



November 24, 2025

Submitted Electronically by GC Key

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

Dear Mr. Morin:

Re: Broadcasting Notice of Consultation CRTC 2025-52 – *The Path Forward – Supporting Canadian and Indigenous audio content* (“Audio Policy Consultation”) – DIMA responses to requests for information

1. These are the responses to the requests for information addressed to DIMA in the context of the Commission’s Audio Policy Consultation, submitted on behalf of our members, the world’s leading music streaming companies.
2. As requested, we have repeated each question addressed to DIMA before our response.

Section 3. A sustainable financial contribution framework supporting diverse Canadian content

Q15. a. Explain, in detail, what should be included in an annual report to show the marketing, promotion, and any other non-curatorial expenses you made in the preceding year to support Canadian music and musicians that cannot be claimed as part of your base contributions. The Commission can only recognize contributions that it can measure and track. Which investments in Canada should the Commission recognize?

The Commission should recognize the full extent of royalty payments to the Canadian music sector as well as marketing, promotion, and non-curatorial expenses made by music streaming services

3. This Question 15a asks for comment on expenses on marketing, promotion, and curatorial activities¹ “to support Canadian music and musicians that cannot be claimed as part of your base contributions”. The exclusion of expenses that cannot be claimed as base contributions by the operators of online undertakings is concerning. In [Broadcasting Regulatory Policy CRTC 2024-121-1](#) and [Broadcasting Order CRTC 2024-191](#) (the “**Base Contribution Decision**”), the Commission set out various mandated contributions. DIMA has explained in its past submissions and maintains² that the Base Contribution Decision should be revoked, as it does not reflect the intent and provisions of the *Broadcasting Act* (the “**Act**”) and Policy Direction.³ Among other things: it disregards music streaming services’ business model which involves sharing approximately 70% of music revenues directly with music rightsholders (i.e. royalties), and some of the allocations (e.g. to local news and community radio) are unfair and inappropriate, while others (e.g. to funds) also divert resources from music streaming services’ direct investments in Canadian artists and music. A very small portion of contribution expenditures (not more than 0.35%, or 7% of the total expenditures) can be allocated to certain initiatives supporting Canadian or Indigenous content (i.e. songwriting camps, production of sound recordings, and events), but that small slice simply does not reflect the breadth and value of online music services’ actual contributions to the Canadian music ecosystem.
4. The Commission’s review of online music services’ financial contributions – including royalties and items in the categories set out under this Question 15a and under Question 15b – will clearly demonstrate that the base contribution regime must be replaced with a flexible framework that recognizes and accommodates the full range of contributions. As we explained in our reply comments in this proceeding,⁴ and as the

¹ Commission staff confirmed on October 28, 2025 that “Curatorial” activities “*broadly refer to activities where content is selected, organized, and displayed for users. This could include the methods outlined in question 10a, however these methods are not intended to present an exhaustive list of possible curatorial activities. The Commission welcomes any input in response to question 15a on tangible investments that can be measured and tracked.*”

² Certain DIMA members are challenging the Base Contribution Decision before the federal Court of Appeal. DIMA and its members reserve all rights on those issues.

³ [Order Issuing Directions to the CRTC \(Sustainable and Equitable Broadcasting Regulatory Framework\)](#) (“**Policy Direction**”).

⁴ DIMA [Reply Comments](#), Audio Policy Consultation, paras. 18-21.

Commission recognized in its recent Broadcasting Regulatory Policy CRTC 2025-299 defining “Canadian program” for the audio-visual sector (the “**AV Canadian Content Policy Part 1**”),⁵ the Act as amended expressly connects copyright to Canadian content *and contributions to the system*.

5. The Commission must expand its definition of recognized contributions to reflect how the music industry functions today. The relationship between the music industry and music streaming is fundamentally based on royalties and a system where artists' discovery, marketing of talent, and career growth are increasingly enabled not just by ongoing marketing, promotion and curatorial activities but by technology and platform tools that connect artists directly with fans. These include investments in artist-centred features, including tools that allow artists to promote their music themselves. These types of support are now essential to building lasting fandoms, and thus sustainable music careers. All of the foregoing should be fully recognized as contributions.

