

ADDENDUM C

Accessible Broadcasting Subcommittee Report to the ICT Chamber Working Group for Affordable and Accessible ICT for Persons with Disabilities (June 2017)

SUBCOMMITTEE ON ACCESSIBLE BROADCASTING

Convener Ms. Elza-Lynne Kruger - Tape Aids for the Blind

The Accessible Broadcasting (AB) Subcommittee was formed at the first meeting of the WG in 2015 under the direction of Ms Elza-lynn Kruger, who had over three decades of work experience in TV and Radio and was currently actively involved in the introduction of innovative broadcast technologies for persons with disabilities. The WG had initially tasked the sub-committee with investigating the introduction of Audio Description (AD) on South African Broadcast Networks with its initial specific focus being [1] The Absence of Regulatory Standards & Guidelines; [2] The Impact of Affordability & Accessibility Factors; [3] Determining Alternative AD Solutions & Options.

Outcomes of these initial investigations gave rise to the sub-committee's subsequent work in Digital Radio broadcasting which also extended to potential inclusive education and distance learning benefits to the WG's Education Sub-committee's work.

Aspects of Audio Description in TV broadcasting that the sub-committee was required to take into consideration:

Unlike Sign Language for the Deaf, which is a visual literal translation of the spoken word dialogue expressed in the language of body movements to convey meaning, Audio Description (AD) is not a translation of the dialogue. Rather, AD relies on the subjective interpretation of an audio describer to provide additional commentary in the gaps between the sections of dialogue. Through sound, they interpret and describe body language, expressions and movements as well as scenery to make the story and settings clear. This in itself places greater responsibility on Policymakers, Regulators, Service Providers and TV Broadcasters to ensure that a Standard Code of professional Ethics and Guidelines be adopted by audio describer practitioners and entities involved in the production of audio description soundtracks for broadcast. More importantly to ensure that its introduction and policy regulation was motivated and mandated by the blindness sector and not driven by private enterprise looking to benefit from this new ICT broadcast service offering without conducting essential due diligence in needs assessments and technical viability pilot trials.

Promoters of AD in countries where it has been established acknowledge that not all TV or Film productions are able to accommodate an AD soundtrack. This would have made it difficult for Broadcasters like the SABC and DSTV to meet the draconian quotas initially prescribed in the draft National Integrated ICT Discussion Paper which called for 50% of all broadcast content having AD in Year 1 and 100% AD content by Year 2.

Compared to the 1% - 2% AD content on TV Broadcasts by the few developed countries in the world that had prescribed AD after decades of evaluation, South Africa's 50% - 100% ratios without any due diligence being conducted in either the Broadcasting or Blindness Sectors were of major concern. Especially in light of the delays in SABC's Digital Migration in 2015 and the predicted failure for SABC to switch to Digital TV by the extended deadline of July 2017 granted to the Department of Communications.

Notwithstanding the astronomical cost burden to produce AD enabled soundtracks for 100% AD content across all TV Channels. At the ICASA Hearings in November 2014, DSTV quoted annual costs to merely produce soundtracks (excluding simultaneous broadcasting costs) of R3.2 Billion per annum with SABC quoting production costs of R1.5 Billion per annum.

Positive outcomes of the sub-committee's work on accessible broadcasting to-date include:

1. Digital Radio Broadcasting being recognized as an ideal alternative transmission channel for Audio Described soundtracks to programmes being simultaneously broadcast on TV to overcome the SABC's delayed migration to Digital TV
2. Recognition of the significant benefits of Digital Radio broadcasting in promoting Inclusive Education and the use of ICT in Education without incurring data costs. As a result, the WG's Education Sub-committee is also considering research into the future value and use of Digital Radio in Education. Furthermore, the split-channel capabilities of Digital Radio can accommodate the simultaneous broadcast of educational literature in multiple mother tongue languages.
3. The sub-committee is constantly expanding its monthly dissemination of DSTV's Audio Described Movie schedules to Organisations within the Blindness Sector. DSTV has increased its viewing hour quota of Movies with AD soundtracks as well as reviewing times that AD Movies are broadcast. DSTV has also indicated that it will be expanding its AD offering beyond Movies, to include TV Series and Sitcoms.
4. Chairman Humphrey Maxegwana of Parliament's Portfolio Committee on Communications extended an invitation for a meeting with the Accessible Broadcasting sub-committee to Mariza Jurgens, chairperson of the WG's Accessible and Affordable committee and Hanif Kruger member of the Accessible Broadcasting sub-committee during their fortuitous meeting at the launch of the SA Note. The intention is to discuss ICT Policy recommendations for accessible broadcasting in relation to Audio Description, as well as the draft Digital Radio Policy that the Department of Communications (DOC) had intended to submit to Parliament in December 2016. The reshuffling of the Minister of Communications last month has further delayed the submission of the Digital Radio Policy as well as the DOC's inputs into the National Integrated ICT Policy.

Challenges and opportunities encountered and activities undertaken by the Accessible Broadcasting sub-committee in its reporting to and delivering on recommendations to the ICT Disability Chamber's Working Group to date include:

1. During meetings held by the AB Sub-committee in the early part of 2016, the DTPS advised that the "Broadcasting" aspect of the Draft National Integrated ICT Policy now fell under the Department of Communications (DOC). The sub-committee's numerous attempts to meet with the DOC throughout 2016 were unsuccessful.

2. At the AB Sub-committee's meeting on 27 May 2016 with the National Broadcasting Regulator, ICASA advised that they were currently redrafting regulations that impacted both audio description and sign language interpretation during broadcasts and would be calling for public participation, with specific inclusion of the blindness and hearing impaired sectors prior to finalization. ICASA was awaiting inputs from the DOC on the direction of the new policies being drafted into the ICT Policy White Paper.
3. ICASA recommended that the sub-committee meet directly with the SABC to address its concerns about the deviation from internationally accepted standards in the audio described broadcasting of the "Sticks and Stones" series on SABC 1 as well as the SABC's lack of Digital TV readiness to support the broadcasting of a second audio channel as required for Audio Description. They further advised that the sub-committee meet directly with the DOC to address its concerns on the direction of policies being drafted into the National Integrated ICT Policy White Paper.
4. Unable to secure audience with the DOC, the sub-committee requested that the DTPS ascertain the DOC's policy direction with regard to Broadcasting in order that it could provide the WG with its recommendations. Such advice was not forthcoming and the National Integrated ICT Policy White Paper was approved by Cabinet on 28 September 2016 without the DOC's inputs relating to Broadcasting.
5. A potential meeting with SABC COO Hlaudi Motsoeneng was set aside due to the uncertainty surrounding his suspension and the subsequent SABC inquiry by the Parliamentary Portfolio Committee on Communications.

The work of the Accessible Broadcasting sub-committee is ongoing and it is optimistic that the delays it encountered with the Department of Communications will be overcome following its meeting with the Chairman of the Parliamentary Portfolio Committee on Communications.