizon large enough to fill the economic gap that will be left by the closing diamond mines.”*⁵
34. A recent analysis by Impact Economics, a Yellowknife-based economic consulting firm, highlighted the significant downward trajectory of the territorial economy.
35. *“The NWT economy is on a trajectory that will see its mining, oil, and gas sector diminish to a small fraction of what it is today. It will leave the territory’s economy almost entirely dependent on Canadian taxpayers to fund its existence. This may sound farfetched, alarmist, and perhaps even controversial. The purpose of this paper is not to frighten or stoke controversy. It is a fact that the diamond mines will close and that oil production at Norman Wells will come to an end. It is also fact that minerals, oil, and gas make up the lion’s share of the territory’s total exports (66%). When these products are no longer available for sale, the territory will lose an important source of income that finds its way through the economy affecting businesses, labour, and government revenues.”*⁶
36. At a recent meeting with the Mayor of Yellowknife and Council members, Mr. Graeme Clinton of Impact Economics set out his firm’s estimates of the negative impact of current economic trends on employment, population growth and consumer spending in NWT.
37. *“More than 1,500 direct and indirect jobs could be lost, and about 1,100 residents could*

⁵ Government of NWT, Budget Papers – Economic Review <https://www.gov.nt.ca/en/newsroom/gnwt-releases-final-budget-19th-legislative-assembly>

⁶ Impact Economics, Eyes Wide Open: Understanding the Effects of a Diminished Resource Economy in the NWT, February 2024, p. 1.

leave the territory, Clinton said, along with approximately \$100 million taken out of the economy in consumer spending — including an estimated \$9.7 million for groceries, \$2.5 million for alcoholic beverages and \$2.9 million for clothing.”⁷

38. The City of Yellowknife is already facing significant economic challenges. The average family income in Yellowknife, while greater than in other communities in the territory, is growing at a much lower rate. Over the past ten years for which data are available, average family income in Yellowknife increased at a CAGR of just 2.2%, compared to 2.6% in NWT, 2.8% in Hay River/Fort Smith/Inuvik and 3.0% in other communities.



Source: NWT Bureau of Statistics. Average Family Income, Northwest Territories by Community and Selected Geographic Aggregation, 2012 to 2021

39. Reflecting these negative economic trends, the 2024 Yellowknife municipal budget is projecting reduced operating revenues and substantial operating deficits, even with proposed increases in property taxes.⁸ Municipal officials suggest that the city currently is

⁷ <https://www.cbc.ca/news/canada/north/n-w-t-could-lose-hundreds-of-jobs-and-residents-when-the-mines-close-economist-warns-1.7168168>

⁸ <https://www.yellowknife.ca/en/city-government/city-budget.aspx>

facing “difficult economic times”.⁹

40. Limited population growth is contributing to the current economic challenges. Unlike in many other parts of the country where population growth has supported economic growth, the population of NWT and in Yellowknife and Hay River has experienced almost no growth over the past five years.

	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	CAGR: <u>19 - 23</u>
Canada	37,828,162	38,027,406	38,451,454	39,276,140	40,528,396	1.7%
NWT	44,512	44,395	44,621	44,664	44,760	0.1%
	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	CAGR: <u>18 - 22</u>
Yellowknife	21,100	21,201	21,407	21,684	21,720	0.7%
Hay River	3,813	3,833	3,828	3,869	3,796	-0.1%
Yellowknife+Hay River	24,913	25,034	25,235	25,553	25,516	0.6%

Source: Statistics Canada. Table 17-10-0009-01 Population estimates, quarterly and NWT Bureau of Statistics.

Population Estimates by Community

41. Retail trade data are a relevant indicator to assess the likely availability of, and growth in radio advertising revenues. As Table 2 shows, growth in retail trade in NWT has tracked behind growth in the country over the past five years. Total retail trade in NWT decreased in 2022 and was flat in 2023, compared to strong growth in the country (8.3%) in 2022 and some growth in 2023. Projected trends in the local economy suggest that there will be further downward pressure on retail trade, with a consequent negative impact on the potential for growth in radio advertising revenues.