The Commission should accommodate music streamers' current approach of identifying Canadian music and musicians

6. This Question 15a asks about annual reporting on expenditures to support “*Canadian music and musicians in the preceding year*”. DIMA does not support a single rigid or narrow definition of “Canadian music and musicians”. As discussed at the hearing, each DIMA member relies primarily on its team of music editors to determine which artists and tracks are “Canadian” for the purpose of marketing and promoting those artists and tracks to users on that service.⁶ Music streaming services will use those parameters for the purpose of reporting on those marketing and promotion activities.
7. However, to the extent that the Commission decides to require a common, mandated definition of “Canadian” for such reporting, then the Commission must start by establishing and implementing that definition before it imposes any reporting requirements – and any contributions framework – that may be based on that definition. That is not only fair and reasonable; it is mandated by the Policy Direction to

⁵ [Broadcasting Regulatory Policy CRTC 2025-299](#), *The Path Forward – Defining “Canadian program” and supporting the creation and distribution of Canadian programming in the audio-visual sector – Part 1 – Certification framework for Canadian programs, artificial intelligence, data collection and publication, and reporting requirements (“AV Canadian Content Decision Part 1”)*

⁶ See for example, Amazon Music, Transcript September 18 2025 at [paras. 971-973](#); Apple Music, Transcript September 26, 2025 at [paras. 3760-3766](#); and Spotify, Transcript September 29, 2025 at [paras. 4712 and 4718](#).

the Commission.⁷ Such an approach would also be consistent with the Commission's position in the recent AV Canadian Content Policy Part 1 that:

In the Commission's view, defining what constitutes a "Canadian program" is a necessary step **before** establishing financial or policy measures to support its creation and distribution in the audio-visual sector. (emphasis added)⁸

8. Moreover, as DIMA and its members have explained in this proceeding, establishing and implementing a definition of "Canadian musical selection" will depend on the extent to which rights owners and distributors can provide origin and nationality information for tracks and artists, and systematically attach that metadata to tracks at scale.

Available data and recommended categories

9. DIMA members may not currently classify their Canadian initiatives in the specific ways contemplated by this question, but they are ready to provide information that they have available: (i) on a going forward basis (not retroactively); (ii) after definitions of key terms such as "Canadian music and musicians") are established and can be fully operationalized; and (iii) where the confidentiality of sensitive operational, competitive and financial data is addressed.
10. The following categories for marketing, promotion, and any other non-curatorial expenses to support Canadian music and musicians would capture online music services' current activities and initiatives, and should be sufficiently flexible to include those that arise in the coming years. Naturally some of these initiatives will fall within the initiatives that were permitted to receive a small credit under the Base Contribution Decision, as discussed further above. Those are still relevant for the purposes of any report related to marketing and promotional support provided by music streaming businesses and should not be excluded for the proposed annual reporting. Each of the following particular categories should not be mandatory. They are intended to serve as a guideline for the Commission to understand the types of costs that can be considered.
 - a) Royalties paid by online music services to music rights holders. DIMA members currently pay around 70% of all revenues they receive for music streaming as royalties to music rightsholders. Those payments support the

⁷ Policy Direction, [section 19](#).

⁸ [AV Canadian Content Policy Part 1](#) at para. 4.

music industry in Canada in a way that no other contributions can. They represent more than 8 times the value of radio royalty payments, and they are paid directly to rightsholders, not indirectly to third-party funds.

- b) Off-platform marketing.
- c) Partnerships and sponsoring festivals and events.
- d) Training such as workshops and songwriting camps.
- e) Local music teams.
- f) Investment in technology, tools and features that allow artists to: access consumption, playlist, and audience data; customize their profiles; promote merchandise; and interact with and develop fans.
- g) Development and production of original recordings. Some DIMA members invest in (limited) music production, as a way to support and partner with artists.

b. Would this information be valuable on its own, or would combining actual performance data such as user engagement (likes, shares, playlist adds) or passive impressions with these activities more effectively show contributions made to Canadian and Indigenous content, and why?

