

Application of the local independent television station group
(LITS)

to commence collective bargaining with

Meta

pursuant to sections 20 and 21 of the

Online News Act

February 4, 2026
Revised February 23, 2026

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Precis

1. This is an application filed on behalf of the local independent television stations group (LITS) to commence bargaining pursuant to sections 20 and 21 of the Online News Act (the “Act”). This Application will demonstrate that, contrary to its submissions to the Commission, Meta has been making LITS news available on a regular basis since the Online News Act came into force December 19, 2023 and therefore qualifies as an operator of at least one digital news intermediary under the Act.¹
2. Notwithstanding this reality, Meta has insisted it does not operate digital news intermediaries as defined under the Act and therefore has not notified the CRTC pursuant to section 7(1). While, as a consequence, Meta platforms do not currently appear on the Commission’s list of digital news intermediaries pursuant to subsection 8(1),² the Commission’s maintenance of this list is an obligation that is separate and apart from Meta’s obligations both to notify and bargain. This Application, therefore, serves both as a notice of intent to bargain and as a request for the CRTC to deem Meta an operator of digital news intermediaries and to have its platforms, Facebook and Instagram, added to the list of digital news intermediaries to whom the Act applies. We note, moreover, that the latter is not legally contingent on Meta notifying the CRTC pursuant to subsection 7(1), and therefore negotiation or bargaining sessions should commence immediately per subsection 19(1)(a).
3. We accordingly enclose:
 - a. Evidence of Meta making available LITS news at Schedule A;
 - b. Evidence of Meta making competing news available through direct links while blocking LITS news links at Schedule B; and
 - c. The written package of information necessary to initiate the mandatory bargaining process, as required pursuant to the Commission’s procedural Guidelines set out in Appendix 2 to Online News Regulatory Policy CRTC 2024-327 at Schedules C & D.

LITS are an eligible group of news businesses

4. The LITS group is well known to the Commission as the joint representative of Canada’s truly independent local television stations. News providing LITS currently comprise fifteen local independent television stations serving twelve

¹ Obligations under the Online News Act were to come into effect no later than 180 days after June 22, 2023, the day Bill C-18 received Royal Assent. <https://www.canada.ca/en/canadian-heritage/news/2023/07/the-online-news-act-next-steps.html>

² Available at <https://crtc.gc.ca/eng/industr/lstdigit.htm>

Canadian markets with locally reflective news and information programming, from St. John's, Newfoundland to Victoria, B.C.:³

- Newfoundland Broadcasting (1 station in Newfoundland -- CJON-DT, St. John's)
 - RNC Media (4 stations in Quebec – CHOT-DT and CFGS-DT, Gatineau; CFEM-DT, Rouyn-Noranda; CFVS-DT, Val-d'Or)
 - Télé Inter-Rives (3 stations in Quebec – CIMT-DT and CFTF-DT, Rivière du Loup; CHAU-DT, Carleton)
 - Channel Zero (1 station in Ontario -- CHCH-DT, Hamilton)
 - Thunder Bay Electronics (2 stations in Ontario -- CKPR-TV and CHFD-TV, Thunder Bay)
 - Miracle Channel (1 station in Alberta -- CJIL-DT, Lethbridge)
 - Pattison Media (2 stations in BC – CFJC-TV & Kamloops; CKPG-TV, Prince George)
 - CHEK (1 station in BC -- CHEK-TV, Victoria)
5. LITS members operate in Canada's smallest TV markets. Small in market size, does not, however, mean small in impact. LITS are among the most prized, effective and efficient operators of local television services in Canada. Among other things, together, we:
- Serve more than 3.5 million Canadians, or roughly 10% of Canada's population, many living in some of the sparsest parts of this country
 - Employ over a hundred full-time and roughly thirty part-time journalists and/or reporters, not including news anchors, ENG/operations personnel, meteorologists and other technical personnel and staff needed to deliver local news programming;
 - Provide over 250 hours of quality, locally relevant news and information programming every week, 52 weeks a year;
 - Provide vital local community news and information 24/7 through our local websites, email newsletters, portals and affiliated news outlets;
 - Gift through the donation of airtime and the involvement of our personnel in on the order of \$20 million across the country every year to charitable and community public service endeavours; and
 - Are relied on virtually every day as our viewers' primary source of news and information.⁴
6. In many markets, LITS are the sole, or one of two, professional daily local news source(s). We provide local news and information without the benefit of the

³ Two other independent local station groups, Zoomer TV and YesTV, provide non-news programming.

