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6 March 2015

 File Number: 2011-488

 2011-488-1

***Via GCKey***

Mr. John Traversy

Secretary General

Canadian Radio-television and

 Telecommunications Commission

Ottawa, ON K1A 0N2

Dear Mr. Traversy:

Re: Biennial Report on Closed-Captioning Accuracy Rate – Broadcasting Regulatory Policy CRTC 2012-362

 SaskTel Video-on-demand service

1. Saskatchewan Telecommunications (SaskTel) is in receipt of CRTC letter dated 20 February 2015, regarding the status of SaskTel’s biennial report on the accuracy of closed-captioning.
2. The CRTC letter states that SaskTel was negligent in submitting its compliance report on 31 August 2014 consistent with quality standard No. 4 set out in Appendix to Broadcasting Regulatory Policy CRTC 2012-362 (Quality Standards Policy), *Quality standards for English-language closed captioning*.
3. A phone conversation with CRTC staff confirmed that the absent compliance report referenced is for SaskTel’s video-on-demand (VOD) programming service.[[1]](#footnote-1)
4. We regret this oversight and hereby submit our biennial report related to the quality of closed captioning for SaskTel’s VOD service.
5. SaskTel is supportive of efforts to improve the quality of closed captioning for the deaf or hard of hearing. In alignment with condition of licence 12 in Broadcasting Regulatory Policy CRTC 2011-59-1, SaskTel offers captions for 100% of English-language and French-language programs in its VOD inventory, with the exception of community programming. SaskTel has demonstrated compliance with the Commission by filing quarterly reports listing the titles of programs available with captions since 2012.
6. Furthermore, SaskTel has simplified the process for its subscribers to access closed captioning by reducing the number of steps to activate/deactivate captioning. When viewing a program, subscribers may simply press the ‘B’ button on the remote control to easily draw up viewing options for closed captioning.
7. Quality standard No. 4 of the Quality Standards Policy states the following:

Monitoring of accuracy rate

Every month each broadcaster must calculate the accuracy rate for two programs containing live content.

Every two years, broadcasters must provide the Commission with a report describing their efforts made in-house and requests to caption providers in order to improve the accuracy rate.

1. SaskTel does not offer live programs on its VOD platform. SaskTel does not produce its own VOD content but instead purchases programming from content providers only in a post-production phase. Programs offered on SaskTel’s VOD platform are pre-recorded and captioned before uploaded onto SaskTel’s servers.
2. SaskTel manually performs a program verification process for each title uploaded onto its VOD servers. A sample of content is selected from the beginning, middle and end of the program to verify the presence of closed captioning and other quality control requirements. If it is determined that closed captioning is not present from the sampled content, or contains visible errors, SaskTel contacts the content provider to correct the captioning.
3. SaskTel responded to concerns raised by the industry about closed captioning and notified all of its VOD content suppliers of its closed captioning requirements.

**CRTC Additional Requests for Information**

1. In its letter, CRTC staff requested other information related to the quality of captioning. For ease of reference, we have repeated each question.

**Your report should include an overview of the licensee’s monthly closed-captioning accuracy rate evaluation results. The report should also highlight in detail the actions taken to address issues related to the quality of closed captioning, in particular with respect to the improvement of accuracy rate, and what investments have been made in both personnel and infrastructure.**

1. SaskTel encounters issues related to closed captioning for programs offered on the VOD platform rarely (i.e. less than ten programs per year). When an issue is discovered during the manual program verification process, SaskTel obtains a replacement copy of the program from the provider and re-loads it onto the server.

**Commission staff also request that you include in your report the number of complaints received with respect to closed-captioning quality since September 2012, the main concerns raised in these complaints and the number of individuals who submitted a complaint.**

1. SaskTel has received very few concerns from customers about the quality of closed captioning for programming on its VOD service. Since September 2012, only the following two concerns were submitted to SaskTel about closed captioning in general:

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| Date | Issue | SaskTel Action | Customer concern status |
| July 2014 | Customer rented program entitled *Head in the Clouds* and indicated closed captioning was not working at points during the program.  | SaskTel obtained a replacement copy from the provider, verified appropriate captioning and re-loaded it to VOD platform for customers | Resolved |
| January 2015 | Customer rented program entitled *Mr. Nobody* and indicated closed captioning no longer present after 53 minutes into the program. | SaskTel obtained a replacement copy from the provider, verified appropriate captioning and re-loaded it to VOD platform for customers | Resolved |

1. We trust that the preceding information addresses the questions raised in Commission staff letter. Should Commission staff have any questions, please do not hesitate to contact us.

Sincerely,



Robert Hersche

Senior Director of Regulatory Affairs

TB/nb

cc: Nanao Kachi, CRTC, nanao.kachi@crtc.gc.ca

 Catherine Arguin, CRTC, catherine.arguin@crtc.gc.ca

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1. Broadcasting Decision CRTC 2012-292. [↑](#footnote-ref-1)