



Canadian Association of Broadcasters
Association canadienne des radiodiffuseurs

July 24, 2008

Via Epass

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mr. Morin:

**Re: Broadcasting Notice of Public Hearing/Telecom Public Notice CRTC 2008-8:
Unresolved issues related to the accessibility of telecommunications and
broadcasting services to persons with disabilities**

1. The Canadian Association of Broadcasters (CAB) is the national voice of Canada's private broadcasters, representing the vast majority of Canadian programming services, including private radio and television stations, networks, specialty, pay and pay-per-view services. The goal of the CAB is to represent and advance the interests of Canada's private broadcasters in the social, cultural and economic fabric of the country.

Introduction

2. In Broadcasting Notice of Public Hearing/Telecom Public Notice CRTC 2008-8 (PN 2008-8), the Commission initiated a proceeding to address unresolved issues related to the accessibility of telecommunications and broadcasting services to persons with disabilities.
3. In the first phase of this proceeding, the Commission has invited interested parties to provide initial comments with respect to a number of specific areas as they relate to improving access and inclusion for persons with disabilities. Three of the areas identified by the Commission are of particular relevance to Canada's private broadcasters – captioning, described video and the portrayal and employment of persons with disabilities.

4. In launching this proceeding, the Commission noted that an estimated 4.4 million Canadians reported having a disability in 2006.¹ The ability of these Canadians to access telecommunications and broadcasting services is undoubtedly an important issue, one that the CAB's members take very seriously. At the same time, from the perspective of access to radio and television programming, the focus should be on those Canadians with hearing and vision related disabilities.
5. The estimated 4.4 million Canadians with disabilities include all Canadians with one or more of thirteen different types of disability.² Of these, hearing and vision related disabilities are the fourth and fifth most reported.
6. In absolute numbers, in 2006 there were some 1.28 million Canadians with a hearing disability, and .836 million Canadians with a seeing disability³, representing 4.2% and 2.7% respectively of the total Canadian population.
7. Canada's private broadcasters are committed to initiatives that promote greater accessibility of broadcasting services to persons with hearing and vision related disabilities. Private broadcasters have also undertaken significant measures to address issues related to the portrayal and employment of persons with disabilities. They have a solid track record of achievements in each of the three areas identified by the Commission in PN 2008-8, as summarized below.
8. The CAB requests the opportunity to appear at the 17 November 2008 public hearing in Gatineau to expand on these comments, to provide an update on our various initiatives, and to respond to the submissions of other parties, as appropriate.

Captioning

9. Canada's private broadcasters are committed to improving accessibility for everyone and they have been instrumental in advancing captioning technology to this end. Every year, the broadcasting industry invests significant financial and human resources in the research and development of captioning technology, as well as in program captioning. In this way, closed captioning has become an integral part of Canadian television operations.
10. There are two dimensions to the provision of captioning – (i) quantity, and (ii) quality.

Quantity

11. Until a year ago, the Commission's policy on the amount of closed captioning that broadcasters were required to do was based on the approach originally set out in Public Notice CRTC 1995-48, *Introduction to Decisions Renewing the Licences of Privately-Owned English-Language Television Stations*.

¹ Statistics Canada, *2006 Participation and Activity Limitation Survey; Disability in Canada* (PALS 2006).

² Disabilities identified by Statistics Canada, in descending order of frequency reported, are: pain, mobility, agility, hearing, seeing, learning, psychological, speech, memory, developmental, chronic, unknown and delay.

³ Source: PALS 2006.

