

MEDIAACCESSCANADA

11 January 2011

Robert A. Morin
Secretary General
CRTC
Ottawa, Ontario

Re: *Call for comments on proposed regulations for the digital television transition, Broadcasting Notice of Consultation CRTC 2010-297 (Ottawa, 9 December 2010)*

1. Media Access Canada (MAC) is a not-for-profit organization with a mandate to advocate for improved quantity and quality of accessible content in Canadian broadcasting and telecommunications. MAC's work includes the development of accessibility standards, participation in national and international standards development committees and working groups, presentations to regulatory and Parliamentary bodies, supporting the disability organizations in their similar regulatory and Parliamentary work, and the dissemination of information about accessibility in electronic media.
2. MAC is leading the Access 2020 Coalition, whose goal is a broadcast day that is completely accessible to all Canadians – including those who are blind, visually-impaired, deaf, deafened and hard of hearing – within the coming decade.
3. The Access 2020 Coalition is concerned that the CRTC's draft regulations for the digital TV conversion do not go far enough to ensure that all Canadians will be informed about the transition and how it will affect them. We are especially concerned that no provision has been made to ensure that people with disabilities are made aware of the transition. Our recommendations for amending the regulations to address this concern are therefore set out below.

A Establish a working group

4. The Access 2020 supports the idea of convening a working group immediately to discuss the dissemination of information about the transition. This group should include representatives of: the federal and provincial governments, public and private over-the-air broadcasters, consumer groups, community television

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organizations, accessibility experts like Media Access Canada and other industry stakeholders.

5. The working group we are proposing would
 - a oversee a national public awareness campaign and co-ordinate the information distributed about the transition
 - b produce a series of public service announcements for broadcast by all broadcasters, to provide an overview of the transition, as well as suggestions on finding additional information.
 - c develop a website that provides user-friendly and accessible information to Canadians, by enabling users to submit their address or postal code to learn the transition plans for their area and nearby television stations, and the steps they should take to prepare for the transition.
 - d establish a call centre no later than May 2011, to allow Canadians an opportunity to obtain the necessary information by telephone if they do not have, cannot obtain, or cannot afford the internet.
 - e develop a media strategy.

Launch a national campaign

6. Canada should adopt a national campaign such as the one we are proposing first and foremost because Canadians own the spectrum. When substantial changes are about to occur to the way in which Canadians can access the broadcasting services using that spectrum, the government, on behalf of Parliament and Canadians, bears a duty to act in the public interest by informing people in this country who will be affected by the change, about it.
7. A national campaign provides an efficient and cost-effective route to explaining the transition, market by market, from an individual viewer's perspective. For example, when CBC goes off the air on August 31, 2011 in Saskatoon, it will explain the change in a public service announcement – but will it also explain that the local Global and CTV television stations will be available over the air

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digitally? Meanwhile in Peterborough we understand that CTV is transitioning to digital, but not the other TV services available in the area (Corus' CBC affiliate).

8. A national campaign will also limit the appearance that the government is indirectly encouraging the viewing audience to switch to BDU or satellite distribution, since with the exception of CBC/Radio-Canada, TVO and a few independent broadcasters, Canada's major television broadcasters are owned by companies that have major BDU interests, and would welcome more subscribers. An arm's-length body, such as the working group we are supporting, will ensure that people can receive impartial, consistent and accurate information.
9. In addition, we recommend that the CRTC establish a co-ordinated national communications campaign to provide all of the information that viewers will need for the transition to digital. Public service announcements developed and broadcast by individual broadcasters in "mandatory" communities are inadequate for informing all Canadians about this complex and important change. We suggest that this campaign be funded as part of the benefits package submitted by BCE in its application to acquire CTV (in which proceeding Media Access Canada, on behalf of the Access 2020 Coalition, has today filed an intervention).

Public service announcements

10. The proposed regulations say that only stations in the mandatory markets and those broadcasting on channels 52 to 69 must air public service announcements and loss-of-service notices.
11. The Access 2020 Coalition recommends the addition of regulations requiring all channels affected by the transition to communicate any planned change with viewers beginning as soon as the planned change is confirmed, and in any event no less than one (1) month before the change occurs.
12. As changes due to the transition will continue in non-mandatory markets after the August 31, 2011 deadline, we also recommend that such announcements in these markets continue after the August 31st deadline for at least six months.

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13. The Access 2020 Coalition specifically recommends that requirements be added to ensure that public service announcements and loss-of-service notices be made accessible to people with disabilities, preferably in consultation with Media Access Canada, who in turn will inform and work with accessibility service organizations across Canada. As well, the proposed national working group should be required to contact disability organizations to ensure they have appropriate information to share with the people they serve and/or their members.
14. We note that low-income groups also face challenges, in being able to afford the new technology necessary to obtain HD television service, and its installation. In addition to broadcaster PSA and loss-of-service notices that clearly explain these issues, the proposed national working group should be mandated to reach out to municipal authorities and welfare offices across the country to ensure low-income people have access to timely and useful information.
15. Finally, I/we urge the development of a specific awareness campaign for municipal and other local authorities (such as First Nations' communities) whose residents are likely to lose over-the-air service over the next few years. There are alternatives that municipal/local authorities can consider to replace the broadcaster service, such as rebroadcasting distant signals over the air, and establishing a community or emergency information channel.

While little time remains to ensure that Canadians, including deaf, deafened, hard of hearing, blind or low-vision people, are made aware of the coming transition, we appreciate the CRTC's decision to initiate this proceeding. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely yours,



Beverley Milligan
President

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