THE CANADIAN BROADCAST STANDARD COUNCIL'S ETHNOCULTURAL OUTREACH AND EQUITABLE PORTRAYAL PROJECT

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ABSTRACT

The Canadian Broadcast Standards Council (CBSC) has undertaken a six-year

endeavor it named The CBSC Ethnocultural Outreach and Equitable Portrayal Project.

This report details the different aspects and stages of that project, while at the same time

highlighting how the Project Manager, who is also the author of this report, navigated

through project challenges.

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1 Strategic Fit: Project Context and Initiation

In the 2002/2003 fiscal year, the Canadian Broadcast Standards Council (CBSC) embarked on a six-year project it called The CBSC Ethnocultural Outreach and Equitable Portrayal Project. The project, which has two inter-related aims, closely fits in with the overall CBSC organizational objectives and strategies. To gain a full understanding of the project, however, it is important to also place it within the larger context of the country's demographic diversity and the institutional responses to that diversity.

1.1 Diversity: A Canadian Reality

Although the term has recently come into popular usage and appreciation, diversity[1], defined here as differences in demographic variables such as race, ethnicity, language, religion, gender, sexual orientation, age, abilities, etc., has always been a feature of Canadian society. Ethnocultural diversity, referring to different sets of social groups each with its own language, culture, and belief system, is a key component of Canada's longstanding social and cultural diversity.

Long before the arrival of the English and French settlers, there existed impressive ethnocultural diversity among the Aboriginal inhabitants of the land that was to become Canada. In the period since colonization, the massive consolidation of the

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[1] Within the broadcasting industry, the term 'diversity' is increasingly used to refer not only the inclusion and reflection of demographic diversity, but also the range of independent editorial voices and programming choices available to the public. In this report we refer mainly to the former aspect.

political and economic power of the English and French ethnocultural groups gave Canada a bilingual and bicultural identity. But behind the façade of this dual identity lay multitudes of other identities which included surviving Aboriginal identities and those of immigrants from other parts of Europe, as well as Asia, Africa, the Caribbean, Central and South America, Oceania, and elsewhere.

Over the years, the need of people from different parts of the world to escape political and economic turmoil and seek a better life has positively converged with Canada's own need to, in the beginning, populate more lands and expand productive capacity (including the building of the transportation and communication infrastructures) deeper into its vast regions, and more recently, to replenish a declining labour force due to an aging population and low fertility rates. This convergence of needs has made Canada a land of immigrants with an increasingly diverse society.

As the data from the 2001 Census and post-census surveys show[2], Canada is fast becoming one of the most diverse societies on earth. In that census, Canadians reported more than 200 ethnic origins and well over 100 languages. As the population percentage of newcomers rises so does the ethnocultural diversity of the country. The 2001 census indicates that 18 per cent of Canadians were born outside of Canada, while post-census surveys have put the figure at 20 per cent, with projections that the percentage would rise to a quarter of Canada's population within a decade. The rate of first-generation

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[2] The 2001 Census and post-census publications can be accessed through the Depository Services Program of the federal government: http://dsp-psd.pwgsc.gc.ca/Collection-R/Statcan/index-e.html or through the website of Statistics Canada: www.statcan.ca.

immigrants is and would continue to be even higher in major census metropolitan areas such as Toronto, where already nearly half of the population is born outside of Canada.

Whereas before Europe (itself a continent of diverse ethnic identities) was the main source of immigrants to Canada, now most of the country's immigrants are coming from continents with very different demographic make-ups. Nearly 80 per cent of the immigrants who arrived between 1991 and 2001 were from non-European sources (58% from Asia; 11% from the Caribbean, Central and South America; and 8% from Africa). As a result, the 'visible minority'[3] population, which now stands at over 13 per cent, is growing much faster than the total population. Projections indicate that within a decade, 'visible minorities' will make up one-fifth of Canada's population. They already make-up a significantly high proportion of some census areas like Markham (56%), Toronto (43%), Richmond Hill, Mississauga, and Brampton (40%), Vancouver (37%), and their numbers are rabidly rising in other major urban centers like Montreal, Ottawa, Edmonton, Saskatoon, Regina, and Winnipeg.

Corresponding with the rise of immigrant populations in general and 'visible minorities' in particular, is the increase of diversity in many forms, including the phenomenal growth in Canada of non-Christian religions such as Islam (which, according

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[3] The term 'visible minorities' was originally coined to identify marginalized groups in need of special interventions within the Employment Equity Act, but its usage outside of the original intention has recently been questioned by the United Nation's Committee on the Elimination of Racial Discrimination (CERD) and the Canadian Race Relations Foundation (CRRF). They argue that the term lumps together different groups as "the other" and thus oversimplifies varying experiences of racism. The CRRF prefers using the term 'racialized' persons or groups because that acknowledges race as a social construct and thus conveys the power relationship that is implicit in racism – See CRRF Press Release – Toronto, June 14, 2007)

to the 2001 Census, grew 130% between 1991-2001), Hinduism (89%), Sikhism (89%)

and Buddhism (84%).

Immigration, the source of Canada's racial, religious, ethnic and linguistic

diversity, now accounts for two-thirds of the country's net population growth, and

projections indicate that by 2030, it will account for 100 per cent of that growth[4]. This

increasing reliance on immigration will lead to even more diversity, which presents both

challenges and opportunities for all Canadians, especially for the country's cultural

institutions.

1.2   Encouraging Diversity: The Role of the CRTC

Immigrants from diverse backgrounds bring new ideas and fresh perspectives on

many aspects of Canadian life. They also bring a wide range of skills, knowledge and

experiences to the labour market, as well as entrepreneurial talents that create businesses,

and thus employment for many Canadians. Moreover, in a globalized world where

intercultural connections are keys to success, the nation's diversity presents an

indispensable wealth for the country. But the benefits of diversity are not automatic; there

has to be an environment that is conducive enough for diversity to flourish and live up to

all its potentials.

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[4] This is according to Statistics Canada's 2006 portrait of the Canadian population. More on the 2006 Census findings can be found at: http://www12.statcan.ca/english/census06/analysis/popdwell/index.cfm

Fortunately, there is at least a growing recognition that ensuring equity and fairness for all Canadians would encourage the full participation of all, which would in turn lead to the optimization of the opportunities presented by the country's social and cultural diversity. At the legislative level, considerable progress has been made in enshrining equality for all Canadians. Where not long ago there existed exclusionary laws that limited the rights of people of non-European origins to settle in Canada, partake in public life, and be safe from arbitrary abuse, there are now a series of legal statutes – including the Canadian Bill of Rights, the Canadian Human Rights Act, the Canadian Charter of Rights and Freedoms, the Multiculturalism Act, the Employment Equity Act, and others – that encourage diversity and explicitly prohibit discrimination based on race, ethnicity, religion, gender, sexual orientation or other identity markers. Even the Official Languages Act, which elevates the status of English and French above other languages, includes provisions that recognize and encourage the multilingual and multicultural nature of Canadian society.

But despite these legislative measures, a significant proportion of Canadians still find themselves at the margins of public life, including the all-important cultural life of the country. Aboriginals and 'visible minorities' are particularly under-represented in the cultural industries, and those of them who break through the employment barriers are ghettoized in lower positions or limited to the ethnic or third-language media. Many also endure inaccurate, unfair, and stereotypical portrayals of their communities in the media. This situation has recently spurred the Canadian Radio-television and Telecommunications Commission (CRTC) to act.

The CRTC, an independent, arms-length public agency that regulates the

broadcasting and telecommunications industries and reports to parliament through the

Minister of Canadian Heritage, seeks to, among other things, apply the Broadcasting Act.

The Broadcasting Act, like many other Canadian policy frameworks, has a diversity

component. Section 3 (d) (iii) of the Act stipulates that the Canadian broadcasting system

should:

> ...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 specific place of aboriginals within that society.

The Commission appears to encourage the fulfillment of the cultural diversity

objectives in two ways: first, through the licensing of ethnic and third-language (i.e. other

than English or French) radio and television broadcast services; and second, by nudging

licensed mainstream broadcasters to be respectful and inclusive of Canadian diversity

within their operations and programming.

In the first instance, the CRTC has – under its current policy statement on ethnic

broadcasting (Public Notice CRTC 1999-117), which mostly upheld the 1985 policy

framework on the same subject – licensed a number of broadcasters on the condition that

they would devote at least 60% of their schedules to ethnic programming and at least half

of their schedules to programming in third languages. Currently fulfilling those and other

requirements, and therefore licensed, are 6 over-the-air conventional television stations,

approximately 20 or so radio stations, 10 specialty audio services, 5 analog specialty

television stations, 15 or more Category-2 digital specialty television services. Roughly

80 additional full-service Category-2 digital stations are licensed but not yet launched. There are also an increasing number of SCMOs (Subsidiary Communications Multiplex Operations)[5] and campus/community radio stations and cable TV community channels that carry ethnic and third-language programming. And, aside from all these Canadian-owned ethnic radio and television services, the CRTC has approved dozens of foreign-based third-language services to enter the Canadian airwaves. This diversity of contents and expressions has met some of the cultural needs of diverse Canadians, and has made Canada's broadcast milieu one of the most varied in the world.

These ethnic and third-language radio and television services operate in tandem with the equally vibrant ethnic and third-language press whose history stretches back to the late 1700s and which currently includes an estimated 400 newspapers and magazines published and distributed across the country. But however varied and vibrant the ethnic media, it cannot and should not be a substitute for the so-called mainstream media which supposedly connects Canadians across cultures and backgrounds. That is why the CRTC has leaned on the broadcast industry, which it regulates, to be more responsive and respectful of their audiences by accurately reflecting them in their increasing diversity.

In a 1999 statement (Public Notice CRTC 1999-97), the CRTC has requested from mainstream conventional television licensees to present it with specific commitments and initiatives that would improve the presence and portrayal of Canada's racial, ethnic, religious and other minorities as well as Aboriginal peoples in their

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[5] SCMOs are radio services that are transmitted through FM signals, but one needs special decoders for signal access.

business operations and broadcast programming. In 2001, the CRTC has gone a step

further. At a public hearing to consider license renewals for some of the country's main

private broadcasting networks, including CTV, CanWest Global, and TVA, the CRTC

has asked all private broadcasters to file annual reports that would detail any progress

they made towards their commitments and plans for reflecting the country's social and

cultural diversity. In addition, the Commission has issued a statement (Public Notice

CRTC 2001-88) calling upon private broadcasters to create and fund an

industry/community task force that would examine the extent of cultural diversity in

Canadian television and present concrete steps for addressing existing concerns.

1.3   Reflecting Diversity: The Role of Private Broadcasters

The CRTC's call for action was taken up by the Canadian Association of

Broadcasters (CAB), a trade association/lobby group that serves as 'the national voice of

Canada's private broadcasters'. The CAB, created in 1926 and currently representing

nearly 700 private radio and television broadcasters, took a number of initiatives in line

with the demands of the CRTC for a more reflective and accurate portrayal of

demographic diversity in broadcasting.

In 2002, the CAB created a Task Force for Cultural Diversity on Television. The

task force, whose membership included representatives from private broadcasting and

key members of Canada's Aboriginal and ethnocultural communities, carried out a major

research lasting two years to examine the reflection and portrayal of cultural diversity on

Canadian private television. The research – which included literature reviews, interviews, focus-groups, and qualitative and quantitative on-screen content analysis – noted improvements in some areas, but mostly confirmed long-held concerns regarding the under-representation and inaccurate and unduly negative portrayal of 'visible minorities' and Aboriginal peoples in broadcasting. To remedy the situation, the study also made recommendations and suggested best-practices covering both on- and off-screen broadcast operations. The best-practices covered subjects like corporate commitment and accountability, internal and external communications, recruitment and retention, production activities, community involvement, and other activities.

In addition to the study on Cultural Diversity in Private Television, the CAB carried out a separate study on the Presence, Portrayal and Participation of Persons with Disabilities on Television Programming, which acknowledged very low participation levels for people with disabilities both on-screen and behind the scenes. The study also noted a number of challenges – including public misperceptions of disability issues, lack of accommodation in the workforce, inaccurate or negative portrayal of disability, especially in drama and news programming – while at the same time making recommendations for broadcasters to address the situation[6].

Both the Cultural Diversity in Private Television and the Portrayal of Persons with Disabilities on Television studies emphasized the fact that being more inclusive presents opportunities for broadcasters to increase their audiences and thus positively

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[6] One of the most visible measures the CAB has taken after the Persons with Disabilities on Television study came out was to launch the "Open Your Mind: We Are Able" public service announcement that has been running on major private television stations.

impact their bottom line. In other words, the studies stressed the point that being more inclusive and respectful of diversity is not just a social responsibility, it is good business. That message, according to the CAB, is one that should ring throughout the broadcasting industry and its practitioners, including the non-regulated industry-stakeholders, such as independent producers, directors, writers, and the unions and guilds that represent them.