12. The 1995 policy recognized that the financial resources available to each broadcaster are different. Under the policy, English-language television stations earning more than \$10 million in annual revenues were required, by September 1, 1998, to caption all local news, including live segments. The policy also required that all such licensees close caption at least 90% of all programming during the broadcast day by the end of individual licence terms. Medium and smaller television stations were respectively expected, or encouraged, to meet the same standards.
13. In its call for applications for licences for new digital, pay, and specialty television services, Public Notice CRTC 2000-22, the Commission stated that it expected applicants for new services to commit to close captioning at least 90% of their broadcast day by the end of their licence term.
14. With the renewals of the large English-language station groups CTV and Global in 2001, the Commission began to require, by condition of licence, the captioning of 90% of all programming over the broadcast day and 100% of all news. Since that time, the Commission has generally required all English-language broadcasters to caption 90% of all programming and 100% of news, with exceptions granted as necessary on the basis of their revenues, whether the licensee is a new entrant to the broadcasting system, and the nature or language of the service in question.
15. Closed captioning requirements for French-language broadcasters have generally been less onerous than for English-language broadcasters because of the more significant challenges of providing captioning in French, including the fact that the technology used for live captioning does not easily accommodate the particularities of the French language and the lack of trained captionists for French-language programming. Nevertheless, in Public Notice CRTC 1999-97, the Commission stated that French-language broadcasters should have closed captioning requirements similar to those applicable to English-language broadcasters. Since then, the Commission has explored the implementation of such requirements as part of its consideration of applications for new licences for French-language television stations, or for the renewal of such licences.
16. The Commission updated its policy on closed captioning in Broadcasting Public Notice CRTC 2007-54, *A new policy with respect to closed captioning* (PN 2007-54). In that notice, the Commission stated that all English- and French-language over-the-air broadcasters would be required to caption 100% of their programs over the broadcast day, with the exception of advertising and promos.
17. This new policy pertains specifically to over-the-air television broadcasters, which will report on their progress in meeting its requirements at their upcoming licence renewals. The Commission, however, also indicated in PN 2007-54 that it intends to discuss the potential application of a 100% captioning requirement to specialty, pay and pay-per-view undertakings as part of their licence renewals or at the time of initial licensing of such services.

Quality

18. Private broadcasters have led several initiatives aimed at improving the accuracy of captioning and establishing standards to promote consistency in the presentation of captions.

19. In 1992, the CAB's Joint Societal Issues Committee on Closed Captioning Standards (JSIC) produced a handbook, *Closed Captioning Standards and Protocol for Canadian English Language Broadcasters*, designed to establish English-language closed captioning standards acceptable to key stakeholders: the caption consumers, the caption creators, and the broadcasters. It is intended as an authoritative guide to Canadian English-language closed captioning for television. The participation in and implementation of these standards across the broadcasting industry is intended to promote consistency as broadcasters strive to achieve the highest level of quality in Canadian English-language closed captioning.
20. A Second Edition of this handbook was produced in February 2004.
21. In order to ensure that private broadcasters continued to be responsive to all audiences, the JSIC met with the Canadian Association of the Deaf (CAD) and the Commission in Winnipeg in November 2005. At that meeting, the JSIC was asked to look into a series of issues relating to closed captioning such as: advances in voice recognition; impact of HDTV on closed captioning; commercial cut-aways; interrupting closed captioning in news and other programming; and closed captioning covering up on-screen emergency information.
22. In response to this request, the JSIC convened a Working Group on Closed Captioning, principally comprised of engineering and operations representatives of several broadcasting companies, to develop a report on these issues for consideration by the CAD. The Working Group produced a report entitled *Requested Technical and Operational Information Related to the Provision of Closed Captioning by Canadian Private Broadcasters*.⁴
23. This report was presented at a follow-up meeting with the CAD in July 2006 in Quebec City to discuss their concerns regarding the quality of closed captioning on private television services. The date and location coincided with the CAD's Deaf Congress and Annual General Meeting.
24. More recently, in PN 2007-54, the Commission expressed concerns about certain issues of quality with respect to captioning, and the reality that standards have not been developed in terms of synchronization of captions and other elements of closed captioning.
25. On December 7, 2007, the CAB filed an Action Plan with the Commission to respond to the challenges associated with closed captioning. At the core of the Action Plan is the establishment of English- and French-language Working Groups that are now at work developing plans and timelines for improving the quantity and quality of closed captioning. The English-language Working Group mandate also includes making recommendations to update the CAB Closed Captioning Standards and Protocol for Canadian English-Language Broadcasters to take into account, for instance, technology changes such as the transition to HDTV. As part of its mandate, the French-language Working Group is to develop a manual establishing the standards and protocol for closed captioning adapted to the needs of broadcasters operating in the French market as well as the specificity and characteristics of the French language.

⁴ Available on the CAB's website at <http://www.cab-acr.ca/english/social/captioning/default.shtm>.