⁹ <https://www.cbc.ca/news/canada/north/city-draft-budget-2024-1.7084887>

Table 2: Retail Trade, Canada and NWT, \$M						
	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	CAGR: <u>19 - 23</u>
Canada	647,325	641,734	718,207	777,547	793,899	5.2%
y/y	1.9%	-0.9%	11.9%	8.3%	2.1%	
NWT	814	894	931	916	917	3.0%
y/y	-1.4%	9.8%	4.1%	-1.6%	0.1%	

Source: NWT Bureau of Statistics. Retail trade, Estimates Retail Trade, By Province and Territory (Unadjusted)

42. The challenging economic environment in NWT in general and Yellowknife in particular, which was exacerbated by the pandemic and the wildfires, has had an impact on the financial performance of *True North FM*. As we set out in detail in our submission in response to Broadcasting Notice of Consultation CRTC 2021-374, CJCD-FM has been struggling for some time. Considering the impact of the fires and evacuation of NWT and Yellowknife in particular, despite our best efforts, revenue is down by 40% to-date in fiscal 2024 versus prior year, and therefore the station continues to operate on a financially unsustainable basis. Current and projected trends in the local economy indicate that the potential for future growth is challenging at best in the near term, and overall, it remains limited for the foreseeable future.

43. Given this assessment, we anticipate significant challenges for a new commercial radio station to attain financial viability. Furthermore, should such viability be achieved, it would most certainly come at the expense of *True North FM*.

44. However, if the Commission concludes that it would be in the public interest to authorize the operation of a second commercial FM radio station in Yellowknife notwithstanding current trends in the market, we believe that Vista should be licensed to provide that new service.

E. 96.5 FM - The Proposed New FM Radio Station

45. With this application and subject to our comments above, we are seeking authority to operate a new FM radio station on FM frequency 96.5. We believe that this application and our proposed new FM radio station (CJYK-FM) effectively address each of the evaluation factors set out in BNC CRTC 2024-57. As we will set out in the following section of this Supplementary Brief, we are proposing to introduce a new radio station with many innovative features that will contribute to the choice and diversity of music and information for residents of Yellowknife.

46. In addition, we submit that the approval of this application would be in the public interest because it would allow the new station to benefit from operating synergies with *True North FM*. This will increase the likelihood that CJYK-FM will be able to achieve financial viability, while at the same time reducing the potential for a significant negative impact on *True North FM* and its existing high quality local radio service.

Quality of the Application

47. CJYK-FM will significantly increase the choice and diversity of news, information and music for the residents of Yellowknife, with a strong focus on local reflection, community access and underserved younger people.

48. Like *True North FM*, CJYK-FM will be live and local, with real people and the same professional management and journalistic standards. However, CJYK-FM will also bring a fresh perspective to what matters to younger listeners in Yellowknife. The station's news staff will be hyper-focused on gathering and presenting stories of the people and events that reflect the times and culture of the city. While the station will offer "traditional" news coverage, CJYK-FM also will bring a strong focus to "real life" stories that affect and impact listeners every day. Our investment in a team to generate honest and authentic stories that address major issues such as the opioid health crisis, food insecurity, homelessness and child

and family issues will resonate as a distinctive new service to the community.

49. As part of this, we will continue to pursue and expand local content innovations, including:

- i. *True North Podcast Factory* - This initiative will turn the CJYK-FM studio into a community content generator by allowing members of the public to access our studios to start a conversation on-air which can then become the basis for expanded conversations through local podcasts.
- ii. *HomeGrown Line Up* – We will expand our local music show to include live-in-studio sessions with local talent and will introduce these local artists to a broader audience through *Vista Radio's Launch Pad* portal for new Canadian bands.





- iii. *True North Tales (the Podcast)* - We will use our well-known local features to create a library of northern stories promoted through a bi-weekly Podcast.
 - iv. *Yellowknife Safe Streets Program* – CJYK-FM will team up with the RCMP and youth services programs to give at-risk youth a platform to discuss issues and help build a safe community for those who may be experiencing trouble staying connected.
 - v. *High School Programming* – We will work with high school youth leaders to develop their own local show that revolves around wellness, learning, community, and language.
50. We will directly address the information needs of residents of Yellowknife over-the-air and online by offering a minimum of 10 hours and 28.5 minutes of spoken word programming each week. Vista Radio’s local content research indicates great interest in topics such as local news, road conditions, weather and information on upcoming community events. With 40+ years of service to Yellowknife and the area, we understand the diverse culture of the region and will work to provide a shared voice for all. 7 hours and 46 minutes of our spoken word programming each week will be devoted to local news and information.

