



January 11, 2017

The Honorable Jean-Pierre Blais
Chairman and Chief Executive Officer

The Honorable Peter Menzies
Vice-Chairperson

The Honorable Judith A. LaRocque
Vice-Chairperson

The Honorable Stephen B. Simpson

The Honorable Yves Dupras

The Honorable Linda Vennard

The Honorable Christopher MacDonald

Canadian Radio-television and Telecommunications Commission
1 Promenade du Portage
Gatineau, Québec
J8X 4B1

Dear Chairman Blais and CRTC Commissioners:

We are writing on an urgent matter that requires both your attention and your action. On January 29, 2015, the CRTC released Broadcasting Regulatory Policy CRTC 2015-25 regarding simultaneous substitution for the Super Bowl in 2017 and beyond. In the almost two years since this decision, thousands of Canadians and several interested groups have voiced their concerns with the decision and its likely impact. To allow sufficient time to review and evaluate those concerns, we ask that you take immediate action to reverse this decision or delay its implementation date.

The ACA is the only professional trade association solely dedicated to representing the interests of client companies that market and advertise their products and services in Canada. Our members, over 200 companies and divisions, represent a wide range of industry sectors, including manufacturing, retailing, packaged goods, financial services and communications. They are the top advertisers in Canada with collective annual sales of more than \$300 billion.

The CMDC is an independent organization of media professionals representing advertising agencies and media management companies, working to advance the effectiveness of media advertising in Canada. Its members account for approximately 80% of the total media ad spend transacted annually in Canada.

Respectfully, this CRTC decision does not appear to have any beneficiaries other than a small number of non-representative (demographically or regionally) Canadian complainants, but its impact on advertisers, marketers and vendors is deep and negative.

Creators, broadcasters, advertisers, Members of Parliament and thousands of Canadians have come together to highlight significant concerns with this decision. As you know, the Super Bowl provides an unparalleled platform for Canadian firms to speak to Canadians. Equally, it provides an unmatched opportunity for Canadian creators – who depend on often scarce creative work – to not only deploy their skills but to do so for the largest TV broadcast audience of the year. Add to this the deep challenges Canada’s broadcast industry is facing in every region of Canada and you can understand why so many Canadian businesses are concerned about ending simultaneous substitution in the Super Bowl.

There is also the matter of ongoing legal uncertainties around the decision itself, which impairs the industry’s ability to fully prepare for and adjust to the potential impact.

All of this is unfolding while the Government of Canada is undertaking a sweeping review of Canada's broadcast policies under the leadership of Canadian Heritage Mélanie Joly. Instead of having duelling initiatives that confuse consumers and harm Canadian creators, it makes sense to suspend the implementation of the CRTC’s Super Bowl decision, and all of the challenges it creates, out of deference to the comprehensive review the government is currently undertaking.

Therefore, we urge you to reverse your Super Bowl decision or delay its implementation, so that its effects can be further explored and considered.

Respectfully,



Ronald Lund
President & CEO
Association of Canadian Advertisers



Janet Callaghan
President
Canadian Media Directors' Council