

APPENDIX 1

SUPPLEMENTARY BRIEF

1. CURRENT CIRCUMSTANCES

- 1.1. On 22nd March 2010, the Commission announced its strategy regarding a compensation for value regime that conventional TV stations in Canada may benefit from, but there was no immediate timeline under which negotiations will occur. So the outcome of such a decision is many months or years away.
- 1.2. The LPIF (Local Programming Improvement Fund) and other incentives for small stations do not apply to a Toronto independent station due to the market size.
- 1.3. Taking into account these circumstances, Quebecor Media Inc. and Groupe TVA Inc. (QMI/TVA) have concluded that their existing TV station, CKXT-TV and CKXT-DT (Sun TV), cannot sustain any more losses without a foreseeable breakeven point. Therefore, QMI/TVA is proposing a positive and proactive solution to the Commission and is hereby applying for a Category 2 Specialty TV licence to be known as Sun TV News that will replace the over the air (OTA) Sun TV station.
- 1.4. Since the rapid deployment of this strategy is critical for Sun TV and programming decisions need to be swiftly made for the next programming season, every day counts. We therefore request that the Commission process this application on an urgent basis in the public interest and for the benefit of the television professionals that are currently involved in the former Toronto One, now the Sun TV venture.
- 1.5. The proposed programming service is in accordance with the Broadcasting Regulatory Policy CRTC 2009-562 (BRP 2009-562) that it is prepared to consider applications for broadcasting licences to operate competitive news specialty services. Therefore, the standard conditions for competitive mainstream national news programming undertaking set in BRP 2009-562 will apply to Sun TV News.
- 1.6. However, **the applicant is asking for an exception to this Policy by applying for a Category 2 licence with mandatory access granted for a maximum period of three (3) years.** All documents usually required by the Commission in order to obtain a national licence with distribution requirements are included in this application.

2. THE APPLICANT

- 2.1. The Applicant for the broadcasting programming undertaking licence of **Sun TV News** is **TVA Group Inc.** on behalf of a general partnership or company to be constituted between TVA Group Inc. (51%) and Sun Media Corporation (49%).
- 2.2. Besides Sun TV, TVA also operates in the French-language market the TVA Network (the number one TV network) as well as the following specialty services: LCN (the number one all-news channel), Mystère, Argent, Prise 2, Idées de ma maison and YOOPA. In the English-language market, TVA is a shareholder in Mentv (51%) and Mystery (50%).
- 2.3. Quebecor Inc. (TSX: QBR.A, QBR.B) is a holding company with a 54.7% interest in QMI, one of Canada's largest media groups. QMI owns operating companies in numerous media related businesses: Videotron Ltd., an integrated communications company engaged in cable television, interactive multimedia development, Internet access services, cable telephony and wireless telephone service; Sun Media Corporation, the largest publisher of newspapers in Canada; Canoe Inc., operator of a network of English and French language Internet properties in Canada; TVA Group Inc., operator of the largest French language over the air television network in Québec, a number of specialty channels, and the English language over the air station Sun TV; Nurun Inc., a major interactive technologies and communications agency with offices in Canada, the United States, Europe and Asia; magazine publisher TVA Publishing Inc.; book publishers and distributors Sogides Group Inc. and CEC Publishing Inc.; Archambault Group Inc. and TVA Films, companies engaged in the production, distribution and retailing of cultural products; Le SuperClub Vidéotron Itée, a DVD and console game rental and retail chain; and Quebecor MediaPages, publisher of print and online directories.
- 2.4. In *New television station for Toronto/Hamilton*, Broadcasting Decision CRTC 2002-81 of 8 April 2002, the Commission approved the application by Craig Broadcasting to operate an English-language over-the-air television station to be known as Toronto One to serve Toronto, with an additional transmitter in Hamilton. Craig launched Toronto One in September 2003.
- 2.5. In that decision, the Commission noted that Craig would bring a new voice to the market and provide viewers in the Greater Toronto Area (GTA) with a fresh

perspective and approach to television. Further, the Commission considered that the new station would provide an opportunity for programs produced by Craig's western stations to be broadcast in the GTA and for programs produced by the Toronto station to be broadcast in Alberta and Manitoba.