11. The information will be valuable on its own. Performance data and passive impressions are fluid and organic, and can be very difficult to “combine” with or trace directly to specific marketing and promotions initiatives.

12. With that being said, DIMA members are justifiably proud of the successes they have supported on their services. DIMA members can report on information in the areas set out further below. Some of the following information is available through third party publications such as the IFPI Global Music Report⁹; the CISAC Global Collections

⁹ IFPI is International Federation of the Phonographic Industry, and represents the recording industry worldwide. See the IFPI Global Music Report 2025, available at https://www.ifpi.org/wp-content/uploads/2024/03/GMR2025_SOTI.pdf.

Report¹⁰; and the Luminate Canada Year-End Report¹¹. Each of these organizations publishes international and Canadian data on a regular basis, allowing stakeholders and governments to track trends in revenues, subscriptions, and innovation.

13. Please see DIMA's May 25, 2025 Comments in this proceeding¹² for a full description and examples of these activities and expenditures.

- a) Levels of royalty payments by online music services to artists and other rightsholders, and the amount of Canada's recorded music revenues generated from streaming;
- b) Export levels of Canadian music (for example, Canada is currently ranked as the third largest global exporter of recorded music, according to Luminate's 2024 "export power score";¹³
- c) Numbers of Canadian streaming subscriptions;
- d) Canada-specific playlists entering the top 10 playlists in Canada; and
- e) Lists of marketing and profile support provided to Juno and ADISQ Gala nominees.

Q20. During the hearing, a "play or pay" framework whereby audio services could choose between playing Canadian content over a certain baseline percentage or making higher financial contributions was discussed.

- a. What kind of exchange rate between financial contributions and Canadian content aired would be appropriate? For example, for every 1% increase or decrease from a hypothetical baseline percentage of Canadian content, what should be the corresponding percentage or dollar-value change in the required financial contribution?**

¹⁰ CISAC is the International Confederation of Societies of Authors and Composers, the world's leading network of authors' societies. See the CISAC Global Collections Report 2025, available at <https://www.cisac.org/cisac-global-collections-report-2025>.

¹¹ Luminate is one of the entertainment industry's primary data and insights company. See the Luminate 2024 Year-End Report, available at <https://luminatedata.com/reports/yearend-music-industry-report-2024/>.

¹² See DIMA's May 5, 2025 [Comments](#) in this Audio Policy Consultation proceeding at paras. 69-87.

¹³ See the Luminate 2024 Year-End Report, available at <https://luminatedata.com/reports/yearend-music-industry-report-2024/>.

14. As described, “play or pay” would be a quota system, and assumes a non-interactive environment in which content can be played at an audience. Quotas, relative market share targets, and content “push” initiatives have no place on music streaming services. Unlike radio stations, streaming services do not program the quantities of the types or categories of music to be played within a total available time. Users dictate how much music of any kind or origin they listen to, or if they will listen to music at all. Quota systems were established for Canadian radio stations in the 1970s, at a time when the only form of on-demand access to music was through the purchase of a physical record. Times and technology have changed. Consumers have more choice and more options to access the music they want. Radio quotas are not a policy instrument fit for music streaming services, where Canadian artists and music are always available to listeners.
15. During DIMA’s appearance at the September public hearing, Commissioner Levy and hearing Chairperson Théberge stated that “we’re not trying to impose traditional broadcast radio rules on the online system” and “we are not attempting to bring the old with the new”.¹⁴ DIMA and its members were heartened to hear that confirmation. In fact, bringing in a “play or pay” quota system – whereby a certain percentage total listening time (or other metric) is supposed to be achieved or a financial penalty will apply – would extend the traditional radio quota system to music streaming. It would be unworkable, inappropriate, and directly harmful to consumer experience and the long-term future of the music sector in Canada. A “play or pay” model would be inconsistent with the user-driven nature of streaming and the objectives of the *Online Streaming Act*.
16. This Question 20 appears to reference certain stakeholders’ call for “equitable” contributions as between commercial radio and online music services.¹⁵ The Act cannot be read by substituting “equal” for “equitable” and then seeking to manufacture some equivalence between sectors. The Commission is not required to come up with a formula for making things equal. The premise of seeking “equality” and then requiring that equivalence only in monetary terms is problematic. Leaving that aside and taking that exercise at face value, in order for there to be an exchange rate, one must value both ends of the exchange.
17. The first element of this exchange is “*what is the value of the play on radio?*”. This is unknown. To the extent it *is* known, the current radio quota leads to extensive repetition of the same relatively low number of songs. It has traditionally been argued by radio

