



Canadian Association of Broadcasters  
Association canadienne des radiodiffuseurs

November 28, 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  
Undertakings**

1. The following are the responses of the Canadian Association of Broadcasters (CAB) to the three undertakings directed to the CAB and our members in relation to the above-noted proceeding.
2. Two of the undertakings are directed only to the CAB. The third undertaking is directed to “each broadcast licensee participating in this hearing”. This is to advise the Commission that the CAB is responding to the third undertaking on behalf of our TV and Specialty and Pay TV members whom appeared as part of the CAB panel and/or to whom the Commission directed interrogatories in this process. Specifically, the CAB is responding to the third undertaking on behalf of CAB members Astral Media Inc., Canwest Media Inc., Corus Entertainment Inc., CTVglobemedia Inc., Rogers Broadcasting Limited and TQS inc.

**For the CAB**

**Please identify and monetize the factors considered by the independent consultant when determining the costs associated with the post-production and distribution of described video content.**

3. The CAB’s response to this undertaking is provided in the attached letter (Appendix 1) from the independent consultant.

**For the CAB**

**Please submit a concise and specific matrix identifying the level of compliance by individual CAB members with W3C accessibility standards.**

4. Please see the attached chart (Appendix 2) which summarizes the responses of CAB members to Interrogatory **(CRTC) 10June08-300 a)** [Describe the measures taken to ensure that the company's website is designed to be accessible to persons with disabilities (e.g., W3C compliance)].

**For Individual Broadcasters that are participating in this hearing**

**The RAAQ has proposed that all English and French over-the-air broadcasters be required, by the end of their licence term, to provide 28 hours per week of DV, starting with 14 hours per week in year one of the licence term. For each broadcast licensee participating in this hearing, please comment on the financial impact of this proposal at the corporate group level. Specifically, please identify the estimated costs in years 1 and 7 that this proposal would represent. Where applicable, please provide details on relevant production, post-production and distribution costs. Please also comment on the impact of these costs on your overall operations.**

5. Based on consultations with the CAB members identified in paragraph 2, above, the CAB has determined that, in the context of this particular proceeding, this undertaking is best answered on an industry-wide basis rather than by each individual named broadcaster. Moreover, given the breadth of the impact analysis required, it is impossible to provide a fulsome and constructive response in the short period of time given. Accordingly, the CAB will provide a response on behalf of the named members as part of our Reply submission due January 12, 2009. We suggest the Commission could then give interested parties until February 3, 2009 to respond to the CAB's submission *on this specific matter*. This timeframe would be consistent with that which the Commission recently established for parties to file comments regarding the reports of the CAB's English and French-language Closed Captioning Working Groups and then for the CAB to submit its response thereto.

Sincerely,

***Original signed by***

Jay Thomson  
Vice-President, Regulatory and Policy

Attach.

November 20, 2008

Mr. Jay Thomson  
Vice President  
Regulatory & Policy  
Canadian Association of Broadcasters  
45 O'Connor Street, Suite 700  
Ottawa, Ontario

Dear Jay:

We understand that the CRTC has requested additional information pertaining to the study we recently completed for the Canadian Association of Broadcasters (CAB) on *Described Video in Canadian Private Television*.

Specifically, the Commission has requested that the CAB “identify and monetize the factors considered by the independent consultant when determining the costs associated with the post-production and distribution of described video content.”

As you know, CONNECTUS Consulting Inc. undertook a series of interviews with private broadcasters, BDUs and descriptive video production houses in completing the study on Described Video for the CAB. The information derived from these interviews comprises a significant component of the study's findings, and forms the basis of the cost information reported. It is also important to emphasize that the cost estimates provided to us represent current averages based on existing regulatory requirements and production capacity; these current estimates could very well increase if the present circumstances were to change.

There are three points to note here.

First, broadcasters uniformly indicated that the current cost of Described Video averages \$1,600 for one hour of English-language programming and \$1,750 for one hour of French-language programming. Because descriptive narrative is added to a program following that program's completion, the cost is identified by broadcasters as part of a program's post-production costs.

On page 18 of our Report, we note the comments of broadcaster participants:

But producing DV versions of a television series adds significant costs to post-production budgets. For example, adding description to the children's program *Franklin* in both English and French increases the cost of post-production significantly – approximately \$42,000 for 26 half-hour episodes in English and 26 half-hour episodes in French at a cost of \$800 for each half-hour produced. Applying this formula to, for example, three different television series would add in excess of \$125,000 to the annual post-production expenditures of a private broadcaster.

