



August 18, 2025

**Submitted Electronically by GC Key**

Mr. Marc Morin  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
Gatineau, Quebec K1A 0N2

Dear Mr. Morin:

Re: Broadcasting Notice of Consultation CRTC 2025-2 - *The Path Forward – Working towards a sustainable Canadian broadcasting system* (“**Market Dynamics Consultation**”) – Requests for Information

1. These are the responses to the requests for information addressed to DIMA in the context of the Commission’s Market Dynamics Consultation, submitted on behalf of our members, the world’s leading music streaming companies.

**Q29. If time limits were introduced for staff-assisted mediation, final offer arbitration, and the standstill rule, what would constitute an appropriate duration for each? Under what circumstances, if any, should exceptions to these time limits be considered?**

2. This Question 29 is not relevant to DIMA or its members. The Commission has the legal authority to make regulations to resolve, by way of mediation or otherwise, any disputes arising only between programming undertakings and distribution undertakings concerning the carriage of programming originated by the programming undertakings (*Broadcasting Act* [para. 10\(1\)\(h\)](#)). The definitions of programming undertakings and distribution undertakings expressly exclude online undertakings (*Broadcasting Act* [s. 2\(1\)](#)). The Commission may not impose mandatory dispute resolution on online undertakings, or any expectation that online undertakings would agree to voluntary dispute resolution procedures offered by the Commission. To the extent an online undertaking were to request or voluntarily agree to any such procedure, that decision and any applicable processes for dispute resolution would be case-specific. It would

not be necessary or appropriate to establish a time limit or other parameters in advance.

**Q36. Would your organization support a standardized, industry-wide approach to open programming guide data or content inventory data to facilitate a more competitive and transparent content discovery ecosystem?**

- a. What are the technical or commercial barriers to providing such data in an open, machine-readable format?**
  - b. What terms or conditions typically govern access and use of this data for third-party developers or public institutions seeking to build content tools?**
  - c. What terms or conditions should govern access and use of this data for third-party developers or public institutions seeking to build content tools?**
- 3. No, DIMA would not support the development of standardized programming guide data or content inventory data by the Commission or other regulatory body, and does not believe any such initiative would achieve a “more competitive and transparent content discovery ecosystem”.
  - 4. The proposed approach may be appropriate for traditional broadcasters, where disparate program schedules across many different channels make consolidated listings a meaningful convenience for consumers or others. However, the proposed approach neither reflects the reality of music streaming services nor addresses any problem to be solved.
  - 5. With comprehensive and readily available content information built into the music streaming system, it's unclear what additional value traditional guide data would offer to users. In essence, all major music streaming services offer the same comprehensive catalog, so a user does not need to navigate between different services to find different content. Content on services is easily searchable, either via service interfaces or a web browser. Further, the on-demand nature of music streaming removes the concept of schedules from the equation. All users need to do to find and discover any music they are interested in is open the streaming service of their choice and take advantage of the featuring and search functions there.
  - 6. The extensive discovery features music streaming services provide to their users are in fact a central component of their competition with each other. As DIMA and its members have demonstrated, music streaming services invest in discoverability initiatives and provide more opportunities than ever before for listeners and the general

public to find artists and musical selections, from Canada and around the world, in countless categories.<sup>1</sup> That level of transparency and discoverability is a core part of the very business model for on-demand music streaming services.

7. Our members' customer-first approach allows them to compete vigorously with one another and with other forms of entertainment to capture consumer attention. This competition naturally leads our members to make Canadian artists and content highly discoverable to Canadian and international listeners, more than was possible before streaming. That is an extremely valuable contribution to the Canadian ecosystem, with meaningful outcomes:
  - a. Streaming has dramatically increased global exposure for Canadian music, with Canada now the eighth largest recorded music market worldwide, according to the International Federation of the Phonographic Industry (IFPI).<sup>2</sup> Between 2014 and 2024, recorded music revenues in Canada more than doubled, rising from \$397 million<sup>3</sup> to more than \$900 million CAD, driven largely by audio streaming, which now accounts for nearly 79% of total recorded music revenue in Canada.<sup>4</sup>
  - b. This growth is reinforced by consumer sentiment. Research conducted by Sparks Insights shows that 85% of Canadians report being satisfied with the amount of Canadian content available on streaming services, and 80% say it is easy to discover Canadian artists.<sup>5</sup>

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<sup>1</sup> See for example DIMA March 11, 2025 [reply](#) in this proceeding, at para. 18: “[M]ore music than ever before has been made available by music streaming services. That achievement is based on the very business model of music streaming services: music streaming services licence virtually all available commercial music and make it available to consumers. They then relentlessly and creatively compete with other services to provide consumers with features to discover and promote artists.”

<sup>2</sup> See IFPI Global Music Report 2025 at page 6, available at [https://www.ifpi.org/wp-content/uploads/2024/03/GMR2025\\_SOTI.pdf](https://www.ifpi.org/wp-content/uploads/2024/03/GMR2025_SOTI.pdf).