- 2.6. However, this TV undertaking did not turn out as expected and QMI/TVA purchased the station on a standalone basis (Approval in CRTC Broadcast Decision 2004-503 of 19 November 2004) hoping to use its marketing experience to make it a success.

3. WHY TRANSFORMING SUN TV NOW?

- 3.1. Even though QMI/TVA has reduced the deficit year after year and has tested different programming options, Sun TV's deficit is now \$50.3M and the average yearly negative EBITDA is \$8M without any indication that its financial health will improve.

4. THE NEED FOR A NEW MADE-IN-CANADA NEWS CHANNEL

- 4.1. When the number one all-news channel in Canada is a struggling cable news laggard from the United States, CNN, it is time for a change; it is time to shake up the current players of the Canadian broadcasting system. It's time for a new choice, a new voice, a new all-news specialty service for Canadians. A new information specialty service committed to leading its American rivals, not following them. A new specialty service that is given the same fair chance to succeed as the two existing, national all-news specialty services – specialty services that, taken together, merely match their top two American rivals in viewership.
- 4.2. Television remains a vital source of news and information for Canadians. And all-news specialty services play a vital role in keeping Canadians well informed on a minute-by-minute, hour-by-hour basis and ensuring that news coverage is both broad and deep. However, being well informed means more than being exposed to dry news. MSNBC and Fox News have understood this. Sun TV News proposes to go beyond the obvious day-by-day headlines and to cover the full range of stories that impact our society, our democracy and our economy.

4.3. Unfortunately, over the past 2 years, English-Canadians watched 73%¹ less news channels than Americans. And the number one news channel in Canada is CNN, a struggling American network that beats both CBC News Network and CTV News Channel by a country mile. In fact, taken together, CBC News Network and CTV News Channel merely match the combined ratings of CNN and Headline News. Altogether, Canadians are paying for these Canadian all-news channels around \$80M a year for such a performance.

All Persons 2+					
Channel	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009
CNN	61.7	64.7	51.9	43.1	59.9
CBC Newsworld	39.0	35.3	39.1	43.2	48.7
CTV News Channel	19.0	25.4	23.8	26.0	25.1
CP24	15.9	17.5	20.0	20.2	21.1
CNN - Headline News	10.2	10.4	11.6	9.4	10.8
BNN Business News Network	6.3	6.2	6.2	6.6	8.9
BBC World News	4.5	1.8	2.9	4.7	6.7
Other*	7.9	9.1	8.2	8.6	9.5
Total	164.5	170.4	163.7	161.8	190.7
Share (%)	4.3	4.4	4.3	4.1	4.8

Average minute audience, all persons 2+

Source: BBM Canada, InfoSys, English Canada, All Persons 2+. Broadcast Years, Mo-Su 2am-2am.

4.4. Not surprisingly, less than one third of English-speaking Canadians are satisfied with the current news coverage available on television². Together, CBC News Network and CTV News Channel have had respectively 21 and 13 years to get it right and they've failed to win over Canadians despite their obvious domestic advantages. It's time for a change. It's time for Sun TV News.

5. SUN TV NEWS: CANADA'S FUTURE HOME FOR NEWS

5.1. By leveraging the human, capital and technological resources of Toronto's Sun TV and transforming the struggling conventional station's general interest mandate to an innovative and proven information specialty service format, the new Sun TV News will provide Canadians with a new choice and a new national voice for information and analysis.

5.2. Sun TV News will be different from the all-news channel we already have in Canada;

¹ * CNN, CBC Newsworld, CTV News Channel, CNN Headline News, BNN, CNBC.

** Fox News, CNN, HLN, CNBC, MSNBC.

Sources: Canada - BBM-NMR, InfoSys, 2007-2008 to 2008-2009 Broadcast Year, All Persons 2+, Mo-Su 2am-2am.

