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Article

Private Broadcasting and the Path to Radio Broadcasting Policy in Canada

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Abstract

The largely unregulated early years of Canadian radio were vital to development of broadcasting policy. The Report of the Royal Commission on Radio Broadcasting in 1929 and American broadcasting both changed the direction of Canadian broadcasting, but were mitigated by the early, largely unregulated years. Broadcasters operated initially as small, independent, and local broadcasters, then, national networks developed in stages during the 1920s and 1930s. The late adoption of radio broadcasting policy to build a national network in Canada allowed other practices to take root in the wake of other examples, in particular, American commercial broadcasting. By 1929 when the Aird Report recommended a national network, the potential impact of the report was shaped by the path of early broadcasting and the shifts forced on Canada by American broadcasting and policy. Eventually Canada forged its own course that pulled in both directions, permitting both private commercial networks and public national networks.

Keywords

America; broadcasting; Canada; commission; frequencies; media history; national; networks; radio; religious

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1. Introduction

Early Canadian broadcasting policy was marked by a few key events. The stage was set by the first Report of the Royal Commission on Radio Broadcasting commissioned in December 1928, more popularly known at the Aird Commission, followed by the Canadian Radio Broadcasting Act of 1932, and the Act to amend the Canadian Broadcast Act in 1936 (Bird, 1988; Peers, 1969; Prang, 1965; Weir, 1965). From 1922 to 1929 before the Aird Report was released, radio was influenced not only by debate over its content, but also its control. The resulting struggle over frequencies was affected by scarcity and by the reality of North American broadcasting. The American Radio Act of 1927 and General Order 40 of August 30, 1928 changed Canadian broadcasting in ways that may have made the Aird Report and subsequent legislation more urgent. Local and international interests stepped

into the vacuum prior to the establishment of a public or national broadcasting network. Both broadcasters and the audience were accustomed to this commercial environment prior to the establishment of a true national network and it was within this environment that the push for a Canadian broadcasting originated.

2. Regulation

The Department of Marine and Fisheries was the regulatory agency charged with radio in Canada, making the conceptualization of the new medium as distinct from the United States, where it was regulated by the Department of Commerce, and in Britain by the British Post office. The Naval Service took over during the war, but in 1922 the Department of Marine and Fisheries resumed regulation of radio and started to issue private, commercial broadcasting licenses and receiving licenses. By 1923

¹ Canada's first effort to regulate what would become radio was the Wireless Telegraphy Act in 1905, designating the authority to license radio to the Department of Marine and Fisheries. Surrounded by three oceans, ship-to-shore communications dominated the early notion of radio's role and regulation. Control over all aspects of radio in the Radiotelegraph Act of 1913 was granted to the federal government and from 1913 to 1922 the Radio Branch continued its work under the Department of Naval Service.



there were 51 private, commercial broadcasting stations; that number grew to 77 by 1929 (Dominion Bureau of Statistics, 1926, 1931). As radio stations multiplied so did the number of listeners, but concentrated listening audiences only reached numbers profitable for commercial broadcasting in a few cities.

The commercial imperative that drove the rapid growth of American broadcasting met with limited success in Canada, not only because its population was slightly less than a tenth of the United States, but also, since radio signals travel across national borders, which forced Canadian radio to compete with American radio.² Without language barriers, physical barriers, such as mountain ranges or technological barriers, the drift of radio signals across the national border is inevitable. The larger American audience guaranteed advertisers, rapid expansion of their commercial networks, and eventually triggered the consideration of the audiences north of the border in Canada, as part of an ever-expanding commercial broadcasting system.

Long before nation building interests were central to discussion of Canadian broadcasting, the impact of commercial broadcasting on the growth of radio networks was crucial (Allard, 1979; MacLennan, 2001; Skinner, 2005; Vipond, 1992). Although the Radio Branch of the Department of Marine and Fisheries regulated licensing, a larger void was left without a network of stations or a plan beyond permitting and facilitating commercial broadcasting. The closest to a national network was the Canadian National Railway's network of stations across the country, but there were only three production studios: in Moncton, New Brunswick, Ottawa, Ontario, and Vancouver, British Columbia. The remaining stations were available to the train's passengers as they passed through cities where programs were broadcast at pre-arranged times by "phantom" stations, hosted on other stations a few hours a week. Due to the limited frequencies to allocate, under the Gentleman's Agreement of 1924 with the United States, only Montreal, Toronto, and Vancouver had two wavelengths, but every other Canadian city was forced to share one wavelength (MacLennan, 2016, p. 198). American programming was only available to Canadian listeners until 1928, if they resided within reception range of stations located in the United States. This crowded space on the radio dial initially did not allow American affiliate expansion into Canada, however, debates about content and changes to American regulation soon created spaces on the dial for American networks in Canada.