¹⁴ Commissioner Levy and hearing Chairperson Théberge, Transcript, August 26 2025, at [paras. 4169 and 4170](#).

¹⁵ For example, Cogeco, CAB, Corus, Stingray Radio, Corus, and OAB.

broadcasters that radio airplay means promotion which leads to sales and other monetization elsewhere. Consequently, only a small number of songs benefit from such “promotion value”. As the panel heard at the hearing, the “natural” level of Canadian music may be in the 10-15% range¹⁶ that online services’ users are already listening to (based on SOCAN data).¹⁷ A quota will ensure that a certain percentage of radio plays are Canadian – but cannot ensure a direct benefit to the Canadian music industry at large, in terms of either audience development or revenue. That is not the outcomes-based solution the Commission has said that it wants as it implements the *Online Streaming Act*, connecting any contributions to “clearly defined, measurable objectives”.¹⁸

18. The second element of this exchange is “*how do you value discoverability initiatives?*”.

It is overly simplistic to measure the value of the discoverability initiatives *either* in terms of the amounts spent on these initiatives *or* the resulting number of plays. In making regulatory policy, the Commission should be clear about the end goals to be achieved, and allow music streaming companies the flexibility to determine how to achieve those goals. Throughout these proceedings, however, the precise meaning of “greater discoverability” has been consistently elusive. There is still no agreement among stakeholders on what the measure of success at “discoverability” is, or even whose perspective – that of Canadian consumers, or the Canadian music industry – should dictate the answer. Online music services are by their nature heavily driven by user choice, which even the best initiatives can affect only to a certain extent. The amounts spent on discoverability initiatives do not guarantee that there will be results produced by such spending.

19. DIMA members maintain that the best measure of success of discoverability initiatives is to assess the level of satisfaction of Canadian consumers with their music streaming services and the contributions of music streaming services to Canadian music, including the levels of royalties generated by streaming services for Canadian rightsholders and artists. It is clear from evidence put on the record in these proceedings that (i) Canadian consumers are satisfied with their music streaming

¹⁶ See Steve Jones, President of Stingray, Public Hearing transcript September 18, 2025 at [paras. 39-41, 61 and 64](#); Rod Schween, Chair of CAB Radio Council, Public Hearing transcript September 25, 2025 at [para. 2716](#); and Ward Smith, Senior VP Global News and Corus Audip, Public Hearing transcript September 25, 2025 at [para. 3311](#).

¹⁷ See Fraser Turnbull, Legal Counsel SOCAN, on behalf of ACCORD, Public Hearing transcript September 25, 2025 at [para. 2936](#).

¹⁸ [Broadcasting Notice of Consultation CRTC 2023-138](#), *The Path Forward – Working Towards a modernized regulatory framework regarding contributions to support Canadian and Indigenous content*, para. 58.

services; and (ii) the Canadian music sector is a commercial success story thanks to streaming.¹⁹ Music sector revenues in Canada, on both the recording and publishing side, have increased significantly since the pre-streaming days and the same holds true for Canadian artists and Canadian rightsholders as evidenced by Statistics Canada data.

