20 January 2025

Re: Broadcasting Notice of Consultation CRTC 2024-288: The Path Forward – Defining "Canadian program" and supporting the creation and distribution of Canadian programming in the audio-visual sector

As stated in Broadcasting Notice of Consultation CRTC 2024-288: "The definition of "Canadian program" and the expenditure requirements framework used by the Commission have remained unchanged for decades."

I am filing this intervention to provide information from Canadian content (Cancon) experts about the definition of "Canadian program" and also to briefly provide some relevant history to the Canadian Radio-television and Telecommunications Commission and assorted facts to put my recommendations into perspective.

First of all, it is a matter of record that I am a former Canadian broadcasting industry insider who has long advocated for a public investigation into evidence of the regulatory capture of the CRTC and long-term systemic corruption associated with regulations enacted in relation to Cancon, including a request to Prime Minister Justin Trudeau.

A copy of my open letter to Mr. Trudeau is included as Attachment 1.

In fact, shortly before Mr. Trudeau prorogued Parliament, I requested standing from the Standing Committee on Canadian Heritage to testify about this matter. CRTC Chairperson Vicky Eatrides was provided with a copy of my request by email.

1. Definition of "Canadian program"

Steven Globerman, Hudson N. Janisch and W.T. Stanbury explain the definition of "Canadian program" in 'Convergence, Competition and Canadian Content', Chapter 12 in *Perspectives on the New Economics and Regulation of Telecommunications,* published by the Institute for Research on Public Policy (IRPP).

As noted in the 1996 publication, the IRPP is an independent, national, non-profit organization founded in 1972 "with a mission to improve public policy in Canada by promoting and contributing to a policy process that is more broadly based, informed and effective."

Unfortunately, the IRPP informed me that a digital version of the publication does not exist. However, I want to publicly express my appreciation to the IRPP for granting me consent to scan a copy of 'Convergence, Competition and Canadian Content' from my own copy of the publication and include it in this intervention, as well as to forward it to politicians.

A copy of 'Convergence, Competition and Canadian Content' is included as Attachment 2.[1]

[1] Apologies for the quality of the scanned copy, due to the marked-up pages in my copy and the fact that I had to scan the chapter on A3 in order to ensure that the page numbers were visible.

Professors Globerman, Janisch and Stanbury assert that a majority of economists consider that Cancon regulations are a means by which corporate interests use the power of the state to redistribute income to themselves.

> It must be emphasized that *none* of the many regulations to which broadcasters (or other "distribution undertakings") are subject seek to specify the themes, subject matter or *substantive* content of program material. "Canadian" programs are simply those that are produced by persons who are Canadian citizens. It is for this reason that most economists think of Cancon regulations as "boiling down" to yet another case of a small, well-organized group using the power of the state to redistribute income to themselves.[2]

In addition, information by these experts illustrates that the definition of "Canadian program" does not serve to effectively safeguard, enrich and strengthen the cultural, political and social fabric of Canada.

> "Canadian" programs are those produced by Canadian citizens in the sense that certain positions must be held by Canadians, and 75 percent of the total remuneration for post-production work must go to Canadians. In other words, "Cancon" is not – legally speaking – about thematic content at all. It is about the *citizenship* of the persons who made the program. Anything produced by a group of Canadian citizens is "Cancon" regardless of its substance. In other words, if a group of Canadians made a program about South American iguanas, the history of the Albanian labour movement, Pathet Lao folk songs, the arms of Teutonic knights, medieval Spanish poetry, moon rocks, the works of a 14th-century Chinese author, the voting laws of South Australia or Pol Pot's political philosophy – all would be classified as "Canadian" in terms of the regulatory requirements.
>
> On the other hand, if a group of former Canadian citizens made a program dealing with the political philosophy of Sir John A. Macdonald, the ranching culture of southern Alberta, the spiritual life of Mackenzie King, the rise of the PQ, any of Pierre Burton's books about Canada, the history of the CBC and CRTC, the growth of minor league hockey on the Prairies, the life of professional nationalist Melville Watkins, the League for Social Reconstruction, the hobbies of John Diefenbaker or the childhood of Jean Chrétien – none would qualify as "Canadian programs." Therefore, it is not "Cancon" that is being subsidized, it is those Canadian *persons* who chose to make their living producing (using the term broadly) material that is broadcast on radio and TV stations or distributed on cable-TV operations in Canada.[3]

Furthermore, Cancon subsidies are not targeted, which the professors explain serves to keep the cost of Cancon subsidies "quite well hidden" and also requires more bureaucrats to be employed at the CRTC.