Partnering with our market-leading *True North FM*, we project a broader level of stories and storytelling across both stations to serve our audiences.

51. News and information programming will be offered at regularly scheduled intervals from 6:00 am to 6:00 pm each weekday plus additional weekend newscasts when our listeners will be looking for regular access to information that will help them manage their family and daily life. Road conditions and weather reports plus information on community events will be available at regularly scheduled intervals seven days a week.
52. Our plan includes an additional five programming staff members in news and on-air and sales and marketing capacities.
53. With this second Vista radio station in the market and additional programming staff, we will be able to provide expanded coverage of local news, information and community events on the air on both stations and on our community portal site, *My True North Now.com*
54. The availability of youth-oriented programming on an over-the-air radio station will increase access by removing barriers created by the cost and reliability of internet and mobile services. It will create important new opportunities for special guest professionals to provide information on issues of specific interest to younger people in the North and for the creation of youth-targeted arts and culture programming, including programming focusing on the culture and languages of the Dene First Nation and local Indigenous musicians.
55. We are proposing a HOT AC format. Currently, there are no HOT AC format radio stations in Yellowknife. As such, adding this format will increase musical choice and diversity and can repatriate listening to the local radio market from audio alternatives such as streaming services.

56. HOT AC is a fun, adult friendly format with a focus on music and lifestyle. All the songs are familiar hits from the 90s through today. The target demographic is adults aged 18 – 49, with a tight target of women aged 30 – 38. The music is predominantly up-tempo and always easy to sing along with. Listeners take HOT AC to the workplace, to work out and everywhere they go. HOT AC is a lifestyle brand with the ability to play great songs from not only the biggest pop stars of the day, but also singer-songwriters and artists who may come from other genres.
57. Our new radio station will play a mix of popular music from today and yesterday for a young adult audience featuring artists such as Adele, Imagine Dragons, Rihanna, Bruno Mars, Justin Bieber, Ed Sheeran, Taylor Swift, Coldplay and The Weeknd. A minimum of 40% of the music played between 6a-Midnight Sun-Mon will be by Canadian Artists.
58. The CJYK-FM playlist also will include Canadian Indigenous music artists such as Tanya Tagaq, Susan Aglukark, Derek Miller, Elisapie, Twin Flames, Iskwé, Silla and Rose, DJ Shub, Crystal Shawanda and Shane Yellowbird
59. A minimum of 5% of all musical selections will be by emerging Canadian artists. Many of these music artists receive little or no exposure in the Yellowknife market. CJYK-FM will extensively showcase new Canadian music. The very popular weekly program “Homegrown Line-up” created by our *True North FM* in partnership with Music NWT and FACTOR will feature 100% local artists, including a consistent mix of new Indigenous music. We will provide opportunities for local musical artists to be interviewed and perform on-air and on the digital portal MyTrueNorthNow.com to increase awareness of their music and to promote their performances at local and regional venues.
60. HOT AC music will be complemented by entertainment-oriented news and information with a particular focus on local voices and the interests of younger people in the north, including youth hosted programming.

61. To provide additional support for the development of Canadian musical talent, if this application is approved, we will make an annual over-and-above contribution to FACTOR of \$15,000. In addition, we will establish the True North Bursary. Each year Vista will award \$5,000 to an Indigenous student who is pursuing a career in journalism or broadcasting. Together these proposed initiatives represent a commitment to make an over-and-above contribution to Canadian content development totaling \$140,000 over the seven-year term of the licence.
62. As is set out in the financial projections filed with this application, we expect CJYK-FM to generate only very modest revenues given the very limited potential for growth in this market. However, as these projections also show, with access to significant operating synergies with *True North FM*, our proposed new station will be able to deliver on the substantial commitments to local reflection and to increased support for Canadian content development set out in this application, while achieving financial viability by the end of licence term.

Diversity of News Voices in the Market

63. Residents of Yellowknife currently have access to six over-the-air radio services offering programming in English, French and Dene languages with a diversity of editorial points of view. Yellowknife is already very well-served in comparison to other northern markets. *True North FM* is unique in the market in that it is the only local radio station that is wholly supported by advertising revenues without benefit of government grants or donations. The approval of this application would increase diversity by adding another such voice.
64. The approval of this application would further increase diversity in the market by introducing distinctive news and information programming specifically focused on younger people and which offers “real life” stories in addition to the hard news of the day.
65. At the same time, the approval of our application will help to maintain the diversity and quality of the programming already available in the market by minimizing the potential for

the introduction of a new commercial radio station to have a significant negative impact on *True North FM* and its ability to continue to provide high quality local programming.