For its part, the CAB moved quickly to encourage its members to address the key findings and recommendations in the two studies and it implanted an annual reporting system that collectively tracks their progress on the issue of diversity in Broadcasting. It also initiated a number of reforms to implement the proposed recommendations of the two studies. Key amongst these initiatives was the replacement of an existing broadcast standard, the *Sex-Role Portrayal Code*, which was limited to the portrayal of gender issues, with a new code, the *Equitable Portrayal Code* (see Appendix 1), meant to encompass the portrayal of all forms of demographic diversity. The new code, currently under CRTC review and expected to be adopted by the end of this year, contains provisions that deal with stereotyping and inaccurate portrayal of all identifiable groups, including women, aboriginal peoples, members of visible minority groups, persons with disabilities and other traditionally-vulnerable groups.

Aside from CAB's initiatives taken on behalf of its members as a collective, individual broadcasters have also taken action to advance cultural diversity in broadcasting. One such case is the Rogers-owned multilingual/multicultural OMNI Television, which is as reflective as any Canadian broadcaster could be of the country's

linguistic and cultural diversity. In 2002, as part of its 'significant public benefits bid'[7]

for the licensing of OMNI.2, a second OMNI Television[8] station in Ontario, Rogers made

a $50 million commitment to fund independent production of third-language television

programming and finance various diversity-oriented public service projects across the

country. It also made a $1 million contribution to the Canadian Broadcast Standards

Council (CBSC), spread over the initial six-year licensing term of OMNI.2 station, to

help raise the awareness level of ethnocultural communities on Canada's broadcast

standards and enhance CBSC capacity to deal with the concerns of these communities on

portrayal and other issues.

1.4   Empowering Diversity: The Role of the CBSC

The Canadian Broadcast Standards Council (CBSC), an independent organization

established in 1990 by the CAB and fully sanctioned by the CRTC (Public Notice CRTC

1991-90), supports private broadcaster's commitment to better reflect Canadian diversity.

It does so by administering a voluntary system of codes that set high standards for

broadcasters' programming and by empowering the public to have a meaningful dialogue

with broadcasters on issues of concern, including the reflection and portrayal of diversity.

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[7] One of the things that the CRTC considers when issuing new broadcast licenses, or approving changes in ownership structures, is the extent that the proposed undertakings would benefit the public. To make their proposals more appealing, broadcasters often include what has come to be known as 'significant public benefits bid', which is commitment to provide financial or other contributions (6% of the deal's value for radio; 10% for television) for the public good. These may include initiatives, like funding for programming, that benefit the contributing broadcaster.

[8] The first OMNI Television station was licensed in 1979 as CFMT. Rogers Broadcasting Limited bought it in 1986 and later renamed it to OMNI.1. Since the 2002 licensing of OMNI.2, the OMNI Television brand has grown to include OMNI.10 (BC), and OMNI.11 (Manitoba).

At the centre of the Council's organizational philosophy is the view that broadcasting is of critical importance to society because of its power to influence opinion and shape public attitudes; therefore, those who wield that power are duty-bound to shoulder the social responsibilities that come with it. They must, above all, exercise self-restraint and be able to balance creative freedoms with respect for and responsiveness to the needs and sensitivities of the audiences they serve.

To help bring about such balance, the Council administers a number of codes private broadcasters have themselves created and pledged to observe, including the *CAB Code of Ethics*, the *CAB Violence Code,* the *RTND Code of (Journalistic) Ethics*[9], and the *Sex-Role Portrayal Code*, which, as mentioned earlier, will soon be replaced by the *CAB Equitable Portrayal Code.* A fifth code, *CAB Journalistic Independence Code*, which deals with the diversity of editorial voices and other content issues brought about by public concerns over the concentration of media ownership, is also under discussion and is likely to be adopted soon.

Of particular interest here is the upcoming *CAB Equitable Portrayal Code* (Appendix 1) which is intended to address unduly discriminatory, abusive or stereotypical portrayal of not just gender issues, but also of race, national or ethnic origin, religion, age, sexual orientation, marital status, or physical or mental disabilities. This code will establish industry-wide standards for dealing with a host of issues, including stereotyping, stigmatization and victimization, derision of myths, traditions or practices,

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[9] RTNDA stands for Radio Television News Directors Association, a world-wide professional association of news journalists, journalism educators and students. Their code of ethics has a journalistic focus, whereas the CAB one is more general. The CBSC administers both of these codes.

degrading material, and exploitation. Other code provisions, such as the Human Rights provision in the *CAB Code of Ethics*, have over the years enabled the CBSC to deal with public concerns regarding the portrayal of Canada's social and cultural diversity. The *CAB Equitable Portrayal Code*, however, is unparalleled in its scope and detail for addressing public concerns on the portrayal of diversity.

Through the numerous codes it administers, the CBSC manages a self-regulatory system which provides recourse to members of the public who may be concerned about what they see on television or hear on the radio – covering everything from fairness and accuracy in the news to controversial public discussions to nudity and violence on television or any other area of public concern. The system encourages the resolution of complaints through dialogue between the broadcaster and the complainant, but if that dialogue does not lead to complainant satisfaction, the CBSC rules on those complaints and issues decisions.

Aside from upholding the broadcast codes, the CBSC is also mandated to inform the public about these codes, and broadcasters about emerging societal trends in relation to the codes. Of these two Janus-like roles, the former is seen to be most essential. Informing the public about the broadcast standards is essential to CBSC operations because only an informed public is likely to participate in the self-regulatory system, and only through public participation will the system work.

A dearth of resources has over the years limited the public information function of the CBSC to only the outreach activities of its National Chair, who serves as the official voice of the organization. Luckily that limitation was overcome by the OMNI grant, a timely contribution that has presented the CBSC with the opportunity and the means to do more in raising public awareness (in this case among ethnocultural communities) of Canada's broadcast standards.

The OMNI Television-funded CBSC Ethnocultural Outreach and Equitable Portrayal Project is a public information project focused on ethnocultural communities. It fulfills the Council's mandate to inform the public about the broadcast codes; and as such, it fits in with the Council's principal objectives and strategies. By informing ethnocultural communities of the existence of the broadcast standards and the self-regulatory system established by Canada's private broadcasters, the CBSC hopes to *empower* these communities to participate in the system and enter into meaningful dialogue with broadcasters on issues that concern them, including the need for a more accurate and non-stereotypical reflection and portrayal of diversity in broadcasting.

2 Getting Started: Project Definition and Planning

As the fore-going analysis has shown, the CBSC Ethnocultural Outreach and Equitable Portrayal Project fit well with the CBSC's organizational objectives and the larger institutional responses to the increasing social and cultural diversity in Canada. But while strategic fit is an important element of the equation, project success, or lack thereof, hinges primarily on the way it is conceptualized, planned and implemented.

Projects are often conceptualized around the requirements of an internal or external customer. The OMNI grant which gave birth to this project did not come with any requirements. Aside from a general statement on the grant being intended to 'enhance CBSC capacity', there were no set requirements or specifications on which the CBSC has to deliver. This absence of the traditional 'customer-contractor' ties meant that the CBSC was free to organize the project in whichever way it saw fit. There was an opportunity here to set internal requirements and conceptualize the project accordingly, but that opportunity was not fully taken. Instead, project work has started without proper project definition and planning, and this has led to a lax process that reverberated throughout the project and with which I, as a Project Manager hired about a year after the work has started, had to sort out.

2.1   Project Manager, Team, and Stakeholders

It is important to note from the outset that there was a lag time of about a year between the start of the project and the hiring of a project manager. During that time, the CBSC management has made two major decisions that would later prove to be somewhat constrictive for me as the hired Project Manager.

First, it was decided that the main focus of the project would be on publishing (in print and web formats) an expanded version of the CBSC brochure in third languages, and using the resulting multilingual brochures and web pages as tools to connect with and inform ethnocultural communities about the CBSC and the broadcast codes it administers. Second, it was decided that the entire publishing process would be outsourced to three leading companies: Lexi-tech International for the translation and proofing; Gordon Group for the design and layout; and Gilmore for the printing.

The decision to outsource the work is understandable and somewhat inevitable. The CBSC does not have in-house capacity to carryout any aspect of the publishing process. It is as a small organization that deals with big issues under limited human and financial resources; and, as such, is too stretched to attempt taking on any work that is beyond its core competencies. An overview of its organizational structure and functions would underscore the point here.

The CBSC is as small organization with a somewhat unique structure. At the top

of the organization is a National Chair who heads a National Executive (a.k.a. Board of

Directors) made up of Chairs and Vice-Chairs of two National Adjudicating Panels

(National Conventional Television Panel and National Specialty Services Panel) and five

Regional ones (BC, Prairie, Ontario, Quebec, and Atlantic). The Panels, made up of

volunteers, 50% of whom are broadcaster representatives and 50% public representatives,

are convened on a case by case basis whenever a complaint cannot be dealt with through

routine summary decisions by an Ottawa-based Secretariat.

The Ottawa-based CBSC Secretariat is the paid operational base of the

organization. It is led by an Executive Director and includes a Director of Policy, and a

Complaints Officer. The National Chair, the official voice of the organization, is also a

member of the Secretariat and has been the sole person (until this project was launched)

responsible for carrying out the Council's public information/education tasks. He carries

out his outreach tasks through appearances, speeches, and interactions with the public at

various forums and events to which he is invited.

The Secretariat team is responsible for the day-to-day administration of the

Council, including processing hundreds of complaints, forwarding them to broadcasters

for response, issuing summary decisions when a precedence exists, convening

adjudicating panels when necessary to rule on complaints, drafting and issuing panel

decisions and other releases, preparing Annual Reports, keeping up-to-date broadcaster

member records, and working with member broadcasters and the CRTC on broadcast-

related issues of public concern. This demanding complaints-driven work has, understandably, prevented the CBSC from veering off into any other types of work, and has thus made the outsourcing of the project's publishing process necessary.

While the decision to outsource is made obvious by organizational limitations and the need to focus on core competencies, the reason behind the delay in hiring a Project Manager to plan and organize the project, oversee the outsourced work, and carry out the other aspects of the project is not so easily understood. There probably was a feeling that there is not much need for a Project Manager since the biggest aspect of the work (the publishing process) is outsourced to leading companies, and other aspects of the project could be incorporated into the duties of the Secretariat team. But whatever the feeling or reasoning behind the delay, it proved to be untenable.

By the time I was hired as the Project Manager, the three outsource companies were churning out the first batch of the brochures, but there was no system in place to coordinate their work or ensure quality output, and there were no plans, let alone action, on the public information and outreach aspects of the projects.

I could not find any data at the CBSC on the project's production process or the work that the companies were doing for us primarily because the normal procedures for outsourcing or awarding contracts were not followed: no Request for Proposals, no bidding process, not even simple specifications on what we wanted these companies to do for us, how we wanted it to be done, when, and at what cost. I could not even find

informal discussion notes on these matters. The three companies were handed the work without any formal procedures probably because they were the biggest in their fields, and thus assumed to also be the best. But even in sole or secure sourcing cases, there should have been a contract or at least a Memorandum of Understanding or some other sort of documentation, which in this case was neglected to the detriment of the project.

Moreover, there was a total lack of any formal project definition and planning; no articulation of project goals and plans for achieving success. Aside from some aspects of the scope of the project being broadly delineated with the decision to focus on publishing an expanded version of the CBSC brochure in third-languages and using those brochures to connect with and inform ethnocultural communities about the CBSC and the broadcast codes it administers, there was not much to guide the management of the project.

Furthermore, there was no framework in place for developing linkages, partnerships, or connections with community stakeholders. The Secretariat was in touch with some of the stakeholders, namely private broadcasters and the CRTC, as part of its normal operations, but there was no input from and no planning or action for linking up with the project's public stakeholders: ethnocultural communities and the organizations that represent them.

In the best of circumstances, Project Managers have input from the very beginning; right when the project is being contemplated for the first time. I not only had no input in deciding the focus and scope of the project (as I came on board a year after

the project started), but there were also no historical data or records to guide me. To complicate matters, my project team consisted of three large corporations with whom we did not have any contractual agreements on which I could assert a modicum of authority; and, due to the demands of the normal CBSC operations, it was unlikely that I would get any help from my colleagues at the Secretariat.

But at least it seemed I had the confidence of the CBSC management. They have, on a number of occasions, made it clear that they considered my knowledge, skills and connections to be well-suited for the project. My undergraduate education in Mass Communications and Sociology meant that I had a good understanding of the media and its role in society, while my graduate-level specialization in publishing and subsequent entrepreneurship in that field meant I had the know-how and experience to manage projects in general, and publishing-related ones in particular. My identity as member of a racial, ethnic, and religious minority meant that I had a sense of the existing diversity and the problematic issue of its portrayal in the media. And the fact that I spoke several languages and was, at the time, the Publisher/Editor of two community publications, and an Ottawa region representative for the Canadian Ethnic Press and Media Council of Canada (CEPMCC), meant that I had the linguistic, cultural, and associational connections that would be valuable in promoting the project within the various ethnocultural communities.