> It should be noted targeted subsidies have some disadvantages from the perspectives of the culturati, the present producers of Cancon: (1) They make the cost of Cancon overt while the present methods of regulation keeps it quite well hidden. Visibility of the it makes it easier for the opponents of the policy to see the potential benefits of eliminating or reducing the subsidy. (2) The present beneficiaries get more than higher incomes as a result of the various Cancon requirements imposed by the CRTC. They gain greater exposure for their work (although this may not lead to greater "consumption" by the public). Targeted subsidies that result in programs with limited exposure and tiny audiences will be harder to support politically than the present regime. (3) Targeted subsidies will require far fewer public servants and regulators to administer than the current complex regime. Thus these administrator-beneficiaries would be made worse off. The problem is that at least some of these people provide advice to politicians on exactly this issue.[4]

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[2] Steven Globerman, Hudson N. Janisch and W.T. Stanbury (1996) 'Convergence, Competition and Canadian Content' in *Perspectives on the New Economics and Regulation of Telecommunications*, p.217. Institute for Research on Public Policy, Montreal.
[3] Ibid, pp.240-241.
[4] Ibid, pp.235-236.

2. The Broadcasting Distribution Regulations

The foundation for the current expenditure requirements framework for Cancon subsidies in the *Broadcasting Distribution Regulations* is based upon:

1) one highly unorthodox regulation enacted by the CRTC in 1994 – subsection 18(6.3) of the *Cable Television Regulations, 1986* (hereinafter referred to as Regulation 18(6.3));

2) an unpublished CRTC decision made in 1996 (File 1000-121), in which the Commission ruled that millions of Canadian cable-TV subscribers did not have the legal right to written notice about Regulation 18(6.3) and its monthly cost, and;

3) the flawed public consultation process employed in 1996 by the CRTC pursuant to Public Notice CRTC 1996-69.

For context, Matthew Fraser – another professor with expert knowledge of the CRTC and its regulations – has publicly stated that the CRTC has been totally captured by corporate interests and is corrupt.

> According to the theory of "regulatory capture," bodies such as the CRTC go through successive stages toward their inevitable corruption. In their infancy, regulators show youthful activism. By middle age, they have succumbed to subtle co-option by industry interests. In their final stages of bureaucratic senility, they degenerate into passive instruments of the corporate interests under their purview.
>
> It would take formidable powers of self-delusion to deny that the CRTC's evolution has followed the capture theory with alarming fidelity. Created in 1968, the commission was already slipping into complicity with industry interests by the late 1970s. A decade later, it was totally captured. This was especially true in broadcasting.[5]

Regulation 18(6.3)

Following Public Notice 1993-74 and a CRTC public hearing, the Commission enacted Regulation 18(6.3) on 25 January 1994.

According to professors Globerman, Janisch and Stanbury, Regulation 18(6.3) signalled a "shift to an exercise tax approach" by the Commission to finance Cancon subsidies.[6]

It is simply not possible to understand the existing CRTC expenditure requirements framework and the Canada Media Fund without understanding this one subordinate law. Regulation 18(6.3) and its ongoing legacy is explained in detail 'One Media Law: A case study of regulatory capture, systemic corruption and the Canadian Radio-television and Telecommunications Commission'[7] (hereinafter referred to as 'One Media Law').

A copy of 'One Media Law' is included as Attachment 3.

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[5] Matthew Fraser (10 June 2000) The man who won't do lunch. *The National Post*, p. D11.
[6] Steven Globerman, Hudson N. Janisch and W.T. Stanbury (1996) 'Convergence, Competition and Canadian Content' in *Perspectives on the New Economics and Regulation of Telecommunications*, p.243. Institute for Research on Public Policy, Montreal.
[7] Keith Mahar (17 August 2015) 'One Media Law: A case study of regulatory capture, systemic corruption and the Canadian Radio-television and Telecommunications Commission'.

It warrants noting that Friends of Canadian Broadcasting condemned the proposed enactment of Regulation 18 (6.3) and also questioned the legality of the 'tax'; stating that if Regulation 18(6.3) was properly understood by Canadians, it would undermine support for Cancon and result in general mistrust of the CRTC.