⁴ Source: CAB 2024 ILNF Annual Report and LITS members.

strong synergies and deep pockets of larger broadcast groups and network competitors.

7. All members of LITS either are or have eligible news business as defined in section 2 of the Act, and attested to that fact as required under the exemption process that took place for Google.
8. While this process did not necessitate the Commission itself initially listing LITS entities as eligible news business under subsection 29(1) of the Act,⁵ we note that most LITS are now identified as news businesses that have received funding under the *Online News Act* on the Commission's website in a document entitled *Status Report on the Implementation of the Online News Act 2024-2025*.⁶
9. This listing satisfies the requirements of subsection 29(1) of the Act for those LITS entities so identified.⁷ Such LITS should therefore immediately be deemed to be entitled to initiate bargaining with Meta pursuant to section 20.⁸
10. In order to permit those LITS not publicly identified on the Commission's website to bargain with the group, LITS urge the Commission to issue a new public list of eligible news businesses on its website as soon as possible. This could largely be accomplished by republishing the Canadian Journalism Collective's (CJC's) current list, given that the Commission's listing is based on data earlier published by the CJC.⁹
11. LITS submit that, given the timelines involved in bargaining, no prejudice would be suffered by Meta by permitting those LITS who are not currently on the Commission's list of eligible news business to be added at a forthcoming date. In any event, LITS recognize that this would be dependent on how and when the Commission updates its list.

⁵ Per subsection 4(1)(a) of the Act and as described under "Exemption Process" in the *Status Report on the Implementation of the Online News Act 2024-2025* at <https://crtc.gc.ca/eng/publications/reports/ona25.htm#a11>

⁶ Ibid, at Appendix. Some LITS are identified by an operating news affiliate. E.g. Thunder Bay Electronics currently identifies its affiliated publisher T.Bay Post Inc. as its news business. Pattison Media Ltd. is not listed as it had not received funding from CJC in the period ending July 21, 2025 that is the subject of the Status Report. Pattison Media Ltd. is now identified on the CJC website as a recipient of funding. See: <https://cjc-ccj.ca/en/funding-recipients/>

⁷ Subsection 29(1) of the Act merely states that "The Commission must maintain a list of eligible news businesses and publish that list on its website. An eligible news business is only included on the list if it gives its consent."

⁸ Until now, LITS have not had reason to seek bargaining as a group, as this has not been heretofore necessary given the exemption for Google.

⁹ Ibid, note 5, *Status Report* at footnote 4. Note, this approach would immediately capture T.Bay Post Inc. and Pattison Media Ltd. The Miracle Channel Association did not receive CJC funding as of December 22, 2025, but is eligible for the next funding round – something the Commission could readily confirm.

12. LITS are seeking compensation for the making available by Meta of LITS news on Facebook and Instagram since the Act came into force on December 19, 2023.

Meta is an operator of digital news intermediaries

13. Meta is an clearly operator of at least one digital news intermediary as defined in section 2 of the Act, namely Facebook. Instagram now also appears to qualify as a digital news intermediary under the Act.¹⁰

14. Parliament's intent was clearly that Meta be covered by the Act. Moreover, as apparently acknowledged in Meta's letter to CRTC staff of December 20, 2024,¹¹ Meta meets the criterion of "a significant bargaining power imbalance between an operator and news businesses" as set out in section 6 of the Act and section 2 of the Regulations.

