

MEDIAACCESS CANADA

8 September 2010

Mr. Robert Morin
Secretary General
CRTC
Ottawa, ON
K1A 0N2

Dear Mr. Secretary General,

**Re: Review of the direct-to-home satellite distribution policy,
Broadcasting Notices of Consultation CRTC 2010-488 (Ottawa,
20 July 2010)**

I Introduction

1. Media Access Canada, (MAC) is a not-for-profit corporation whose mandate is to increase the quantity and quality of accessible content in Canadian broadcasting and telecommunications. As the Commission knows, accessible content refers not only to closed captioning but to descriptive video.
2. Since its inception, MAC has worked with the broadcast and accessibility industries to develop harmonized and professional accessibility standards, to promote education and awareness and to undertake research and development.
3. We are pleased to provide our comments on the CRTC's review of its DTH satellite distribution policy.

II Carriage of over-the-air television stations

4. We support the financial strength of Canada's over-the-air TV sector. TV stations that face continuous financial problems lack the capacity to invest in the high-quality programming mandated by Canada's broadcasting legislation. CRTC policies must therefore ensure that over-the-air TV stations are able to maximize their revenues, and that these stations continue to serve the needs of Canadians, including Canadians with disabilities.

Media Access Canada, a not for profit corporation

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5. MAC has also supported the CRTC's decision to require (after several decades) the closed captioning of 100% of over-the-air TV stations' schedules.
6. We have two concerns, however, about the standards of quality to which over-the-air stations are expected to adhere. First, to promote closed captioning standards of the highest quality, MAC recommends that the CRTC require Digital Quality closed captioning on every television service that is distributed by satellite. Second, to minimize costs for the CRTC, while encouraging industry compliance with Digital Quality closed captioning standards, MAC recommends continued focus on measuring compliance with these and other standards.

III DTH policy requirements

7. We have reviewed Broadcasting Notice of Consultation CRTC 2010-488, and have been unable to locate any reference to accessibility requirements.
8. As the CRTC knows, unlike wired BDUs services such as cable, DTH services must dedicate a specific channel to described video because they are unable to pass through Secondary Audio Program content, or SAP.
9. While we welcomed Bell's decision to dedicate a full channel to described video programming, we now seek a commitment that is focussed on the foreseeable future when all programming will be described. Will each DTH service dedicate an entire described video channel for each over-the-air TV service that is described? We suspect that each DTH service will immediately say no – on the ground that they prefer to use their current and near-future capacity for other services. Meanwhile, we believe that the rights of Canadians with disabilities cannot be ignored.
10. One practical solution to the capacity dilemma is to ensure that SAP capability exists in the next DTH equipment upgrade.
11. Other practical alternatives already exist to provide seamless distribution of accessible content such as closed captioning and descriptive video. We encourage the CRTC to require DTH providers

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to demonstrate due diligence in understanding and using these technologies.

12. We again call on the CRTC to address the issue of ensuring one-click access to enabling descriptions and captions in set top boxes. Again, a practical solution would be for the CRTC to encourage DTH providers to forward these problems to manufacturers such as Scientific Atlanta, for resolution in the near future.
13. Finally, until the 100% of programming is described video, equivalent to the CRTC's current policy on closed captioning, all DTH listing guides should identify described programming.

We appreciated the opportunity to respond to the Commission's notice in this matter.

MAC respectfully requests the opportunity to appear before the Commission in Gatineau during its November 16 hearing.

Sincerely yours,



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