I had some reservations about the delineated scope of the project (especially the focus on translations as an outreach method), but my job was not to question past

decisions; it was, rather, to make the project a success within the parameters set by the CBSC management. Regardless of the scope, the project was in bad shape mainly because it lacked any external or internal requirements and was poorly, if at all, conceptualized and planned. It became my job as the newly hired Project Manager to sort it out; to plan, organize, coordinate, and control the project on a going-forward basis. So after receiving a somewhat scant verbal briefing from the CBSC management, I assumed responsibility for the project. I started my work by assessing, through a SWOT analysis, where things stood with the project.

2.2   Strengths, Weaknesses, Opportunities, and Threats

Although the project clearly fitted with CBSC strategies, it lacked strategies of its own. To devise a formal strategy for the project, it was important to first isolate the key issues in terms of strengths to build on, weaknesses to address, opportunities to realize, and threats to avoid or overcome. The following SWOT analysis gives a picture of the issues as I saw them at the start of my assignment as Project Manager.

Strengths

- Project's strategic fit within CBSC objectives
- A strong and enthusiastic backing for the project by the CBSC leadership
- Credibility of the CBSC among key stakeholders, especially the CAB and CRTC
- Abundant financial resources to carry out the project

Weaknesses

- Lack of strategic planning and project development

- Absence of contractual agreements and documentation on outsourced work

- Inadequate, if any, consideration of subsequent stages of the project

- Lack of involvement from community stakeholders

Opportunities

- Interact with the country's increasingly diverse demographic base

- Fulfill a societal need for this type of public information project

- Make connections with the public outside of the complaint process

- Raise public awareness of the broadcast codes and the self-regulatory process

- Empower more Canadians to participate in the self-regulatory process

- Raise CBSC profile and extend its services to more cultural communities

- Enlarge CBSC membership base to include more ethnic broadcasters

- Engage the vibrant ethnic press as conduits for CBSC information

- Link mainstream broadcasters with their somewhat alienated ethnic audiences

- Enhance the reflection and portrayal of Canadian diversity in broadcasting

- Serve as an example for other public-interest institutions on diversity issues

Threats

- Risk of project being viewed as a separate "ethnic" matter

- Problematic issue of selecting some outreach languages over others

- Possible backlash from those opposed to multilingual access to information

- Skepticism, even cynicism, from those whom the project seeks to inform

- Perception of project as an empty rhetoric or PR exercise for self-regulation

- Resistance to change from private broadcasters regarding equitable portrayal
  which may reinforce perception of project as empty rhetoric

The SWOT analysis was the first step I took to build a more formal project out of the haphazard activities that preceded me in the first year of the project. It provided a snapshot of the main issues facing the project; and, at first glance, I was happy to note that the strengths and the opportunities outweighed the weaknesses and possible threats, both of which could be overcome with strategic thinking and good management.

2.3   Discussion on Vision, Mission, and Strategies

After sorting out the main issues facing the project, the next step in building a more formal project was to articulate the strategies and devise an overall direction for the project. To arrive at clear policy statements on project-related issues, I first drafted a three-page discussion paper and then requested a meeting on it with the CBSC National Chair, and the CBSC Executive Director at the time.

The discussion paper, titled "Informing Ethnocultural Communities in Canada: A Preliminary Exploration of Possible CBSC Strategies," was meant to facilitate a discussion on the main issues facing the project. It was organized through seemingly simple strategy questions and suggested answers that were open for discussion, including:

why an ethnocultural communities outreach project was necessary, how we define and relate to ethnocultural communities, what were the best ways of reaching and informing those communities, how will the public information and outreach work be organized, what were our expectations for the project, and how will we measure its success.

Our discussion started with the project's vision, mission and objectives. We viewed our vision to be no less than engendering a more accurate reflection and portrayal of Canadian diversity in broadcasting, and our mission was to encourage and empower all citizens, regardless of their background, to participate in the broadcasting life of their country by raising their awareness of the broadcast codes and standards. We aimed to first, inform ethnocultural communities of the existence of the broadcast standards and the self-regulatory system established by Canada's private broadcasters; and second, as a result, engender a more equitable portrayal of those communities. The two objectives are inter-related in that an informed public is the best promoter of fair and consistent reflection and portrayal of diversity in the broadcast media because such a public would be in a position to hold broadcasters, who as businesses are likely to be responsive to the concerns of their markets, accountable for the way they cover and portray Canadian diversity.

After agreeing on the project's vision and mission, our discussions focused on the articulation of much-needed project policies on a number of important issues. For example, on the question of defining ethnocultural communities, we decided to think of those communities not as entities outside of the mainstream (as they are often thought

of), but, since every Canadian belongs to one ethnic group or another, simply as the constituent parts of the Canadian public, which the CBSC seeks to inform as part of its specified organizational objectives.

On the question of why the ethnocultural outreach project, we considered our reasons to be much deeper than the mere fact that it is funded by a broadcaster (OMNI.2) whose licensing obligation is to serve ethnocultural communities in their primary languages. For one, the Canadian public, which the CBSC seeks to inform, has become increasingly multi-ethnic and multilingual, so having a multilingual approach to public information and outreach is a symbolic move that would encourage greater public participation in the CBSC process. Secondly, among ethnocultural communities are many newcomers with low proficiency levels in either of the two official languages, so informing them about the CBSC in their own languages of comfort would make sense. Thirdly, Canada's increasing cultural diversity is accompanied by an increase in third-language programming and the emergence or proliferation of ethnic and third-language broadcasters who are increasingly joining the self-regulatory system that the CBSC administers and would appreciate to connect with their audiences in the languages they broadcast. All these and other reasons make the multilingual outreach project a great tool for serving our stakeholders, namely private broadcasters and the diverse public audiences they serve.

On the question of how to reach ethnocultural communities, we discussed a number of strategies and tactics, including devising targeted exposure and outreach

campaigns that would further be broken down into smaller promotional tasks. We also agreed to link project activities with the larger CBSC ones. For example, the project would boost the public relations function of the National Chair by notifying him of the main events and meetings with ethnocultural significance to consider as part of his ongoing public relations/outreach activities. Also, we would translate CBSC decisions that may have significance to a particular community and would release such decisions to that community's media outlets so as to raise people's awareness of the CBSC and its complaint-resolution process.

On the question of expectations and measuring success, we considered several options. We reasoned that ultimately the success of the ethnocultural outreach project will be measured by the level of awareness of the CBSC among ethnocultural communities that make-up the Canadian public, but there needs to be more immediate ways of evaluating the project. In that regard, we discussed having a built-in evaluation and monitoring system of the project. Another way to continuously assess progress and performance would be through project reports. In this regard, we agreed that the Project Manager would provide written reports at specified intervals with actionable points flagged for decision by the National Chair or the Executive Director, and may also be called on to provide detailed reports for OMNI Television, the project funder.

2.4 Work Breakdown Structure

The afore-mentioned project strategies or policy statements that resulted from our discussions led to the write up of a Terms of Reference for the project, which in turn led to a Work Breakdown Structure (WBS), organized into a process mode with four main functions, each broken down into a number of tasks and subtasks. The following illustrates the project's WBS down to the level of the main tasks only:

Figure 1 Work Breakdown Structure of the Project

1.0 The CBSC Ethnocultural Outreach Project
   1.1 Outreach Database
      1.1.1   Identify and segment target audiences
      1.1.2   Obtain lists for each audience category
      1.1.3   Create an easily-accessible database
      1.1.4   Enter contact information into the database
      1.1.5   Continuously correct and update the contact information
      1.1.6   Manage interactions with target audiences thru database
   1.2 Production Coordination
      1.2.1   Organize and direct the outsource team
      1.2.2   Devise an overall translation and production strategy
      1.2.3   Formalize the language selection process
      1.2.4   Clarify translation output specifications
      1.2.5   Create production specs for all outreach collaterals
      1.2.6   Put a pre-press workflow in motion
      1.2.7   Set up a checklist, tracking, and feedback system
   1.3 Placement and Promotion
      1.3.1   Develop an overall outreach strategy
      1.3.2   Hit all target audiences with initial mailings
      1.3.3   Follow-up in other ways with the key contacts
      1.3.4   Arrange for one-on-one meetings when necessary
      1.3.5   Schedule and attend relevant events for outreach
      1.3.6   Seek feedback and refresh contacts
   1.4 Distribution
      1.4.1   Obtain a variety of mailing materials
      1.4.2   Carry out continuous mailings down the target list
      1.4.3   Fulfill orders as they come

It is interesting to note that The Terms of Reference, which I presented to and was promptly approved by the CBSC management, gave the project its first overall shape and direction. It covered issues like reporting lines, project phases, methods, expected results, deliverables and timelines, and was actually enough to organize the project. But for the purpose of formally structuring, planning, scheduling, monitoring, and controlling the project, I needed a Work Breakdown Structure (WBS) for the project. I needed the WBS to better organize project work, and develop such work down the task-level. Each of the tasks illustrated above were broken down into sub-tasks for more precise work duties to perform. For example, the production task to "put a pre-press work flow in motion" entailed further planning and a long list of sub-tasks that was carried out methodically one-step at a time (as indicated later in this report – see the section on Prepress, Printing, and Web Development).

The project was simple and straightforward enough that it did not require the use of complex network analysis tools. And the process-mode in which the four functions of the project were organized was flexible enough to carry out some of the activities or tasks concurrently. In fact, many of the activities were performed simultaneously without any scheduling pressures, though some (e.g. distribution vis-à-vis production tasks) were obviously contingent on the completion of preceding functional tasks.

3   Further Action: Project Implementation

Having properly defined, conceptualized and formally organized the project, we

felt ready for an official launch of the project, more than a year after project work has

started but only a month after I became the Project Manager. To attract maximum

attention for the project, we announced the launch of the project through a multilingual

press-release at the *Innoversity Summit* in Toronto, an annual industry gathering covering

issues of diversity and the media. Following the launch, the project implementation

proceeded according to the Work Breakdown Structure. That is to say it proceeded in a

process mode with four main functions (management, production, promotion, and

distribution), each broken down into a number of project tasks and sub-tasks.

3.1   Managing through an Outreach Database

The goal of the management function of the project was to manage and control

the entire workload of the project in the most effective and efficient way possible, taking

into consideration the strengths, weaknesses, opportunities, and threats identified earlier.

Management was the constant and unifying feature of the project in that it cut across all

the different aspects or functions of the project. The main tools used here were a project

notebook and a project database. The first was used to record and review overall progress

and setbacks, while the latter contained all the project's contacts and recorded my

interactions with them.

The project work began with the generation of an accessible database of our target audiences. And generating such database involved a number of tasks, including identifying and segmenting the target audiences, obtaining contact lists for each audience category, creating an easily-accessible database, entering contact information into the database, continuously correcting and updating the contact information, and most importantly, diligently managing relations with the target audiences and other project stakeholders through the database.

To begin with, I identified and segmented the target audiences into several key categories, including third-language radio and TV broadcasters; third-language newspapers, magazines, and media associations; multicultural, settlement, aboriginal and ethno-specific community organizations; media awareness and other educational entities; identity-based or media-related public advocacy groups; as well as other community or public-interest contacts. All the categories were then further segmented into sub-categories to facilitate better outreach (see Appendix 2).

The next step was to collect as many contacts on the identified categories as possible. I did that by doing an extensive research on the web, visiting the library or ordering published lists, and calling umbrella organizations to obtain their lists of member organizations. Sometimes all sources and tactics were used to obtain or cross-check certain lists and the process was a challenging one. For example, in compiling the ethnic press list, I first obtained several published lists, then I cross-checked against each other, then I called ethnic media associations for their latest lists to make sure I have

included recently-launched publications while omitting the ones that have folded. It is estimated that there are about 300-400 ethnic publications in Canada. The numbers could not be more precise because the list is in a constant ebb and flow. Still, over time I have developed a method that ensures the listing of all the main publications that have stood the test of time, while at the same time allowing for a flexible database process that accommodates changes in the list. In some cases this included emailing or calling around to ascertain accuracy or to update the information we have compiled.

The task of ensuring the accuracy of all the compiled data became part of the routine project work. It continued beyond the building of the database and entering the contact lists into the database because project success depended on keeping up-to-date records that would facilitate the goal of being in constant touch with the target audiences.

The outreach database was custom-built using the FileMaker software program. The resulting database contained entries for name of organization, name of the main contact person and an alternative contact, complete address information, identification of the category and sub-category of the target audience, the community or language if applicable, a section on general notes, a phone log section for recording any phone interactions we may have had with the contact. The database also kept records of letter correspondences to our contacts because we set it up in a way that text of the letters could be generated through it. We wanted to do the same thing for emails, but after a while it became cumbersome to generate Eudora emails through the FileMaker system, so we kept the email function separate.

Over the years, I have fine-tuned the database and increased the number of contact information it contains. It eventually grew to contain over 3000 contacts in five main categories, and almost thirty subcategories. And it has proved to be indispensable for the outreach project in that it allowed us to, among other things, keep taps on and manage our interactions with the project's various target audiences and stakeholders.