USA - Nielsen Media Research, 2007-2008 to 2008-2009 Broadcast Year, All Persons 2+, Mo-Su 2am-2am.

² Leger Marketing, Sun TV Television News Information Needs, Fall 2009 (See Appendix A1).

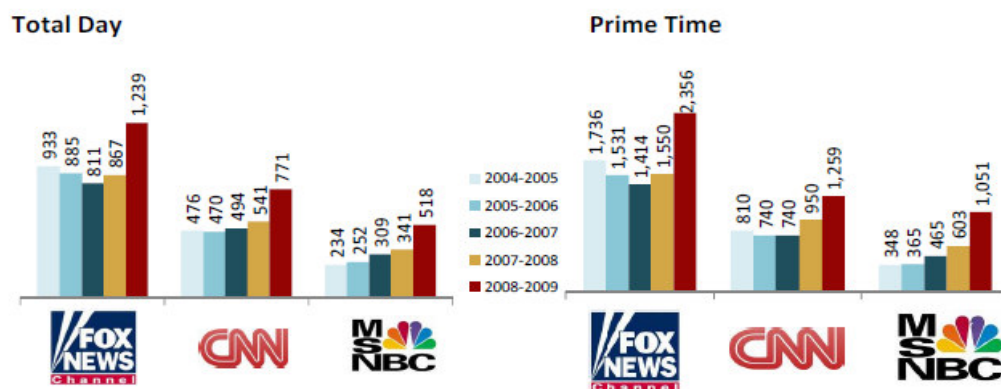
offering Canadians an attractive mixture of “hard news” reporting during the day and “straight talk” opinion journalism at night. “Hard news” during the day and “straight talk” at night is a proven formula for commercial success. This is very different than what CBC, CTV and CNN have offered Canadians on their “all-news” platforms.

- 5.3. “Hard News” will almost exclusively rely on live reporting and real-time conversations with journalists covering breaking news – as opposed to the more traditional news wheel format that features a revolving set of news stories. But these headlines will be analysed, commented upon and discussed at length. The host will question the reporter and will have an intelligent exchange that will often open to further debate. News will not be read like in a news bulletin. Daytime “hard news” will be covering a broad range of political, economic and lifestyle stories that matter to Canadians both rural and urban. So even its “hard news” portion will not be “all news” like it has traditionally been done in Canada. Short traditional news bulletin may be programmed but not more than once an hour.
- 5.4. “Straight Talk” will be programs featuring hosts and guests that deliver strong opinions and analysis of stories that are important to Canadians that day. “Straight talk” opinion journalism at night will be clear, intelligent and engaging – featuring a broader array of television personalities and signature hosts who will challenge viewers to think – and decide – for themselves. The challenging of ideas in itself may feed the news but at least will attempt to have Canadians make their own mind on the events occurring every day in Canada.
- 5.5. Here in Canada, the French-language all-news specialty service LCN saw its ratings more than triple³ when it moved toward that formula just over one year ago. Today LCN is not only a commercial success, but it has re-energized news coverage for French-speaking viewers; providing them with a new choice and a new voice that previously had been absent in the French-language news broadcasting space. Contrary to Sun TV News however, LCN is built on the news-gathering infrastructure of TVA for traditional newscasts.
- 5.6. In the United States, Fox News, the cable news network that led the development of the “hard news/straight talk” format, has been the number one cable news network for many years running. Fox News’ total audience was as high as CNN and MSNBC

³ In the timeslots that switched to more opinionated programs

combined. Fox News holds the Top 10 cable news programs in the United States. Today both CNN and MSNBC are modifying their programming approaches to mimic Fox News while remaining all-news channels with limited documentaries, as well.

USA - All News channels Audience Trends



Source: Nielsen Media Research, Total USA, Total Day.