3. Exercising Regulatory Power, Frequency Assignment and Religious Broadcasting

A variety of factors coalesced to change the distribution of radio frequencies, make American broadcasting feasible inside the national boundaries of Canada, and

move Canada toward the development of a national network. The most controversial radio debate in the House of Commons and the newspapers focused on complaints about the International Bible Students' Association (IBSA) and their programs on several stations across the country. The granting or denial of radio licenses remained one of the few powers exercised by the Ministry of Marine and Fisheries. Minister P. J. A. Cardin decided not to renew the licenses of the IBSA stations after letters complaining about their broadcasts were received (Johnston, 1994, p. 379; McGowan, 2008, pp. 8–9; Opp, 1994, pp. 103–104; Prang, 1965, pp. 4–5; Vipond, 1992, pp. 197-198, 2010, p. 79). The decision came under criticism in the House of Commons, in particular from J. S. Woodsworth, Labour MP from Winnipeg North Centre, who wanted "to protest against...the very arbitrary action on the part of the department with regard to the cancellation of these licenses" (Canadian Parliamentary Historical Resources, 1928). Woodsworth acknowledged the stations' connection to the IBSA, but noted that its status a business was also a consideration (Canadian Parliamentary Historical Resources, 1928). As noted by Mark McGowan, one of the incidents that sparked religious controversy was Judge Joseph F. Rutherford's talk on the radio in 1927 about Catholics and Protestants, while in Toronto (Toronto Star, 1927, as cited in McGowan, 2008, pp. 8-9). Woodworth further argued in the House of Commons that the correspondence tabled upon which these decisions were based were files comprised, in large part, of newspaper clippings focused on the discussion of the decision, not complaints prior to the decision (Canadian Parliamentary Historical Resources, 1928, p. 3618). Woodsworth also noted the hypocrisy of one "correspondent [who] complained that the programs of the Bible Students' Association were too American, and then he went on to say in the very same letter that they prevented the receiver from getting American stations" (Canadian Parliamentary Historical Resources, 1928, p. 3619). The religious controversy on the radio focused on questions of censorship and favoring one religious group over another.

One of the significant outcomes of the denial of the license renewal was the shift among the remaining stations. In 1927 before the IBSA stations were revoked, the Christian and Missionary Alliance station, in Edmonton, started broadcasting, but with the winnowing of the competition, was able to survive and eventually grow (Opp, 1994, p. 104). The change in the distribution of radio stations may have had a greater impact than the debate over religion on the radio. The interruption by CKCX, an IBSA phantom station, during CFRB's popular Baptist sermon on their shared frequency, provoked complaints (Bone, 1924, as cited in McGowan, 2008, p. 9). Hon. Donald Kennedy, United Farmers of Alberta Member of Parliament from Peace River, asked if there was a "complaint that the Bible Student's Association had interfered

² The American population at 124,039,648 in 1931 and Canadian population at 10,376,379 in the same year was also a crucial factor in the cross border relationship (Statistics Canada, 2011; United States Census Bureau, 2000).



with the advertising of Gooderham and Worts whisky?" to which Hon. J. S. Woodsworth replied in the affirmative (Canadian Parliamentary Historical Resources, 1928, p. 3619). The conflict over religious broadcasting and the subsequent denial of license renewals created a furor in the press over censorship, possible religious alliances, and the power of the Minister of Marine and Fisheries, concealing the other factors at work. The removal of the IBSA from their stations licensed in 1924 in Saskatoon, followed by Vancouver, Edmonton, and Toronto in 1926, generated a space for the growth of other stations on their shared frequencies. The centralization and dominance of traditional voices was swifter and more consistent in the United States, where the Bible Students and Judge Rutherford more rapidly removed from the airwaves (Goodman, 2014; McChesney, 1993). The availability of these new frequencies coincided with the development of broadcasting policy in the United States that was soon followed by legislation and the redistribution of radio frequencies throughout North America.