> Friends of Canadian Broadcasting considers the Commission's proposal a breach of faith with seven million Canadian households. If properly understood by consumers, the proposed action will fan general public mistrust of an important public institution, and thereby threaten public support for broadcast regulation in general, and the public good which that regulator has been designed to contribute.
>
> Along with many other public interest groups, Friends asked the Commission in March 1993 to ensure a contribution from the cable industry's very substantial profits for such a purpose. Instead the Commission chose to impose a 'tax' upon cable subscribers to promote Canadian programming — with the cable monopolies anointed as tax collectors. We have publicly described this stance as one whereby the CRTC is "enabling the industry to pick the pockets of its captive subscribers for this purpose."
>
> We doubt the Commission's authority to impose such a tax. We also doubt the Commission's authority to establish arms-length agencies to collect and dispense cable subscribers' funds for production purposes.[8]

Furthermore, the CRTC employed unethical and potentially unlawful tactics to ensure that Canadian citizens did not properly understand Regulation 18(6.3).

As documented in 'One Media Law':

1) Regulation 18(6.3) was designed to permit cable-TV companies to charge Canadian subscribers approximately $600 million over its initial 5-year period if the monopolies voluntarily transferred 50% of the amount of money collected from their subscribers to a fund subsidizing the operations of private television production companies.

2) The cost of Regulation 18(6.3) was completely hidden to ratepayers, as Canadian cable-TV subscribers were never provided with written notice about Regulation 18(6.3), its cost, or its beneficiaries.

3) Public officials at the CRTC permitted the monopoly cable-TV companies to collect the cost of Regulation 18(6.3) under a false pretence, a method of collection which I have publicly described as "government-regulated fraud."[9]

In 1995, three lawyers (Christopher K. Leafloor, Neil Milton and J. Blair Drummie) provided free legal services to permit me to try to establish the legal right of Canadian cable-TV subscribers to notice about Regulation 18(6.3) to ratepayers, by suing my own cable-TV company and requesting specific declarations from the court in order to establish the legal right of subscribers to notice about the scheme and its monthly cost.

[8] Friends of Canadian Broadcasting, "Program Fund for Canadian Programming", Intervention to the CRTC, 17 September 1993, pp.1-2.
[9] Keith Mahar, "Canadian Television Fund: A Convenient Deception", *Canada Free Press*, 13 June 2008.

Justice Robert Sharpe determined in Mahar v. Rogers Cablesystems Ltd. that the failure by Rogers Cablesystems Ltd. to provide notice of Regulation 18(6.3) "raised a genuine issue of law of significance to the public at large."[10] However, the corporation won a precedent-setting decision on jurisdiction grounds, and the superior court judge did not rule on the merits of my legal case. Justice Sharpe stated in his decision, "the task of deciding this case has been specifically assigned by Parliament to the C.R.T.C."[11] with the potential future decision by the Commission subject to review by the Federal Court of Appeal.

A copy of Mahar v. Rogers Cablesystems Ltd. is included as Attachment 4.

Unpublished File 1000-121 CRTC Decision

Following Mahar v. Rogers Cablesystems Ltd., Mr. Leafloor provided me with free legal service and filed a complaint to the CRTC on my behalf (as Cable Watch), alleging that cable-TV companies across Canada had acted unlawfully by collecting 18(6.3) fees from consumers without notice.

In addition, the Cable Watch complaint alleged that the CRTC itself had violated the law in relation to Regulation 18(6.3), by:

1) acting beyond the authority granted to it by Parliament when it enacted the regulation;

2) failing to notify Canadians of its intent to enact Regulation 18(6.3); and,

3) failing to notifying Canadians of the cost consequences to them of Regulation 18(6.3).

Furthermore, the CRTC was requested to hold a public hearing into the matter to permit Canadians to participate in the process.

A copy of the Cable Watch complaint is included as Attachment 5.

As documented in 'One Media Law', two days after the complaint was filed, the Minister of Canadian Heritage was urged by the Public Interest Advocacy Centre to "swiftly" establish an independent review of the complaint (a request which was rejected by the Minister).

