

**GENUINE CANADIAN CONTENT:
FAIR ACCESS TO BROADCASTING FOR ALL WORLDVIEW STREAMS
IN CANADIAN SOCIETY**

SUBMISSION

to the

CANADIAN RADIO-TELEVISION AND TELECOMMUNICATIONS COMMISSION

on

A REVIEW OF THE POLICY ON RELIGIOUS BROADCASTING

By

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EXECUTIVE SUMMARY

This submission argues that section (1)d and e of the Act require the Canadian broadcasting system^{to} reflect that which lives within the nation of Canada. The most significant plurality for making "Canadian" programs is based on ultimate worldview convictions—whether religious, philosophic, value, or otherwise. Thus "religious broadcasting" must be dealt with in the same way, and in the same category, as other "general" broadcasting. The "worldview streams" that run through the people of Canada must be found back in the broadcasting products and structure. The current commercial and public broadcasters fail to do this adequately.

The CRTC should seek to establish proportionate and equitable balance in the influence on broadcasting by these "worldview streams" within the Canadian people. The autonomy of broadcasters should be limited by making them more responsible to their viewers and listeners. Canadian listeners must be empowered to influence programming so that their "worldview streams" find expression in the full range of programming on Canadian radio and television. This will require major changes in the regulatory structure of Canadian broadcasting.

I. INTRODUCTION

I commend the CRTC for reviewing its policy on religious broadcasting. Contemporary Canadian society is at a cross roads. We are struggling with how different groups with distinct views of life can live together in harmony in one political community.

This brief argues that the Canadian broadcasting system can play a role in promoting social harmony by better accommodating the true plurality that lives within the Canadian people. When all groups feel fairly and equitably included in our national institutions, we will build loyalty to our nation and national institutions even though our basic ideas of life may continue to differ and even clash.

II. RELIGIOUS BROADCASTING NOT A SPECIAL CATEGORY

Some Canadians think religious commitments are irrelevant to culture, politics, and society, while others think they are too good for the public realm. The prevailing solution for both approaches has been to restrict religion to "worship-style" programming.

This approach is often used by policy makers, but fails to recognize the real impact of religious and other commitments on human action. It confuses religious institutions--i.e. churches and synagogues and mosques--and that which occurs within them, with religious commitments. The CRTC seems to use this approach in addressing "religious programming" as one type of programming along side

information, enlightenment and entertainment programs. The CRTC seems to assume such narrowly defined religious programming exhausts the issue, and only needs to be "balanced" with other types of programming under Section 3(i)i.

I would agree that there is a category of religious "worship" programs. But the remaining non-"worship" programs are not religiously "neutral." All information, enlightenment and entertainment programs reflect a vision of life, values, and engage in evaluation of human behaviour. This has been well-established by a host of contemporary scientific and philosophical studies.

Religion, in this broad sense, is an assumption that guides all program making and purchasing. Thus I am arguing religion must be broadly defined as Webster's New International Dictionary does: "that which one holds to be of ultimate importance." These matters of ultimate importance, or religion, permeate every program that is broadcast.

On this basis, the CRTC can not treat religious broadcasters that clearly intend to provide a full range of information, enlightenment and entertainment programs, as though they were a different category of broadcasting. The CRTC is warranted in dealing with "religious broadcasting" as a separate category of programming only if the intent of the broadcaster is to provide simply "religious worship" programs.

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Since there is no statutory basis for treating religion, understood in this broad sense, as a special category, the CRTC must deal with it as other

"mainstream" broadcasting under section (1)d and e. This reads:

(d) the Canadian broadcasting system should

(i) serve to safeguard, enrich and strengthen the cultural, political, social and economic fabric of Canada,

(ii) encourage the development of Canadian expression by providing a wide range of programming that reflects Canadian attitudes, opinions, ideas, values and artistic creativity, by displaying Canadian talent in entertainment programming and by offering information analysis concerning Canada and other countries from a Canadian point of view,

(iii) through its programming and the employment opportunities arising out of its operations, serve the needs and interests, and reflect the circumstances and aspirations, of Canadian men, women and children, including equal rights, the linguistic duality and multicultural and multiracial nature of Canadian society and the special place of aboriginal peoples in that society, and