4. Station Reallocation

By the late 1920s, many smaller American radio stations could not compete due to technical requirements, the requirement to produce live programming, and the reallocation of frequencies (McChesney, 1993). The opposite was true in Canada. Canadian radio stations ranged from small local stations with very little equipment, low power, and shared facilities, to the larger stations that continued to make investments in their stations and lobby for their continued presence on the radio dial. The movement of American affiliate stations into Canada came at an opportune time, prior to the establishment of a Canadian national network and immediately after the censure of religious broadcasts that resulted in the loss of stations operated by the IBSA. American affiliates managed to acquire existing Canadian stations for their chains prior to any potential regulations that might forbid the process or limit American program content (MacLennan, 2016, p. 197). The immediate affiliation of four stations with NBC and CBS also coincided with the reallocation of frequencies under the American General Order 40 and three of the affiliates were each recipients of one of the six clear channels assigned to Canada, held exclusively or were offered a shared position on the dial. The American Radio Act of 1927 and the subsequent reallocation of stations under General Order 40 were disruptive to listeners in Canada and their stations (MacLennan, 2016, 2017; Socolow, 2008). The greater conflict over the American Southern border with Mexico about frequencies remained unresolved until 1941; Mexico received no clear channels in the reallocation of stations in 1928 (Fowler & Crawford, 2002; Kahn, 1996, p. 206). The reallocation in the United States resulted in the major commercial broadcasting chains, NBC and CBS, acquiring the clear stations.

Results were similar in Canada, when many of the radio stations assigned clear stations became American

network affiliates almost immediately afterward. CFRB in Toronto as principal station, on clear channel 960, became a CBS affiliate directly following the change. The frequency, however, remained a shared frequency with CKGW, a station that would become an NBC affiliate in 1928. CKAC in Montreal also shared the clear channel of 730 with CFCF. CKAC became a CBS affiliate almost immediately afterward. CFCF, however, moved to 1030 as principal station on its own clear channel by March 1929, and became an NBC affiliate (Federal Radio Commission, 1971, pp. 201-204; The National Broadcast Authority, 1928, 1929). Toronto's oldest station, operated by The Toronto Star, became principal station with CNRT, a Canadian National Railway station on clear channel 840 (Federal Radio Commission, 1971, pp. 201–204; Gabriele, & Moore, 2012; The National Broadcast Authority, 1928, 1929). The clear stations in Canada were assigned primarily to large stations that were to become American affiliates. The remaining two clear channels were 910, shared by CFQC Saskatoon; CJGL London, CJWL Saskatoon, and CNRS Saskatoon, and 690 shared by CFAC Calgary; CFEN Calgary; CHCA Calgary; CJCJ Calgary; CKCO Ottawa; CNRC Calgary; and CNRO Ottawa (The National Broadcast Authority, 1928, 1929; United States Department of Commerce, 1926). The lack of regulatory barriers in Canada permitted the entry of American affiliates into the country. The reallocation of frequencies, however, allowed the clear channels to be assigned mainly to stations large enough to become American affiliates.

This concentration of clear channels among powerful stations, particularly stations broadcasting as American affiliates, intensified the impact of American programming within Canada. Prior to this reallocation and the agreements to become affiliates, these stations were successful in their own right with Canadian content. CKAC, CFCF, CKGW and CFRB all added to their broadcast days, by supplementing or replacing Canadian programs with American programs, once they were affiliates (MacLennan, 2001, 2005). In part, the sought-after clear channels made this possible, especially if they were not shared. Prior to this change, American content was not as readily available to Canadian listeners, except after dusk.

5. The Case of CKGW

CKGW was one of the first Canadian stations to become an American affiliate as part of NBC, but did not receive a clear channel in the reallocation. Its active campaign to acquire a clear channel, without sharing broadcast time with another station on the same wavelength, demonstrates the importance of a full broadcast day the Canadian market. Without a doubt the most ambitious private Canadian station, CKGW the "Cheerio station", was very concerned about the station's place on the dial. In 1926, CKGW installed its transmitter in Bowmanville, east of Toronto, making its station at 5,000 watts the most powerful station in Canada, rivaling some American stations (Dominion Bureau of Statistics, 1926). The last