15. Given the Regulation on point, for the purposes of this Application, it is not necessary to interpret whether "a significant bargaining power imbalance" can be said to exist between LITS and Meta. We note, however, that in terms of size, Meta is at least four orders of magnitude larger than any LITS, and its "strategic advantage" and "prominent market position" is evidenced by, among other things, the fact that it chose to limit the making available of news in Canada to no apparent great detriment to its global business.

Meta does not fall under an exemption

16. Meta has not requested an exemption order pursuant to section 4 of the Act, and therefore is subject to bargaining. Moreover, and by virtue of this, Meta is not subject to sections 6 and 9 of the Regulations defining "fair compensation" and "sustainability of the Canadian news marketplace", or subsection 10(3) that limits compensation for broadcasters.

Meta is not making any separate payments to LITS for news content

17. LITS confirm that no payments to LITS for the use of their news content have been made in accordance with a licence or agreement pursuant to subsection 25(a) of the Act. Nor is there any relevant tariff approved by the Copyright Board for the use of that content pursuant to subsection 25(b) of the Act.

¹⁰ Instagram reportedly has 21 million users in Canada, meeting the criterion of section 2(b)(i) of the *Online News Act Application and Exemption Regulations*, <https://laws-lois.justice.gc.ca/eng/regulations/SOR-2023-276/page-1.html>. See <https://madeinca.ca/instagram-statistics-canada/>

¹¹ Meta financial numbers were provided in confidence "without prejudice" to its position on making news available.

18. Accordingly, LITS news content is an appropriate subject of mediation sessions or final offer arbitration.

Contrary to arguments filed by Meta in response to the Commission staff inquiry, Meta is clearly making LITS news available

19. In a Commission staff inquiry, initiated October 2, 2024, the CRTC stated that it “has been made aware of reports that news content from Canadian news outlets continues to be available on Meta’s platforms in Canada” and requested “comments on what measures Meta is taking to comply with the Act, and whether news is being made available on Meta’s platforms in Canada”.

20. In a response dated, October 17, 2024,¹² Meta stated:

Last year¹³, Meta ended news availability on Facebook and Instagram for users in Canada for reasons we publicly explained.

Meta has taken, and continues to take, robust steps to ensure that its platforms are not operating as “digital news intermediaries” within the scope of the Act.

After Meta identifies a domain, page, or account as a news outlet, Meta notifies the news outlet that its posts will be made inaccessible to people in Canada on Facebook and Instagram.

In addition, users in Canada are not able to post content on Facebook or Instagram containing a link to a domain of a news outlet.

21. In abridged responses dated December 20, 2024 and January 17, 2025 to further staff requests for information, Meta made such further claims as:

- It is Meta’s publicly available policy, enforceable by Meta’s Terms of Service, that, because of the Act, news is not available on Facebook and Instagram to Canadian users;
- Meta identified Facebook Pages, Instagram accounts, and Internet domains of news outlets;
- Meta has also taken extensive ongoing monitoring measures to ensure that potential news content produced by news outlets is not available to Canadian users; and
- If a user on Facebook or Instagram in Canada attempts to post news content, then the user will not be able to post the content.

¹² Made publicly available after the Commission rejected Meta’s confidentiality request

¹³ <https://about.fb.com/news/2023/06/changes-to-news-availability-on-our-platforms-in-canada/>

22. On December 3, 2025 Commission staff issued a letter noting the "steps that Meta has taken to implement and enforce its policies regarding news content" and stating "we will continue to monitor the situation and will follow up as needed."

23. Importantly, this letter was:

- a. a staff letter and therefore not an official decision or pronouncement of the Commission; and
- b. indeterminate on whether Meta is indeed making news available under the Act.

24. As is evidenced by the attached examples of Meta making LITS news available on Facebook and Instagram (at Schedule A), Meta's responses are evasive misleading and/or false.

25. The examples identified in Schedule A clearly constitute "news content" as defined in section 2 of the Act: "means content — in any format, including an audio or audiovisual format — that reports on, investigates or explains current issues or events of public interest."