(e) each element of the Canadian broadcasting system shall contribute in an appropriate manner to the creation and presentation of Canadian programming;

It is especially urgent in contemporary Canada that we treat all value approaches to programming in a fair and equitable manner. Worldwide, the distances between religious and ideological communities are not shrinking as fast as geographic distances have been in our global village. Conflict along ideological and religious lines--not to mention ethnic, racial, and linguistic divisions--appear to be intensifying around the world. This is also true in Canada. Our national institutions, such as broadcasting, must show the people that there is room for them to participate in, contribute to, and develop Canadian society, politics, culture and economics. This must especially be so for the poor and marginalized.

Section (1)d and e, of the Act sets the ground work for this participation. The CRTC must now define what is "Canadian," as the Act says: the broadcasting

system must "provide a wide range of programming that reflects Canadian attitudes, opinions, ideas, values and artistic creativity." Some people may wish Canada was filled with "neutral folk" that simply love amusement on the radio or television. But "wishing" is not the task of the CRTC. The CRTC must answer the question: what lives within the people of Canada? What are the major "streams" of belief--the things "one holds to be of ultimate importance"--that shape how Canadians see the world and life and thus lead to significant differences in all types of programming? It is the major--I will call them--"worldview streams" that make for different social, political, economic and cultural interpretations that must be reflected in Canadian broadcasting and together form "Canadian content."

Let me illustrate how these "worldview streams" are critical in broadcasting. In Public Notice CRTC 1988-161, September 1988, the CRTC asked for "balanced treatment of matters of public concern."¹ Clearly, the major religious, ideological, philosophical, and value communities--secular as well as so-called religious--have views on "matters of public concern." These must be articulated in our Canadian programming. In the last decades, for example, not only have Marxists and liberal capitalists criticized poverty and unemployment but so have the Catholic and Protestant Churches and other religious groups. Who can forget the controversy over the Catholic Bishop's Statement on Unemployment! All of these fundamental viewpoints are held by large segments within Canada and should be, according to the Act, reflected back to Canadians.

¹ Public Notice CRTC 1988-161, September 1988.

IV. WHAT IS THE FUNDAMENTAL PLURALITY?

I have already suggested religious plurality—understood broadly as "that which one holds to be of ultimate importance"—ought to be reflected back to Canadians. This would include a variety of religious and ideological approaches, some of which correspond with other communities, such as French and English, aboriginal and multicultural groups, but many of which do not.

But why not other forms of plurality? The Act, for example, identifies "disabled" [Section 3(1)(o)] as a group that needs to be reflected back to Canadians. This is proper, but only in a limited sense. Being disabled is not a conviction that guides one's ultimate understanding of the world and life. Being disabled or poor or an ethnic minority is something all Canadians need to be seriously confronted with. Yet the views of how these issues ought to be handled differ significantly among Canadians, depending on one's basic views of the world. For example, Protestant, Catholic, Marxist, and pragmatist readings of disability or poverty can be quite distinct. They need to be presented in the programming Canadians view and use to interpret their reality.

Thus the type of plurality that ought to be structurally included in the Canadian broadcasting system is the type that relates to the different ways people see and react to the world. This plurality has strong ramifications on program making and would result in real differences in programming.

V. REPRESENTATION AND "BROADCASTING DEMOCRACY"

A fundamental question in interpreting the Act, in my view, is to determine how Canadians ought to be represented within the broadcasting system. How do

the basic convictions of Canadians get expressed in programming? Do the boards of the broadcasting organizations "symbolically represent" the major worldview streams in Canadian society? Are they "trustees" or "delegates/agents" for Canadians, or do they descriptively represent Canadians as a microcosm of society as a whole?

CRTC Public Notice 1983-112, requires that a "religious broadcaster have an "ownership structure that is broadly representative of religious groups in Canada."² And that this ownership structure have management control. It is odd that this is a requirement only for religious groups since there does not appear to be a statutory basis for an exclusive application of this criterion.

However, this idea is an excellent starting point for all broadcasters. The ownership structure of the entire system should represent the major worldview streams—the true plurality—within Canadian society. These ownership structures must have management control—so these differences come out in programming. Such a requirement would make the broadcasters more responsive and representative of Canadian society.