3.2   Coordinating the Production of the Outreach Collaterals

The goal of the production function of the project was to produce outreach collaterals that are error-free, on-time, and on-budget. To realize that goal, I began by mapping out the entire production process. Then I settled on a series of steps or activities starting from the selection of outreach languages and ending at the output of the print and electronic outreach collaterals. After that I outlined specifications on each step of the process which I discussed and impressed upon the three outsource companies to follow. And finally, I put in place a monitoring, control and feedback system to ensure continued quality output.

Success in the production function hinged not only on having a coherent strategy, but also in being able to compel the three companies who we outsourced the production work to follow the procedures and specifications resulting from that strategy. But before discussing the strategies further, a word about the three companies is called for here.

Working with the Three Companies

As mentioned earlier in this report, my biggest challenge as a Project Manager was dealing with the three companies who were handling project work for us. They were essentially my project team, but I did not have much authority over them as a Project Manager. I did not even have any formal contracts or written agreements on which I could assert a modicum of authority. All I had to rely on was my communication, negotiation, and trouble shooting skills. Luckily all three companies, Lexi-tech International, Gordon Group, and Gilmore Printing, were prominent companies considered to be among the biggest and the best in their field and were eager to please us.

Our translation work was outsourced to Lexi-tech International, one of the leading translation and other linguistic services in Canada. With offices in Ottawa, Moncton, Quebec City, Montreal, and Toronto, Lexi-tech translates over 60 million words per year while serving over 300 clients at any time across a wide range of industry sectors. They employ over 200 full-time employees, over half of whom are professional translators, while retaining hundreds of additional translators on a freelance basis. The company prides itself for being a one-stop shop for translation, revision, proofreading, adaptation, and a variety of other document management tasks.

Likewise, Gordon Group, the company we outsourced the project's pre-press, design, typesetting, and web development work, is a leading company in its field, which is design and branding. The company is known for its award-winning design for a

complete range of marketing tools, from corporate identities to multimedia collaterals to exhibit displays. Their office building in Ottawa is always teeming with the activities of graphic designers, writers, editors, web and multimedia developers, and a host of other production artists who use a variety of equipments and applications.

Gilmore Printing, the company handling our printing needs, is also a leader in its field. They have built a reputation for excellence in the printing and duplication world, and they pride themselves for providing large enterprises in North America and around the world with the information management solutions they need to distribute, bill for and update print and electronic communications products. Sometimes Gilmore Reproductions, a specialized wing of Gilmore Printing, handled our job.

The stature and professionalism of the three companies meant that we could expect quality output from them. But the fact that they were so enormous sometimes meant that the needs and demands of a small client like us may fall through the cracks. Moreover, the fact that we did not have a system in place at our end to coordinate, monitor, and control the production work we outsourced did not bode well for ensuring quality output. As the saying goes, you cannot expect what you did not inspect.

To remedy the situation, my first inclination was to reset the relationship by drafting a written contract or at least a detailed, signed Memorandum of Understanding on the outsourced work with each of the three companies so as to create a reference point for my dealings with them. But I sensed that the CBSC management was not keen on the

idea probably because the companies have been doing the work for us for over a year already, and demanding a written agreement so late in the game may seem odd. So, I settled for the next best thing, which was to focus on putting in place controls through a set of structures, procedures, and specifications to ensure quality output. This consisted, among other things, a series of systematic correspondences with the outsource companies based on input I would gather from a pool of volunteers that send-in their comments on translation, textual and overall 'look and feel' design matters.

I also tried to make my communications with the companies more effective by reducing the number of people I was dealing with to only one person per company, and introducing the appointed account/project managers to each other so as to increase their familiarity with the project as a whole (from translation to print/web output) and facilitate a team approach in addressing project challenges (more on this in the evaluation section, section 4, of this report).

Language Selection and Translation

The first step of the production process was the preparation of the English and French language texts that would be the basis for our public information and outreach messages. This was followed by the selection of the third-languages in which the prepared text was to be translated, which was in turn followed by the actual production of a number of outreach collaterals or promotional tools in the selected third-languages. The

outreach collaterals were to consist of a new expanded brochure[10], a Public Service

Announcement (PSA) to be placed in various ethnocultural publications; and a web page

for each of the languages to be posted in the CBSC website[11].

Prior to my becoming the Project Manager, 12 languages have been selected as

outreach languages in which to translate the CBSC brochure. But I could not ascertain

any criteria for the selection. After discussing the issue with the CBSC management, we

agreed to select the languages primarily on the basis of Census Canada's linguistic

community agglomerations in the major and medium-sized urban areas, and the level of

broadcasting in those languages in Canada. We later supplemented the criteria with the

acknowledgment that certain newcomer linguistic communities, with smaller population

or broadcasting presence in Canada, might have members who were not yet fully

proficient in English or French and would therefore benefit from information in their

primary languages. The chosen languages were, after all, meant to convey information

about broadcast standards and the audiences' viewing and listening expectations;

information that all Canadians were entitled to.

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[10] Before this project the CBSC brochure was a limited bilingual (back-to-back English and French) one. As part of the project, the old brochure was replaced with expanded (six-panel) separate unilingual ones. The back panels of each now contained short summaries of some of the provisions of the broadcast codes. The new brochure became the basis for translations into third-languages.

[11] The idea of the Print-PSA was not on the table at the beginning, but I argued for it when I was hired and it proved to be effective. Also, the original idea for the website was to have short multilingual paragraph notes announcing the availability of the brochures in different languages. But, in the course of the project, we completely redesigned the CBSC website. Among the changes were the inclusion of diversity visuals throughout the site, and devoting an entire section for multilingual content, a section where each one of the third-languages would have its own page explaining the contents of the organization's website, and clickable options to access the brochure, in plain PDF format, in that language.

Based on our multifaceted criteria, we have eventually selected a mix of 42 languages whose total population reach is estimated at around 13.5 million Canadians, based on Statistics Canada's 2001 census (see Appendix 3). And considering that English and French remained the primary languages for the project's various information and outreach tools, the linguistic reach of the project could potentially extend to all Canadians.

Once the languages were selected, the translation work was assigned on a yearly-basis depending on the amount of scheduled workload taking place in that year. Except for several languages whose translations we assigned to freelancers, all the translations work was done by Lexi-tech. But whereas the first batch of the translation work was given to them without clear guideline, I made an effort to be as specific as possible on what we wanted them to do on all the translations I assigned to them as Project Manager.

My specifications covered everything from the abilities of the translator to the format we wanted the final translations to be sent to us, to the option of having the work judged for quality by independent reviewers, to clarifications on the kind of support we seek even after work is completed. The specifications may seem too demanding, but as will be indicated in later sections of this report (see the evaluation on Production Coordination in section 4.1), they proved to be worthwhile as part of the project's quality control mechanisms.

Pre-press, Printing, and Web Development

I was equally demanding in my specifications regarding the pre-press, printing, and web development work done by Gordon Group and Gilmore Printing, while at the same time actively seeking and taking into account their recommendations. In that respect, the relationship was a symbiotic one, requiring input from all sides. Here is a generalized snapshot of the back-and-forth production process as seen at my end:

Figure 2   Pre-press Workflow for the Project's Outreach Collaterals

Begin with English copy of brochure/PSA/website text
Develop schedule and specifications for the translation process
Discuss and agree on the above with Lexi-tech
Send text to Lexi-tech for translation
Resolve format and font issues that may arise
Receive draft translation from Lexi-tech
Determine external review process
Send to external reviewer (often a volunteer contact)
Resolve issues between reviewer and Lexi-tech
If issues remain arrange for a third opinion on translation
Determine design and layout specifications
Develop schedule and specifications for design, layout and typesetting
Discuss and agree on the above with Gordon Group
Send to Gordon Group for design, layout and typesetting
Respond to requests for clarification from Gordon Group
Resolve script/font and other technical issues that may arise
Get external advice and review as required
Evaluate design and typesetting with independent reviewer
Resolve issues between reviewer and Gordon Group
Review and approve final product
Develop schedule and specifications for printing
Discuss and agree on the above with Gilmore
Send to Gilmore for printing
Respond to requests for clarification from Gilmore
Get external advice and review as required to resolve technical issues
Evaluate final proofs / blues with reviewer
Resolve issues between reviewer and Gilmore
Give final approval for printing

Because of the number of the pre-press, printing, and web development steps and players (translators, designers, typesetters, etc.) involved, I had to keep detailed notes and memos on file so as to be able to track progress and respond to difficulties as they arise. My record keeping processes included continuously reviewing all records to date in the project notebook or on computer files, updating these records and constantly organizing them into an easy-to-track system, and occasionally highlighting the issues that require my immediate action or intervention.

With familiarity and experience, the production process has become simpler over the years. For example, I have reduced the amount of interactions I had with Gilmore, for printing the brochure, by fine-tuning the process. Having already settled rudimentary matters like paper stock, colours, etc. at the beginning, I would approve the printing of a brochure not from a final print spread sent by Gilmore (as before), but by the printout of the desktop file sent to me via email from Gordon Group. Once I approved the brochure, Gordon Group would simply send the file to Gilmore who would prepare printing plates directly from disk.

All the outreach collaterals were subject to the same back-and-forth production and vetting process, but not all of them went through printing. For example, the final output of the Print-PSA gets delivered through email or in CD, and, of course, the multilingual web pages simply get posted on the CBSC website. The following is more information on the CBSC outreach collaterals, the communication tools of the project:

<u>Brochures</u>:

The main and most important information and outreach collateral is a four-colour

brochure (Flat: 22.500 x 8.500 Folded: 3.750 x 8.500) printed on Luna Gloss, 160m

paper. It describes the Council's services and provides the most pertinent extracts from

Canada's broadcast codes, and is translated and published in 44 languages, including

English, French, Amharic, Arabic, Armenian, Bengali, Chinese, Cree, Czech, Dari,

Dutch, Farsi, German, Greek, Gujarati, Hindi, Hungarian, Inuinnaqtun, Inuktitut, Italian,

Japanese, Korean, Macedonian, Mohawk, Ojibwe, Pashto, Polish, Portuguese, Punjabi,

Romanian, Russian, Serbian, Sinhala, Somali, Spanish, Tagalog, Tamil, Turkish,

Ukrainian, Urdu, and Vietnamese. The print-runs range from 1000-2500 copies printed

mostly just once for third-languages; and 2000-5000 copies for English and French

printed every year of the project – a combined total of 92,000 copies (see Appendix 4).

<u>Web pages</u>

The CBSC website (www.cbsc.ca) contains information in 44 languages. The site has a

splash page which directs viewers to access information in English, French or Other

Languages. Clicking on the "Other Languages" choice would take to a page that lists all

the third-languages selected for the outreach project. Each language on the list has its

own introductory web page with cursory explanation of the English and French contents

of the website, as well as links to a PDF version of the brochure in that language.

Print PSA

The CBSC Print PSA is intended to be placed in ethnic or third-language community publications. It is meant to raise people's awareness of the CBSC in general, and to announce the availability of the multilingual brochures in particular. It is available in all of our 44 outreach languages, and in three sizes (1/4 page or 5"x8", 1/8 page or 5"x4", and a base bar or 11"x2") meant to give choice to publishers as to where in their publication they would place it. We request that publications carry the PSA as part of their own community information initiatives (i.e. without any cost to the CBSC).

Broadcast PSA

Production planning was commenced on a new 30-second Broadcast-PSA to replace the existing one[12]. The new Broadcast-PSA, which informs people about the CBSC and the codes it administers, will be dubbed in all of the CBSC outreach languages, and will be available for third-language radio and television stations to air on a voluntary basis.

Project Insert

The insert, a glossy 8 ½ x 11 full colour four panel folded, explained the project, its goals and ongoing activities in English and French (on different sides of the fold) We printed about 5000 copies of the insert at the early stages of the project, but has not been reprinted since then primarily because the information on the project's activities is dynamic and ever changing and thus not conducive to the insert as we originally planned.

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[12] The old, existing Broadcast-PSA in the official languages is intermittently broadcasted by various radio and television stations across the country. The project laid the ground work for a new CBSC Broadcast-PSA, but the actual production and dubbing has not yet started.

Project Folder

The folder, a 9 x 12 four-colour with project visuals and of the usual thickness of folders, has been reprinted on many occasions and is used often by the project as well as the CBSC in general for presentation purposes.

Cardboard Posters

A select number of the Print-PSAs are made into cardboard posters of various sizes and are used at the CBSC booth at public events. The posters are self-supporting and are placed on the table alongside the brochures (which are placed on stacked plastic racks) and other CBSC information materials.

Roll-up Display Unit

Intended to be the focal point of the CBSC booth at public events, the roll-up display unit is a 33.5" x 86" adjustable and easy-to-setup unit with a graphic banner that uses design elements from the brochure, the CBSC logo, tagline text, and other attention-grapping multilingual words and visual elements. Parts of the unit include a retractable cassette, an adjustable pole, and a lightweight nylon carrying case with a shoulder strap.

Aside from these high-quality collaterals that were produced for us by Gordon Group and Gilmore Printing, I made use of simpler collaterals like a "Did you Know" flyer or factsheets on the project (which I often inserted in mailings to notify recipients about different aspects of the project) and other promotional materials that I myself would generate on the computer, using design visuals from the outsource companies.