26. On February 13, 2008, a meeting of the English-language working group took place at the CTV offices in Scarborough; the Working Group discussed key areas to be addressed with respect to improving the quantity and quality of closed captioning, and received a presentation on voice recognition technology from CRIM, an IT applied research centre. Voice recognition technology for closed captioning is now used by French-language broadcasters in Canada. It should be noted, however, that this is a 're-speaker' solution only; current voice recognition software is not sufficiently advanced to support broadcasters' needs at this time.
27. On February 25, 2008, a meeting of the French-language working group took place at the Astral offices in Montreal; the group held a wide-ranging discussion regarding the key areas to be addressed with respect to improving the quantity and quality of closed captioning by French-language broadcasters and captioning providers.
28. On February 28, 2008 the Commission indicated in a letter to the CAB that the CAB Action Plan on Closed Captioning had been approved.
29. Throughout the course of the next several months, the CAB Working Groups will continue to develop proposed solutions for a number of closed captioning issues, including accuracy, comprehension, synchronization and consistency, and agree upon proposed solutions and/or standards.
30. After further meetings of the Working Groups, the CAB will incorporate their recommendations in an updated version of the CAB closed captioning code and, where viable, will include timeframes for implementation. The updated CAB code will then be submitted to the Commission by November 2008.

Described video

31. The Commission has not adopted system-wide requirements for the provision of described video, in light of the technical, operational and cost issues that must be overcome. Some of these issues were previously addressed by the CAB in its 2003 intervention to the renewal applications of 22 specialty services first licensed in 1996. In that intervention, the CAB made the following comments:

On the matter of described video programming, while US programs containing described video have become available on a limited basis from US conventional broadcasters, there remain a number of factors that make the acquisition of US described video programming a difficult proposition. Unlike closed captioning which is usually provided by the programs' producers, described video programming is provided by the US networks for their own use and is not available for the use of other broadcasters. Moreover, the conventional network programming is not the typical fare for Canadian specialty services. The US and foreign satellite services who provide a portion of the foreign programming available on Canadian specialty services have not been as active in providing described video programming...

Currently, DTH distributors are unable to pass through described video programming to their subscribers. Furthermore, cable operators who receive many of their programming services through satellite signals will have to adapt the technology used in their cable systems to accommodate described video programming. This will require significant capital plant upgrades to ensure that described video programming is passed on to Canadian subscribers.

32. Moreover, the ability of individual services to undertake specified levels of described video varies greatly from service to service, depending in large part on the nature of the programming and on the resources available to the licensee.
33. For all of these reasons, the Commission has adopted a case-by-case approach to the provision of described video, tailoring specific requirements to the circumstances of each licensee.
34. For example, in decisions renewing the licences of the conventional television stations operated by the principal Canadian ownership groups, the Commission introduced requirements for the provision of described video by those television stations serving the largest markets, beginning at a level of two hours per week of priority programming in the first year, and increasing to four hours of such programming in year five. The Commission further required that at least half of the described video programming be original programming.
35. In the case of the renewal decisions for the 22 specialty services initially licensed in 1996, the Commission also adopted a case-by-case approach which took into account the nature of each service. The Commission did not impose any specific requirements on services whose programming was music-based, or was oriented towards sports, or news and information. Rather, the Commission focused on services featuring those types of programming, such as drama, documentary and children's programs, that best lend themselves to described video. Accordingly, in the case of such services, and depending on individual circumstances, requirements for the provision of described video programming were imposed as conditions of licence.
36. In general, the required amount of described video programming was set at two hours per week, increasing after three years to three hours per week. Moreover, a minimum of 50% of the hours of described video programming required on an annual basis had to be original programming. However, taking into account the difficulties associated with the provision of described video, the Commission decided that these requirements should only come into effect on 1 September 2005, with the increase to three hours per week beginning no later than 1 September 2008. This timetable was intended to enable the specialty licensees to develop their programming plans and make the necessary system upgrades, and also to allow broadcasting distribution undertakings to make whatever system upgrades they require in order that they may pass described video through to their subscribers.
37. It is important to point out that, since the Commission made these decisions, American broadcasters have virtually ceased to provide described video of their programming and to invest in technologies to support this service. Indeed, in 2002 the United States Court of Appeals struck down the FCC rules requiring OTA television broadcasters to provide a minimum level of described video, on the grounds that the FCC had acted beyond its authority in adopting such rules.⁵ This means that, for some time now, U.S. broadcasters, who operate in a market ten times bigger than the Canadian market, have not been required to provide described video to serve the

⁵ U.S. Court of Appeals, Decision No. 01-1149, November 8, 2002
(<http://www.fcc.gov/ogc/documents/opinions/2002/01-1149.html>)

visually impaired community, which has had a significant and substantial limiting impact on the quantity of described programming that can be made available in Canada.