20. The “play or pay” model assumes a closed, domestic system of content delivery, but streaming is inherently global. Music streaming services do not operate within national borders; they provide artists with direct access to worldwide audiences. In fact, the success of many Canadian artists on streaming platforms today is driven by international streams and fanbases, not just domestic listening. This export potential is one of the most powerful contributions music streaming makes to the Canadian music sector, and it cannot be measured by domestic play counts alone. Tying contribution obligations to Canadian content plays within Canada fails to account for the broader economic and cultural value delivered by streaming services to Canadian creators - in particular, the global promotional value of such streams. A model based on domestic quotas or local play thresholds is a fundamental mismatch to how success works in a global, digital environment.
21. While DIMA does not support “level playing field” arguments as a justification to impose measures of equitable contributions, we note that the Commission has already required online undertakings to make contributions far in excess of those made by commercial radio. Under the Base Contribution Decision, online undertakings are required to contribute 5% of their annual contributions revenues to support Canadian and Indigenous content; commercial radio stations are required to contribute \$1,000 plus .5% of revenues over \$1.25 million to Canadian Content Development (“**CCD**”) initiatives.²⁰

¹⁹ See sources cited by DIMA in its May 5 2025 [Comments](#) in this proceeding at footnote 22:

Data published by the International Federation of the Phonographic Industry (“**IFPI**”), the International Confederation of Societies of Authors and Composers (“**CISAC**”) and the Society of Composers, Authors and Music Publishers (“**SOCAN**”) continue to show revenue growth in Canada. CISAC data show a 5.8% increase in total Canadian music authors’ rights growth CISAC [Global Collections Report 2024](#), p. 24. Canada ranks among the top ten markets for both recorded music and authors’ rights revenues, with “digital” accounting for 79.3% for rights in the sound recording (IFPI) and 52% for rights in the musical work (authors/songwriters) (CISAC): see [IFPI Global Music Report 2025](#) and [2024 CISAC Global Collections Report 2024](#), p.24. See also: The Canadian record production and distribution industry earned \$903.3 million in operating revenue in 2023, up 21.2% from 2021, the last time the survey was conducted (see [Statistics Canada, Sound recording and music publishing, 2023](#)). SOCAN distributed a record-high total of \$512.4-million to rightsholders in 2024, a 17.5% year-over-year increase (see [SOCAN Annual Report 2024](#)).

²⁰ Radio Regulations, [s. 15\(2\) and 15\(5\)](#).

22. Once the CRTC reviews the financial contributions – including a proper consideration of the fact that approximately 70% of music streaming revenues are paid in royalties to rightsholders, and the items set out under Questions 15 a and b above – it will be clear that no mandated financial contributions are warranted, or possible.

Section 5. The future of audio

Q25. Acknowledging that broadcasters may not always know if a particular selection has been generated by AI and that the Commission intends to minimize regulatory burden:

a. What specific elements could a disclosure requirement include in order to ensure reasonable and effective transparency for listeners when AI-generated music is broadcast?

23. DIMA members are global businesses, and the use of AI is international. Any AI-generated music labelling should align with international standards if and as such standards are established.

24. Music streaming businesses cannot verify AI provenance more reliably and consistently than content creators can and, consequently, the only way to deliver any consistency in disclosures to consumers would be to rely on upstream metadata insertion by content providers. Therefore, any disclosure requirement must be: (i) predicated on the music streaming service receiving industry-standard metadata from the content provider indicating that the content is AI-generated, and (ii) aligned with global standards governing disclosures.

b. What form could disclosure requirements take for different kinds of audio services?

25. Any required disclosures should appear on the service visually in the user interface only. Streaming services generally do not have the rights to add to or change the sound recordings or artwork they receive from rightsholders and distributors. Any such modification would moreover be impractical, disproportionately burdensome, and highly detrimental to the consumer experience.