3.3   Public Outreach and Promotion Activities

The goal of the promotion function of the project was to effectively convey the CBSC public information message to as many Canadians as possible, and in a manner that ensures greater linguistic accessibility. The message, which is conveyed through the various multilingual information tools and outreach activities, is about audience expectations; not only on portrayal issues, but also in every area of broadcasting.

Broadcasters are responsible for every second of what they air, including programming they create or purchase, advertising, promos, content of third party call to talk shows, etc. Whether it is accuracy in the news, human rights issues, violence on television, unfair comments on talk shows, sexual content and so on, every one in the public should know his or her rights vis-à-vis programming contents. The project is tasked to inform the public, in all their ethnocultural components, and raise their awareness of the broadcast standards that are in place.

The Outreach Strategy

To raise public awareness of the broadcast standards and ensure the widest possible reach to our increasingly diverse society, the project has devised a simple yet effective outreach strategy. The strategy consists of conceptualizing and segmenting key target audiences, then outlining and executing a multifaceted promotional campaign with

selected exposures and follow-ups for each audience, and continuously refining those exposures and follow-ups in light of actual results.

As mentioned in Section 3.1 of this report, the project's target audiences were conceptualized and segmented into several key categories, which were then further segmented into sub-categories to facilitate better outreach. Then each one of the audience segments went through a three-stage outreach campaign process with particular presentations or promotion exposures. The following diagram illustrates the process:

Figure 3   Diagram of the Project's Outreach Strategy

CBSC Ethnocultural Outreach

Target Audiences
Ethnic and/or third-language radio and TV broadcasters, newspapers, magazines, and media associations. Multicultural, settlement, aboriginal and ethnic community organizations. Media awareness and other educational entities. Identity-based or media-related public advocacy groups. Other interested educational, community or public-interest groups.

Stage I: **Introduction**	**Stage II:** **Intensification**	**Stage III:** **Renewal**
- Press releases - Mass mailings - Responding to the phone and email queries from public	- More targeted letters - Follow ups on above - PSA placements - Public presentations - Exhibits, events, etc.	- Repeating previous - Revising outreach and promo tactics for some of the contacts based on obtained results
Monitoring, Evaluation & Refinement	Monitoring, Evaluation & Refinement	Monitoring, Evaluation & Refinement

The first stage is largely introductory and consists of mass mailings with some follow-up calls. The second stage sees intensified interactions with more personalized letters, Print-PSA placements, exhibits and public presentations. And the third stage is concerned with outreach renewal measures that deal with any identified diminishing results from outreach. All stages are continuously monitored, evaluated and refined based on the results they yield.

Our promotional campaigns and presentations involve a number of communicative methods (including letters, emails, phone calls, face-to-face meetings, etc.) and tools (press-releases, flyers, brochures, PSAs, web pages, exhibits and displays at various public events, etc.). To get optimal responses, we carefully regulate the sequence and frequency of our promotional presentations to each target audience so as to maintain interest and deal with any identified diminishing returns on our outreach.

The Ripple Effects of Outreach

There is a ripple effect to our outreach in that all of our selected target audiences (both the main categories and their sub-categories) are all organized entities with considerable reach within the different communities we seek to inform. They are all intermediaries selected on the basis of their potential to let diverse members of the public know about the existence of our informational brochure or help them obtain it. Our aim is to reach those with the furthest reach, hence the ripple effect.

The selection of the different sets of target audiences involved not only identifying the intermediary organizations, but also identifying the contact persons within each organization; the person who would be most suitable to promote the project and disseminate its information materials within the organization and the outside community it serves. Outreach to these contacts involved developing a system to identify associated events. This included researching the internet to identify key events for each grouping, and arranging for possible attendances. Often these organizations take the initiative and invite us to their events, and depending on availability, we (the National Chair – the national voice of the CBSC – and myself, together or separately) attend such events every year either as presenters, as exhibitors or just as guests to connect with and have face-to-face interactions with the project's various target audiences.

Third Language Broadcasters

The first set of the project's target audiences are third-language radio and television broadcasters, including not just 'ethnic' broadcasters, but also 'mainstream' broadcasters with periodical programming in third-languages. Broadcasters – ethnic or otherwise, and regardless of whether they are conventional networks, analog specialty stations, Canadian and foreign-based digital stations, cable TV community stations, and campus-based community radio stations – are considered to be important stakeholders of the project. They are also the most likely intermediaries in informing the public about the codes we administer.

Our outreach to this important target group consisted of emailing a factsheet on the project[13], sending sample copies of the multilingual brochures, and face-to-face interactions at events. We have also been invited to a number of broadcaster events ranging from 'open houses' for specific broadcasters to annual industry events like those of the CAB or its members (e.g. the *Télédiversité* annual conference in Montreal, jointly organized by TQS, TVA, and Astral Media) or by other groupings, like the annual gathering of the National Campus and Community Radio Association (many campus and community radio stations have significant programming in third-languages, which makes them great intermediaries for the project's multilingual public information and outreach).

Oftentimes we would attend events that are not directly related to broadcasting, but that would have a general focus on media and diversity, whether they are organized by government bodies (like Heritage Canada) or others (like the *Innoversity Summit* in Toronto). And as a result of our continued interactions, industry players in general and broadcasters in particular have become increasingly aware of project activities, and many have made use of our multilingual brochures as a tool for informing and connecting with their diverse audiences.

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[13] All the over 600 broadcaster members of the CAB/CBSC, most of whom broadcast only in English or French, received the project factsheet. Those who broadcast in third-languages received additional outreach. Many of the broadcasters, ethnic or otherwise, said they made good use of the multilingual brochures as tools for connecting with community contacts from the diverse audiences they serve.

Third-language Publications

The second set of target audiences for the project are ethnic or third-language publications and related media associations, including ethnic press and electronic media associations, and aboriginal, ethnic, and faith-based community newsletters, newspapers, and magazines. Here the targets were the publishers and editors who, due to their positions, are opinion leaders within their communities. They not only have their fingers on the pulse of their communities, but they also have the capacity to reflect and influence it. And as such, they are well-positioned as intermediaries for the dissemination of the CBSC message. Their publications are important sources of information for their communities, and thus great venues for reaching the community.

At the outset of the project, I sent out a letter introducing and explaining the project to all the 350 ethnic publications in our database. Then whenever a brochure is printed in a certain language, I would send a letter to all the publications that publish in that language, as well samples of the brochure in that language, and a request that they place the Print-PSA in their publications so that their readers would know about the availability of the brochure and, hopefully, order it from us for free. Sometimes if a CBSC decision is of direct relevance to a particular community, we translate the decision in their primary language of that community and send it to their publications in the hope that the publishers/editors would refer to it in their news or analysis and thus raise community awareness of the CBSC and the self-regulatory system it administers.

I also made a point of attending their associational meetings, and have scheduled speaking engagements at some of their events. To underline the importance we attach to our relationship with this important target audience, I have, for example, scheduled our National Chair to address some of the gatherings of the organizations that represent the ethnic press, including the National Ethnic Press and Media Council of Canada (NEPMCC), the Canadian Ethnic Writers and Journalists Club (CEWJC), and other ethnic press associations. All this was done to solidify our relationship and foster more cooperation with this important target audience.

Community Organizations

The third set of target audiences for the project are community organizations, including organizations that represent specific ethnic groups, resource centers, organizations that cater to different multicultural or newcomer communities, and faith-based associations. Our outreach activities to this group included regular mailings and fellow-up phone and email contacts. Our connections were meant to either inform audiences of the CBSC role or to seek their feedback in order to evaluate how well we are reaching into their communities.

Connecting with community organizations required not only being in tune with the issues that concern them, but also knowing about all the upcoming events in a given community's life so that we can schedule outreach at major community gatherings. The events we attend range from ones that of relevance to just one particular community, say

the Vietnamese community, or a grouping of communities that have a common racial or cultural affinity, like the events associated with Asian Heritage Month. In addition, we make use of topical issues and current events as opportunities for linking with different audiences and informing them of why they need to know about Canada's broadcast codes and the self-regulatory process created by broadcasters.

Educational Associations

The fourth set of target audiences are educational associations, including media education associations, language training schools, parent/teacher associations, and select number of public school boards. In reaching this category of target audiences, I sought to position the CBSC brochure as a resource on media education, as learning-aid at language training centers, or as reference for anyone interested in media and society.

One of the most important discourse communities we targeted with our message are media education professionals and the organizations that represent them. We have established close contact with the Canadian Association of Media Education (CAMEO) and its member associations in nine provinces as well as several other organizations that share its objective of raising awareness about media issues. And we maintain our contacts by attending these organizations' events.

We have, for example, attended several events organized by the Association of Media Literacy (AML), a member of CAMEO, including the annual *"Sharefest: Lessons*

and Resources for the Classroom". That event, which covered a number of media literacy topics, brought together a number of leading media education professionals. Some of these professionals have successfully incorporated available CBSC information as tools for teaching about the media industry and its various institutions to middle and high school students. Many educators have responded to our outreach and ordered additional brochures for distribution to their students or contacts.

Another important educational audience that we targeted with our message is the Teachers of English as a Second Language (TESL), who have served as intermediaries for reaching their students. It is the view of the CBSC that new immigrants learning Canada's official languages at ESL training centers are an important target audience for our multilingual brochures because: 1) since they are not yet fully proficient in either of the two official languages, they tend to be very appreciative of information in their languages of comfort; and 2) as newcomers to this country, they know less of Canadian institutions and are therefore eager to know about such things like the role of the CBSC in Canadian broadcasting.

Our outreach to this group consisted of targeted mailings to ESL program administrators and networking at their professional gatherings at TESL Canada conferences as well as the smaller provincial and city-level gatherings. We have, for example, attended several of the annual "Education Week" events organized by the English as a Second Language (ESL) Department of the Ottawa-Carleton Catholic School Board (OCCSB), which brings together teachers, administrators, and students of

20 OCCSB-managed ESL training sites in the capital region over four days of exchanges and interactions. In general, as a result of our outreach over the years, more and more ESL teachers are becoming aware of how well the CBSC multilingual brochures may fit into their teaching curriculums. Many of these teachers are ordering our brochures as learning-aids for their students both as a way to teach new terms and as an opportunity for media education.

In addition, as a result of the project's outreach and presentations by the National Chair, I have fulfilled orders for thousands of the brochure for distribution to students of communications or media ethics courses at universities and other academic institutions across the country.

Other Contacts

The fifth and final set of target audiences are 'other contacts' category meant to encompass varying contacts, including public advocacy groups, legal aid clinics, government agencies, and select members of legislative assemblies. It is important to note that contacts in this category were approached as a last resort in outreach. For example, we entered a number of MP and MPP contacts in our database, but we did not dilute our outreach campaigns by contacting them all; rather, we focus our efforts on only where it makes sense and on those who could make a difference in our outreach needs. Case in point is our outreach to the public in Nunavut.

Given that the CBSC brochure is available in Inuktitut and Inuinnaqtun (a dialect of Inuktitut that uses Roman orthography as opposed to the traditional syllabics), and the fact that over 70% of the population in Nunavut speak the language and/or its dialect variant, we felt that we need to have an effective outreach in that territory. But the problem was that we did not have enough contacts there to make much impact. So it made sense to promote the project to all the 19 members of the Legislative Assembly of Nunavut in the hope that they would serve as intermediaries for reaching and sharing our message with the public in that territory. We did that and obtained the hoped effect.

Whether it is targeted at third-language broadcasters, third-language publications, community organizations, educational associations, or other contacts, our public outreach and promotion activities have yielded results. And as a result of our extensive outreach, orders for the brochure and other project collaterals have been pouring in from all over the country. Fulfilling those orders in a timely fashion is the priority of the distribution function of the project.

3.4   Distribution of the Brochures

The goal of the distribution function of the project is to continuously send out the CBSC brochure to new contacts, while fulfilling orders for additional brochures within a 48 hour time span. Since the inception of the project, we have distributed tens of thousands of our multilingual brochures to interested parties across the country either as part of initial mailings or as fulfillment of subsequent orders.

We routinely carry out initial or introductory mass mailings to the various target audiences that include a letter explaining the project, samples of the brochure in English and any other language(s) of relevance to the recipient, and other suitable promotional collaterals. Initial mass mailings to ethnic publications, for example, would include an introductory letter, a sample of the brochure in the language of their publication, and print copies of the PSA, with a note mentioning that it is available in TIFF and JPEG formats for those interested in placing it in their publications.

Brochures are also mailed out as fulfillment of additional orders from people who received initial mailings or from people who we may have received the brochures through our intermediaries, read our announcements in community publications or stumbled on our website. Regardless of the source of their initial awareness, we have successfully fulfilled all orders within the same day or the next day at most.