There is no "volume" test for making available under the Online News Act

26. In anticipation of arguments from Meta that they are not in the business of news, and that any infractions or occurrences of news being made available are minor or incidental, we submit that this is irrelevant. There is no "volume" test for making available under the Act.

27. To the contrary, the test for "make available" is simply:

- 2(2)** For the purposes of this Act, news content is made available if
- (a)** the news content, or any portion of it, is reproduced; or
 - (b)** access to the news content, or any portion of it, is facilitated by any means, including an index, aggregation or ranking of news content.

28. LITS recognize that per, subsection 19(2):

The bargaining process is limited to matters related to the making available, by the digital news intermediary in question, of news content produced by a news outlet that is identified under section 30 as a subject of the bargaining process and, if an application is made under subsection 31(1), determined by the Commission to be a subject of the bargaining process.

29. Thus, to fall under the Act, LITS acknowledge that news must be made available by Meta either through “reproduction” on its platforms, Facebook and/or Instagram, or by facilitating access “by any means.”
30. Any incidence of “making available” on Facebook and/or Instagram therefore can trigger bargaining under the Act. The volume of such “making available” may go to compensation payable, but it is irrelevant in determining liability.
31. As is clear from the LITS examples at Schedule A, however, the making available by Meta of LITS news on its platforms is *not* merely incidental. Hundreds, if not thousands, of Facebook and Instagram users have been making available LITS news on a fairly regular basis.

Meta is neither consistent in making news outlet links “inaccessible”, nor is this sufficient

32. In its arguments that it does not make news available, Meta places extensive emphasis on identifying domains of, and links, to news outlets, and preventing them from being posted on Facebook or Instagram. However, this is not a valid test for “making available” under the Act.
33. There is no restriction on what qualifies as “reproduction” under subsection 2(2)(a) – it could be a photo, pdf, or text cut and paste. Nor is there any limitation to the form of access under subsection 2(2)(a) – it could be via a link; but it does not have to be.
34. However, even if the Act limited making available to links – which it does not – LITS evidence at Schedule A confirms that Meta’s blocking measures still often fail. We have uncovered numerous examples of news links being provided on Facebook (and Instagram). Moreover, Facebook user postings of links to YouTube that feature news content – including the exact same news content that Meta seeks to remove when posted by news outlets directly – appear to escape Meta blocking.
35. This only makes sense. Meta’s very business is premised on maximizing people posting on and using its platforms, and generating advertising revenue from that use. To now say that because users (not Meta itself or news outlets) share news on its platforms, Meta escapes liability, represents a complete disavowal of Meta’s entire business model.
36. What Meta, apparently does do, is periodically do a “clean-up” and take down links to news – after they have been up for a while. Indeed, in the weeks leading up to the filing of this Application, this happened to a number of the LITS links we identified in Schedule A. This does not detract, however, from the fact that

the links *were* made available, and fresh ones appear, therefore subjecting Meta to liability under the Act.¹⁴

Other Meta arguments that it is not making LITS news available are false or irrelevant

37. In light of LITS evidence at Schedule A, many of the claims Meta has made with regards to ending news sharing on its platforms are either irrelevant or blatantly false. Contrary to statements noted at paragraphs 20 and 21, above:

- Meta *did not* end news availability on Facebook and Instagram for users in Canada starting in June 2023;
- The steps Meta has taken, and continues to take, have been *insufficient* to ensure that its platforms are not operating as “digital news intermediaries” within the scope of the Act. Whether or not these steps can be considered “robust” is *irrelevant*;
- The fact that Meta’s publicly available policy is that, because of the Act, news is not available on Facebook and Instagram to Canadian users is *irrelevant*. The policy is *not enforceable* by Meta’s Terms of Service;
- Users in Canada *are able* to post news content on Facebook and Instagram; and
- The fact that Meta *believes* it has also taken extensive ongoing monitoring measures to ensure that potential news content produced by news outlets is not available to Canadian users is *irrelevant*.