38. Canada's private television, specialty and pay broadcasters have worked diligently to improve the accessibility of their programming to persons who are blind or whose vision is impaired, in line with the Commission's expectations. To that end, the CAB is undertaking research to provide an update regarding described video, including the challenges related to availability and costs which, amongst other things, differentiate described video from closed captioning. We anticipate being able to present the findings of this research as part of our 6 October 2008 Reply comments.

Portrayal and employment of persons with disabilities

39. In Public Notice CRTC 2004-2 introducing the decisions renewing the licences of 22 specialty services originally licensed in 1996, the Commission addressed the presence, portrayal and participation of persons with disabilities in television programming, which had been raised by several interveners at the earlier specialty renewal hearing and discussed with the CAB during its intervention.
40. The Commission requested that the CAB develop and file an action plan outlining the process it would use to examine these issues. In response to this request, the CAB filed its Action Plan on August 16, 2004 which proposed to:
- create a Steering Committee from the JSIC to oversee the implementation of the Action Plan;
 - create an Outreach Committee, comprised of persons with disabilities to serve as an advisory group on the implementation of the CAB's Action Plan; and
 - complete three streams of work for inclusion in a research report to the CRTC: comprehensive consultations, focus group research and Best Practices research.
41. The CAB undertook to provide a report on its research initiatives in July 2005 (subsequently extended to September 2005).
42. On September 16, 2005, the CAB submitted to the Commission its research report entitled *The Presence, Portrayal and Participation of Persons with Disabilities in Television Programming*. It was based on a qualitative research study that included the following components:
- Extensive consultations through one-on-one interviews with representatives from service and consumer disability community non-government organizations (disability community NGOs), persons with disabilities within the broadcasting sector, government officials, senior managers in the broadcasting industry and representatives from the Canadian production sector.
 - A Stakeholder Forum which brought together 20 disability community NGOs, broadcasters, performers and producers in a facilitated discussion of issues, barriers and tools/initiatives.

- Best Practices research and analysis, focused on broadcasting industry initiatives and industry-related initiatives in the U.K., the U.S. and Canada.

43. This approach yielded a comprehensive Report that provided extensive detail on the issues and barriers challenging persons with disabilities, in society and in television programming alike. It further provided a series of recommendations for the development of a broadcaster tool kit to move forward on greater inclusion of persons with disabilities within the broadcasting industry, and for addressing issues of presence and portrayal on-screen.
44. Canada's private broadcasters developed a number of initiatives to address these issues after the release of the research report. They include the following:

The launch of a Public Service Announcement campaign, *Open Your Mind*

45. On November 6, 2006, following up on the recommendations contained in the research report, the CAB announced the launch of a PSA campaign called Open Your Mind to affect social attitudes towards persons with disabilities.
46. This PSA features four individuals from the disabled community from various occupational backgrounds and is aimed at demonstrating and encouraging the employability of persons with disabilities in a variety of fields.
47. It was originally scheduled for its heaviest rotation in January and July of 2007. The spot proved so compelling in its messaging and in its positive portrayal of individuals with disabilities and the careers they are pursuing that it was featured prominently by CAB television and specialty members throughout 2007.

The release of *Recommended Guidelines on Language and Terminology – Persons with Disabilities: A Manual for News Professionals and Glossary*

48. Also released on November 6, 2006, this manual for news professionals was developed in consultation with Radio and Television News Directors Association of Canada. It includes recommended guidelines on the use of language and terminology when referring to persons with disabilities.
49. It has been made available to all CAB and RTNDA members, and is also available online in a printable and accessible format on the CAB's *Diversity in Broadcasting* website.

A brochure on *Employment Opportunities in the Canadian Broadcasting and Affiliated Production Sector*

50. A third initiative announced on November 6, 2006 was this brochure, aimed at improving the participation of persons with disabilities in the industry. It outlines the types of employment available in the broadcasting and affiliated production sector. It is available on the CAB's *Diversity in Broadcasting* website in an accessible and printable format, and is promoted to the disability community, educational institutions and relevant government agencies and/or departments (municipal, provincial and federal).