- 5.7. Given the success of the “hard news/straight talk” format in both French-speaking Canada and the United States, as well as low levels of satisfaction amongst English-speaking viewers with traditional news bulletin coverage on television, there is clearly a market for a totally new approach to information specialty service in Canada.
- 5.8. This is an altogether different programming service than the all-news currently licensed in Canada. Sun TV News is an information service with zest.
- 5.9. Sun TV News will be modern; demonstrating true value-added content convergence with Quebecor’s print properties across Canada. ...Something Canada has not seen before.

6. SYNERGY WITH QMI’S NEWS PROPERTIES AND LOCAL PRESENCE

- 6.1. Quebecor Media, the owner of Osprey Media and Sun Media Corporation, is now the largest newspaper publisher in Canada. Osprey Media is one of Canada's leading publishers. Its titles include 20 daily newspapers with a combined average daily circulation of 325,249 and 34 non-daily newspapers together with shopping guides, magazines and other publications. Osprey Media is also engaged in commercial printing and the distribution of inserts and flyers to more than a million Ontario households. Sun Media Corporation is Canada's largest national chain of tabloids and

community newspapers. It publishes eight urban dailies, covering most major centres in Canada, as well as seven free commuter dailies in as many Canadian cities, nine local dailies in Ontario and western Canada, and some 150 weeklies, buyers' guides and other specialty publications.

- 6.2. Osprey Media's Daily newspapers are : Barrie Examiner, Belleville Intelligencer, Brantford Expositor, Chatham Daily News, Cobourg Daily Star, Cornwall Standard-Freeholder, Kingston Whig-Standard, Niagara Falls Review, North Bay Nugget, Orillia Packet & Times, Owen Sound Sun Times, Pembroke Daily Observer, Peterborough Examiner, Port Hope Evening Guide, Sarnia Observer, Sault Star, St Catharines Standard, Sudbury Star, Timmins Daily Press, Welland Tribune as well as 34 other newspapers not published every day.
- 6.3. Sun Media Corporation's Daily newspapers are The Ottawa Sun, The Toronto Sun, The London Free Press, The Winnipeg Sun, The Edmonton Sun, The Calgary Sun, Le Journal de Montréal, Le Journal de Québec with the following Free commuter dailies : 24 Hours™ - Ottawa, 24 Hours™ - Toronto, 24 Hours™ - Calgary, 24 Hours™ - Edmonton, 24 Hours™ - Vancouver, Journal 24 heures™ - Montréal and Community dailies in Ontario, Manitoba and Alberta : The Recorder and Times - Brockville, Ontario, Stratford Beacon Herald – Ontario, The Daily Herald Tribune - Grande Prairie, Alberta, St. Thomas Times-Journal – Ontario, Fort McMurray Today – Alberta, The Daily Miner and News - Kenora, Ontario, The Daily Graphic - Portage La Prairie, Manitoba, Simcoe Reformer – Ontario, Woodstock Sentinel Review - Ontario as well as numerous weekly newspapers.
- 6.4. With the help of over 1000 Sun Media journalists that are located in every major city of the Country, Sun TV News would have a dedicated multiplatform team in order to report about any news event in all regions of Canada. In the few localities that Sun Media is not present, for instance the Maritimes and Saskatchewan, Sun TV News will build infrastructures that will insure a local presence.
- 6.5. Moreover, Sun TV News will make good use of new media like Internet and mobility in order to develop and nourish local content in Canada.
- 6.6. Therefore, Sun TV News will be a national licence with an important local presence country wide and will be representative from coast to coast.