[Meta’s procedural obligations in response to this Application necessitate an immediate response](#)

38. If Meta is of the opinion that LITS should not be a subject of the bargaining process, its recourse under the Act is to apply to the Commission for a determination of the issue, pursuant to subsection 31(1).

39. Should Meta choose to do so, LITS respectfully submit that, given the evidence we have provided, the Commission should dismiss the application summarily, as it would clearly be “frivolous, vexatious or not made in good faith”, under subsection 31(3).

[Meta’s responses to the Commission’s inquiry may warrant penalties](#)

40. Subsection 60(1) of the Act states:

¹⁴ We note a January 16, 2026 article in The Logic where it was reported that some Canadians were obtaining access to news content on Meta platforms and that a Meta spokesperson had suggested it “could be a bug”. Again, the reasons news is made available on Meta are irrelevant; the fact of it being made available is the legal test.

60 (1) Subject to any regulations made under paragraph 76(a), an operator or a director, officer, employee or agent or mandatary of an operator commits a violation if they

(a) contravene a provision of this Act, a provision of the regulations, an order made under this Act or an undertaking that they entered into under section 65; or

(b) make a misrepresentation of a material fact or an intentional omission to state a material fact to a person designated under section 57 or paragraph 63(a).

41. LITS believe that in failing to notify the Commission, pursuant to section 7(1), that it operates one or more digital news intermediaries under the Act, Meta is in breach of subsection 60(1)(a).

42. Moreover, we submit that Meta's responses to the Commission's staff inquiry appear to misrepresent material facts and contain intentional omissions.

43. Meta's desire to evade application of the Online News Act is a matter of public record. It should therefore not be a surprise that Meta would intentionally provide answers to Commission staff that justify that position while conveniently avoiding reality.

44. Ultimately, the Commission must decide whether penalties pursuant to subsection 60(1) of the Act are warranted. How Meta chooses to respond to this Application may be an appropriate indicator.

[Meta must be monitored for potential undue preference](#)

45. LITS have uncovered a number of incidences where Meta has made competing news outlet news available via direct links on Facebook and/or Instagram, while blocking LITS news links. See Schedule B.

46. Such conduct clearly represents a preference conferred on news outlets directly made available by Meta and a competitive disadvantage to LITS who are not. Whether this is deliberate or undue (contrary to section 51) is not a matter LITS choose to address in this filing.

47. However, we are concerned about possible repercussions, including intentional retribution from Meta, that could result from filing this Application. We therefore request that the Commission stay vigilant in addressing this Application in a timely manner, and ensure it is in a position to respond quickly to any apparent breaches of section 51.

The broader damage to Canada’s news ecosystem of Meta’s actions should no longer be ignored

48. Two and a half years after Meta’s decision to remove news from its platforms, the world has become a more fragile, unpredictable place where national sovereignty is increasingly challenged.¹⁵ At a time when Canada’s news ecosystem has never been more important to maintaining our democracy, Meta has directly contributed to its demise, both by leaching advertising dollars and by, intentionally, compromising the ability of legitimate trustworthy news voices to be found on its platforms while favouring non-traditional, often extreme, news voices.
49. Meta’s double-barreled hit to credible Canadian news providers, such as LITS – reducing their revenues and increasing distribution of competing, less trustworthy, news sources that adhere to no journalistic standards – should no longer be allowed to stand.
50. Trust in news in Canada is at an all-time low – according to the Reuters Institute, only 39% of Canadians express trust in news overall, down from 58% in 2018.¹⁶ But the news sources Canadians do trust are local news, including local TV stations like LITS and the major broadcast news brands in Canada (CTV, CBC, ICI Radio Canada, CTV, Global and Noovo).¹⁷
51. Meanwhile, despite its “process of ending news availability in Canada”,¹⁸ as the operator of three of Canada’s six most popular social media platforms, Meta continues to be a major source of news for Canadians. But now, almost without a doubt, Meta is the largest source of untrustworthy news and disinformation.¹⁹

