

January 13, 2022

**Mr. Claude Doucet**

Secretary General

Canadian Radio-television and Telecommunications Commission

Ottawa, Ontario, K1A 0N2

**Complaint by Safeguard Defenders against CGTN and CCTV-4 –  
Request to Extend the Response Deadline on Fairness and Practical Grounds**

Dear Mr. Doucet,

I am writing to you on behalf of China International Communications Co., Ltd ("**China International**" or "**we**" or "**our**") to: (i) acknowledge receipt of the letter from your office dated January 4, 2022 regarding allegations advanced by the Safeguard Defenders against our Canadian programming broadcasts on CCTV-4 and CGTN (together, our "**Channels**") and (ii) request an extension to the response deadline.

First and foremost, we understand that the Safeguard Defenders have advanced allegations. We also understand the CRTC's desire to explore these allegations more deeply and to establish a complete account of the facts and circumstances around each allegation.

However, having reviewed the Safeguard Defenders' allegations, we very respectfully submit that, on grounds of fairness and practicality, as detailed below, the January 31st response deadline would not allow us sufficient time to carefully, diligently, and thoughtfully respond to each of the allegations advanced against our Channels. We note, for instance, that the time span of the alleged programs is excessively long (from 2013 to 2019), and our production team has undergone a lot of changes during this period of time. Therefore, searching and extracting the programs will be very time-consuming. Besides, at least five (5) sources hyperlinked in the Safeguard Defenders allegations (listed below) do not open, making it difficult for our management team and external counsel to thoroughly investigate and properly respond to each allegation. Due to the length of the complaint (28 pages) and the number of records and documents that must be reviewed by our management team and external counsel, we require significantly more time than currently allotted to prepare a response to each allegation.

At this time, a number of key personnel who will need to be involved in preparing our response are unavailable due to public health reasons relating to the current pandemic or have been deployed to prepare for and cover the Beijing Olympics. We are further resource-challenged on account of the upcoming Chinese Spring Festival, which will constitute extended public holidays in China.

We note that the [Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure](#), SOR/2010-277 ("**CRTC Rules**"), under Canada's [Broadcasting Act](#), allows the CRTC to "dispense with or vary" any rules under the CRTC Rules if the CRTC "is of the opinion that considerations of public interest or fairness permit" (s. 7). Moreover, while we are not requesting an adjournment, and fully intend to provide a detailed and thoughtful response, we note that the CRTC Rules even allow the CRTC to "adjourn proceedings" where "the circumstances or considerations of fairness permit." In the case at hand, we respectfully submit that, on the grounds of fairness and practicality described above, it would be in the public interest—and fairness would permit—an extension of the response deadline to allow us to carefully, diligently, and thoughtfully respond to each of the allegations against our Channels.

As such, while we acknowledge that your office has asked us to respond to the Safeguard Defenders' allegations by January 31, we are writing to kindly request a reasonable extension of the deadline to **March 31, 2022**.

Here are at least five hyperlinks contained in the Safeguard Defenders' complaint that we could not open:

- ❖ The first YouTube link on Page 3:  
<https://www.youtube.com/watch?v=POjaAsNQy3Q>
- ❖ The Google Drive link on page 15:  
<https://drive.google.com/open?id=1Wo7xLUKNZUc3JSOIyWTBI236JrMV5Ycw>
- ❖ The YouTube link at the top of page 18:  
<https://www.youtube.com/watch?v=mHuxlz5a4qs>
- ❖ The YouTube link at the top of page 19:  
<https://www.youtube.com/watch?v=1z0wFNGLrc>
- ❖ The CNTV link at the top of page 19:  
<http://tv.cntv.cn/video/C19133/af7e3e673ebf474ab78e657c2a6d2abb>

In addition, underscoring both the fairness and practicality grounds cited above, we would also like to point out that our Channels contribute, precisely, to many of the values enumerated in your letter and more broadly in section 3 of the *Broadcasting Act*. To name a few, our Channels enrich and strengthen the cultural values of Canadian broadcasting by disseminating content in a variety of languages, including Mandarin, and are regularly watched by thousands of Canadians, both local and those of Chinese decent. Our Channels cover a variety of topics, including cultural and artistic programming, and we disagree with the Safeguard Defenders allegations that our Channels are inconsistent with Canadian values.

We sincerely thank you for your time and consideration.

Warm Regards

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