66. Also, as a multi-station radio broadcasting company, Vista has the capacity to offer the employees of CJYK-FM access to a broad range of in-house training programs as well as career advancement opportunities in other markets.

Market Impact

67. The approval of this application will reduce, though not eliminate the potential for the licensing of a new commercial radio station to have a negative impact on the quality of the radio services available to the local community.

68. The local economy has not yet recovered from the combined impact of the pandemic and the wildfire emergency. It faces significant challenges. Demographic and economic indicators are flat or negative, with the likelihood of significant contraction in the future. The commercial radio market in Yellowknife as reflected in the financial performance of *True North FM* has been in decline since well before the pandemic, underperforming comparable markets in terms of both revenues and profitability. Currently, there is only very limited potential for growth in local radio advertising revenues.

69. As such, if this application is approved, while we will endeavor to attract new advertising revenues into the local radio market, we expect CJYK-FM to derive a portion of its revenues from *True North FM*. This necessarily will have a negative impact on *True North FM*, though that impact will be somewhat offset by operating synergies which will allow that station to share some of its operating expenses with CJYK-FM.

70. If the Commission approves the introduction of a standalone radio station by a new entrant, the impact on *True North FM* and on its ability to maintain its service will be much more severe. *True North FM* will not be able to offset revenue losses with reduced expenses.

Moreover, revenue losses are likely to be much greater because the new entrant, unlike Vista, will face few incentives to try to minimize the impact on our station. A heritage 40+ year old station will be put at risk.

71. There will also be an impact on the overall operations of Vista. Traditional radio broadcasters compete every day with Google, Facebook and others for the attention of audiences and for advertising revenues. The introduction of a standalone radio station by a new entrant in Yellowknife could mean that *True North FM* will never become financially sustainable. This will result in an ongoing drain on Vista's financial resources, diminishing its ability to do battle with the foreign owned "Digital Giants" and our capacity to continue to provide high quality radio service in some of our marginally profitable markets we continue to serve.

Competitive State of the Market

72. Under the Common Ownership policy, in markets with fewer than 8 commercial radio stations broadcasting in the same language, a radio broadcaster may own up to a maximum of 3 radio stations. This policy recognizes that ownership consolidation within certain established limits can benefit local listeners by helping establish a solid financial basis for delivering higher quality jointly owned radio services.
73. Under this policy, Vista may own up to 3 radio stations in Yellowknife. If this application is approved, Vista would own only 2 local radio stations, one fewer than the prescribed limit. As such, there are no regulatory barriers to prevent the Commission from approving this application and from allowing local listeners to benefit from this proposed modest increase in station ownership.

F. Conclusions

74. In *Broadcasting Decision CRTC 2023-33 Findings regarding market capacity in the Yellowknife radio market*, the Commission concluded that the market of Yellowknife, Northwest Territories could not support an additional commercial radio station at that time. We believe that was the correct decision. Since then, there has been no improvement in the indicators on which the Commission based its decision. In fact, last year's wildfires and the current 2024 wildfire season have made the situation even worse. As such, we continue to believe that Yellowknife cannot support an additional commercial radio station now.

75. However, if the Commission concludes that it would be in the public interest to authorize the operation of a second commercial English language FM radio station in Yellowknife, we believe that Vista should be licensed to provide that new service:

- i. We are proposing to establish a new local radio station offering extensive, innovative locally-reflective news and information programming based on professional management and journalistic standards, with a distinctive format targeting underserved younger people, including substantial commitments to a minimum amount of news and information programming each week, to Canadian content development and to increased exposure for local musical artists, including local Indigenous musicians.
- ii. All these commitments are underpinned by a solid and realistic business plan that relies on realizable operating synergies with our existing local radio station.
- iii. The approval of our application will increase diversity in the market by introducing distinctive news and information programming specifically focused on younger people and will provide significant new exposure for local musical talent, including in particular Indigenous musical talent.