VI A BALANCED REPRESENTATION OF CANADIAN WORLDVIEW STREAMS

Although there is no longer an explicit statutory provision requiring the CRTC to ensure the "balanced opportunity for the expression of differing viewpoints," the issue of balance is always critical in a plural society.

² CRTC Public Notice 1983-112, June 2, 1983.

In 1988, the CRTC policy on balance did not require balance within every program but asked for a balance within each broadcaster--or "each licensee."³ This however, has been a failure with a variety of radio and television stations featuring "jolt-programming" that does not, in any way, represent all views points.

I would add, this policy cannot work, without organized broadcasting representation of the major worldview streams in Canadian society. Each of the major worldview groups in Canada can never keep up with the number of responses that would be necessary to respond to all the programs shown on Canadian television and radio stations. They simply do not have the resources to do so. This policy puts a worldview group--that by happen stance has a station owner or bureaucratic manager that shares their view of life--in the advantage while other groups are left with no real resources to present their views in entertainment, information and enlightenment programs.

This problem of lack of resources can be clearly seen in Vision TV. Although it is forced into a privatized and ghettoized situation, Vision TV programming probably has among the highest Canadian content of all broadcasters. Yet it is forced to produce these shows entirely with private financing.

Another problem with the CRTC's treatment of "balance" is that it only asks that programming "relating to matters of public concern" to be balanced. This is an unwarranted distinction. How do we know whether an issue is a matter of public concern for one major stream or another? Most worldview streams are not

³ Public Notice CRTC 1988-161, September, 1988.

represented in the boards of most broadcasters. Nor, and this is crucial, can the boards of these organizations understand, from out of their limited worldviews, what would be a matter of public concern for other groups.

Take one worldview group, for example the Christian Churches, and ask what their issues of public concern are. The obvious answer is abortion. But a closer study shows they are also deeply concerned about euthanasia, poverty, family life, environmental degradation, racism, the rape of natural resources, etc. etc. These issues constantly appear in the news and public affairs programs, in dramatic and entertainment programs, but the Churches do not have the resources to respond to every or even a few of these programs when they disagree with their values.

Instead of asking for a balance within each licensee, the CRTC should strive for a balance of fundamental worldview streams in Canadian society within the broadcasting system as a whole. In this way, all worldview streams in Canadian society will be enabled to present their views in entertainment, information and enlightenment programs.

The CRTC must ensure that there is equitable or proportionate representation of the major worldview streams in Canadian society within the Canadian broadcasting system. This would especially require a reining in of the large so-called "secular" broadcasters. But it would also mean that new challenging broadcasters, such as "Trinity Broadcasters" from Edmonton, not be given unproportionately large airtime. "Trinity Broadcasters" does not, in many respects, represent what most Christians in Alberta would like to see as the

interpretation of Canadian culture. Consequently it should qualify for only very little airtime.

VII ACCOUNTABILITY AND DEMOCRACY IN CANADIAN BROADCASTING

The CRTC says "it is the licensee's responsibility to decide whether an issue is a matter of public concern and to determine the manner in which balance is to be achieved."⁴ In order for the system to truly reflect the fundamental interpretations of culture, society, politics and the economy that live within the different worldview streams in Canadian society, the CRTC needs to examine the structure of the existing broadcasters.

The Canadian system is a mixture of private and public broadcasters. But in view of section (1)d and e of the Act, exactly how are these broadcasters responsible to Canadian listeners/viewers for what they do?

One dominant model in broadcasting in Canada, and around the world, directly ties broadcasting to business. This causes major distortions. At heart, a broadcasting board driven by the profit motive determines what Canadian listeners/viewers hear and see on these stations.

The theoretical argument for this is based on the market idea of "consumer sovereignty"--thus consumption of programs is reduced to flipping channels and choosing what others decide we ought to see. This is premised on the assumption that it is appropriate for persons seeking to maximize profits to decide what the

⁴ Public Notice CRTC 1988-161, September 29, 1988.

worldview streams in Canadian society need or want to see in interpretations of politics, economics, society, and culture!