Our order fulfillment gets sent out in varying packages ranging in size from the normal 4" x 9" letter to L15" x W12" x H4" or larger size boxes. And to make sure that no time is wasted in fulfilling orders, we purchased and kept various-sized parcels and other mailing and shipping materials in stock. The fact that the printer sends the brochures to us ribbon-bound or shrink wrapped in pre-arranged numbers have saved us time. All distribution is processed at the mailing room of the Canadian Association of Broadcasters (CAB) office, which is just across the hall from the CBSC office suite, and is sent through normal Canada Post, although we have occasionally used courier services to fulfill rush orders from organizations or individuals.

4   End Results: Project Evaluation and Assessment

The CBSC Ethnocultural Outreach and Equitable Portrayal Project, which was pegged to the initial six-year licensing term of OMNI.2, will come to a formal end next year. When it does, there will hopefully be a formal project review and a discussion on future options. The review process would examine project successes, shortcomings, and lessons learned; while the discussion on future options would lead to a decision on whether to terminate the project, continue it as it is, or rearrange it in one way or another.

As far as future options are concerned, a consensus seems to be already emerging within the CBSC on the view that since the project is based on one of the permanent mandates of the organization (to inform the public about the broadcast standards and the self-regulatory system), and since it has developed CBSC capacity for fulfilling that mandate, it would be counter-productive to terminate it. The options, therefore, have narrowed down to either extending the project as it is with a different funding mechanism or incorporating its activities into normal CBSC operations; probably by creating a permanent Public Information and Outreach position within the CBSC that would be responsible for continuing the activities started by the project and taking on new ones to further the CBSC mandate to inform Canadians about the broadcast codes and the self-regulatory system it administers.

Whatever direction the CBSC takes with this project or its associated activities, there should be a thorough review process on successes, shortcomings and lessons

learned. This review could be done internally or by bringing in an independent auditor that would evaluate the project from every angle to point out any issues that may have been overlooked during the life cycle of the project. Until that formal review or independent audit, I provide here a more general (i.e. not including sensitive details) evaluation and assessment of the project.

4.1   Project Performance Evaluation

One of the ways we initially considered to evaluate the project and the effectiveness of its awareness-raising measures was to look at the extent the complaints we receive may have increased. This method of evaluation, however, had very obvious shortcomings. For one, there is no direct correlation between being aware of the existence of the broadcast standards and the act of sending in complaints to the CBSC. Many people may become aware of the codes, but not send in complaints for various reasons, including the possibility that they may in fact be satisfied with what is on radio and television or feel that broadcasters are adhering to all the standards. Secondly, it would be difficult to ascertain the extent that an increase in complaints is due to the project's outreach activities or to other factors.

Still, we have noticed an increase in the number of complaints received by the CBSC. We also noticed an increase in complaints from individuals with ethnoculturally diverse names, as well as complaints regarding third-language programming. But for the purpose of gauging the success of the project, there are better methods. One such method

is to evaluate the performance of each function of the project based on its stated goal.

Here is a general evaluation of how the different functions of the project have fared:

Project Management

The goal of effectively and efficiently managing the project across the four functions (Management, Production, Outreach and Distribution) and within each function was achieved despite the built-in scope constraints and/or work-related obstacles. I had my reservations about the delineated scope of the project, but I was able to work within its constraints; and I overcame existing work-related obstacles to build a more formal project out of the haphazard activities that preceded my tenure as Project Manager.

Through effective management of the project, the strengths of the project, particularly the fact that it was well-rooted in the organization's public information or education mandate, were capitalized on; the weaknesses were addressed one-by-one in a systematic way; the opportunities were realized to a large extent; and threats minimized. I took over a project that was in a bad shape and I have succeeded to turn it into a success through effective planning, coherent strategizing, and straightforward structuring of the work into tasks and sub-tasks. Moreover, using generally-accepted management, publishing, and marketing principles, I succeeded in carrying-through efficient processes that not only ensured quality output of a number of outreach collaterals, but also made such collaterals widely available to an ever-increasing number of people.

The outreach database proofed to be very effective in managing and recording my interactions with the target audiences. Similarly, the project notebook, in which I recorded all the progress and problems of the project, has served as an effective administrative tool, especially in monitoring and controlling all aspects of the project. Both the database and the project notebook have helped me to stay on top of the project and have made reporting to the CBSC management very detailed and much easier than it would normally have been.

Production Coordination

The goal of the production function of the project, which was to produce a number of information and outreach collaterals that were error-free, on-time, and on-budget, was demonstrably achieved. Through the management and coordination of the work of the three outsource companies, brochures, PSAs, web pages, kit-folders, posters, display units, etc. were produced in 44 languages; all while maintaining production timelines and quality assurance standards throughout the project.

Anytime quality was deemed to be compromised (even in products that were done prior to my becoming the Project Manager) or there were delays in production schedule, I prevailed upon the companies to own up to the situation and absorb associated costs or reduce fees as compensation. The fact that the normal procedures for outsourcing were not followed has complicated matters for me because it meant that I had to deal with these companies in a vacuum (no contractual or other types of agreements, no records,

and no guidelines). But I overcame that challenge through a number of measures, including devising a coherent production strategy and putting in place a set of clear procedures and specifications for the three companies to follow.

As a result of my specifications and quality assurance measures, there was a marked improvement in the quality of our output. My measures also led to the identification and correction of errors in some of the work that was done for us before I came on board. For example, in assessing past translations (with the help of an independent vetting process I introduced) I noticed that in some cases important terms that were central to our message were being mistranslated (e.g. in one case the word 'broadcasters' was mistranslated as 'host'), so I insisted that any assigned translator be fully qualified and familiar with broadcasting-related terms on a forward-basis, and that any errant translations be redone at their cost.

Another example where added specifications at the translation stage have yielded great results is the requirement that Lexi-tech should send along fonts for each of the languages being translated and a PDF (in addition to Word) of every translation file. Getting the fonts that the translator has used in creating the file have eased difficulties with text (especially for languages in syllabic orthographies) and the PDF of the original translation file has ensured the integrity of the text (it is used for comparing and checking if the text looks like it should; to make sure it has not been corrupted during transfer or other points in production). These specifications have pre-empted technical difficulties

later on at the design and typesetting stages, and have thus made the overall production process more efficient.

The overall effectiveness and efficiency of the project was also enhanced through the better management and coordination of our contacts at the three outsource companies. Instead of dealing with whoever is around at a given time, I demanded that each company appoint a single person to deal with me. Then I managed the appointed account managers as a team by introducing them to one other and taking collective action to ensure quality output that begins with translations at Lexi-tech, proceeds to pre-press development at GordonGroup, and ends with the final printing at Gilmore.

There were, to be sure, difficulties in managing the said team, particularly given the fact that I did not have much authority over them, but through mediation, some cajoling, and few threats (to take our business somewhere else), the process has generally resulted in better quality control and has saved us time. The following is a brief assessment of our relations with the three companies.

Lexi-tech International

The relationship with Lexi-tech was excellent. They had early on appointed a Project Manager to interface with us, and that person has remained in that position throughout the project. This long tenure aided their Project Manager to know more about the CBSC and its translation needs. He was responsive to our needs, timely in delivering

on schedule, and very helpful in sorting out difficulties, whether they were related to translation, proofing, or font/orthographical challenges.

Lexi-tech was also reliable in quickly translating for us non-project-related contents that were the subject of complaints sent to the CBSC. So given the company's demonstrated ability to deliver on our needs, and the likelihood that the extension of the project may mean more translations (e.g. translating the entire Portrayal Code once it is approved by the CRTC), it would be beneficial for the CBSC to keep Lexi-tech as an outsource company. But I would also recommend that the CBSC cultivate a pool of other translation companies and/or freelance translators to turn to in special circumstances. Having options is always good, especially in negotiating prices.

Gordon Group

Dealing with Gordon Group was not easy. Problems kept popping up despite my best efforts to regularize the relationship and simplify the production process. Challenges in pre-press are expected when dealing with such high number of third-languages, including many in syllabic orthographies. But I anticipated those challenges by, for example, requiring Lexi-tech to supply additional fonts for each language they translate and to be prepared to provide extra textual help to Gordon Group in case that is needed. The problem, therefore, had less to do with textual or other inherent challenges than with the inability of Gordon Group to adequately organize for the needs of the project.

The problems stemmed mainly from the fact that they were not sufficiently responsive to my request for them to appoint a project or account manager to handle our file as a whole. This meant that in the first few years I was dealing with more than half a dozen people at their end: the brochure designer, the Print-PSA designer, the web developer, a person handling the posters, one for the roll-up unit, and several management people who were intervening to resolve one conflict or another. And when they finally appointed a Project Manager to interface with us, they would not keep a person in that role for long, which defeated the purpose of having a project/account manager in the first place. I dealt with four different project managers in the past two years alone, and each time they bring in a new account/project manager, I had to brief that person about where things stood because no one at Gordon Group kept complete taps on our specifications.

The problems were not only frustrating, but they also led to errors in production and some delays in schedule. The good thing, however, was that the company always owned up to their mistakes, and absorbed any costs associated with errors they caused[14]. These included errors I have noticed (thanks to the quality control and feedback mechanisms I instituted all over) in brochures they designed prior to my becoming a Project Manager.

I discussed our concerns with Gordon Group representatives on a number of occasions, the last of which was more of a review of their work processes and what

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[14] Gordon Group covered the cost of reprinting three brochures because their typesetters were responsible for errors introduced to the document (after our final approval) that went on to print. They also reduced their fees on a number of occasions as a good will gesture or perhaps to appease us.

changes could be made to address our concerns. Lately they have adopted a more responsive approach towards our concerns; but, still, if the project or its activities are extended, there should be a serious discussion on whether or not to retain Gordon Group. The sole/secure sourcing arrangement we had with them has not worked as well as expected. Usually when you stay this long with one company, they become more familiar with your work and needs, and that makes the working process easier and faster. That, however, was not often the case with Gordon Group.

Gilmore Printing

My interaction with Gilmore was limited in that I only dealt with them when we were readying up to print the brochures, which were usually ganged up in groups of four. And, as mentioned earlier in this report, the process has become routine enough to allow for more process efficiency. With the paper stock and other basic issues decided at the beginning of the project, I would approve the printing of a brochure not from a printer's spread, but by a desktop file sent to me via email from Gordon Group, who would then send the file to Gilmore to prepare printing plates directly from disk. This meant that my interaction with Gilmore was often limited to the administrative processing of their bills.

The quality of Gilmore's printing was very good. However, if the project or its activities were to be extended, I would, again, recommend that the CBSC should move away from the sole sourcing approach. Printing is a straightforward job that any number of sources could deliver on, often at a lower cost than has been the case with Gilmore.

Public Outreach

The goal of the public outreach function, which was to convey the CBSC message to the identified target audiences using the various multilingual information collaterals, was largely achieved. But more could have been accomplished. I devised and executed an outreach strategy that targeted influential organizations, many of whom have helped us spread our message to Canada's diverse communities. And the various multilingual information and promotional collaterals were used well to raise the awareness of the broadcast standards among the project's target audiences. The project has indeed made an impact on the targeted audiences (see more in section 4.2); there were, however, certain factors that if addressed correctly could have made the outreach even more effective.

First, the performance of the project's public information function and that of the CBSC in general would have been tremendously enhanced if we carried through the planned reinvigoration of the CBSC Broadcast-PSA. One of the responsibilities of CBSC broadcaster members is to air, a minimum of three times per week, a 30-second (radio or television) PSA about their station's commitment to adhere to the broadcast codes. The CBSC provides the script of the PSA and broadcasters have leeway in terms of production (voice and video visuals). Broadcasters, however, have not often met their obligation to air the PSA as required, nor has the CBSC been strict in enforcing that obligation. And in cases where broadcasters air the PSA, the varying productions leave the impression that there are differences in the message. In other words, the voice and/or visual differentials and inconsistencies on broadcasting have lessened the impact of the

PSA. So, during this project, plans were made to replace the existing Broadcast-PSAs with a new one, one whose script and production are both determined by the CBSC; and to put in place a system that would ensure all broadcasters run the PSAs as per the times required. Unfortunately, this plan has not been implemented. If it had been implemented, it would have immensely increased public awareness of the CBSC and its important role in Canadian broadcasting, and thus furthered the project's outreach objectives.

Second, the coordination of the project's outreach activities with those of the CBSC National Chair was less than optimal. As the official voice of the CBSC, the National Chair carries out extensive outreach activities – including interactions with the media as well as speeches, presentations and appearance at various educational and public venues or events – all for the purpose of raising public awareness of the CBSC. The hope was that the fulfillment of the overall public information and outreach mandate would be enhanced by coordinating the National Chair's activities with those of the project. And there was such coordination at first, but it did not last long due to other demands on the National Chair's work schedule. This lack of coordination was unfortunate as it may have created an impression that the CBSC has a two-tiered policy towards public information and outreach: one for the mainstream, and one for the "ethnics". This impression, needless to say, run counter to our conceptualization of the project's audience (i.e. how we defined ethnocultural communities) and that certainly did not help my attempts to minimize the risk of project being viewed as a separate "ethnic" matter.