> We are in receipt of the complaint filed by Cable Watch, an organization founded by Keith Mahar, a cable subscriber from Ontario.
>
> Mr. Mahar's complaint sets out a number of allegations concerning the decision made by the CRTC following the Structural Public Hearing for the cable industry in June of 1993. These allegations raise issues as to the procedural correctness of the decision which are serious and potentially important for the cable industry as a whole, and cable consumers.
>
> While we advance no position with respect to the merits of the jurisdictional concerns contained in the complaint, we believe they are of such importance that the government should swiftly take steps to initiate an independent review of Mr. Mahar's complaints and to take appropriate action if necessary.[12]

[10] Mahar v. Rogers Cablesystems Ltd. (1995), 25 O.R. (3d) 690 (Gen. Div.), p.705.
[11] Ibid, p.701.
[12] 30 November 1995. Request to the Hon. Michel Dupuy by Public Interest Advocacy Centre (Michael Janigan), p.1.

As a result of the Cable Watch complaint, the CRTC established File 1000-121.

However, the CRTC refused to hold a public process to determine the matter involving the legal rights and financial interests of several million Canadians. Instead, the quasi-judicial tribunal conducted a process behind closed doors and without public participation to render its decision into the legal issues.

During this process, a comprehensive submission was filed to the CRTC by Mr. Leafloor that addressed relevant facts and legal arguments supporting the allegations of unlawful activities.

A copy of the Cable Watch submission by Mr. Leafloor is included as Attachment 6.

The CRTC subsequently made its decision, ruling itself and cable-TV companies innocent of any unlawful activities in a decision that the Commission did not make public (hereinafter referred to as the "File 1000-121 unpublished CRTC decision"**)**.

A copy of the File 1000-121 unpublished CRTC decision is included as Attachment 7.

In effect, the CRTC ruled that:

1) Parliament had granted it with the authority to require millions of consumers to pay artificially inflated rates each month for a monopoly service in order to both unjustly enrich cable-TV monopolies and also subsidize private Canadian television production companies;

2) the consumers paying for the scheme were not entitled to be notified about the scheme, that they were paying for it, or its monthly cost to them; and,

3) it was acceptable for the Cable-TV companies to collect the Regulation 18(6.3) fees from several million Canadian under false pretence.

Unfortunately, I was unable to launch an appeal of the File 1000-121 unpublished CRTC decision to the Federal Court of Appeal within the specified timeline due to experiencing a severe episode of suicidal depression, as I addressed in my chapter in '*Coming Out Proud to Erase the Stigma of Mental Illness*'.[13]

<u>Public Notice CRTC 1996-69</u>

After the CRTC made its unpublished decision, it issued Public Notice CRTC 1996-69, calling for comments on its proposed approach to regulate "*broadcasting distribution undertakings*" (Cable-TV, direct-to-home satellite, multipoint distribution system technologies, etc.), including a requirement for each such service to make a financial contribution to the development and production of "Canadian programming" based upon a percentage of their gross annual revenues earned from broadcasting activities.

[13] Mahar K (2015) 'Changing My Mind' in *Coming Out Proud to Erase the Stigma of Mental Illness*. Corrigan P., Larson J. & Michaels J. Instant Publisher: Collierville, USA.

In effect, the CRTC was proposing to abolish Regulation 18(6.3) in name only, by permitting cable-TV companies to continue collecting the Regulation 18(6.3) monthly fees from their subscribers.

For the cable-TV companies, the proposed regulations were basically to change their *voluntary* contributions to mandatory contributions, and simply modify the amount transferred to subsidize Cancon.

Despite still experiencing poor mental health, I officially notified the CRTC prior to its public hearing that its proposed regulations were not fair or equitable to cable-TV subscribers across Canada, and also included facts to identify that such regulations were to provide a windfall in revenue to selected cable-TV companies, citing specific data for Newmarket, Ontario (a cable-TV system owned by Rogers Cablesystems Ltd.).[14]

A copy of my intervention is included as Attachment 8.

On 15 October 1996, Dan McTeague – then a Member of Parliament – and I appeared together at the CRTC public hearing to jointly address the proposed regulatory changes.