two call letters in CKGW stand for Gooderham and Worts, a Toronto whiskey distillery on Lake Ontario, broadcasting during the American prohibition. Whisky advertising was not the station's goal; instead it aimed to become the hub of Canadian broadcasting. CKGW's vigorous pursuit of a separate frequency for its station is evident in the letters the station manager exchanged with any person or agency that might assist in the goal of a separate frequency. In the wake of the reallocation of radio frequencies, CKGW's manager wrote to the Liberal MP for Perth North, Francis Wellington Hay, with extensive plans for the reorganization of the six exclusive wavelengths and eleven shared wavelengths, providing for an exclusive frequency (Ashcroft, 1928). May 14, 1928, shortly after the announcement of reallocation of wavelengths for November 11, 1928, M. B. Mayersmith, General Manager of CKGW, wrote to the Deputy Minister of the Department of Marine and Fisheries to explain that the station frequently received criticism for interference from KDKA (Mayersmith, 1928). Interference from or with American stations was successfully presented by other Canadian stations seeking their own wavelength. R. W. Ashcroft, General Manager of the Trans-Canada Broadcasting Company, outlined the problem that until March 31, 1928: CFCA of The Toronto Star, CKNC of Canadian National Carbon Co., and CKCL of Dominion Battery Co shared one wavelength; CFRB of Standard Radio Manufacturing Corporation and CJYC with CKCX of the IBSA shared a second; and CKGW of Gooderham & Worts, Limited had its own wavelength. With the plan for a major redistribution of stations across North America in April 1, 1928, CFCA acquired its own wavelength; CKNC and CKCL would share a wavelength; and finally CFRB and CKGW would also share a wavelength (Ashcroft, 1928). Not only had CKGW lost its separate wavelength, but it was being forced to share a wavelength with its biggest competitor. In Toronto, The Globe jumped into the fray with an editorial that argued, "Many of [its] family of radio fans declare that conditions are many times worse...and that the United States wave-shifts have not only spoiled reception of many of their favorite United States stations" (The Globe, 1928). The editorial also explained that the newspaper received letters complaining about the changes in the American stations "destroyed reception of Canadian stations as well...where Toronto stations were formerly heard...we now cannot get...Canadian programs" (The Globe, 1928). The newspapers, as one of the largest radio ownership groups, and commercial radio stations, jumped into the debate about the future of radio, as the federal government moved out the period of benign neglect in the early 1920s. The debate, intensified by newspaper involvement, that ensued prior to and in the wake of the frequency reallocation, heightened public awareness debate with regard to the control of radio.

Ralph Ashcroft, General Manager at CKGW, proposed three alternatives that included moving CFRB to share a wavelength with any other stations and leave CKGW on a wavelength of its own. Ashcroft further explained

CKGW was the most powerful and modern, with a great range and sponsored Canadian programs. The station was also "the 'key' station in the Trans-Canada Broadcasting Co., an organization functioning in Canada, similarly to the National Broadcasting Co., in the United States" (Ashcroft, 1928). Chain broadcasting, Canadian quality programs, and the fact that the \$75,000 CKGW had already spent on Canadian talent that could be doubled with twice the air time, were enumerated as the relative merits of CKGW in comparison to other stations, particularly in Toronto (Ashcroft, 1928). Broadcasters considered viability and profitability of commercial stations as crucial to the evaluation of Canadian stations, just as the Federal Radio Commission did in the United States (McChesney, 1993). Hon. Francis Wellington Hay did follow up on CKGW's request explaining, "It does seem strange that a very much inferior Broadcasting station in Toronto shall be permitted full time, and a wholly, or practically no commercial broadcasting station, prepared to serve the public is only allowed part time" (Wellington Hay, 1928). He was warned by the Deputy Minister A. Johnston that Gooderham & Worts, Limited should be ready "for the contingency of sharing time with not more than two other stations" (Johnston, 1928). This was a follow up to a previous communication to Gooderham & Worts's legal representatives on March 28, 1927. CKGW's attempts to secure its own wavelength and relocate to Toronto were central to its plan to become anchor station for its own network, in order to become an American affiliate station and a hub for the production or original programming.

