



SABC SUBMISSION ON THE ICASA DRAFT CODE FOR PERSONS WITH DISABILITIES REGULATIONS, 2017

(06 JUNE 2019)

SABC PANEL

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INTRODUCTION

- ❑ The SABC welcomes the opportunity to participate in this regulation development process which seeks to improve services offered to persons with disabilities
- ❑ The SABC strives to cater for persons with disabilities in line with applicable regulatory and statutory requirements
- ❑ The SABC is mandated to deliver a public value proposition of educating, informing and entertaining all South Africans in all official languages
- ❑ The SABC delivers its broad public service mandate through its 18 radio stations and 7 television channels (SABC 1,2 and 3 , SABC News, SABC Encore, Sports Channel and Parliamentary Channel on the DTT platform)

PUBLIC SERVICE MANDATE

- ❑ The SABC's obligations in terms of section 8 of the Broadcasting Act include:
 - Make its services available to throughout the Republic
 - Provide television and radio services programming that informs, educates and entertains
 - Provide a broad range of services targeting children, women and people with disabilities
 - Be responsive to audience needs, including the needs of the deaf and the blind

- ❑ The 2004 SABC Editorial Policies provide a framework with which TV and Radio services execute the disability mandate on these platforms

SABC SUBMISSION

❑ In a nutshell the SABC calls for :

1. The Authority to conduct regulatory impact assessment (RIA) to assess the compliance cost, availability of service providers and different means of achieving the intended objectives
2. Persons with disabilities should have access to the three-tiers of broadcasting services
3. Regulations effective date: post the analogue switch-off date
4. For optimal access of broadcasting services , it is advisable for audience assistance services to be provided during performance period
5. It is submitted that audience assistance service targets should apply per bouquet rather than per channel
6. The SABC require government funding for public service mandate
7. USAAF funds should be used to advance the broadcasting needs of persons with disabilities

SABC'S PERFORMANCE AGAINST THE CURRENT REGULATIONS , CONT

SABC Disability Committee

- ☐ Establishment of the SABC Disability Committee responsible for the monitoring and evaluation of the implementation of disability management objectives within SABC
- ☐ The SABC ensures that employees with disabilities are reasonably accommodated, have access to tools of trade and have access to SABC facilities

SABC Disability 360 Project

- ☐ The SABC Disability 360 Project covers disability on-air, online, on the ground through events (2016/2017FY).
- ☐ It aims to inspire change to disability as a whole through educational and informative content.
- ☐ The content of this project is offered in all the 11 official languages and the Khoi San languages

SABC'S PERFORMANCE AGAINST THE CURRENT REGULATIONS , CONT

Website Accessibility Project

- ☐ Website Accessibility Project (2018/2019FY) will provide an accessibility standard on all websites for persons with disabilities. All future Radio Websites developments will follow the identified accessibility standard

Complaints Process

- ☐ Receive written complaints, verbal complaints can be reduced to writing, complaints can be lodged at all our regional offices

Career expo

- ☐ Participated in career exposure initiatives for scholars with disabilities. The purpose of the initiatives was to brand the SABC as an employer of choice and also to assist scholars with disabilities to make informed career decisions.

SABC'S PERFORMANCE AGAINST THE CURRENT REGULATIONS , CONT

Awareness campaigns

- ☐ Commemorated and hosted days of importance such as International Women`s day, 16 Days of Activism, International Disability Day, etc. These days were utilized to raise awareness that related to gender mainstreaming and disability awareness

Facilities:

- ☐ Most SABC offices have wheelchair friendly ramps;
- ☐ Generally SABC radio facilities are on the ground floor for ease of access;
- ☐ Broadcast studios are suitable for persons with disabilities;
- ☐ Most lifts are suitable for the blind

Sign language

- ☐ Provision of sign language translation on programming of national interest ,some news bulletins and some educational programmes
- ☐ Trained staff on sign language translation
- ☐ Provision of sign language interpreter at our front desks and during SABC events

