



June 3, 2020

Mr. Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario K1A 0N2

Dear Mr. Doucet:

Re. Amendment proposed by Bell Media Inc., Corus Entertainment Inc. and Rogers Media Inc. to their condition of licence that requires prime time programming to be broadcast with described video – First Progress Report

Corus Entertainment Inc. (Corus), Rogers Sports and Media Inc. (Rogers) and Bell Media Inc. (Bell) (collectively, the Broadcasters) are pleased to submit our first report on the progress made by the licensees to address the issues involved in fulfilling the condition of licence that requires prime time programming to be broadcast with described video.

Our “Report on Providing Described Video for Prime Time Programming” (the Report) is a joint submission by Corus, Rogers and Bell, in accordance with the encouragements and requirements set out in paragraphs 37 to 39 in BRP 2019-392:

“Accordingly, the Commission encourages the Licensees to hold regularly occurring consultations with DV stakeholders consistent with this commitment, for the purpose of collaboratively developing solutions to address the issue requiring the 24 hours exception granted by the Commission in this decision.

For these consultations, the Commission encourages the Licensees to adopt a working group model similar to the Closed Captioning Working Group to work in consultation with persons who are blind or partially sighted in reducing accessibility barriers with respect to the provision of DV. The Commission also encourages the Licensees to consider and explore solutions informed by DV best practices developed in other contexts and by innovations and new technologies.

To make certain that all interested stakeholders are informed of the progress of the working group’s activities, the Commission requires the Licensees to file a

progress report with the Commission every six months from the date of this decision until the next licence renewal. The reports are to be provided to the Commission no later than 3 June 2020, 3 December 2020, 3 June 2021, and 3 December 2021. The reports will be made available on the Commission's website and will be reviewed during the proceeding to renew the Licensees' licences, which expire in 2022."

In establishing new described video requirements for large broadcast groups, the Commission is pursuing two specific objectives: (1) increasing the amount of described programming in the Canadian broadcasting system, and (2) providing users with a seamless experience when accessing content of their choice. Since September 2019, the amount of described programming has increased exponentially. Users now experience a much greater degree of certainty knowing that programs of interest are available and accessible in described video during prime time on all of the English- and French-language TV services provided by Rogers, Corus and Bell. The Broadcasters have made significant operational and technological investments to fulfill these objectives and improve the user experience for Canadians who are blind or partially sighted.

That being said, the Broadcasters also recognize that practical realities limit our ability to ensure that *all* of the programming in prime time is available in described video. Those circumstances were acknowledged by the Commission and a specific exception was provided for American programs delivered within 24 hours of the date and time of their broadcast.

The Broadcasters appreciate the exception provided and have been working very hard to maximize the amount of described programming being delivered to the Canadian broadcasting system.

Going forward, our efforts with respect to the 24-hour exception will follow the Commission's recommendations. We have developed a 3-part process:

- (1) Community Consultations
- (2) Development of a Described Video Working Group
- (3) Reporting to the CRTC

Community Consultations

In May 2019, the Broadcasters participated in an initial town-hall forum discussion hosted by the Canadian National Institute for the Blind. As the Commission noted in its decision, these kinds of forums provide important opportunities for interaction with users and for community participation in discussing described video issues, concerns and successes.

The Broadcasters and the CNIB initiated another consultation with members of the blind or partially sighted community via a second Tele-Townhall on May 21, 2020. This second Tele-Townhall provided an opportunity for the Broadcasters to update participants on our

efforts to date to increase the amount of programming available with described video during prime time.

The Broadcasters were pleased to hear directly from the participants about their appreciation in the progress made since September 2019 and the significant increase in described video programming now available to them. The Consultation was productive and provided valuable insights from users of described video content. In particular, we received important feedback about the quality of DV for programs that are described either live or shortly before broadcast, and we were able to have a robust conversation with all stakeholders regarding the technical barriers currently existing for such short turnarounds in providing described video.

Going forward, the Broadcasters will hold bi-annual consultations with the described video user community. Each consultation will be held prior to the preparation of the Broadcasters' report to the Commission. In that way, the Commission will be provided with insight as to the comments expressed by that community at the most recent consultation.

Development of a Described Video Working Group

Following the community consultation on May 21, the Broadcasters have initiated the formation of a described video Working Group to address issues on a going forward basis. In addition to Broadcasters, the Working Group includes representation from individuals who are users of described video content, as well as organizations representing the blind or partially sighted community. The members of the Working Group are listed in Appendix A.

The Working Group recognizes the importance of reducing accessibility barriers to the Parties' prime time programming with the knowledge that sharing common viewing experiences is essential for full participation in society by all its members, including those who are blind or partially sighted. Accordingly, the Working Group's Mandate is to: "Address the issues requiring the temporary 24 hour exemption to providing described video for prime time programming, and to consider and explore solutions informed by described video best practices developed in other contexts and by innovations and new technologies."

Much like the consultations, the Working Group will meet on a bi-annual basis. The plan is for the Working Group to meet before the next consultation in the Fall of 2020. In that way, the community at large will have the benefit of also getting an update from the Working Group as to its efforts and objectives.

Reporting to the CRTC

Following the community consultations and Working Group meetings, and as required by BRP 2019-392, The Broadcasters will file reports to the Commission in June and December for each of the next three years. The Broadcasters will also keep logs detailing the receipt date of all American programs received without described video and broadcast in prime time, which will be included with the Broadcasters' licence renewal applications for evaluation by the Commission.

Conclusion

With ever-emerging technologies and advances in workflow capabilities, real efforts have been made by Corus, Rogers and Bell to decrease the amount of time required to add described video to programming arriving from the United States without described video and within 24 hours of its scheduled premiere. To that end, all parties continue to work on developing solutions allowing for described video to be provided in shorter turnaround times, thereby shrinking the instances of programming airing without described video. Presently, prime time programming that continues to air without described video is usually live, or arrives within several hours of its first broadcast without sufficient time to provide described video. In these cases, viewers are now alerted about the lack of described video and future repeats via on-air billboards.

The Broadcasters have separately been working on developing solutions appropriate to their business to decrease the time required to provide described video for programming that arrives near to or simultaneously with its premiere broadcast. The Broadcasters anticipate that the efforts of the Working Group to collaboratively share technical solutions will result in overall industry improvement in providing described video and development of best practices that will benefit all stakeholders.

The Broadcasters look forward to submitting a second report on December 3, 2020, which will detail the initial efforts of the Working Group and its progress in meeting the goals of its established mandate.

Sincerely,



Alain Strati

Assistant General Counsel, Regulatory Affairs

Bell Media Inc.



Karen Phillips

Sr. Director, Government Relations and Compliance

Corus Entertainment Inc.



Susan Wheeler

Vice-President, Regulatory, Media

Rogers Sports & Media Inc.

Appendix A – Described Video Working Group

Broadcasters

Calla Dewdney (Rogers Sports & Media)

Karen Gifford (Corus)

Michael Menard (Corus)

Alain Strati (Assistant General Counsel, Regulatory Affairs, Bell Media)

Community Organizations and Individuals

David Errington (President & CEO, Accessible Media Inc.)

Louise Gillis (President, Canadian Council for the Blind, National)

Tim Nolan

Antoine Perrault (Executive Director, Regroupement des aveugles et amblyopes du Québec)

Gary Steeves

Marcia Yale