Finally, our inability to be more flexible in dealing with diminishing returns on our outreach to some of the project's target audiences may have limited the performance potential of the project. There was great enthusiasm and reception for the project and its activities from our target audiences during the early periods of the project. But interest in the project and its main collateral, the brochure, has understandably waned over time among some of our key target audiences. This was normal and to be expected in public information campaigns of this kind. And although our message (basically the contents of our brochure) was somewhat static, I had some leeway in modifying my correspondences or changing the sequence of our outreach activities to sustain or renew interest. Such minor adjustments were enough to sustain or renew the interest of some of our target audiences, but not of others. One case where we needed more flexibility to deal with the challenge of diminishing returns on outreach was with the ethnocultural publications.

The principal aim of our outreach to the publishers and editors of ethnocultural publications was to enlist their support in reaching the hundreds of thousands of Canadians who read their papers on a daily, weekly, or monthly basis. More specifically, we wanted them to carry our PSA, which announced the availability of the multilingual brochures, for free (as part of their own community service initiative). After a series of letters, phone calls, and face-to-face meetings with key contacts, I succeeded in convincing many ethnocultural publications to carry our PSA. Persuading them to continue carrying it was another matter.

It was hard to persuade many of these ethnocultural publications to continue carrying our PSA, even intermittently and in any of its three sizes, over longer periods (say, over a season) for better impact. The novelty of placing our PSA for free seemed to fade with the publishers after the first few times, and our continued outreach on this matter has reached somewhat of a dead-end. So to move things along, I suggested that we become flexible in our approach and offer a small, fixed honorarium as incentive for publications each time they print the PSA in their publications. Our budget was large enough to accommodate this move, but the CBSC the management did not welcome the suggestion.

I believe the honoraria would have helped in getting more favourable responses from the ethnocultural publications.[15] In fact, I often wonder how much impact we would have made if we had involved ethnocultural publications more in this project. I wonder what would have been the results if we were, for example, to give the translation contracts to the publishers or editors of these publications instead of outsourcing it to Lexi-tech. The editors/publishers of these publications are, after all, best positioned to do the translations and the move would certainly have solidified their buy-in and commitment for the project, and thus made our outreach to their communities more effective. If the project or its activities were to be extended, I would recommend that the CBSC consider each and every possibility for building more flexibility into the project in order to make it more effective, including the pros and cons of decentralizing the

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[15] The ethnic press has long complained of being overlooked when it comes to the placement of government and other institutional ads. The honoraria would have showed that the CBSC is different and considerate enough of their situation, and this would have helped in soliciting their support for the project.

translation and production work, away from single sourced companies to those who could help us further in spreading our message to Canada's diverse communities.

Distribution

The goal of the distribution function has been easily and fully achieved. Distribution of the brochures, either as initial mail-outs or as fulfillment of orders, always went smoothly. And we continuously sent out the CBSC brochure to new contacts, while fulfilling orders within a 48 hour time period at most. Needless to say that on occasions when I was out of the office on a work-related trip or on vacation, I would, of course, make sure that my phone message and 'out of office' automatic emails would notify people who to contact for speedy order fulfillment. That way people would get the orders when they wanted regardless of whether I was available or not.

If there was any challenge with distribution it would have been in getting the right size packages for the varying orders of the brochure. I often scrambled to get suitable mailing packages or boxes from Office Depot and other suppliers. But I always succeeded to find the right package or was able to modify some (e.g. using fillers) to suit our needs.

Tens of thousands of the brochures were distributed over the years to individuals and organizations. Some organizations in our target audiences have ordered hundreds of brochures at a time, and were further distributing them to their members or contacts at

their own expense. These organizations provided us highly valuable distribution networks without much input, either in labour or in cost, from us.

4.2   Project Impact Assessment

Another way of gauging the success of the project is to assess the extent it has impacted the CBSC or created a favourable opinion of the organization among it's stakeholders, namely private broadcasters, the CRTC, and the general public.

The project clearly had a positive impact on the CBSC in that it invigorated its public information and outreach mandate, and created a communications apparatus or capacity that did not exist prior to this project. This includes an expansive outreach database with over 3,000 community contacts, tens of thousands of information and outreach collaterals that could be used for years to come, and proven strategies for connecting with the public. The project has also been successful in creating a favourable opinion of the CBSC among its other stakeholders.

For the CBSC to ensure its long-term viability and effectiveness, it must sustain the support of the private broadcasters by convincing them that it is valuable to both their individual businesses and to their industry as a whole; it must have the confidence of the CRTC by demonstrating that the self-regulatory process it administers is for the public good, and not completely beholden to the private broadcasters that fund it; and it must cultivate public trust in the system by giving ordinary Canadians an effective voice in

programming-related concerns. The following is a general overview of some of the ways

that the project has made an impact on the CBSC and its relations with the stakeholders.

The Public

It is important to reiterate the fact that the CBSC Ethnocultural Outreach and

Equitable Portrayal Project is a public information endeavour meant to increase people's

awareness about the broadcast codes and the self-regulatory system created by private

broadcasters. The public, therefore, is the central focus of the project. Through selected

intermediaries, outreach activities, and multilingual information tools[16], the project has

conveyed the CBSC message to hundreds of thousands of Canadians, including many

who have not heard about the CBSC before. And those that the project has reached are

now aware of the existence of the broadcast codes, and are, therefore, likely to participate

in the self-regulatory system administered by the CBSC.

The project exceeded expectations in terms of the interest it generated among the

public, in general, and the various intermediary organizations it used to reach them, in

particular. This was reflected by the amount of positive feedback that poured in from

individuals and organizations alike. Letters, emails, and phone calls have poured into the

office to express interest and appreciation for the project. Many commended the CBSC

for informing all Canadians, regardless of their ethnic background, about the self-

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[16] Of the 44 languages used by the project, English and French were understandably the largest. The project, for example, oversaw the production and distribution of 23,000 brochures in the official languages. This means that aside from the speakers of the selected 42 third-languages, many other Canadians also had access to the project's message through the official languages.

regulatory process and how they can participate as audiences to ensure that their values and concerns are reflected in radio and television programming. Others focused their feedback on the impact the brochures in their primary languages had in spurring their communities to get involved. It was empowering for them to know about their entitlements as audiences, and they appreciated the CBSC for letting them know.

In particular, the project had an influence on the targeted intermediaries and thus positively impacted their relations with the CBSC. The project was, for example, instrumental in kick-starting a dialogue between the CBSC and some of the emerging third-language broadcasters. As a result of CRTC's 'open entry' approach to licensing Category 2 digital broadcasters, there has been a proliferation of third-language broadcasters. The project has kept taps on these new licensees, entered them into the project database once they start broadcasting, and communicated to them the benefits of joining the CBSC and using the project's various outreach collaterals to link up with their audiences and inform them about the standards that all broadcasters are expected to meet. Some of these broadcasters have been very appreciative of the dialogue process for public information.

The project has also been appreciated by Ethnocultural publications and their readers. Although it was challenging to get these publications to continuously carry our PSAs, all those we contacted have been cooperative in one way or another in raising the awareness of their readers about the CBSC and the codes it administers. Many have requested large quantities of our brochures for distribution to their community contacts or

for display at events they were sponsoring. Some have written editorials or news pieces about the project or placed our PSA in their pages. Still others, like the Tamil monthly, *Thamilar Senthamarai*, have gone the extra mile by not only placing our Print-PSA in their pages, as requested, but also printing the full text of the brochure (in their language) in their pages for their readers.

The feedback from other intermediaries (i.e. community organizations, media education associations, and others) has equally been positive and enthusiastic. Often our message spread exponentially due to the fact that most of our contacts were organizations with further contacts. For example, in one of our regular mailings, we sent information on the project to the Multicultural Council of Saskatchewan, an umbrella organizations for various ethnocultural organizations in that province. Someone there has taken on herself to fax our letter to all the member organizations of the council. As a result, we received requests for the brochure from organizations who were not on our list, but with whom we now have good working relationships; all with further potential to reach and inform thousands of individuals about the CBSC and the codes it administers.

An informal survey[17] we recently conducted confirmed that the objective of the outreach has been accomplished. In the survey, we asked a group of audiences who received our multilingual brochures whether the CBSC information had made a difference to them as audiences; 86% of them responded that they now follow radio and television programming with more interest and understanding and are more likely to take

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[17] The survey was conducted for us by a former University of Ottawa professor, and was done among the Armenian and Greek communities in Ottawa. We selected these communities and that region to extrapolate on the effectiveness of our outreach among all the communities in all the regions.

broadcasters to task if they are deemed to be in violation of the codes. In that sense, the project has succeeded in telling a growing number of the public that the CBSC is here to give them voice, and they seem to have appreciated our gesture. This has, in turn, enhanced the image of the CBSC among the public, and contributed in solidifying their trust in the self-regulatory system it administers.

Private Broadcasters

The CBSC (through the self-regulatory system it administers) benefits private broadcasters in that it shields them from direct CRTC regulatory control[18], while at the same time casting the industry as a socially-responsible one that is willing and ready to address public concerns on their own. Some broadcasters, however, may not be fully appreciative of the role of the CBSC mainly because they have negatively associated the Council with public complaints. They often hear of or from the CBSC only when someone has launched a complaint against their programming, a back-and-forth process that often ends in a CBSC ruling that goes against them, in favour of the public complainant. The Ethnocultural Outreach and Equitable Portrayal Project has somewhat remedied the situation by shedding a different light on the CBSC, one that shows the organization fully engaged in an initiative that is not directly related to complaints.

The project has affirmed the CBSC as an organization that is actively and extensively promoting the self-regulatory system created by private broadcasters, and, in

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[18] When a broadcaster becomes a CBSC member, the CRTC suspends certain conditions of license on it, and since all complaints regarding the member broadcaster's programming is handled by the CBSC, the broadcaster is able to maintain a 'clean' public file with the government regulator.

the process, building their image as responsible members of the Canadian community. It is interesting to note that during this project, the CBSC has changed its tagline from "Encouraging Excellence in Broadcasting" to "Private Broadcasting, Public Trust" to drive home the point that private broadcasters are at the centre of the CBSC process to address any concerns the public may have on what's being transmitted over the airwaves.

In addition, the multilingual project has contributed to private broadcasters' stated commitment to cultural diversity, something that was recently required of them by the CRTC. In particular, the project provided an unprecedented buzz for the industry's upcoming *Equitable Portrayal Code.* The CBSC Secretariat, including the Project Manager, have advised the industry about the code, took part in public consultations over it, and, through the outreach activities of the project, informed the public about the upcoming code. And if, as expected, the project or its activities are extended, it will undertake a massive public information campaign for the code and its application, a campaign that will ultimately enhance the image of private broadcasters and the self-regulatory system they have created.

Finally, an unintended by-product of the project has been the potential expansion of the membership ranks of both the CAB (Canadian Association of Broadcasters) and the CBSC. Through its extensive outreach activities, the project has spurred the interest of some community and third-language broadcasters to join these organizations. The membership ranks of the CAB/CBSC include the overwhelming majority of Canada's broadcasters, but there are a sizable number of broadcasters that are not members.

Consider, for example, the case of some third language broadcasters. Although the main Canadian ethnic broadcasters like Telelatino, Asian Television Network, Fairchild and others have long been active members of the CAB, some of ethnic broadcasters have opted for a parallel organization.[19] In its interaction with some of these broadcasters, the project has created interest for them to join the bigger organization. And since membership to the CBSC is open to all broadcasters (not just those represented by the CAB), a number of non-commercial campus and community radio stations have also shown interest in joining the CBSC. The more broadcasters join the CBSC, the more the credibility of the self-regulatory system is boosted; something that is also of benefit to the private broadcasters who created the system.

The CRTC

When the CRTC approved CAB's proposed set up of the CBSC back in 1990, it made it clear that as the legal designate of Parliament to oversee the broadcasting industry, it cannot completely absolve itself of its responsibility via self-regulation (see Public Notice CRTC 1991-90). This formally put the CBSC under the watchful eye of the CRTC, and made the latter one of the most important stakeholders of the former.

There are a number of ways that the CRTC retains influence over the CBSC. One way is through the complaint process. Although the CRTC forwards all complaints it receives concerning CBSC members (nearly all private broadcasters in Canada are CBSC

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[19] In the late 1980s, a group of ethnic broadcasters have, under the leadership of the late Johnny Lombardi of CHIN-Radio, moved to form their own lobby group, the Canadian Association of Ethnic Broadcasters (CAEB), separate from the CAB (founded in 1921).

members), when someone is not satisfied with the decision of the CBSC, they can ask the CRTC to review the matter. It has been a mark of CBSC success that the CRTC has never once reversed a decision of the CBSC.

Another way that the CRTC retains influence is by its periodical examination of whether or not the CBSC is meeting its public-service objectives. And herein is where the project has made its impact. The project has enhanced the image of the CBSC in the eyes of its most powerful stakeholder by demonstrating, through this project, that it is very serious in its objective of informing the public about the broadcast standards and the recourse available to them in the application of these standards. Needless to say, the CRTC has been very pleased with the outreach project. In a letter to the CBSC, dated 27 July 2005, the then CRTC Chairman, Charles Dalfen, wrote:

> "I would especially like to commend the CBSC on its Ethnocultural Outreach and [Equitable] Portrayal Initiative.... The CBSC's outreach initiative goes a long way to increasing awareness and understanding of broadcast standards and the Council among Canada's diverse communities and no doubt will contribute to furthering the participation of all Canadians in the system."

