

Aurora

Community Channel

1st November 2021

BY EMAIL: captioning@infrastructure.gov.au

Dear Sir/Madam,

Thank you for the opportunity to make a submission with respect to the Australian Government issues paper, 'A Captioning Scheme for Subscription Television' ('**Issues Paper**') dated October 2021.

Aurora Community Television Ltd. welcomes the proposals in the Issues Paper. We strongly support a simpler approach to captioning, which will see STV continue as the leader in television captioning while also being fairer to STV channel providers and more transparent and predictable to viewers.

About Aurora Community Channel and our experience with captioning

Aurora is the smallest of all the channels on subscription television. Our suppliers are also small, independent, local producers with limited resources. It is an enormous imposition upon them and therefore left to Aurora to provide captions. Aurora simply does not have the depth of resources of others channel and this burden may well become too much.

The reform proposals

Aurora Community Television Ltd. welcomes the reform proposals outlined in the Issues Paper, on the basis that they are implemented as a package. The package of reforms we support will maintain the STV industry as the leading television source of captioning for deaf and hearing-impaired Australians but through a simplified and fairer approach.



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(1) Removing the annual 5% increase on each genre's captioning target.

We strongly support the proposal to introduce a cap on each genre's captioning target, rather than progress to the current ultimate 100% requirement.

Successive 5% year on year increases means that the compliance burden on our business is continually increasing and there is a real cost associated with this. In addition, unless the targets are capped we will be required to caption at 100% in the future, which we submit is onerous compared to the level of captions required on FTA services with much larger audiences.

As such we strongly support the proposal to remove the 5% annual increases. Our view is that STV captioning targets should be capped across all genres at no greater than the relevant FY22 captioning level per genre (or an average of the FY22 targets if the movies and general entertainment categories are collapsed).

We submit that the FY22 captioning levels already provides an extremely high level of captioning. Any higher means that technical compliance becomes a significant challenge.

It should be noted that our free to air counterparts (Channel 31 in Melbourne and Channel 44 Adelaide) are not required to provide any captioning whatsoever, yet they have received significant government funding for other purposes. A higher burden of captioning could mean that the channel is no longer viable.

(2) Introducing a low audience share exemption.

We support a low audience share exemption which applies where viewership of our channel is below 0.1% (one tenth of 1%) of the average annual national audience share (across both FTA and STV in all homes). This proposal ensures that STV captioning obligations are appropriately targeted to the channels with a reasonable level of viewers.

This exemption is consistent with the regulatory policy of the BSA, which states that different levels of regulation should be applied to services "according to the degree of influence" those services have on the Australian community.

As stated, Aurora Community Channel is one of the smallest in Australia, yet our obligations are no different to major players with deep resources. Additionally, our audience share is small with revenues even smaller therefore Aurora has a very limited degree of influence. Audiences do not have the expectation that a community channel would provide a full suite of captioning or other added benefits. The channel has a tiny team whereas captioning is costly and challenging.

Introducing an objective test for exemptions based on well-known metrics will ensure that captioning is targeted at channels with a reasonable audience share.

(3) Collapsing the Movies and General Entertainment (**GE**) genre categories.

The STV captioning rules are currently confusing from both a regulatory and viewer perspective. The Movies and GE genre categories are divided into three subcategories per genre, each with their own separate captioning targets. It is up to each STV licensee to nominate the applicable Movies or GE subcategory for each channel. This means that under the current rules, Movies and GE channels that sit on multiple STV platforms may have different captioning obligations per platform.

Collapsing the category splits in the Movies and GE genre categories will create a simpler captioning regime for the whole of the industry, enabling channel providers to more clearly identify their captioning obligations and ensure that channels are captioned at the same rate regardless of which STV platform they are distributed on.

In conclusion, Aurora Community Television Ltd. strongly supports the package of reforms outlined in the Issues Paper. These proposals will ensure that captioning is appropriately targeted at channels with a reasonable audience share and will also assist in simplifying the regime for the whole of the STV industry.

Please do not hesitate to contact me on [REDACTED] if you have any questions regarding the matters raised in this submission.

Kind regards,



Phyllisse Stanton
CEO
Aurora Community Television Ltd.