



17 May, 2022

Paul Kamaras
Diversity, Localism and Accessibility Section – Content Safeguards Branch
Australian Communications and Media Authority
Via email: Paul.Kamaras@acma.org.au
captioning@acma.gov.au

Dear Paul,

ACCAN appreciates the opportunity to comment on the Draft Captioning Target Reduction Orders for 2021-22.

ACCAN strongly argues that captioning on all television services regardless of type or content is in the best interests of the Australian community, and in particular, the one in six Australians who are deaf or hearing impaired. ACCAN has long held that the reduction of captioning targets will significantly inhibit the potential of reaching the mandated goal of 100 percent captioning by 2032, enshrined in the broadcast services act 1992¹, and severely disadvantages individuals, such as people on the autism spectrum and people who are deaf or hearing impaired, for whom the captioning of television services is essential.

Whilst strongly advocating for any simplification of process or regulation which will improve the potential of meeting this target, ACCAN understands the current difficulties in captioning channels such as racing and live sports; particularly where there is already a significant amount of visual or printed information available on-screen, and captioning the commentary serves no inherent purpose – a designated racing channel is an exemplar of this.

ACCAN's position is that whilst supporting the legislated requirement of 100 percent captioning on all television services by 2032, the potential benefit is not significant enough to consumers in the instance of the listed services in these draft orders given that all of them are racing channels. Therefore, ACCAN sees no impediment to the acceptance of these orders, provided that:

1. All information such as statistics, form information, odds, etc, is printed on-screen
2. As the technology for the provisioning of captioning improves year on year, exemptions such as these continue to be reviewed annually with an expectation that racing services will be included in the 100 percent of captioned programmes by 2032.

Please do not hesitate to reach out should you have any questions or require any further clarification.

Vaughn Bennison
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¹ <https://www.legislation.gov.au/Details/C2022C00079>
[Australian Communications Consumer Action Network \(ACCAN\)](#)
Australia's peak body representing communications consumers