51. It has proven to be a valuable tool and leave-behind when Canada's private broadcasters visit with secondary school students to discuss employment opportunities in broadcasting. It has also been circulated to over 600 educational institutions, at the same time as the circulation of scholarship application forms for the 2008 round of scholarships.
52. The PSA and both brochures continue to be received very positively within the disabled community, by our industry partners and by government as valuable contributions to the promotion of diversity in the workplace. Through the PSA campaign and information materials, private broadcasters continue to provide a much needed focus on persons with disabilities, one of the most underrepresented groups in Canadian society, while increasing awareness of the barriers confronted by persons with disabilities and identifying the tools that can break these barriers down.

Development of the *CAB Equitable Portrayal Code*

53. Subsequent to the filing of the CAB research study, the CAB also undertook a full review of its four principal broadcast standard codes for the industry: *The CAB Code Regarding Violence in Television Programming*; *The CAB Sex-Role Portrayal Code for Radio and Television Programming*; *The CAB Code of Ethics*; and *The CAB Broadcast Code for Advertising to Children*. This review indicated that the most comprehensive way to address the research findings on the reflection and portrayal of ethnocultural groups, Aboriginal peoples, and persons with disabilities would be to develop a new Industry Code to replace the *CAB Sex-Role Portrayal Code*. To this end, and at its own initiative, the CAB developed a new *Equitable Portrayal Code* to ensure fair, accurate and non-stereotypical portrayal of all persons in television and radio programming.
54. The new *Equitable Portrayal Code* goes well beyond the ethnocultural, Aboriginal and disability communities that were the focus of the above-noted research studies, by expanding the *Code's* provisions to include *all* Canadians. The new *Code* is intended to assist in overcoming negative portrayal in broadcast programming based on matters of race, national or ethnic origin, colour, religion, age, gender, sex, sexual orientation, marital status or physical or mental disability.
55. The new *Code* is the first of its kind in the world. It includes provisions that are not to be found in any other code known to the CAB. It acknowledges that negative portrayal may take the form of stereotyping, stigmatization and victimization, derision of myths, traditions and practices, degrading commentary, and exploitation, each of which is prohibited by the new *Code*.
56. Subsequent to further discussions with Commission staff and extensive discussions among members of the CAB's JSIC, the CAB filed a revised *Equitable Portrayal Code*, which was approved on March 17, 2008 (Broadcasting Public Notice CRTC 2008-23).
57. An article published in April 2008 in *Abilities Magazine* – a publication for and about persons with disabilities – focuses on the development and approval of the *Equitable Portrayal Code*, noting it is a 'major step' in dealing with portrayal issues.

Best Practices for Diversity in Private Radio

58. Private radio broadcasters have also done their part to address issues related to the portrayal and employment of persons with disabilities. They are committed to achieving high standards for

their broadcasts and were among the founding members of the Canadian Broadcast Standards Council (CBSC). As members of the CBSC, radio broadcasters adhere to a number of industry content codes relating to programming and advertising material including the *CAB Code of Ethics*, *RTNDA (Journalistic) Code of Ethics* and the *CAB Equitable Portrayal Code* and regularly review these codes to ensure they meet evolving community standards and expectations for programming, including the fair and accurate portrayal of ethnocultural minorities, Aboriginal peoples and persons with disabilities.

59. Private radio broadcasters recognize that the continued selection and promotion of music and spoken-word talent/programming from ethnocultural minorities, Aboriginal peoples and persons with disabilities contributes to the better reflection of diversity in commercial radio. Private radio broadcasters also recognize that Canadian Content Development contributions can have a positive impact on the advancement of diversity in private radio. For these reasons, Canada's private radio broadcasters also encourage other industry stakeholders, including regional and national music associations, guilds, unions and music funding agencies, to develop strategies for talent development in ethnocultural, Aboriginal, and disability communities.
60. The strategy of the CAB's private radio members to advance the reflection and promotion of talent from diverse backgrounds – including ethnocultural groups, Aboriginal peoples and persons with disabilities – is based on the development and implementation of a wide range of best practices with an emphasis on music and spoken-word programming, human resource initiatives, community outreach, and accountability and measurement. Many private radio operators, at both the station and corporate levels, have already brought forward their own innovative approaches to promoting diversity in the workplace and on air.
61. The CAB submitted an initial series of best practices and a reporting template for diversity in private radio to the Commission as part of the overall CAB submission to Broadcasting Notice of Public Hearing 2006-1, *Review of the Commercial Radio Policy*.
62. In its new *Commercial Radio Policy* (Broadcasting Public Notice CRTC 2006-158) the Commission commended the CAB's proposed best practices and reporting template for diversity in private radio, noting they were positive and effective tools for radio licensees. The Commission requested that the CAB amend its proposed best practices to address the role that talent development and emerging artists can play in fostering diversity on radio.
63. The CAB's revised *Best Practices for Diversity on Private Radio* were filed with the Commission in March 2007 and adopted by the Commission in Broadcasting Public Notice CRTC 2007-122.
64. The best practices formalize the commitment of Canada's private broadcasters to achieving diversity both in on-air portrayal and within the industry's workforce by:
 - creating best practices and practical initiatives to improve the representation and ensure the fair, accurate and non-stereotypical portrayal and reflection of Canada's diversity on radio;
 - ensuring an accepting, respectful and inclusive work environment, a representative workforce and a workplace where all employees experience fair treatment and equal opportunity for career advancement;

