

REPLY TO NOTICES OF GROUNDS FOR OBJECTION

Filed with the Copyright Board by SOCAN on February 20, 2026 pursuant to Rule 21 of the *Copyright Board Rules of Practice and Procedure*

SOCAN Tariff 22.E – Internet – Canadian Broadcasting Corporation (2027-2029)

1. This Reply is in response to the Notice of Grounds for Objection filed by the Canadian Broadcasting Corporation/Société Radio-Canada (“CBC”).
2. The CBC has filed numerous grounds for objection. SOCAN denies these grounds, and any factual or evidentiary assertions made therein, and puts the CBC to the strict proof thereof. SOCAN reserves the right to raise additional points in response during the proceeding.
3. SOCAN expressly denies the CBC’s objections to the proposed royalty rate structure and the proposed royalty rates. The proposed royalty structure and royalty rates, including any applicable minimum fees, are fair and equitable, and properly reflect the value of the use of musical works by the CBC in its online audiovisual services, online music services, and other online programming. Further, the proposed royalty structure and royalty rates align with the rates of other tariffs covering similar uses of music. SOCAN will advance evidence in support of its position in the course of this proceeding.
4. SOCAN expressly denies the CBC’s assertion that the proposed tariff must be adjusted for factors such as repertoire-use and statutory exemptions and puts the CBC to the strict proof thereof.
5. SOCAN expressly denies the CBC’s objections to the proposed terms and conditions. The proposed terms and conditions are found in recently approved or proposed tariffs, or closely mirror the terms and conditions in other recently approved or proposed tariffs and are, in any event, fair and equitable.