- iv. The approval of this application will reduce the potential for the licensing of a new commercial radio station to have a significant negative impact on the quality of the radio services currently available to the local community.
- v. This application's approval would be consistent with the established regulatory requirements set out in the Common Ownership policy and would allow local listeners to benefit from this proposed modest increase in ownership consolidation.

76. For all these reasons, we believe that the approval of this application would be in the public interest.

Appendix A: True North FM 2023 Fire Evaluation

In the fall of 2020, Vista Radio re-focused our two radio services in the Northwest Territories, serving regions around Yellowknife and Hay River. Responding to feedback from the communities we serve, *True North FM* debuted with a hyper-focus on the people of NWT. In 2023, *True North FM* and our community information portal, *MyTrueNorthNow.com*, were integral in serving these communities. It began in the Spring when the community of Hay River was threatened by flooding. Civic officials partnered with *True North FM* to keep residents informed and safe. It was not long after that a new threat surfaced. Wildfires swept across the region, forcing the evacuation of many communities across the Territory, including the capital of Yellowknife.

Beginning before the evacuations, we were monitoring early fire outbreaks, which mostly affected the South Slave region of the NWT, including the Wood Buffalo Region, Hay River/KFN, and surrounding areas. We were connected to local governments for updates from officials on scene during the fires and the community who were evacuated. We significantly increased the number of stories being produced when orders were called and produced an average of 6-8 stories daily based off information given by the GNWT, NWT Fire and Local Governments.

In May 2023, Hay River and K'at'l'odeeche First Nation were evacuated to surrounding communities, including Fort Smith, Enterprise, and Yellowknife. Our News and On-air content team was able to collect information from community members and leaders like Mayors Rebecca Alty and Kadis Jameson, along with organizations in town including the Salvation Army, Crazy Indian Brotherhood, and online sources open to helping those in need.

True North FM also took requests for assistance from the rehomed families, put out requests for information or items that were specific to their needs, and directed where to find them in our city. We monitored and updated the community through on-air and social media updates, as information was made available by NWT Fire.

As the fire season grew across NWT, and the threat came closer and closer to our communities, we

increased emergency updates to three times per hour. Simultaneously, the city of Yellowknife was preparing a full-scale evacuation. Our Staff began preparations also to put resources in place to continue broadcasting critical information. On August 16th, the evacuation order came, and our team relocated to Vista's Grande Prairie studio where we could follow up on news leads and continue broadcasting over the air and streaming for those evacuated. Once the order was called, we had the Mayor of Yellowknife on our airwaves less than 10 minutes after the announcement to give further information and steps on how to proceed given the deadline to leave the city by means of air or highway. We provided constant updates into the evening, first thing in the morning, and all throughout the next day. We started to announce evacuation steps and flights for those in the community who still needed a way to evacuate.

We continued to monitor the fires in the North and South Slave regions, connecting with government members, RCMP personnel, and community members who were displaced to receive updates on concerns that affected them. Yellowknife Mayor Rebecca Alty also made a commitment to provide city updates back home as she was still in the city.

The return happened September 6th, with the True North Team creating a "return home" resource page on *My True North Now.com* with updates on businesses, their expected opening and closing times, and changes to regular daily schedules in Hay River and Yellowknife. To assist returning families in need, we created and launched the Wildfire Relief Fund, in partnership with The Salvation Army. This program was quickly expanded to all Vista radio stations and online community portals across Canada. This initiative was also heralded as Broadcast Dialogue's Best Community Service Initiative for Small Markets in 2023.



Following the residents' return to Yellowknife, Prime Minister Justin Trudeau visited the North to view the devastation inflicted on the region. Active coverage of the Prime Minister's trip was a major priority from the moment he landed in Yellowknife, flew south to the Hay River, and made the trip back to the NWT capital to address the media. A reporter from *True North FM* stayed by the Prime Minister's side on his trip, and numerous web and on-air stories were created and filed for the city and the country.

Recover Together

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To continue our support for the communities we serve, our next initiative focused on helping local businesses who experienced severe impact during forced closures. We created and executed a significant program called our “Recover Together” plan for small, locally owned businesses in our communities. This was and continues to be a “no charge, no commitment” advertising package for businesses that were affected by the fires to promote get their goods and services front and center without the concern of financial marketing and advertising costs. We originally wanted to offer this initiative as a 3-month plan and decided to extend this offer an additional 3 months into 2024. Our current total is over \$400,000 in advertising value donated to help promote and reinvigorate the local economy.