7. CREATING A LEVEL PLAYING FIELD FOR SUN TV NEWS

- 7.1. The time has arrived for Sun TV News. But given that CBC News Network and CTV News Channel have enjoyed the benefits of a carriage that is mandatory for BDUs and “almost mandatory” for subscribers for 21 and 13 years respectively, Sun TV News requires *short-term* and *time-limited* mandatory access for a maximum period of three (3) years by BDUs in order to effectively expose and promote its programming to viewers across Canada. We do not ask for mandatory basic distribution, but only to be available on cable and satellite distribution undertakings allowing the public to have access to Sun TV News without any obligation to choose it.
- 7.2. Taking into account the urgency of transforming the general interest licence into a specialty licence because of the rapid evolution of the market and programming decisions that need to be rapidly made for the next programming season, we request that the Commission expedite this licence process in order to be operational by January 1st, 2011. We believe that this application needs to be processed on an urgent basis. This would be in the public interest for the following reasons:
- 7.2.1. First, the transformation of Toronto’s Sun TV into Sun TV News would provide Canadians with a new editorial voice while withdrawing a competitive but unprofitable conventional general interest station from the overcrowded Toronto market.
- 7.2.2. The cold hard reality is that there is no probable path to financial viability for Sun TV in its present form⁴. Despite growing its audience and revenues with the addition of transmitters in Ottawa and London⁵, and receiving concessions in its licence renewal, Sun TV cannot generate now or in the future the financial resources to deliver beyond the minimum licence requirements, and does not have the national distribution to attract enough national advertisers to make it a profitable enterprise.
- 7.2.3. In today’s world, the Toronto conventional TV station advertising market is incapable of supporting the current number of conventional stations. The transformation of Sun TV will liberate advertising dollars for the remaining

⁴ CRTC Broadcast Order 2010-168 makes it now impossible for Sun TV to survive until the fee for value issue is completely resolved.

⁵ All Sun TV’s over the air transmitters will be removed.

conventional stations.

- 7.2.4. A maximum of three (3) years of mandatory access would provide a sufficient level of financial certainty to compensate for the lost advertising revenues that the new undertaking will have to face while completing Sun TV's full transformation into Sun TV News. Making this passage without delay and as smooth as possible will insure more stability for current employees.
 - 7.2.5. The transformation of Sun TV into Sun TV News would simultaneously bolster news television in Canada, strengthen the relative competitive position of Toronto's remaining conventional broadcasters and preserve jobs at Sun TV.
 - 7.2.6. And finally, the proposed licence and process would be fair to both broadcasters as well as to cable and satellite operators.
- 7.3. Whereas CBC News Network has enjoyed 21 years of an analog service status on basic tier and CTV News Channel has enjoyed 13 on a high penetration tier, Sun TV News is only seeking three years of protection to complete the transformation of Sun TV and to effectively expose and promote its "hard news/straight talk" format to Canadians. Given the protection Canada's two incumbent all-news specialty services have enjoyed and their inability to surpass their leading American competitor in ratings, our request for a maximum period of three (3) years mandatory access is highly reasonable and respectful of both cable and satellite operators' business interests.
- 7.4. Even if Sun TV's application is a new and first of a kind request, the Commission has already granted some players of the broadcasting system exceptions in order to give them a chance to succeed again. For example, TQS, now V, has applied during the renewals of its broadcasting licences for an exception to the rules regarding local programming and category 1 news programming for its stations. The Commission has approved TQS's application⁶ and the proposed measures of exception given the specific context. As mentioned by the Commission, this exception may be for a limited period of time.
- 7.5. In short, the transformation of Toronto's Sun TV into Sun TV News with a licensing process as requested, would strengthen the conventional general interest television market in Toronto and offer all Canadians, on a national basis, a much-needed, new editorial voice while being fair to existing all-news services, respectful of cable and

⁶ Broadcasting Decision CRTC 2008-129

satellite providers and justifiable from a proceeding point of view.

8. A CLEAR CHOICE

- 8.1. At a time when Canada is exhibiting considerable economic, athletic, artistic and humanitarian leadership on the world stage, it is simply unacceptable that our leading news channel is an American cable news network that is struggling in its home market. The time has arrived for a new choice; a new voice; a new information specialty service for Canadians.
- 8.2. With its proven format of “hard news” during the day and “straight talk” opinion journalism at night, Sun TV News will be well-placed to succeed commercially and may well put Canada back into the lead of its own TV information, while simultaneously preserving jobs and strengthening the conventional general interest TV market in Toronto.
- 8.3. A seven year licence issued quickly featuring short-term and time-limited mandatory access would allow us to complete the transformation of Sun TV into Sun TV News and provide Canadians with a new information specialty service offering for the first time in several years an additional editorial voice in Canada and for Canadians.

