



**Canadian  
Association of  
Broadcasters**

**L'Association  
canadienne des  
radiodiffuseurs**

July 18, 2007

Mr. Claude Majeau  
Secretary General  
Copyright Board of Canada  
56 Sparks Street, Suite 800  
Ottawa, ON K1A 0C9

Dear Mr. Majeau:

**Re: CMRRA/SODRAC Inc. – Online Music Services Tariff 2008**

1. The Canadian Association of Broadcasters (CAB) is the national voice of Canada's private broadcasters, representing the vast majority of Canadian programming services, including private radio and television stations, networks, specialty, pay and pay-per-view services. The goal of the CAB is to represent and advance the interests of Canada's private broadcasters in the social, cultural and economic fabric of the country.
2. This letter constitutes the statement of objections of the CAB in respect of the statement of proposed royalties filed by CMRRA/SODRAC Inc. (CSI) for the reproduction of musical works in CSI's repertoire by online music services in 2008. This statement of proposed royalties was published in the Supplement to the Canada Gazette, Part 1 on May 19, 2007.
3. To the extent that some of the CAB's members may be engaged in activities that the tariff purports to cover, the CAB objects to the tariff's proposed terms and rates on the basis that they are excessive and unreasonable. In particular, the CAB opposes increases to the tariff rates, and the proposed expansion of the rate base to cover gross revenues for Limited Downloads and On-demand Streams from the existing rate base of subscriber payments. The CAB submits that the Board should not approve the tariff as filed.
4. In closing, the CAB requests that it be made a party to this proceeding and that it be permitted to make representations to the Board at any hearing convened to consider the proposed tariff.

Sincerely,

**Original signed by**

Margot Patterson  
Vice-President, Legal Affairs

c.c. Claude Brunet (Ogilvy Renault)