Section 6. Confidentiality, safeguards and data collection

Q28. The Association des professionnels de l'édition musicale suggested in their written submission that the Commission collect a ranked list of the top 10,000-most streamed tracks in Canada from each registered audio streaming service.

a. What specific insights could be derived from a ranked list of the top 10,000-most streamed tracks in Canada such as market share by origin, language or genre, and how could this data inform regulatory measures to enhance the discoverability and promotion of Canadian and Indigenous music?

26. DIMA does not have, and has not seen, evidence to suggest that useful specific insights could be derived from such a list.
27. Before the Commission requires any additional data reporting, it must determine whether the request is rationally connected to a clear objective under the Act, and that the specific reporting requirement will yield data that the Commission must have to develop policy or effectively measure the impact of its rule-making. The Commission must also consider whether the disclosure of any such data to third persons is in the public interest.²¹ APEM's submission does not provide adequate evidence that a ranked list will yield useful insights, and accordingly, that this exercise would be in the public interest.
28. More particularly, a ranked list cannot be used as the basis for imposing, or monitoring compliance with, a quota system for music streaming services. As we explained in our response to Question 20a above, quotas have no place on music streaming services. Unlike radio station audiences, music streaming users dictate how much music of any kind or origin they listen to. One of the key reasons consumers are turning to streaming in such great numbers is in fact their ability to shape their listening experience. Their choices and preference drive the success of the entire system, and the fact that Canadian artists and tracks are succeeding in Canada and worldwide²² shows that they are being discovered.
29. As DIMA has explained in past submissions,²³ its members do not receive the metadata that would be needed to determine the "origin" and "language" of a given track. It is not even possible to assign a consistent "genre" to tracks across services.
30. Only if and when: (i) definitions of key categories are established; and (ii) content providers make available the metadata that would allow services – or third party

²¹ *Broadcasting Act* [section 25.3\(5\)\(a\)](#).

²² Graham Davies, President and CEO of DIMA, Public Hearing Transcript September 26, 2025 at [para. 4068](#), "Today, Canada stands as the eighth largest recorded music market in the world – this is a tremendous success story", citing IFPI Global Music Report 2025, available at https://www.ifpi.org/wp-content/uploads/2024/03/GMR2025_SOTI.pdf.

²³ See DIMA's May 5 2025 [Comments](#) in this Audio Policy Consultation proceeding at paras. 39-41 and 112-113.

organizations or researchers reviewing the lists of tracks – to determine the origin, language and genre of the 10,000 tracks, will it be possible to draw any insights at all.

31. The collection and analysis of lists of tracks provided by music streaming services would not yield “specific insights”. Any insights would be very limited:

- a) *High level “top of the market” trends only.* At the public hearing in this proceeding, Apple Music told the panel that there are “over 100 million songs in the Apple Music catalogue, with thousands added every day”.²⁴ Given the sheer volume of sound recordings available on music streaming services, and the daily changes in user-led tastes and selections, an analysis of top 10,000 tracks would likely only yield general directional information in the subset of the market, or high level trends, over time.
- b) *Limits on causality.* For the reasons stated above, the Commission must consider that many factors can affect which tracks are most streamed by users, during any given period. Social media, local and international events, seasons, holidays and much more can affect streaming trends. Promotion and playlists may try to capture and “ride” those trends, but they do not direct them.
- c) *Limits on usefulness for decision-making.* A review of lists of tracks provided by music streaming services cannot stand alone as a means to assess those services’ contributions to the Canadian system. The Commission must consider other factors that indicate the success of Canadian music and the music industry, such as royalty payments and the export of Canadian music.
- d) *Mainstream bias.* A review focusing on the top most streamed tracks (be it the top 10,000 or more) on streaming services that make available over a hundred million tracks, would necessarily focus on more mainstream genres of music, to the detriment of less popular genres and/or minority artists focusing on more niche audiences. Such an approach would discriminate and overlook (i) the diversity of music creators participating in the modern music ecosystem in Canada; and (ii) the success of many minority creators, whose art might not be amongst the top 10,000 most streamed tracks in the

²⁴ Mike Lawless, head of Apple Music and Apple Podcasts for Canada, Public Hearing transcript September 26, 2025 at [para. 3596](#).

country, but which is reaching more listeners, getting more plays, and generating more revenue than the same recordings did on the radio.

b. Is this sample size reflective of the music that is listened to on online audio services in Canada? After how many of the most streamed tracks would there be diminishing returns to understanding the audio content that is listened to in Canada?