Furthermore, advertising has become too closely intertwined with program content. Programs with high ratings can attract bigger advertising budgets, and thus get priority. Canadians are reduced to passive consumers at the command of the big money that controls the commercial stations. Why should profit motive dictate what people should listen to or see?

CBC is a marginal improvement over commercial broadcasting because it rejects (partially) the commercialization of broadcasting. Yet, CBC is flawed in allowing public servants or bureaucrats to decide what Canadians should view. For example, the show "Man Alive" is CBC's response to what "religious folk" want to see. Many tune into it, but does it represent the type of program(s) the Protestant and Catholic streams in Canadian society would choose to produce if consulted?

We need to empower Canadians to become more active listeners and viewers. There is enough autonomous broadcasting power, autonomous artists, and autonomous managers and producers in the Canadian system. We need to enable Canadians to decide what interpretations of major issues in life we will see and hear.

At heart, both the public and commercial models fail to enable listeners to exercise positive constructive responsibility for programming and culture. Listeners can not be responsible since there is no mechanism to influence programming. The flip side to this point is that the broadcasters themselves are not really

accountable to anyone outside of advertisers and the state--certainly not to the public other than through consumer sovereignty. This is not to argue that programs that a worldview group objects to, should not air, but that there should be lines of accountability between producer and consumer on programming.

I would argue for more democracy in broadcasting. But then, the nature of the democratic role of viewers/listeners ought to play in broadcasting is different than the "passive market consumer" and that proposed by political theories of representation. I would argue that the democratic role of viewers/listeners that is peculiar to broadcasting is that viewers/listeners ensure / consent to the interpretation of their worldview stream in the programming of the broadcaster they support. Thus, they should have the means and power to ask: is our "way of seeing life and the world" generally represented in the broadcaster's entertainment, public affairs, enlightenment, comedy and other programs?

VIII. BROADCASTING AND THE HEALTH OF CANADIAN SOCIETY

Section (1)d of the Act says the broadcasting system should "serve the needs and interests, and reflect the circumstances and aspirations, of Canadian men, women and children..." In many ways, the structure of our current system does not do this.

When ratings become the driving force behind a medium, programming is degraded into a struggle to titillate the maximum number of people at any one point in time. This means a recourse to "jolts"--programs that try to sensationalize, entertain, and exaggerate in order to get our attention. This distortion is common

in most of our radio and televisions stations, and is out of control in most American television. The opposite trend is to "capture a share of the market"--narrow-casting--by specializing the programming. But this promotes the escapism of the viewers and listeners into one type of programming without being challenged by other types of programs and issues.

The CRTC should be aware that these trends in broadcasting are not neutral but can be socially destructive. It leads to passive viewing and escapism in the Canadian public. People find life in television more exciting and happy than their own. People are diverted away from the real-life issues in their communities to a make-believe world. Escaping into the private fantasy-world of television or the luring "kitsch" of many radio stations, peppered with advertisements--that tell you life will be better if only you drink Coke or Pepsi--distort the true character of human and non-human nature.

It is crucial for the health of our society, in my view, that more viewpoints make it on the air, without being edited by profit motive, neutrality, or state beneficence.

IX CONCLUSION

In conclusion, I would suggest the following guidelines for allowing the worldview streams in Canadian society to influence broadcasting as required in Section (1)d and e of the Act.

First, the majority of Canadian broadcasting should be produced or purchased by (1) non-profit organizations that are exclusively dedicated to

broadcasting, and (2) are based on a major worldview stream of listeners in the Canadian public--via a popular vote, or memberships, or sales of program magazines, or some other method.

Second, a small amount of airtime should be reserved for social institutions, such as, political parties, churches/ synagogues/ mosques, education groups, etc. These groups need an opportunity to speak directly to the public.

Third, small or new worldview groups in society should get occasional airtime. For example, this is done in the north with Inuit and native broadcasting.

Fourth, "common" (not neutral) programs such as the news, sports, major cultural events, etc. should be produced by an organization that has a board composed of representatives of the listener-based organizations. The strength of the representation should be proportionate to each group's strength in the nation. This would give them a constructive and meaningful say in the direction of "common" broadcasting. They need not agree with all the programs, but their views would not be run over and would be proportionately represented in common programming.

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