5 July 2013  
Ms Ann Campton and Mr Jared Henry  
Department of Broadband, Communications and the Digital Economy

Via email: [ann.campton@dbcde.gov.au](mailto:ann.campton@dbcde.gov.au)

ACCAN thanks the Department of Broadband, Communications and the Digital Economy for the opportunity to contribute to its Multichannel Captioning consultation.

We have a number of concerns regarding this important consultation. First, we are disappointed that these two proposed options for implementation of captions on free-to-air multichannels were developed without any consumer input. Second, we assert that both proposed time frames to reach 100 per cent closed captions on multi channels are too long.

Our own research indicates that over 30 per cent of Australians use closed-captions some of the times when watching television and it is widely known that many Australians who are Deaf or hearing impaired rely on closed-captions to gain meaningful access to television news, information and entertainment. [[1]](#footnote-1) Digital multichannels have been part of the Australian free-to-air television landscape since 2005 and yet there is no requirement for these free-to-air multichannels to provide closed-captions other than those previously closed-captioned programs rebroadcast from the networks primary channel.

Australia lags far behind other comparable countries when it comes to providing access services to free-to-air television. For example, the 2012 report of the UK communications regulator, OFCOM, on access services for television indicated a majority of television channels exceed their required closed-caption quotas, which range from 70 to 100 per cent for most channels.[[2]](#footnote-2)

In the short consultation time we have had with our members it is apparent that these options do not meet consumer expectations or requirements. The following response from one of our members reflects the majority view of consumers:

“*Being a 71 year old hearing impaired person who uses captioning on a daily basis and assuming I will live no more than the average life span it would seem that both option 1 and 2 have a far too long lead time before 100% implementation.*

*There is a large percentage of people my age with hearing problems and we are going to be disadvantaged by both of these options.*

*Would it not be reasonable to expect the completion of captioning to be in less than five years with the only option on this that any channel to receive exemption has to prove they are unable due to financial or other legitimate reason?.”*

Expecting consumers who rely on closed-captions to wait until at earliest 2022–2023 for 100 per cent access to multichannels is unacceptable. ACCAN summarily rejects both the proposed implementation options. We recommend the Government develop a new closed-captioning implementation timeframe with consumer consultation and input.

ACCAN would be happy to facilitate future consumer consultation with the Government to develop appropriate guidelines for the implementation of closed-captions on free-to-air multichannels.

Sincerely,

Wayne Hawkins,   
Disability Policy Advisor

1. 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)
2. See <<http://stakeholders.ofcom.org.uk/market-data-research/market-data/tv-sector-data/tv-access-services-reports/2012-report>>. [↑](#footnote-ref-2)