¹⁵ See, for example, Davos 2026: Special address by Mark Carney, Prime Minister of Canada, January 20, 2026 at <https://www.weforum.org/stories/2026/01/davos-2026-special-address-by-mark-carney-prime-minister-of-canada/>

¹⁶ Reuters Institute, *2024 Digital News Report*, at <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/canada>

¹⁷ Ibid. Unfortunately, while Reuters data tracks “Regional or local radio” and “Regional or local weekly newspaper” it does not track “Regional or local TV” as a specific category. Rather Reuters tracks the major TV news brands (some of which are now also radio news brands). Based on the data presented, and LITS own internal data on station news reach and ratings, however, we think it reasonable to surmise that LITS would have similar trust percentages – namely in the 60% range.

¹⁸ As claimed in its *Changes to News Availability on Our Platforms in Canada*, June 1, 2023, at <https://about.fb.com/news/2023/06/changes-to-news-availability-on-our-platforms-in-canada/>

¹⁹ Reuters data, at Ibid note 16 above all but prove this. Social media as a source of news actually declined from 55% in 2022 to 46% in 2025, presumably in large part because of Meta’s actions in “ending” news availability in Canada. However, Meta’s platforms, remain top sources for news, with Facebook at 25% (down 4%), Instagram at 13% (up 3%) compared to market leader YouTube at 29% (up 4%). The only way to reasonably read this data is that, while the Facebooks news ban has driven a small percentage of social media users to YouTube for legitimate news sources, many remain on Meta platforms, still accessing news, much of it untrustworthy.

If bargaining is to be in good faith, it must start now

52. Meta's conduct since the inception of the Online News Act can reasonably be described as one of bad faith.
53. The company has clearly sought to flout Canadian law through purportedly – but not effectively or completely – removing news from its platforms rather than paying a modest share of its revenues to Canadian news providers. Further to this, Meta failed to provide complete and accurate responses to direct questions asked by the Commission about the availability of news on its platforms.
54. Meta has sought to nip a potential global threat at the bud by denying Canadians ease of access to Canadian news. The inevitable result is that Canadians have cleverly found ways to post and access news on Facebook and Instagram, that circumvent both Meta's technological efforts to remove news content and its gameplan.
55. In light of this, the Commission should not hesitate to bring the full import of the Online News Act immediately to bear by confirming the required date of initiation of bargaining as immediately – namely the day after the filing of this application.
56. Meta has already delayed required compensation for LITS news by over two years. It will do everything possible to delay further. This should not be allowed.
57. Meta must bear the burden, including any negative repercussions, of further delay. For example, pursuant to the Commission's guidelines, this matter should go to mediation in 90 days, regardless of whether Meta has agreed to initiate bargaining – failure to bargain would represent *de facto* evidence that the parties were unable to reach an agreement. In such circumstances, and assuming Meta does not then engage, the Commission should also reduce the 120-day mediation period and take the matter promptly to final offer arbitration.
58. LITS are fully prepared to commence the bargaining process immediately. No further time should be wasted.

Conclusion

59. Hundreds of thousands, if not millions of Canadian Facebook and Instagram users are still receiving news despite Meta's supposed "ban". Whether this is deliberate or unintentional makes no difference to Meta's liability under the Online News Act.

60. Under the plain reading of the Act, Meta operates one or more digital news intermediaries that are making LITS news available to Canadian users. Meta should be immediately required to enter into collective bargaining with LITS to ensure fair compensation.

Schedule A – Evidence of Meta making LITS news available

[See separate document.]

Schedule B – Evidence of Meta making news competitors to LITS directly available

[See separate document.]

