5 July 2013

Manager

Contemporary Community Safeguards Inquiry

Australian Communications and Media Authority

PO Box Q500

Queen Victoria Building

NSW 1230

Via email: [ccsinquiry@acma.gov.au](mailto:ccsinquiry@acma.gov.au)

ACCAN thanks the Australian Communications and Media Authority (ACMA) for the opportunity to contribute to its Contemporary Community Safeguards inquiry

As the peak consumer organisation in the communications sector including broadcast television, we will limit our comments to the sections of the inquiry which relate to television access specifically in the areas of emergency information and closed-captions.

**Emergency information**

*Question 93: The ACMA has drawn a connection between ‘protection of the public’ and emergency information safeguards. Do you agree with this connection? Are there other interventions or safeguards that should be included here?*

Over the past several years Australia has experienced a number of natural disasters - the 2009 Victorian bushfires, the 2011 Queensland floods, the 2013 Tasmanian bushfires. Many Australians depend on television and radio emergency alerts to keep safe during these events. While anecdotal evidence indicates that many people are utilising social media to keep abreast of emergency events, it is essential that our existing emergency alert systems remain in place. As such ACCAN supports the ACMA’s connection between ‘protection of the public’ and emergency information safeguards.

We recommend that the current provisions in the broadcast codes remain as they are essential to ensuring community safety.

**Closed-Captions**

*Question 97: Should the concept of ‘access be relevantly included as a guiding core principle in contemporary broadcasting codes of practice?*

*Question 98: The ACMA has drawn a connection between ‘accesss and captioning interventions. Do you agree with this connection? Are there other interventions or safeguards that should be included here?*

The concept of access is paramount in ensuring that all Australians have meaningful access to television - our foremost medium for news, information and entertainment. ACCAN’s research indicates that over 30 per cent of Australians use closed-captions some of the time when watching television and it is widely known that Australians who are Deaf and many Australians who are hearing impaired rely on captions when watching television[[1]](#footnote-1).

ACCAN is aware that caption requirements are included in the Broadcasting Services Act (BSA), however we see a need for regulatory interventions to be included in broadcasting codes of practice.

These interventions provide clear definitions of broadcast requirements while at the same time reinforcing the essential benefit that access services provide for many Australians. In the increasingly converged media landscape these interventions outline best-practice for broadcasters. We recommend that all current regulatory interventions be included in updated current codes of practice - including any increases in access services. It is also essential that these access services are retained regardless of the delivery method i.e. any closed-captioned programming that has been broadcast and is re-played on non-broadcast delivery platforms needs to retain the closed-captions.

ACCAN is available to provide further input to the ACMA if requested.

Sincerely,

Wayne Hawkins

Disability Policy Advisor

1. See See <<http://accan.org.au/index.php?option=com_content&view=article&id=298:research-on-caption-awareness&catid=98:access-for-all&Itemid=234>>. [↑](#footnote-ref-1)