<sup>3</sup> See Music Canada, “Music Canada Statistics 2014”, available at <https://musiccanada.com/wp-content/uploads/2017/05/2014.pdf>.

<sup>4</sup> See Music Canada, “IFPI’s Global Music Report 2025 reveals tenth consecutive year of growth”, available at <https://musiccanada.com/news/ifpi-global-music-report-2025-reveals-tenth-consecutive-year-of-growth/>

<sup>5</sup> Spark Insights, “Streaming lets Canadians find music they love - and Canadian musicians find audiences around the world”, May 2024, available at <https://sparkadvocacy.ca/insights/2024/05/streaming-lets-canadians-find-music-they-love-and-canadian-musicians-find-audiences-around-the-world>.

8. In short, DIMA members already operate in a highly competitive and transparent content discovery ecosystem.
9. In addition to third-party listings providing no incremental benefits to user, there may be significant “technical barriers” to DSPs providing data in a prescribed way for non-user third parties. Global music services offer nearly the full history of recorded music in their libraries and receive hundreds of thousands of new tracks each week. They are not set up to provide “content inventory data” to “third-party developers or public institutions seeking to build content tools”.

**Q37. If your organization provides or accesses data regarding audio tracks, does that data typically include information necessary to identify an audio track as Canadian? If not, please identify the main issues in identifying audio tracks as Canadian.**

10. DIMA does not provide or access this type of information. We refer the Commission to responses by DIMA members. Please see our response below to Q37a, which references industry-level challenges in identifying tracks by nationality.

**a. Would appropriately defined “Canadian music selection” Interested Party Information (IPI) and International Performer Number (IPN) codes permit your organization to readily and conveniently identify International Standard Recording Codes (ISRC) as qualifying as “Canadian music selection” or as Indigenous music?**

11. DIMA does not itself use recording codes to identify musical selections.
12. To our knowledge, neither IPI codes nor IPN codes would be sufficient to identify Canadian or Indigenous musical selections. The codes’ purpose is to identify the royalty participants (songwriter, composer, publisher, performer, etc.) for royalty distribution by collective management organizations, not to identify the nationality of the song itself. Even if a single code could identify if a song meets the Canadian content criteria, rightsholders (i.e., labels and digital aggregators) would need to supply such metadata when delivering the song to online undertakings. Digital music services typically do not pay royalty participants directly, so they do not receive or process this metadata. Without additional linking mechanisms, digital music services could not match IPI/IPN codes with ISRC codes at scale.
13. In addition, implementing such a system would require extensive changes to existing data delivery systems. Record companies and sound recording aggregators would need to deliver this metadata to services through existing feeds for the millions of

tracks in services' existing catalogues, while also delivering this information for the continuous flow of new tracks being added to the services.

14. In DIMA's comments in the Commission's proceeding *The Path Forward – Supporting Canadian and Indigenous audio content* ([BNC CRTC 2025-52](#)), we set forth the substantial operational challenges that would confront any effort by its members to identify a sound recording as a "Canadian music selection" in the existing digital music supply chain.<sup>6</sup> These challenges include the lack of sufficient metadata, including metadata about the nationality of any given track, and the difficulty of consistently defining nationality in a global supply chain. In our comments, we further explained that any definition of Canadian content in the context of music streaming services should be broad and flexible, and reflect the realities of the operation of streaming services and consumer engagement with those services.<sup>7</sup> As we set forth in those comments, a "prescriptive" approach to the definition of Canadian content is not appropriate for online services with no "imposed content", no limits on airtime, and with ample promotion space.<sup>8</sup>
15. In DIMA's comments in the Commission's *Call for Comments – Co-development of an Indigenous Broadcasting Policy* ([Broadcasting Notice of Consultation CRTC 2024-67](#)), we explained that our members currently work with many Indigenous artists and various Indigenous organizations, and that they rely on their content providers to provide the relevant information about the content they deliver. We stated, and we reiterate here, that given that the definition of Indigenous music currently depends on voluntary self-identification, it is unclear whether a database or more formal system of categorizing Indigenous works would be of lesser or greater "evidentiary" value than the information that some artists currently choose to share with online music services.<sup>9</sup>

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<sup>6</sup> DIMA Audio Policy [Comments](#), paras. 39-41.

<sup>7</sup> DIMA Audio Policy [Comments](#), para. 34-38.

<sup>8</sup> DIMA Audio Policy [Comments](#), para. 55.

<sup>9</sup> DIMA [Comments](#) in BNC 2024-67, paras. 28-29.

16. DIMA appreciates the opportunity to respond to these requests for information on behalf of its members.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colin Rushing', with a stylized flourish at the end.

Colin Rushing  
Executive Vice President and General Counsel  
Digital Media Association (DIMA)

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