6. Mixed Reaction

The North American reallocation of wavelengths disrupted the balance of the distribution of Canadian radio stations and provoked letters to the Ministry from both radio stations and listeners. The reallocation and subsequent conversion of Canadian stations to network affiliates changed the content of the stations that were in reception range. Finally on December 6, 1928, the Royal Commission on Radio Broadcasting, more popularly known as the Aird Commission, was created by Order in Council P. C. 2108 to investigate radio broadcasting and to advise on future management, control, and financing. It has been argued that the withdrawal of the IBSA licenses provoked the formation of the Commission (Vipond, 2010); however, it is also clear that additional pressures were exerted on the Radio Branch of the Ministry of Marine and Fisheries by radio stations eager to form their own networks and become American affiliate stations. Ralph W. Ashcroft, General Manager at CKGW, continued to press the Minister of Marine and Fisheries for a power increase to "10,000, 20,000 and/or 50,000 watts" (Ashcroft, 1929). Ashcroft also favorably compared his station's program offerings to that of other stations; CKAC owned by La Presse and CFCF owned by Canadian Marconi Company, both in Montreal



that were given assurances of power increases (Ashcroft, 1929). He finally stressed that "CKGW, under its present management, has done more to elevate the standard of Canadian programs than anyone else in the Dominion. A number of these programs are being supplied to stations in Montreal, London, Winnipeg and other points by means of inter-city telephone lines" (Ashcroft, 1929). Ashcroft may have been the most outspoken critic of the government's plan to create a national network, potentially harming CKGW's interests and that of commercial broadcasters; pockets of resistance to a national network came from all quarters across Canada.

Suspicions about the goals of a government broadcasting monopoly appeared in newspapers across Canada. An editorial in The Ottawa Journal warned "limited knowledge of what the government has in mind there are many apparent dangers in any scheme of national broadcasting in this country" (The Ottawa Journal, 1928). The real fear may have been encapsulated in the conclusion: "All of these are practical issues quite apart from the strong obligation many entertain to the idea of giving any Government exclusive access to such a powerful agency of propaganda. Conscious or unconscious, as the radio. But the whole question is one of great and growing importance and worthy of the Government's careful study" (The Ottawa Journal, 1928). The newspapers fanned the fires of debate by encouraging readers, who were also listeners, to participate by sending letters to the newspapers. They were then happy to pepper their pages with public opinion through publication of the letters.

Loyal listeners were eager to protect their already familiar local programs, American programs that could be heard over the border, and American programs broadcast by Canadian radio stations, as affiliates or by employing electrical transcriptions (MacLennan, 2001, p. 24). Federal Radio Commissioner Harold La Fount, writing to station owners and operators, discredited listener opinions, "Letters from listeners commenting on the allocations indicate that, although many people have a fair knowledge of radio, they do not understand the allocation of regulation of broadcasting stations" (The Globe, 1929a). "Radio Regulations", in the Manitoba Free Press, predicted that Winnipeg would have a 5,000 watt station like CKGW in Toronto that would make Winnipeg "clearly audible in Japan, Australia and possibly even Mars and Venus" (Radio Regulations, 1928). Listeners' eagerness to join the discussion of the new national network was compounded, not only by the cases made for and against the Canadian network, but a fear of the unknown. "National broadcasting", an editorial in the Halifax Chronicle, explained that any change would be an improvement, but sided with public regulation:

Considerable friction has developed, and complaints have been numerous as to reception being spoiled and to objectionable propaganda being put on the air. It is difficult to regulate or to maintain a proper control over radio broadcasting in the hands of so many private interest operation without co-operation and probably often at cross purpose. (Halifax Chronicle, 1928)

The editorial went on to make comparisons to the BBC, but the focus was on the system and its benefits. "All that is desirable is that there should be a unified control over the broadcasting system of the country to the end that the best results in reception may be ensured and that the service may be kept free from objectionable programmes and other features that offend the moral sense of the public" (Halifax Chronicle, 1928). In the months that preceded the establishment of the Royal Commission on Radio Broadcasting, in December 1928, there were radio stations and listeners on both sides of the debate.

By the late 1920s in the United States, NBC and CBS were clearly dominant and growing broadcasters (Mc-Chesney, 1993). In Canada, however, the more powerful stations central to the discussion of national broadcasting were stations, such as CKGW, CFCF, CKAC, and CFRB, all corporately owned and American affiliates. Not to be overlooked are the many independent stations across Canada that operated alone, with very few resources that catered exclusively to local listeners. Local independent radio stations included those with faulty equipment (Duffy, 1983), those with local business support (Kozak, 2016), and those that supplied local content across the country, outside the limits of Canadian regulations (MacLennan, 2010). The first seven years of broadcasting established private broadcasting as an option. Both established local stations, serving their communities, and larger stations, affiliated with networks, developed during the 1920s, demonstrating that private broadcasting could rival public broadcasting.