Schedule C - Written package of information necessary to initiate the mandatory bargaining process

As required pursuant to the Commission's procedural Guidelines set out in Appendix 2 to Online News Regulatory Policy CRTC 2024-327 at Appendix B, LITS hereby provide:

1. Name and contact information for the person(s) authorized to bargain on behalf of the news business(es):

Peter H. Miller B.Sc., LL.B.
Counsel to LITS
C/o Channel Zero Inc.
2844 Dundas St. W.
Toronto, Ontario
M6P 1Y7
peter@petermiller.ca

2. The following LITS are immediately participating as a group of news businesses:²⁰

- Newfoundland Broadcasting Company Limited (CJON-DT, St. John's)
- RNC Media Inc. (CHOT-DT and CFGS-DT, Gatineau; CFEM-DT, Rouyn-Noranda; CFVS-DT, Val-d'Or)
- Télé Inter-Rives Ltée (CIMT-DT and CFTF-DT, Rivière du Loup; CHAU-DT, Carleton)
- CHCH (2190015 ONTARIO INC.: CHCH-DT, Hamilton)
- DBA CHEK Media Group (CHEK-TV, Victoria)

Pattison Media (CFJC-TV & Kamloops; CKPG-TV, Prince George), Miracle Channel (CJIL-DT, Lethbridge) and Thunder Bay Electronics (CKPR-TV and CHFD-TV, Thunder Bay)²¹, would join the bargaining group as soon as the Commission places them on its public list of eligible news businesses

Attached to this Application as Schedule D is an attestation that the representative named above has written authorization to bargain on behalf of each news business.

²⁰ News businesses are identified here as they are identified in the Commission's list at <https://crtc.gc.ca/eng/publications/reports/ona25.htm#a11>. Inconsistencies in naming convention (sometimes using corporate entity; sometimes station call sign) are in the original. The Commission notes the presence of such potential "typographical errors" and "minor discrepancies" at footnote 4.

²¹ Through T.Bay Post Inc., and such other news businesses as Thunder Bay Electronics may request, and the CRTC may accept as eligible news businesses.

Written authorizations of participating news businesses shall be made available to the Commission upon request.

3. The following is a list of the news outlets operated by the news businesses which are to be the subject of bargaining. For completeness, this list identifies all participating (immediate and future) news business and their associated news outlets:
 - Newfoundland Broadcasting Company Limited: CJON-DT
 - RNC Media Inc.: CHOT-DT, CFGS-DT, CFEM-DT & CFVS-DT, Val-d'Or
 - Télé Inter-Rives Ltée: CIMT-DT, CFTF-DT & CHAU-DT
 - CHCH (2190015 ONTARIO INC.): CHCH-DT
 - T.Bay Post Inc.: CKPR-TV & CHFD-TV through TBnewswatch.com
 - Miracle Channel Association: Bridge City News
 - Pattison Media Ltd.: CFJC-TV & CKPG-TV
 - DBA CHEK Media Group: CHEK-TV and cheknews.ca
4. LITS request that the date on which the 90-day bargaining period is to begin be set as the day after the filing of this application, namely February 5, 2026.
5. Should Meta agree to bargain in good faith, LITS is prepared to be flexible on the schedule for bargaining activities. In order to comply with the Commission's procedural requirements, we propose the following, which contains the required elements:
 1. A determination of the initial information to be shared between parties: By February 27, 2026;
 2. The sharing of initial information between parties: by March 6, 2026;
 3. The initial proposals from each party: by March 13, 2026;
 4. The responses (including reasons) to the proposals from each party: by March 20, 2026;
 5. The counter-proposals from each party: by March 27, 2026; and
 6. The responses (including reasons) to the counter-proposals: by April 3, 2026.

The foregoing would leave approximately four weeks for actual bargaining. If an agreement is to be struck between the parties, LITS believe this would be adequate time.

We reiterate that, further to paragraph 60 above, should Meta decline to agree to bargain with LITS in good faith, it would be appropriate to move as expeditiously as possible to final offer arbitration, regardless of whether the preceding documentation has been exchanged.

Schedule D – Representative’s Attestation of written authorization to bargain

[See separate document.]

*** End of Document ***