32. As explained above, DIMA does not believe any kind of "top tracks" list will reveal specific insights that are useful for this purpose, including because one of the great strengths of the streaming model is that users can enjoy a broad range of Canadian content regardless of its popularity. It would also be necessarily skewed towards mainstream genres and creators, as explained at para. 31(d) above.

c. How often, and for what time interval should this data be reported?

33. DIMA maintains that this additional reporting requirement is not justified or appropriate. No relevant insights could be derived from this exercise for regulatory decision-making or policy-making purposes, especially in a situation where the precise meaning of "greater discoverability" or success of discoverability measures has not been defined.

34. However, if the Commission does require data collection of this kind, it should do so on a limited trial basis only so that stakeholders have an opportunity to review, assess and comment on the process and results.

35. For a trial year, data should be collected no more than once. Following a trial year, stakeholders should have an opportunity to review, assess and comment on the process and results. With that input, the Commission should then reassess whether such an exercise is appropriate, and is worth the time and resources devoted to it by those businesses providing data, and those persons reviewing and commenting on the data, including Commission staff.

Q29. The Commission currently publishes revenue, expenditures, contributions to Canadian content and profitability data in the form of National and Regional level financial summaries, in addition to publishing this data at the entity level for large radio operators. These publications allow for accountability and transparency throughout the broadcasting system as well as ensure stakeholder access to relevant data for their participation and monitoring of the Canadian broadcasting system. Please comment on the possibility of the CRTC publicly releasing aggregated audio revenues and contribution expenditures at the entity level for all entities with ACGBR greater than \$25 million.

36. DIMA is on the record in this proceeding and earlier proceedings with respect to data sharing, data publication, and the importance of confidentiality for financial and sensitive business data.²⁵ This is a matter of particular importance for foreign online services, and we will return to it in our final written comments. DIMA was concerned to see the Commission’s approach to the publication of information by online undertakings in the recent AV Canadian Content Policy Part 1.
37. DIMA members’ businesses are international, and data disclosed from one jurisdiction could be extrapolated to others. Moreover, most DIMA members are publicly-traded companies and are subject to their own established domestic financial and operational regulatory requirements and practices for accounting, data management, and limited disclosures. The Commission has been directed to consider such other “foreign regulatory regimes that affect online undertakings”.²⁶
38. The Commission has previously determined that disclosing the financial information of an individual online undertaking would lead to commercial harm.²⁷ The revenue and expenditure information of individual entities or undertakings must not be publicly disclosed. Any data that is published must be aggregated at a level, and in a manner, that does not and cannot reveal the source entities, ownership groups, or undertakings. Even aggregated data should be structured carefully to avoid enabling reverse-engineering of proprietary business models or revealing competitive strategy.

²⁵ See DIMA’s May 5, 2025 [Comments](#) in this Audio Policy Consultation proceeding at paras. 143-147; its February 24, 2025 [Comments](#) in Broadcasting Notice of Consultation CRTC 2025-2, *The Path Forward – Working towards a sustainable Canadian broadcasting system*, at paras. 37-39; and its June 14, 2024 [Comments](#) in Broadcasting Regulatory Policy CRTC 2024-121, *Proposed orders imposing conditions of service and expenditure requirements for carrying on certain online undertakings*, at para. 27.

²⁶ Policy Direction section 8(f).

²⁷ For example, [Broadcasting Regulatory Policy CRTC 2022-47](#), *Annual Digital Media Survey* at paras. 138-146; [Base Contributions Decision 2024-121-1](#) at paras. 59-61.

39. 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 small dot above the final 'g'.

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

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