



*A Chance to Hear... A Chance to be Heard  
La chance d'entendre et de se faire entendre*

16 November 2011

Mr. John Traversy,  
Secretary General,  
CRTC  
Ottawa, ON  
K1A 0N2

Re: MAC and the Broadcasting Accessibility Fund.

Dear Mr. Traversy;

The Canadian Hard of Hearing Association (CHHA) is a consumer-based organization formed by, and for, hard-of-hearing Canadians. CHHA works cooperatively with professionals, service providers and government bodies, and provides information about hard-of-hearing issues and solutions. CHHA is Canada's only nation-wide non-profit consumer organizations run by and for hard-of-hearing people.

As CHHA's goal is to increase public awareness of hearing loss and to help Canadians with hearing loss fully integrate into Canadian society, it is our position that television content must be 100% accessible, throughout the entire broadcast day. It is also our position that a 100% accessible content day must be of a quality that is understandable by and useful to, those who rely on it

Dr. Charles Laszlo, the founder of CHHA and a recipient of the Order of Canada, is one of six accessibility community interim Board of Director's of Media Access Canada, put there by the voting members of the Access 2020 Coalition of which CHHA is one. The Access 2020 Coalition is growing as one united voice for 100% accessibility in Canadian broadcasting.

CHHA fully supports MAC as the administrator of the Broadcasting Accessibility Fund as well as their governing principles filed with the commission in response to its call for comments. In our view the central consideration must be that the invention, implementation and success of captioning came from innovation in the accessibility world – and not from the broadcast industry.

Further all the key milestones for increased accessibility to date, have been the result of the work of accessibility organizations, including:

- The 1980's development of live display software for license to Canadian entrepreneurs to stimulate the start up of a captioning production industry.
- The 1992 Monitor Project 1.
- First delivery of a captioned master requirement by broadcaster (Global) for independent producer in the early 1990's which created a ripple effect. Global did this to ensure support in their licence renewal.
- Closed Captioning Best practices/training manual commissioned and paid for by LOBC Inc.
- The creation and execution of business a model to underwrite closed captioning in Canadian broadcasting.
- Implementation of voice recognition and closed captioning.
- Monitor 2 2010 – 2012.
- On-line DV English and French production and presentation best practices for digital environments 2011.

MAC's proposal ensures the accessibility community can continue its work in driving the accessibility agenda.

Canadians with disabilities should not have to wait another quarter of a century for fully accessible content that is not only captioned, but also described. We respectfully submit that we do not want to see yet another initiative controlled by the television industry that leads to people with disabilities volunteering their time with no progress to show for it. We have done this for too long.

We also believe that like closed captioning, innovation in achieving a 100% accessible broadcast day has and will come from the stakeholders who are most interested in achieving this goal.

Therefore, CHHA supports an independent fund, controlled by organization with disabilities which is why we ask the CRTC to decide in favour of MAC. May you need additional information, please do not hesitate to contact our Executive Director, Mr. Robert Corbeil by email at [rcorbeil@chha.ca](mailto:rcorbeil@chha.ca) or by phone: 1-800-263-8068.

Sincerely,



Louise Normand  
CHHA - National President