Submission

12 January 2024

Manager, Media Diversity Section
Australian Communications and Media Authority
PO Box Q500, Queen Victoria Building, NSW 1230
By Email: captioning@acma.gov.au

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Re: Draft captioning quality guidelines

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The Australian Communications Consumer Action Network (**ACCAN**) thanks the Australian Communications and Media Authority **(ACMA)** for the opportunity to comment on the draft captioning quality guidelines **(the guidelines)**.

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all.

ACCAN welcomes the development of captioning quality guidelines which clarify the ACMA's interpretation of quality requirements in the Broadcasting Services (Television Captioning) Standard **(the standard)**. The guidelines unpack some of the concerns raised with ACCAN by consumers over time, including latency, timing, readability, and the essential nature of captions that are meaningful.

Further, the guidelines provide clarity for broadcasters relating to what a 'distinct program segment' means and 'meaningful captions' are.[1] However, as ACCAN indicated in our previous submission to the sunsetting of the standard, the ACMA's role in monitoring of captions compliance could be expanded upon, through more active monitoring of captions quality.[2] ACCAN recommends that:

- The ACMA proceed with a trial of a captions quality measurement model, specifically the Number Edition Recognition model (NER). ACCAN notes that there is substantial support to engage in a trial of the NER model from both broadcasters and consumers who submitted to the sunsetting consultation.[3]
- The draft captioning quality guidelines are subject to review on an agreed and reasonable schedule as a living document well prior to the next sunsetting of the standard, to ensure the capture and advancement of good practice and to continually reflect consumer expectations.

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[1] Australian Communications and Media Authority, 2023. Proposal to remake the Broadcasting Services (Television Captioning) Standard 2013 Consultation Paper, Pg.10. Available at: https://www.acma.gov.au/consultations/2023-04/sunsetting-television-captioning-standard
[2] ACCAN, 2023. Submission to the sunsetting of the television captioning standard. Available at: Sunsetting of the Television Captioning Standard (accan.org.au)
[3] Consumer submissions and broadcaster submissions to the Sunsetting of the television captioning standard can be accessed: https://www.acma.gov.au/sites/default/files/2023-10/Submissions_1.zip

ACCAN also welcomes and acknowledges the ACMA's public commitments and recent audits undertaken to improve the monitoring of captions quality in 2023. [4] Trialling the NER model and pursuing options to enshrine better consumer protections for quality captions into legislation is an appropriate pathway toward achieving this goal.

ACCAN appreciates the opportunity to provide comment on the draft captioning quality guidelines. Should you wish to discuss any of the items raised in this submission, please do not hesitate to contact me at david.swayn@accan.org.au.

Yours Sincerely,

David Swayn
Disability Policy Officer

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[4] ACMA, 2023: Channel 7 breaches captioning rules. Viewable at: https://www.acma.gov.au/articles/2023-03/channel-seven-breaches-captioning-rules