- identifying and removing barriers to access and employment within the broadcasting system; and
- identifying the business opportunities associated with fostering an inclusive and diverse workforce and airing programming that attracts diverse audiences.

CAB Diversity 'Webinars'

65. In 2006 the CAB undertook a needs assessment to determine what form(s) of professional development support may be required by CAB member companies to best help them develop corporate strategies and implement best practices in the areas of cultural diversity and persons with disabilities. This assessment led to the planning of two CAB Diversity Webinars.
66. The webinars – interactive online seminars developed for and delivered to CAB members – will include a range of useful information about diversity, geared to assisting our members with their own diversity planning and strategies. Designed as an interactive platform for the delivery of information and discussion with human resource professionals within CAB member companies, Webinar content could include:
- updated information on the growth of diversity in Canadian society;
 - perspectives 'from within': what ethnocultural groups, Aboriginal peoples and persons with disabilities are suggesting for effective diversity planning;
 - perspectives 'from outside': diversity initiatives and strategies that have proven successful in other jurisdictions; and
 - strategies for diversity planning in smaller markets.
67. The CAB advised the Commission of its Diversity Webinars in the CAB's *2007-2008 Report on Diversity in Broadcasting*. In its 26 June 2008 response to this report, the Commission took particular note of the Diversity Webinars as well as Diversity Seminars to be held during annual conferences of Regional Associations, stating that "[b]oth projects promise to provide fresh and innovative mechanisms for providing support to broadcasters and are concrete examples of the CAB's continuing leadership in this area."
68. The first Webinar designed for English-language television services is scheduled to be delivered in the fall. The second Webinar designed for French-language broadcasting services is scheduled for later in 2008.

CAB Diversity in Broadcasting Website

69. Originally launched in May of 2005, the *Diversity in Broadcasting* website (www.cab-acr.ca/diversityinbroadcasting) continues to evolve as a key resource for CAB members, industry stakeholders, and the ethnocultural, Aboriginal and disability communities. It was reorganized in 2006 to enable easier access to information on diversity activities and programs initiated by

individual broadcasters, and continues to evolve as a central conduit for broadcasters, stakeholders and the public to access information on the industry's diversity measures, initiatives and activities. The website includes a vast array of information, including research reports, news releases, speeches, articles, specific initiatives (e.g. scholarships/training programs) and notification of diversity events.

70. The *Persons with Disabilities* section underwent extensive expansion in 2006-2007. This section of the website includes information on the initiatives undertaken by the CAB and Canada's private broadcasters in the area of improving the presence and portrayal of persons with disabilities in broadcasting. Of particular note, this section provides access to the three aforementioned initiatives launched in November of 2006, including booklets on *Recommended Guidelines on Language and Terminology* and *Employment Opportunities in the Canadian Broadcasting and Affiliated Production Sector*, as well as the *Open Your Mind* Public Service Announcement campaign.

Conclusion

71. In its 26 June 2008 letter responding to the CAB's *Report on Diversity in Broadcasting*, the Commission commended the CAB for showing "a high level of commitment...to lead the Canadian broadcasting industry in addressing diversity objectives".
72. The CAB appreciates this acknowledgement by the CRTC of the CAB's initiatives to better serve Canada's diverse population, including persons with disabilities. Canada's private broadcasters will continue to lead the broadcasting industry in these areas. The CAB looks forward to discussing at the November hearing the various activities described above, including our research on described video and its challenges, and to provide updates as appropriate on these and other new accessibility-related initiatives.

Sincerely,

Original signed by

Jay Thomson
Vice-President, Regulatory and Policy

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