9. SUN TV NEWS’S CONTRIBUTION TO THE OBJECTIVES OF THE *BROADCASTING ACT* (THE ACT)

- 9.1. The first objective of the Act is to make sure that Canadian programs are produced, programmed and seen in Canada by Canadians. While doing this, the Commission aims at the maximum use of Canadian creative resources. Since a minimum of 90% of our programming will be Canadian, we will make maximum use of Canadian creative and other resources in the creation and presentation of programming, all this while respecting high standards.
- 9.2. QMI/TVA has evolved, in the last 50 years or more, specifically in the information business and in the creation/promotion of a genuine Star System. QMI/TVA’s ownership is as Canadian as it can be.
- 9.3. The proposed service will serve to safeguard, enrich and strengthen the political, social, cultural and economic fabric of Canada, with a schedule offering a wide range of programs that reflects Canadian attitudes, opinions, ideas and values by displaying Canadian talent as well as by offering information and analysis concerning Canada

and other countries from a Canadian point of view. Sun TV News will reflect the circumstances and aspirations of Canadian men and women, including equal rights, the linguistic duality and multicultural and multiracial nature of Canadian society and the special place of aboriginal peoples within that society.

- 9.4. Sun TV News will provide balanced information with a reasonable opportunity for the public to be exposed to the expression of differing views on matters of public concern, information that will be drawn from local, regional, national and international sources.
- 9.5. In the first year of operation, Sun TV News projects to expend \$4 589 000 in the production of Canadian programs. This amount will grow to \$6 301 000 in the 7th year of operation.

10. MARKET CAPACITY

- 10.1. According to a national survey performed by Léger Marketing (See Appendix A), the demand for a service like Sun TV News is high. 73% of respondents are interested in this concept, 41% would subscribe, and among the 35% that would purchase the channel on an individual basis, 59% would pay as much as \$1.00 a month⁷ for Sun TV News.
- 10.2. Canadians seem to be eager for new television content since HDTV is popular. A few years ago, television operators were worried that the Internet would shrink TV audiences. Now and concurrent with specific convergence efforts, we realize that the total audience is increasing. In 1995, the average weekly individual viewing was 24 hours and in 2007-2008 it was 26.6 hours⁸. We have even observed a positive effect on audience results derived from social media Web users while watching television. Finally, the penetration of digital set top boxes is now sufficiently solid for the market to absorb new players.
- 10.3. As demonstrated by major recent events in Canada, when the relevant content is on TV, people will come. In this kind of programming service, the relationship between the content, the audience and the revenues are proportional. Furthermore, the

⁷ A wholesale price of approximately \$0.50.

⁸ CRTC Monitoring Report

availability of the same content, though repackaged, on different platforms such as online and mobile will contribute to the overall success of Sun TV News as soon as the brand is widely known.

11. IMPACT ON OTHER SERVICES

- 11.1. Even if Sun TV News will have a certain impact on the all-news national services available in Canada, in Broadcasting Public Notice CRTC 2008-100, the Commission has determined that the existing all-news services are strong and healthy enough to introduce direct competition:

“it would be appropriate to immediately introduce competition between Canadian services operating in the genres of mainstream sports and mainstream national news. The services operating in these genres - The Sports Network (TSN), Sportsnet, Le Réseau des sports (RDS), CBC Newsworld, Newsnet, Le Réseau de l'information (RDI) and Le Canal Nouvelles (LCN) - are strong, healthy, highly popular, and highly competitive.” (Emphasis added)

- 11.2. We are of the opinion that at first some audience will shift from CBC News Network and CTV News Channel but within less than two years, we expect to expand Canadians interest in news and information services as well as a repatriation of viewers from CNN, MSNBC, and Fox News. In the long run, we believe the impact on the existing Canadian all-news services will be negligible (See Carat market research - appendix B):

11.2.1. Only 30% of Sun TV News's audience will come from existing Canadian all-news channels.

11.2.2. English Canada is served by only 2 national All News channels: CBC News Network and CTV News Channel. French Canada, a market 4 times smaller than English Canada is also served by two all-news channels: RDI and LCN. This supports the fact that the Canadian English-Language market has room for a new news channel.

