

Accessibility of audiovisual media services
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1. Introduction

Access services refer to providing text subtitles, sign language translation or audiodescription to enable disabled people to follow TV broadcasts. Such services are usually regarded as potentially beneficial to a much broader part of the population than disabled people. In that field, the global situation in Europe is commonly regarded as poor.

The workshop was very rich, with many participants sharing different views and experiences. Taking as a basis the thorough comparative study provided by the EPRA secretariat, the working group tried to structure the discussion around 4 proposed issues:

- Accessibility policies
- Cost structures
- Digital switchover
- European level benchmarking

2. Accessibility policies

Most participants reported policies that were set through the traditional toolbox of regulatory measures: mainly law and PSB contracts, codes and recommendations.

Some countries, such as Latvia, do not have any policy so far regarding accessibility; some such as Poland mention a **lack of awareness** on the national level for those issues. But many participants have described continuous and fairly recent progress at the national level.

The group also reported on numerous **voluntary measures** that were taken by broadcasters themselves, as in Sweden for example with a long tradition of voluntary measures taken by all main channels, public and private alike. Still, provisions are expected to be incorporated to the law in order for the newcomers to adopt the same high levels of accessibility.

When it comes to policy, **concrete targets** are the most effective form of rules regarding accessibility. But this is not always the case: the global picture is very scattered to this regard. Targets can be set in number of hours of programmes, in percentages of the programme, and also in terms of type of programmes, with a strong focus on evening news, as well as, for example, children programmes. **Progressive targets** seem the most effective way to implement obligations in practice: setting higher targets over time, starting from low requirements towards very high ones (for example a goal of reaching, on a ten year term, a level of 90% subtitling, 10 percent audiodescription and 5% sign language). Such progressive targets can take the form of pluriannual plans.

Of course, all accessibility solutions are not evenly spread or considered. Subtitling is by far the most common accessibility solution, while audiodescription and sign language translation remain marginal, partly due to their intrusive aspect for the general public.

Also, most countries make a **distinction between public and private services**, the rules being stronger for the former than the private, although the countries that have the strongest set of measures tend towards equality between private and public, all things being equal. The rules can differentiate on the type of service (generalist or thematic) as with the recent measures introduced in Portugal, or give special attention to community channels, as reported by the Irish BCI. In some cases, the requirements can propose alternatives: a provider is faced with the choice of investing in accessibility for its own service, or contributing to a financial trust aimed at providing accessibility on community TV as in the UK.

Most regulatory authorities are entrusted with **monitoring** missions. According to some participants, monitoring shows that broadcasters usually provide more access services than legally required.

Other policy measures with regard to accessibility are awareness campaigns in favour of accessibility (one is reported in the UK towards audiodescription, which is often less known), as well as organized consultation between service providers and representatives of the disabled end-users.

3. Cost structures

There are several ways of financing access services: the first is **self-financing by broadcasters** themselves. In the UK for example, the rules set a threshold of affordability, along with a criteria of minimum audience share (set at 0.05%). If fulfilling the requirement amounts to more than one percent of a broadcaster's revenue, that broadcaster can be allowed to do less than required. Such a measure can reveal itself as problematic in times of economic crisis, when revenues fall, with the number of British broadcasters that can afford the requirements dropping from 90 channels to 78. Such developments mean a drop in the overall level of accessibility and are also costly in terms of image loss for the broadcasters towards the public confronted to a drop in accessibility. Similar problems are reported in Latvia, for example, where **the drop in revenues is a threat** to initiatives in the field of accessibility, while such initiatives would be increasingly important in a context of ageing population.

Moreover, the British participant reported a problem of lag in collecting the data establishing the targets for each service provider, the financial data being based on the previous year's revenue, and establishing next year's requirements. As a consequence, when facing sudden and significant revenue changes, the requirements might not be appropriate to a channel's current situation.

Other countries, such as Ireland, do not integrate such thresholds in their policy, even if the BCI has regard to the likely financial impact of any requirement to comply with targets and timeframes set for the provision of access services.

The other common funding solution is **government funding**. This is mostly the case for public service broadcasters. Other special funding by the government seems to remain exceptional (it is the case in Belgium - Flanders, for example).

The discussion also raised an equality problem between countries: the cost of making a programme accessible is basically the same regardless of the audience. **The cost per viewer is therefore much higher for smaller countries**. The so-called “patchwork” of varying levels of access services across Europe is the reflection of the diversity in size of landscapes and internal markets.

Some noticeable aspect of making access services is that when successful, **it can become an economic sector as such**. That was reported by the Czech Council where there is a flourishing subtitling industry, while Ireland reported a shortage in stenotypists and sign language interpreters, with the result that those tasks were in some cases outsourced to Australia.

4. Digital switchover

Digital TV is regarded as a good opportunity to make way for more accessible programmes, through dedicated channels for sign language such as in Norway, or through broadband access or IPTV and on demand accessible services. But there is also some **risk** that the digital transition would actually result in poorer accessibility.

As an example reported by British Ofcom, analogue subtitling offers the possibility of making the text bigger in size for better readability. On digital, however, the subtitles appear with a fixed size. This example shows that it is the whole delivery and value chain that is concerned with accessibility, not only content providers. Without properly addressing those questions in policy, the benefits for disabled people might as well never happen.

In that regard, the UK reports the existence of adaptive technology, for example DTT set-top boxes featuring a red button allowing to set accessibility features on and off.

Another issue is bandwidth scarcity. This is especially the case for DTT, as reported by the Italian representative, where sometimes the number of services offered in a multiplex is favoured at the expense of accessibility services. In this perspective, the development of broadband or satellite solutions can be an incentive for the availability of access services, especially intrusive solutions like sign language translation. This view correlates with the BBC policy of offering subtitling for 90% of its iPlayer online on-demand offer and with Poland setting audiodescription channels on IPTV.

5. European level benchmarking

When evaluating the level of availability of access services, quantitative comparison with other countries is often seen as a good method.

It was highlighted during the working group that whereas the issue of social inclusion is consistent across all countries, there is a huge difference in policies, in traditions, and actual situations regarding accessibility of TV programmes across Europe. For example, the brand new policy in Portugal does

not take reruns into account in the calculation of requirements while the requirements set in the UK policy do include repeat programmes.

The working group revealed that many EPRA members are currently in a process of stocktaking of accessibility requirements, in order to establish their own policies. In that process, benchmarking becomes a necessary tool, either to set policies or to evaluate those policies and levels of accessible programmes. Could this opportunity be seized to set common basic rules in order to ensure proper benchmarking?

In the meantime, however, participants in the working group agreed on the importance of a continued information exchange between EPRA members, in particular on the introduction of new measures in the wake of the AVMS implementation process. The EPRA Secretariat will, as a first step, create a dedicated forum of discussion on the EPRA website and will inform all members about this initiative.