The words of the then CRTC Chairman are an appropriate summation of the project and its objectives, as well as its success in achieving its objectives and thus having an indelible impact on all of its stakeholders.

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Appendix 1

Canadian Association of Broadcasters'
Equitable Portrayal Code

**Code is to be Administered by the
Canadian Broadcast Standards Council
(once it is approved by the CRTC sometime early 2008)**

Introduction

This Code, which replaces the *Canadian Association of Broadcasters ("CAB") Sex-Role Portrayal Code*, has been created to ensure the equitable portrayal of all persons in television and radio programming. Canada's private broadcasters recognize the cumulative societal effect of negative portrayal and, by creating this *Equitable Portrayal Code* ("Code"), establish common standards to prevent such portrayal.

The CAB solicited input on the Code from 36 public stakeholder organizations representing ethnocultural, Aboriginal, and disability groups in the English- and French-language markets.

The *CAB Equitable Portrayal Code* reflects the responsibilities of licensees, under the *Broadcasting Act,* to ensure that their programming and broadcast services achieve the highest standards, and demonstrates the private broadcasters' commitment to the equitable portrayal of all persons in their programming.

Background

In July 2004, the Canadian Association of Broadcasters endorsed the recommendations included in *Reflecting Canadians – Best Practices for Cultural Diversity in Private Television*, the report of the Task Force for Cultural Diversity on Television ("Task Force Report"). A key recommendation was that the CAB review its industry codes for the purpose of determining whether they addressed concerns identified in the Task Force's research findings regarding the reflection and portrayal of ethnocultural and Aboriginal groups. The Task Force Report was followed by a report commissioned by the CAB, *The Presence, Portrayal and Participation of Persons with Disabilities in Television Programming* ("CAB Persons with Disabilities Report"), which was released in September 2005. The CAB Persons with Disabilities Report also noted a lack of industry reference points or standards concerning the depiction and portrayal of persons with disabilities and called for a review of existing codes to address this concern.

The CAB was guided by the research findings in both the Task Force Report and in the CAB Persons with Disabilities Report relating to reflection and portrayal in developing this Code.

Specifically, the Task Force report, and in particular the Phase IV Focus Group research, identified the following areas of concern with respect to achieving the fair and accurate portrayal of ethnocultural and Aboriginal groups:

> ➢ Stereotyping;
> ➢ Negative and Inaccurate Portrayal; and
> ➢ Unbalanced Portrayal in Newscasts.

The CAB Persons with Disabilities Report, and in particular Part III of the Research Report, identified similar concerns regarding the reflection and portrayal of persons with disabilities focusing primarily on inaccurate or stereotypical portrayals in dramatic and news and information programming and concerns regarding the victimization of persons with disabilities in programming.

This Code is designed to complement the research conducted and the initiatives undertaken by Canada's private broadcasters and other industry stakeholders in the area of diversity, and the general principles contained in the other CAB and industry codes referenced in Appendix A, namely, the *Radio Television News Directors Association ("RTNDA") Code of (Journalistic) Ethics*, the Advertising Standards Canada *Gender Portrayal Guidelines for Advertising* and the *Canadian Code of Advertising Standards*.

This *CAB Equitable Portrayal Code* is the response of the Canadian Association of Broadcasters to concerns identified in the Task Force Report and the CAB Persons with Disabilities Report regarding depiction and portrayal. It will be administered by the Canadian Broadcast Standards Council.

Statement of Intent

It is the intent of this Code that broadcasters shall encourage equitable portrayal. This Code is intended to assist in overcoming unduly negative portrayal and stereotyping in broadcast programming, including commercial messages, based on matters of race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability.

General Principles

[a]   The objective of equitable reflection of identifiable groups is well recognized by broadcasters, who consider that the portrayal of such groups shall be comparable to, and reflective of, their actual social and professional achievements, contributions, interests and activities.

[b]   Television and radio programming shall strive to present all identifiable groups in various social and occupational roles, at home and at work outside the home.

[c]   Nothing in this Code should be interpreted as censoring the depiction of healthy sexuality; however, broadcasters shall avoid and eliminate the depiction of gratuitous harm toward individuals in a sexual context, as well as the promotion of gender-related degradation.

[d]   Broadcasters and the public should also refer to the *CAB Voluntary Code Regarding Violence in Television Programming*, which contains provisions prohibiting programming that sanctions, promotes or glamorizes violence against

identifiable groups; and the *RTNDA Code of (Journalistic) Ethics* and certain clauses of the *CAB Code of Ethics*, which deal with news and public affairs programming.

[e]   Broadcasters shall evaluate individual programs within the context of their overall schedule, on the one hand, and broadcast services and other media available within their market, on the other, to ensure a varied approach to programming content that reflects the equitable portrayal of identifiable groups.

[f]   Assessment of a station's performance in relation to program development, acquisition and scheduling should take into account the station's overall schedule and record on the issue of the portrayal of individuals or groups on the basis of race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability.

[g]   Any appreciation of portrayal in television and radio programming is assessed in the fictional or non-fictional context of a program, feature, character, dialogue, voice-over or visual interpretation. Taking into consideration the societal, educational and entertainment purposes of program creation, it is recognized that balance in portrayal within a specific or individual program is not always possible or even desirable.

[h]   No code can reasonably anticipate every circumstance of negative portrayal. Consequently, the CAB expects all such circumstances to be dealt with in accordance with the spirit and intent, as well as the wording, of this Code.

Code Application and Administration

Application of this Code is the responsibility of the individual licensee. Complaints and inquiries should be addressed to and dealt with by the broadcaster involved.

Complaints not resolved between the complainant and the broadcaster will be referred to the Canadian Broadcast Standards Council, which is charged with the administration of this Code and the process which that entails.

To create awareness of this Code, the CAB will work with the Canadian Broadcast Standards Council, which will distribute copies to interested parties, post the Code on its website in the CBSC's wide range of Aboriginal and ethnocultural languages, and encourage broadcasters to broadcast relevant public service announcements.

The Code

1. Equitable Portrayal

Television and radio programming shall respect the principle of equitable portrayal of all individuals.

2. Human Rights

Recognizing that every person has the right to the full enjoyment of certain fundamental rights and freedoms, broadcasters shall ensure that their programming contains no abusive or unduly discriminatory material or comment which is based on matters of race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability.

3. Negative Portrayal

In an effort to ensure appropriate depictions of all individuals and groups, broadcasters shall refrain from airing unduly negative portrayals of persons with respect to race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability. Negative portrayal can take many different forms, including (but not limited to) stereotyping, stigmatization and victimization, derision of myths, traditions or practices, degrading material, and exploitation.

4. Stereotyping

Recognizing that stereotyping is a form of generalization that is frequently simplistic, belittling, hurtful or prejudicial, while being unreflective of the complexity of the group being stereotyped, broadcasters shall ensure that their programming contains no unduly negative stereotypical material or comment which is based on matters of race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability.

5. Stigmatization and Victimization

Recognizing that members of certain of the following identifiable groups face particular portrayal issues, broadcasters shall ensure that their programming does not stigmatize or victimize individuals or groups on the basis of their race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability.

6. Derision of Myths, Traditions or Practices

Broadcasters shall avoid the airing of content that has the effect of unduly deriding the myths, traditions or practices of groups on the basis of their race, national or ethnic

origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability.

7.   *Degrading Material*

Broadcasters shall avoid the airing of degrading material, whether reflected in words, sounds, images or by other means, which are based on race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability.

8.   *Exploitation*

a)   Broadcasters shall refrain from the airing of programming that exploits women, men or children.

b)   Broadcasters shall refrain from the sexualisation of children in programming.

9.   *Language and Terminology*

Broadcasters shall be sensitive to, and avoid, the usage of derogatory or inappropriate language or terminology in references to individuals or groups based on race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability.

 a) Equality of the sexes must be recognized and reinforced through the proper use of language and terminology. Broadcasters shall employ language of a non-sexist nature in their programming, by avoiding, whenever possible, expressions which relate to only one gender.

 b) It is understood that language and terminology evolve over time. Some language and terminology may be inappropriate when used with respect to identifiable groups on the basis of their race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status or physical or mental disability. Broadcasters shall remain vigilant with respect to the evolving appropriateness or inappropriateness of particular words and phrases, keeping in mind prevailing community standards.

10.   *Contextual Considerations*

Broadcasts may fairly include material that would otherwise appear to breach one of the foregoing provisions in the following contextual circumstances:

 a) Legitimate artistic usage: Individuals who are themselves bigoted or intolerant may be part of a fictional or non-fictional program, provided that the program is not itself abusive or unduly discriminatory;

 b) Comedic, humorous or satirical usage: Although the comedic, humorous or satirical intention or nature of programming is not an absolute defence with respect to the proscriptions of this Code, it is understood that some comedic, humorous or satirical content, although discriminatory or stereotypical, may

be light and relatively inoffensive, rather than abusive or unduly discriminatory;

c) Intellectual treatment: Programming apparently for academic, artistic, humanitarian, journalistic, scientific or research purposes, or otherwise in the public interest, may be broadcast, provided that it: is not abusive or unduly discriminatory; does not incite contempt for, or severely ridicule, an enumerated group; and is not likely to incite or perpetuate hatred against an enumerated group.

Appendix 2

Target Audiences of the CBSC Ethnocultural Outreach Project

Third-language Broadcasters

- Conventional networks
- Analog specialty stations
- Canadian digital stations
- Foreign-based digital stations
- Cable TV community stations
- Commercial radio stations
- Campus radio stations

Third-language Publications

- Ethnic media associations
- Aboriginal publications
- Student publications
- Ethnic publications
- Faith publications

Community Organizations

- Community resource centers
- Multicultural associations
- Settlement organizations
- Aboriginal organizations
- Ethnic organizations
- Faith associations

Educational Institutions

- Media education associations
- College and university centers
- Parent/teacher associations
- Third-language schools
- Public school boards

Other Contacts

- Identity-related advocacy groups
- Media-related advocacy groups
- Government agencies
- Legislative assemblies
- Legal aid clinics

Appendix 3

Selected CBSC Outreach Languages and their Population Estimates
Source: 2001 Census

Amharic – 14,205

Arabic – 290,280

Armenian – 32,905

Bengali – 34,650

Chinese – 1,028,440

Cree – 97,230

Croatian – 71,725

Czech – 30,880

Dari –

Dutch – 157,875

Farsi – 111,705

German – 635,520

Greek – 158,800

Gujarati – 80,835

Hebrew – 63, 675

Hindi – 227,295

Hungarian – 89,230

Inuinnaqtun –

Inuktitut – 32,775

Italian – 680,970

Japanese – 65,030

Korean – 91,610

Macedonian – 25,125

Mohawk - 755

Ojibwe – 30,505

Pashto – 7,990

Polish – 249,695

Portuguese – 264,995

Punjabi – 338,720

Romanian – 60,520

Russian – 157,455

Serbian – 50,110

Sinhala – 15,415

Somali – 31,260

Spanish – 610,575

Swahili – 25, 300

Tagalog – 244,690

Tamil – 111,585

Turkish – 32,520

Ukrainian – 200,525

Urdu – 139,445

Vietnamese – 165,645

Appendix 4

Brochure Printing by CBSC Fiscal Year

2002/2003	2003/2004	2004/2005	2005/2006
Arabic - 2500	Cree - 1000	Amharic - 1000	Bengali - 2000
Chinese - 2500	Czech - 1000	Armenian - 1000	**English - 3000**
English - 3000	Dari – 1000	Croatian - 1000	**French - 2000**
French - 2000	**English (r) -3500**	Dutch - 1000	Gujarati - 2000
Hindi - 2500	**French (r) - 2500**	**English (r) - 5000**	Hebrew - 1000
Inuinnaqtun - 2500	German - 1000	**French (r) - 2000**	Swahili - 1000
Inuktitut - 2500	Greek - 1000	Farsi - 1000	
Italian - 2500	Japanese - 2000	Hindi (r) - 1000	
Portuguese - 2500	Korean - 1000	Hungarian - 1000	
Punjabi - 2500	Ojibwe - 1000	Macedonian - 1000	
Somali - 2500	Pashto - 1000	Mohawk - 1000	
Spanish - 2500	Polish - 1000	Polish (r) – 1000	
Tamil - 2500	Russian - 2000	Punjabi (r) - 1000	
Ukrainian - 2500	Tagalog - 2000	Romanian - 1000	
	Turkish - 1000	Serbian - 1000	
	Urdu - 1000	Sinhala - 1000	
	Vietnamese - 2000		

(r) = reprints

Note: Although the languages have been selected early on, their translation and printing were staggered over the years so as to make the workload more manageable and to make time for outreach activities. 92,000 copies of the brochure has thus far been printed. 23,000 of those in English and French. The brochures in the official languages were reprinted every year of the project to cope with higher demand.