

NOTICE OF GROUNDS FOR OBJECTION

Filed by Bell Canada, Rogers Communications Canada Inc., Cogeco Communications Inc., Québecor Média Inc., Canadian Communications Systems Alliance, Bragg Communications Incorporated (dba Eastlink), and TELUS Communications Company

In relation to proposed tariff *ARTISTI – Pay Audio Tariff (2027-2029)*

Filed with the Copyright Board (the “Board”) on 2025-12-17 pursuant to Rule 18 of *Copyright Board Rules of Practice and Procedure*.

General Statement of Objection

This is the Notice of Grounds for Objection of Bell Canada, Rogers Communications Canada Inc., Cogeco Communications Inc., Québecor Média Inc., Canadian Communications Systems Alliance, Bragg Communications Incorporated (dba Eastlink), and TELUS Communications Company (the “BDUs”) to the Proposed Tariff for Pay Audio Tariff for 2027-2029 (the “Proposed Tariff”) filed by ARTISTI and published on the Copyright Board website on November 17, 2025, pursuant to the provisions of section 68.2 of the *Copyright Act*.

The BDUs respectfully reserve the right to rely upon objections raised by other parties to the proceedings, *mutatis mutandis*. The BDUs also reserve their right to raise additional substantive points of objection throughout the proceedings related to the Proposed Tariff.

These objections are filed in accordance with the *Copyright Act* and the Practice Notice on the Filing of Grounds for Objection.

Inter alia and without limiting their general objection, and without admitting that they are liable for the payment of royalties pursuant to the Proposed Tariff, the BDUs object to the following:

Grounds for Objecting to Royalty Rates in the Proposed Tariff

The BDUs object to the rates set out in section 4 of the Proposed Tariff for the following reasons:

- Said proposed fees do not reflect the fair, reasonable and appropriate value of reproduction of works in ARTISTI’s repertoire. Said proposed fees do not reasonably reflect either the amount or the type of the impact of performance use by a licensee.
- Said proposed fees do not reasonably reflect either the amount or the type or the impact of such reproduction by a licensee.

Grounds for Objecting to Terms and Conditions in the Proposed Tariff

The BDUs object to the reporting and auditing provisions contained in the Proposed Tariff at sections 6 to 8. Said provisions are intrusive and require the disclosure of potentially sensitive confidential information, require the disclosure of information that is not necessarily available to licensees, and place a disproportionate burden on licensees.

Additional Grounds for Objecting to the Proposed Tariff

The BDUs understand that performers typically assign the exclusive rights to reproduce their performances for any purpose to the sound recording makers. As a result, Artisti is not in a position to licence the reproduction right to pay audio services.

As well, the proposed tariff proposes to licence the reproduction of performers' performances and targets, in part, BDUs, despite the fact that BDUs do not reproduce any performers' performances in connection with the transmission of pay audio services.

Yours truly,