



June 21, 2022

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

Dear Mr. Doucet:

Re. Broadcasting Regulatory Policy CRTC 2019-392. Described video of prime-time programming broadcast by the services of Bell Media Inc., Corus Entertainment Inc., and Rogers Sports & Media Inc. – Progress Report

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

In BRP 2019-392, the Commission recognized the practical realities of the program delivery process and the difficulties faced by the Broadcasters in describing late-arriving programming. Some American prime time programs received by the Broadcasters without DV already in place are delivered only shortly before they are scheduled for broadcast. In those cases, the Broadcasters may not have sufficient time within which to produce a DV version of the program in time for its original air date. As a result, the Commission specifically approved an exception whereby US programs delivered within 24 hours of their broadcast date and time are not required to be described for that broadcast.

As reported in our last update in December 2021, while the Broadcasters cannot yet report that all of the required programming in prime time is available in described video, we remain focused on maximizing the amount of described programming made available in the Canadian broadcasting system and have continued to make great strides. We do note that there will continue to be isolated instances where programming is received live or near-live, and in those cases, we will not be able to provide DV before first broadcast.

Unless and until automated AI options progress to the point where the quality of DV on a prime-time program can be assured, we do not see how we can circumvent these isolated instances without removing our ability to air premiere programming during prime time completely. However, as U.S. program providers are increasingly providing DV with their content, we expect these isolated instances to continue to decrease.

As previously reported, many of the issues that caused us to seek relief from the Condition of Licence (COL) in 2019 have since been resolved. Accordingly, the Broadcasters can report that collectively, only a few reoccurring live or near-live programs and/or sporadic and infrequent technical issues have caused programs to go to air without DV on their initial broadcast.

### **Described Video Working Group Meeting**

As previously reported, the Broadcasters formed a Working Group that includes representation from persons who are blind or partially sighted, organizations representing the blind and partially sighted communities and industry members. The current members of the Working Group are listed in Appendix A, representing both Canada's French- and English-language communities. The Working Group recognizes the importance of reducing accessibility barriers to the Parties' 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 and partially sighted.

Its 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, innovations and new technologies.*

To be clear, the encouragement provided by the Commission in BRP 2019-392 regarding the Licensees' commitment to work in consultation with persons who are blind or partially sighted is to: "*address the issue that requires the 24 hours exception granted by the Commission in this decision.*"<sup>1</sup>

The Working Group most recently met on June 2, 2022. Few comments were made relating to the amount of DV or the quality of the DV in prime time. This is clearly a positive indication that the DV experience as it relates to the mandate of the Working Group has been very good. Having said that, the Working Group continues to discuss any other barriers and areas for improvement relating to DV.

### **Community Consultation**

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<sup>1</sup> Broadcasting Regulatory Policy CRTC 2019-392

Following our last Working Group meeting, and in keeping with our initial plan of meeting twice annually with the community, the members agreed to schedule another community tele-town hall which we are planning to hold in September.

### **Conclusion**

The Broadcasters have made great progress in decreasing the amount of time required to add described video to programming. Incidents of programming requiring DV in prime time, which do not include DV, is low, and the Commission-approved amendment in BRP 2019-392 has provided a helpful measure of flexibility in those rare instances.

Through establishing lines of communication with the Community we have ensured a seamless and direct process for their feedback, and this remains a cornerstone to providing a better viewing experience of our traditional linear services through the resolution of any unknown issues.

Going forward, the Broadcasters will continue to provide dedicated email boxes as well as Direct Outreach available to the community. Additionally, the Broadcasters will be scheduling another Community Town Hall in September of this year.

As noted in our last report, it would appear that having a forum in which to speak directly to the Broadcasters – and not the turn around time of US programming – is of more concern to the Community. Such direct contact appears to be the best way for the Broadcasters to help work towards solving the individual issues and concerns expressed in the Working Group Meetings and Community Tele-town Halls.

Accordingly, subsequent Working Group sessions will continue to focus on issues raised in the Community Consultations and how best to address them. The Broadcasters look forward to gaining insights from community members in our next meetings.

Sincerely,

[filed electronically]

**David Bennett**

Associate Director, Regulatory Affairs  
BCE Inc. / Bell Canada

**Karen Gifford**

Sr. Director, Regulatory Compliance and Licencing  
Corus Entertainment Inc.

**Calla Dewdney**

Sr. Manager, Regulatory Media

## **APPENDIX “A”**

### **Broadcasters**

- Calla Dewdney (Rogers Sports & Media)
- Karen Gifford (Corus)
- Mike Menard (Corus)
- David Bennet (Bell Media)
- Rob Germain (CHECK TV)

### **Community Individuals and Organizations**

- Em Williams (Accessible Media Inc)
- Louise Gillis (Canadian Council of the Blind)
- Antione Perrault (Regroupement des aveugles et amblyopes du Québec)
- Marica Yale (Alliance for Equality of Blind Canadians)
- Dean Steacy (Alliance for Equality of Blind Canadians)
- Tim Nolan

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