It is a matter of public record that I notified the Commission that its proposed Cancon expenditure requirement framework would be in violation of Government policy which stated that regulation should prevent cross-subsidies and be equitable. The design of the CRTC proposal was to permit cable-TV companies, including Rogers Cablesystems Ltd., to retain broadcasting revenue without accounting for its purpose, thereby facilitating cross-subsidization from monopoly services and resulting in an unfair competitive advantage. In addition, the cost of the CRTC proposal was to be grossly inequitable to millions of Canadians because the CRTC was allowing the monopolies to continue collecting the same monthly amount charged for Regulation 18(6.3).[15]

At the same time, Mr. McTeague stressed to the CRTC that he was concerned that its public hearing was "unbalanced and biased" because Canadians were not effectively notified about the Cable Production Fund and Regulation 18(6.3), which precluded citizens from fully participating in the CRTC process.[16]

Weeks after appearing at the public hearing, I experienced a life-altering episode of acute psychosis while trying to write a comprehensive submission about the regulatory scheme, which interrupted my CRTC campaign for an extended period of time.[17]

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[14] 18 July 1996. Intervention by Cable Watch (Keith Mahar) re: Public Notice CRTC 1996-69. Filed on the CRTC public file as Comment 104.
[15] 15 October 1996, Transcript of Proceedings: The Regulation of Broadcasting Distribution Undertakings, pp.1532-1564. Keeley Reporting Services Inc. Ottawa.
[16] Ibid, p.1538.
[17] The experience was documented in a short film in 2006 by E.C. Warner (The Naked Advocate). https://www.youtube.com/watch?v=-707an8uaEo

Broadcasting Distribution Regulations enacted in violation of Government policy

Despite being provided evidence that the Cancon contribution scheme was to violate Government policy, bureaucrats at the CRTC enacted the *Broadcasting Distribution Regulations* anyway– requiring broadcasting distribution services to contribute 5% of their gross revenues earned in broadcasting activities to subsidize the operations of Canadian television production companies.

Professors Globerman, Janisch and Stanbury state that these "contributions" to fund Cancon "are, in fact, a tax,"[18]

More importantly, however, given the fact that the *Broadcasting Distribution Regulations* were knowingly enacted in violation of Government policy, one is justified to describe the subordinate legislation as being illegitimate.

As documented in 'One Media Law', I have advocated for an investigation into existing evidence of the regulatory capture of the CRTC and its long-term systemic corruption to successive governments, as well as taking action to update the issue and generate additional information and evidence on the record. Based on the documented facts, it is fair to state that evidence exists of possible state capture by the same vested interests benefiting from the corrupt nature of the CRTC.

Following are a few highlights resulting from my actions:

1) 5 January In 2006: Lawyer Paul Armarego provided information to the attention of politicians Stephen Harper, Gilles Duceppe, Jack Layton and Jim Harris about my allegations of long-term systemic corruption at the CRTC, specifically addressing the existence of File 1000-121 and the File 1000-121 unpublished CRTC decision.

2) 27 March 2006: File 1000-121 and all of the documents stored in the file (including the CRTC's copy of its unpublished decision) were destroyed and public officials at the Commission have repeatedly refused my requests to identify why File 1000-121 and all the documents were destroyed at that particular time and which individuals initiated the destruction of the file and documents.

3) 20 July 2007: Pursuant to Broadcasting Public Notice CRTC 2007-70, I submitted 'Profiteering in the Name of Culture' as an intervention to the CRTC, which included copies of documents formerly stored in File 1000-121 that were in my possession as appendices, including a copy of the unpublished File 1000-121 CRTC decision. As a result, all these documents were placed on the CRTC public file.

4) 7 February 2008: I appeared at a CRTC public hearing and put information on the public record about the File 1000-121 unpublished CRTC decision and advocated for a judicial review into the matter.[19]

[18] Steven Globerman, Hudson N. Janisch and W.T. Stanbury (1996) 'Convergence, Competition and Canadian Content' in *Perspectives on the New Economics and Regulation of Telecommunications*, p.224. Institute for Research on Public Policy, 1996. Montreal.
[19] Transcript of CRTC public hearing (7 February 2008) 15237-48.

In response, CRTC commissioner Rita Cugini alleged on the public record that the CRTC had never made the File 1000-121 unpublished decision, while simultaneously claiming to be totally ignorant about its background.[20] Hours later, I issued a press release stating that Canadians had been overcharged by more than $1.2 billion, which was picked up by Reuters, Forbes, CNBC and several other news sources

5) 8 February 2008: MP Libby Davies (NDP) raised the issue of Canadians being overcharged by more than $1.2 billion in the House of Commons[21] and MP Jim Abbott – then Parliamentary Secretary for Canadian Heritage – provided false information to Parliament in response.[22]

6) 17 February 2016: I requested Prime Minister Justin Trudeau to initiate an investigation into the existing evidence of the regulatory capture of the CRTC and long-term systemic corruption, providing a copy of the File 1000-121 unpublished CRTC decision and other key documents to his attention.