By the time the Royal Commission on Radio Broadcasting produced its report on September 11, 1929, four radio stations in Montreal and Toronto had arranged to join CBS and NBC as affiliates and the country was divided about the future impact of a Canadian national network. The major recommendations of the committee were to create a national broadcasting company with provincial representation. The most contentious of the recommendations was the first one that endorsed a national company to operate all Canadian radio stations: "A national company which will own and operate all radio broadcasting stations located in the Dominion of Canada, the company to be called the Canadian Radio Broadcasting Company" (Royal Commission of Radio Broadcasting, 1929, p. 4). As noted by Gasher (1998) and Vipond (1992), Charles Bowman thought that the American view of Canada, as part of the North American market, changed John Aird's sense of national broadcasting. Certainly the broadcasters visited by the Commission in New York were quite correct in this assumption, since the American affiliate stations in Canadian cities were included in rates sold for broadcasting in regions that in-



cluded these cities (Columbia Broadcasting System Correspondence, 1935). During this early period of private broadcasting, through the work of a few American network stations in Montreal and Toronto, Canada became part of a North American market.

While local independent stations feared the possibility of elimination and being replaced by larger regional stations, the American networks had no interest in surrendering their larger stations to a national network. Thus far the major changes to Canadian broadcasting were the elimination of stations due to objectionable content and the reallocation of radio stations on the dial, due to the new American Radio Act in 1927 and subsequent General Order 40. The views of private broadcasters, however, were not the only ones represented in the pages of the newspapers. At best, as suggested in *The Globe*, the much-anticipated report could bring order to a neglected system. It explained:

Obsolete equipments [sic] have monopolies on wavelengths [with]...limited range and which they fail to use, even within their own short scope, for hours daily. At the same time high-class modern stations, ready, anxious and able to serve listeners wherever located in Canada, are forced to divide wavelengths with one or two others similarly embarrassed. Whatever else the Commission does or fails to do, it can hardly fail to suggest means to bring order out of chaos in this respect. (The Globe, 1929b)

While there were perceptions of wasted capacity and uneven distributions that contributed to the "chaos" of the system prior to the Aird Report, once the report was delivered, the reaction against it was so passionate and heated that the report did not immediately result in the nationalization of radio, as recommended. At the conclusion of this period of private broadcasting, the opportunity to establish a national network was introduced by the Aird Commission. It became a reality after a decade of private broadcasting. Marc Raboy (1990) argues that this system "of the 1930s, evolved as a hybrid of the British and American public service and commercial models" (p. 48). The greater considerations of the political economy of broadcasting overshadowed the impetus for a national broadcaster until the Aird Commission, followed by the establishment of the Canadian Radio Broadcasting Commission, and then the Canadian Broadcasting Commission.

7. Conclusion

During the early period of Canadian private broadcasting, private investment in the industry served local and independent interests freely, until the creation of a national network. The censure of religious speech on the radio provoked debate about the role of government in broadcasting. The opening up of licenses for frequencies due to censure and the reallocation of frequencies through-

out North America permitted a few Canadian radio stations to also become American affiliates. The changes wrought by the regulator in the censure of religious stations and the impact of station reallocation strengthened the case for a public or national broadcasting system. The real debate about system of national broadcasting and first steps towards its establishment occurred in the wake of the changes to Canadian commercial broadcasting in the 1920s. Without a Canadian system or network, listeners were vulnerable to external forces of change, whether religious, censure through the regulator, or the profit motives of large profitable radio stations that intensified the American content within Canada, where Canadian programming had previously flourished. Significant delays in policy development allowed the local interests of listeners and their attachment to local broadcasting, as well as Canadian and American commercial broadcasting, to help ensure the possibility of continued private broadcasting alongside the new national network. The compromise of private and public broadcasting in Canada emerged from the remnants of the existing private system and a new public system that grew to resolve some of the inequities of the initial private, commercial system.

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Conflict of Interests

The author declares no conflict of interests.

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