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Ms Ann Campton & Mr Jared Henry
Department of Broadband, Communications and the Digital Economy
By Email: ann.campton@dbcde.gov.au ; jared.henry@dbcde.gov.au

Dear Ms Campton and Mr Henry,

Multichannel captioning

Deaf Australia appreciates the opportunity to comment on the proposed options for TV multichannel captioning increases, and the extension of time we were given to respond.

We note that Option 1 proposes commencing at 40% captioning in 2014-15 for 6am to midnight, rising to 100% in 2022-23; and that Option 2 proposes commencing at 20%, rising to 100% in 2024-25.

It is our understanding, based on research by Media Access Australia, that for the time period 6am to midnight, out of 10 multichannels three already provide close to 100% captioning content, two already exceed 40% and two are close to 40%, leaving only three that have levels lower than 40%, and only two that have levels lower than 20%.

This means that the Minister and the Department of Broadband, Communications and the Digital Economy are actually proposing that captioning **decrease** before it increases. Further, the Department is proposing decreases of 40-50% on current levels for three out of 10 multichannels (Option 1); decreases of 60-70% on current levels for three multichannels and 20% for two multichannels (Option 2). In fact Option 2 proposes an increase on current captioning levels for only one out of 10 multichannels.

This is totally unacceptable.

Our members and supporters expect real increases in current TV captioning levels. We fail to see why the Minister and the Department consider it acceptable for consumers who have already been putting up with less than 100% captioning on multichannels for eight years to accept massive decreases in captioning levels and wait a further 10-12 years to reach 100% captioning on multichannels when they already have almost that level on three out of 10 multichannels.

We understand that Government may want to look after the needs of multichannels that may be small and have some financial difficulties; however, the legislation already allows for these multichannels to apply for exemptions.

It is insulting for Government to effectively ask around 4 million consumers to accept that their needs are less important than the needs of a few businesses.

We therefore reject both proposed options and call on the Department to approach this issue from the point of view of consumers who have already waited far too long for no reasonable purpose: overseas experience already shows that captioning on multichannels is affordable for the majority of

multichannel broadcasters and the legislation already provides for those who can prove unjustifiable hardship.

We wish to see a proposal that disallows decreases in current levels and requires 100% captioning on multichannels within three years.

We are happy to discuss this further.

Yours sincerely,

Karen Lloyd AM
Executive Officer