11.2.3. Finally, Sun TV News is different than the two all-news channel licensed by the Commission. This is an information programming service that is new and different because news is the matter to be discussed and analysed from different angles. This is far from being a service licensed to program wall to wall news.

12. CANADIAN PROGRAMMING EXPENDITURE (CPE)

- 12.1. Sun TV News will expend an average of 31% of its gross revenues in Canadian programs over the first licence term. On the first year, the amount will be \$4 589 000 growing to \$6 301 000 in year seven. (See financial projections - Appendix C)

13. WHOLESALE FEE

- 13.1. Before addressing this issue, it is important to remind that the Commission has decided that the wholesale fees will not be regulated anymore.
- 13.2. Furthermore, being distributed in BDU's line up does not mean that this service have to be necessarily chosen and paid by the public. Therefore, the applicant does not ask the Commission to rule on the wholesale fee.
- 13.3. This being said, the applicant believes that, as shown in the financial forecast in appendix C, Sun TV News will be generate a positive cash flow on year five with a \$0.25 wholesale fee. This is a lot less than CBC News Network service but, like in the French-language market, we are confident that the Canadian public will demonstrate a higher satisfaction for Sun TV News by choosing the service either on a standalone basis or in a news package.

14. CLOSED CAPTIONING FOR DEAF OR HEARING IMPAIRED PERSONS

- 14.1. An application for a new licence is surely not the best forum to engage a discussion on the appropriate level of closed captioning. In order to obtain the licence we are applying for, we gather that the Commission will impose to Sun TV News a condition of licence requiring closed captioning of 100% of programs.
- 14.2. Nevertheless, we ask the Commission to note that, however commendable this obligation is, the sums that need to be invested in such an amount of closed captioning means a lower amount is left for Canadian programs. Some digital specialty services may not be launched in particular because of the cost of closed captioning on all programs.
- 14.3. As an example, the average hour of closed captioning costs around \$300 for an Information & Analysis service depending on the format of the support used. Based on this figure, 85 hours of original programs a week would cost \$25,500, which represents

close to one and a half million dollars a year. For some diginets, this represents the entire yearly programming budget.

- 14.4. Sun TV News will attempt to improve on the quality of the captioning and will cooperate with the associations of deaf and hearing impaired persons so that the closed captioning offered satisfies as much as possible the needs of those Canadians.
- 14.5. The licensee commits to respect, by condition of licence, the standards of quality established by the industry task force as soon as such a quality code is approved in line with Regulatory Broadcast and Telecom Policy CRTC 2009-430 of 21 July 2009.

15. CONCLUSION

- 15.1. The last national voice that the Commission licensed in Canada was in 1997. In the United States, changes have occurred in the Information Business during that time. It seems that in Canada, the two leaders have accepted their respective positions and have demonstrated little innovation.
- 15.2. Unlike all-news channels already licensed, Sun TV News is different.
- 15.3. This new information channel will add Canadian content to the broadcasting system since it will program primarily original Canadian programming.
- 15.4. We consider this application a proactive operation and we ask the Commission to process it as a matter of priority. QMI/TVA will be ready to launch this new service on January 1st, 2011. This is why we request some distribution rules, but only for a maximum period of three (3) years (7 times less than CBC News Network and 4 times less than CTV News Channel).
- 15.5. Sun TV News is a solution to a problem: the problem being that the most popular news service in Canada is from another country and that the TV stations in the most crowded market of the country are struggling. We hope the Commission will recognize this situation and approve the proposed solution quickly.
- 15.6. We thank the Commission for taking into serious consideration this application and for studying our application on a fast track basis for a new editorial voice in Canada.

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