SABC's performance against the current regulations

Subtitling

- ☐ Purpose: to make material available to wider audience and to provide TV access for persons with disabilities
- ☐ Wall-to-wall subtitling is covered on most local content genres (Dramas, sitcoms and Soaps)
- ☐ The 2014 RFP book contained a brief for generic subtitling for the purposes of SABC1,2 and 3 prime time
- ☐ The SABC has acquired the software/play-out system for subtitling for the digital environment

Audio description

- ☐ Audio description workshops have been conducted for commissioning editors
- ☐ The SABC has partnered with Audio Describe (Non-profit organisation) to improve accessibility of broadcast content for the blind

Links with organisations for persons with disabilities

- ☐ SABC TV channels and radio channels have numerous links with organisations for persons with disabilities. These organisations are listed in our compliance reports

PRODUCTION COSTS OF CC AND AD

COST ESTIMATION (ANNUAL) TO PRODUCE CC & AD ON ALL CONTENT							
	Minutes	Hour	Day	Year	Total Minutes/Year	Cost/Minute	Cost/Annum
	60	1	24	365	525,600		
CLOSED CAPTIONING	48	1	24	365	420,480	R 250	R 105,120,000
AUDIO DESCRIPTORS	48	1	24	365	420,480	R 600	R 252,288,000
Total Annual Cost							R 357,408,000

PRODUCTION COSTS OF CC AND AD, CONT.

Explanatory notes of the calculations

- ☐ The above calculations are based on a 48 minute broadcast hour
- ☐ The costs per minute are based on costs for CC and AD's
- ☐ There is a need to check if the South African broadcast industry have sufficient resources (specialised skills & production equipment) to satisfy the requirements of the draft regulations

FACILITIES COSTS OF CC AND AD, CONT.

COST ESTIMATION OF FACILITIES COSTS FOR CC & AD		
Closed Captions	Creation workstation (each)	R 200 000
	Broadcast Channel (each)	R 2 500 000
	Content servers, IT infrastructure	R 5 000 000
Audio Facilities	Audio final mix suite with Voice Over booth (each)	R 1 500 000

PROVISIONS OF THE DRAFT REGULATIONS

Subtitling

- ☐ The SABC has established guidelines which dictate the manner in which subtitling must be provided. It provides guidelines on subtitle size, line length, timing, grammar, fonts, shading, colour, language length, technical aspects, etc.
- ☐ The SABC submits that the cost implication and the technical complexities of subtitling should be considered
- ☐ English has in the past been a default language for subtitling. The difficulty with subtitling one programme in 11 official languages should be cautiously considered

Audio Captioning and Audio description

- ☐ The SABC submits that audio description and audio captioning targets should be implemented digital environment (after the analogue switch off date)

Sign language translation

- ☐ An official sign language translation must be determined for ease of implementation

General Requirements - Regulation 6 (Billing management)

- ☐ The term “licensee” is used across Regulation 6; thus , clarity is sought on whether all these provisions are applicable to both the ECS and BS or not
- ☐ All TV licence statements are posted or e-mailed to licence holders
- ☐ There is a self-help service on the website , an sms self-help service and telephone services and telephone services where a licence holder’s outstanding balance can be read to them on the phone

Customer service staff:

- ☐ The SABC submits that the Authority should indicate if these provisions are applicable to broadcasting service licensee or ECS licensee
- ☐ The SABC proposes that the word “stores” should be defined for ease of implementation of Regulation 6(5)
- ☐ In the SABC, customer service is generally offered through the call-centres and via written correspondence
- ☐ There are currently 5 deaf staff members within TV Licences who can assist deaf licence holders

CONCLUSION

- ☐ The SABC submits that the Authority should conduct RIA with a view to inform the extent to which regulations should prescribe audience assistance services quotas
- ☐ The Authority needs to access the compliance costs, required resources, available skills, required development and reasonable timelines
- ☐ A phased-in approach of audience assistance services should be adopted
- ☐ The Regulations should distinguish provisions applicable to TV or Radio or both
- ☐ The final Code/Regulations should be effective post the analogue switch off date to allow for a smooth digital transition
- ☐ Funding for the public service mandate is required. At this point, the SABC will not be able to meet the proposed regulatory requirements due to lack of funding
- ☐ Broadcasters should be subsidized and have access USAF funding for these proposed regulatory requirements

Thank you