Mr. Trudeau never acknowledged receipt of the material submitted, despite my specific request. Moreover, no investigation into the CRTC is initiated. To the contrary, the Trudeau government actually increased the statutory authority of the Commission by enacting the *Online Streaming Act*.

As a consequence, in mid-2024 the CRTC ordered U.S. streaming companies to contribute 5% of their revenue earned in Canada in order to subsidize private Canadian media companies, resulting in threats of retaliatory trade sanctions by U.S. lawmakers and the current legal cases before the Federal Court of Appeal.

3. Path Going Forward

Given that Rogers Communications Inc. actually benefited financially when the CRTC introduced its 5% contribution requirement framework – in terms of the corporation's ability to use revenue from its basic cable-TV subscribers to cross-subsidize other businesses and gain an unfair competitive advantage – a case can be made that the CRTC is unfairly discriminating against the U.S. streaming companies.

In addition, professors Globerman, Janisch and Stanbury assert that Cancon regulations violate the principles of free trade with the U.S. The experts state, "while there is much talk about culture and national identity, in reality what is involved here is the protection of a highly articulate (and hence hugely politically influential) industrial sector in flagrant violation of the principles underlying free trade."[23]

Furthermore, successive Canadian governments have ignored evidence of systemic corruption at the CRTC related to the unjust enrichment and subsidization of companies operating in the Canadian broadcasting industry.

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[20] Transcript of CRTC public hearing (7 February 2008) 15249-51.
[21] Hansard (8 February 2008) Parliament of Canada. Oral Question Period, No. 047 (1130).
[22] Ibid.
[23] Steven Globerman, Hudson N. Janisch and W.T. Stanbury (1996) 'Convergence, Competition and Canadian Content' in *Perspectives on the New Economics and Regulation of Telecommunications*, p.211. Institute for Research on Public Policy, Montreal.

In light of the tariff threats recently made by Donald Trump, it is entirely possible that the U.S. President might penalize companies in the Canadian broadcasting industry by using Section 301 of the *Trade Act of 1974* if he becomes aware of these issues, and is willing to publicly address them for the benefit of U.S. companies.

Consequently, although successive Canadian governments have been unwilling to address evidence of malfeasance at the CRTC, it is possible that Canadians might finally learn about Cancon and the need for a public inquiry into the CRTC from American journalists and lawmakers, which would be good for the health of Canadian democracy.

4. Recommendations

The CRTC:

- Re-establish File 1000-121 with available copies of documents formerly stored in the file, including a copy of the unpublished File 1000-121 CRTC decision. I officially provided copies of such documents to the Commission on 11 September 2021 pursuant to Broadcasting Notice of Consultation CRTC 2021-281.[24]

- Issue a public notice:

  A) acknowledging the existence of the File 1000-121 unpublished CRTC decision;

  B) apologizing to Canadians for effectively hiding the monthly cost of the Cancon scheme from consumers for 30 years; and,

  C) announcing a public consultation process and public hearing specifically to hear from ordinary Canadian citizens about their priorities for the Canadian broadcasting system and views about Cancon.

- Re-schedule the public hearing scheduled to commence on 31 March 2025 until after the Federal Court of Appeal rules on the U.S. streaming company cases and the public consultation/hearing recommended above.

Finally, in the event that the CRTC does not adopt the above recommendation to re-schedule its upcoming public hearing, I request the right to appear as a private citizen at the hearing scheduled to commence 31 March 2025 to further expand on this intervention information provided in this intervention and answer questions by the CRTC in the public interest.

Sincerely,

Keith Mahar
PO Box 108
Mawson ACT 2607
Australia

[24] Intervention by Keith Mahar re: Broadcasting Notice of Consultation 2021 (Intervention #271) https://applications.crtc.gc.ca/ListeInterventionList/Documents.aspx?ID=298510&ID=298510&en=2021-281&dt=i&lang=e&S=C&PA=B&PT=NC&PST=A (retrieved on 19 January 2025)