



September 10, 2021

Filed Electronically

Mr. Claude Doucet  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
Ottawa, Ontario  
K1A 0N2

Dear Mr. Doucet:

**Re: Broadcasting Notice of Consultation CRTC 2021-281: Application by Rogers Communications Inc. to effect a change of ownership and effective control of Shaw Communications Inc. (and its subsidiaries) Application No. 2021-0228-4**

1. Unifor is Canada's largest private sector union and has more than 310,000 members across Canada, working in 20 economic sectors. Unifor represents more than 26,000 workers in the telecommunication sector and 12,500 media workers, including 5,000 members in the broadcast and film industries.
2. We support a healthy and diverse telecommunications and media landscape. Acquisitions and mergers of this scope can create inequities in employment markets and in this case local programming and local news coverage. Unifor would like to caution the commission on these issues and ensure that should the commission approve this transaction, that it will consider the impact on employment as well as local programming, specifically local news; that needs to receive sustaining support in an equitable manner.
3. *"Based on its 2020 annual aggregate returns, Rogers directed \$7.2 Million of the allowable local expression contribution of \$7.25 Million to fund the production of local news on Citytv, while Shaw directed \$12.937 Million of the allowable contribution of \$13 Million to fund the production of local news on the Corus-owned Global station."*<sup>1</sup>
4. When asked, "How this transaction would impact the current use of this funding flexibility,"<sup>2</sup> and whether they would continue to fund their current OTA stations and increase funding for OMNI, Rogers was vague and replied only that they had not yet finalized their plans, *"However, Rogers expects to continue to use the flexibility granted in the Broadcasting*

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<sup>1</sup> DM#4062331 - Réponse-Response - 14 July 2021 - Abridged - Response to CRTC Deficiency Questions - Rogers 29Jul2021 (Page 5)

<sup>2</sup> DM#4062331 - Réponse-Response - 14 July 2021 - Abridged - Response to CRTC Deficiency Questions - Rogers 29Jul2021 (Page 5)

*Distribution Regulations (the Regulations) and related policies, and to reallocate funds to help support local English-language news programming and community programming, as we do today for Citytv and our community channels (Rogers TV/TV Rogers). We do not intend to continue to allocate funds to unaffiliated Corus-owned Global television stations.”<sup>3</sup>*

5. Unifor would like to ensure that contributions will not diminish in the ‘flexible’ funding formula with this transaction. The loss of thirteen (\$13) million dollars in funding for Corus television stations could be disastrous. At best, local news levels would stay the same, but would be redistributed from West to East in this country; at worst flexible funding formulas that aren’t adjusted could cause a devastating loss of local news and community content, that won’t be able to be recovered if we don’t act accordingly.
6. Therefore, Unifor submits that this merger should trigger a tangible benefit package that provides a lifeline to local news equitably across the country. Unifor further submits that beyond the tangible benefit package from this merger, ongoing, annual contributions should be made to support local news as Corus television stations will be affected by loss of a stable funding mechanism that was heavily relied upon.
7. Unifor also relies on the commission to ensure that the cost of this transaction is not undervalued, so that contributions to tangible benefits and funding to local news is calculated appropriately.
8. Consolidation and a concentration of larger companies do not necessarily lead to better jobs and working conditions. The labour market in the telecommunications sector is controlled by a few companies, leading skilled workers with less options for competitive employment. After the de-regulation of the sector, we saw that the large companies began to outsource or contract out work in order to reduce their labour costs. Typically, these contractors employed lower-wage workers compared to those being employed by the large companies directly. Over time, wages and working conditions have deteriorated due to outsourcing and the continued push from these companies to drive down the costs of labour. In the case of Unifor members, those who work as contractors for Rogers, for example, are some of the lowest paid workers in the sector.
9. We have seen the evolution of the sector after de-regulation – where the large companies are larger and more profitable than ever before (with more customers), at the expense of workers whose wages and working conditions have been eroded through outsourcing. Because there are less competitors (especially large competitors), workers potentially looking to leave one company have less options to work for a company that may provide better working conditions.

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<sup>3</sup> DM#4062331 - Réponse-Response - 14 July 2021 - Abridged - Response to CRTC Deficiency Questions - Rogers 29Jul2021 (Page 5)

10. Unifor appreciates the commission reviewing this application with an employment lens as well as an opportunity, should this merger be approved, to protect and enhance the diversity of voices that tell Canadian stories in our communities.

11. Unifor would like the opportunity to respond in writing and in person to interventions, we would like to address, in person the questions and concerns outlined in this brief and it is for these reasons that I request to appear at the public hearing.

Respectfully submitted,

A handwritten signature in blue ink that reads "Randy". The signature is stylized with a large, looping "R" and a long, sweeping underline that extends to the right.

Randy Kitt  
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