The quoted figure of \$1,600 is the approximate fee currently charged to the broadcaster for the work involved in scripting, taping, editing and inserting description for a given one-hour program. The above illustration is thus broken down as follows:

- $\$1,600 / 2 = \$800$  for a 30-minute program such as *Franklin*
- The current estimated cost for 26 English-language episodes of *Franklin* ( $\$800 \times 26$ ) = \$20,800
- The current estimated cost for 26 French-language episodes of *Franklin* ( $\$800 \times 26$ ) = \$20,800
- Total current estimated cost to the broadcaster: \$41,600
- Assuming the same costs for three television series:  $\$41,600 \times 3 = \$124,800$

In fact, the costs for the French-language version of *Franklin* would be slightly higher, as French-language private broadcasters interviewed for the study reported the current cost of DV per hour of programming at \$1,750.

Second, we note that there is an editing error on page 18 of our Report. We state:

There are also additional distribution costs involved, estimated at approximately \$30,000 per year for the average broadcaster.

In fact, this sentence should actually appear two paragraphs below, in a brief discussion of BDUs and should read:

There are also additional distribution costs involved, estimated at approximately \$30,000 per year for the average *BDU*.

Again, the figure of \$30,000 in current annual DV distribution costs was provided by BDUs interviewed for the study, but this figure was not broken down by study participants. We noted that in Quebecor's appearance at the CRTC Accessibility Hearing on November 17, 2008, the same figure of \$30,000 in DV distribution costs was noted with respect to Videotron.

Third, we note on page 18 of our Report:

As noted by several participants in the Study, the process of producing and distributing DV also trigger a number of 'below the line' costs beyond the actual cost of versioning the program, including salaries, feeds, the creation and distribution of digital copies, the remixing of sound, etc. Broadcasters point out that there is 'much more than meets the eye in terms of how much an hour of DV can cost you. It goes beyond what we pay (the DV production house)'.

While private broadcasters interviewed for the study uniformly identified the presence of 'below the line costs', these were not monetized by study participants.

We trust that this satisfies the request for additional information. Please let us know if any further clarification is required.

Yours truly,

**Original signed by**

Richard Cavanagh  
Partner

## Appendix 2

\_\_\_\_\_(CRTC)10June08-300  
**Summary of Member Responses**  
**Subject: Measures taken to become W3C Website Compliant**

<b>Member</b>	<b>Response to ___(CRTC)10June08-300</b>
Astral Media	<ul style="list-style-type: none"> <li>● (Translation from responses in French) We have over 70 websites; most of them were developed before current accessibility standards were in place; following a recent summary review, it would appear that many of our websites were found to be in conformity with some of the 14 rules of the Web Accessibility Initiative;</li> <li>● Over the course of the next months, Astral will work with its DG of Information and Technology and the various business units to invite them, when reviewing their websites, to consider the issue of the integration of the accessibility rules.</li> </ul>
CTV Globemedia	<ul style="list-style-type: none"> <li>● Since 2005, new sites that are built “from scratch” are constructed to W3C accessibility standards as much as possible.</li> <li>● It is not possible to ensure 100% validation of W3C standards since some content management systems were purchased four or five years ago – before current accessibility standards were in place.</li> </ul>
Canwest	<ul style="list-style-type: none"> <li>● Canwest does not have a specifically documented policy to meet W3C or WAI standards however we have taken steps to introduce features to help users with varying abilities or browsing technologies to access our content</li> <li>● Canwest proactively reviews content to incorporate elements to meet W3C such as font sizes, colour adjustments and content placement</li> </ul>
Corus	<ul style="list-style-type: none"> <li>● Corus web developers report that various parts of some of Corus’ websites meet some of the criteria and that meeting even a simple majority of the recommendations would require a complete rebuild of major portions of our sites.</li> </ul>
Rogers (September 5 <sup>th</sup> response in ATT 1 - Questions to CLECs)	<ul style="list-style-type: none"> <li>● To date, 22 of 52 radio websites are compliant, with the remaining 30 to be redesigned for compliance in the near future.</li> <li>● The websites for OMNI Television<sup>1</sup>, Citytv<sup>2</sup>, Bio and G4TechTV will be redesigned to comply with W3C standards in the near future. It is important to note that Rogers’ media websites will never be 100% W3C compliant given the complexity and dynamic nature of the audio and audio-visual content offered on these sites.</li> </ul>
Rawlco	<ul style="list-style-type: none"> <li>● Our websites are designed to be simple to navigate and easily accessible by standard browsers.</li> <li>● We will be reviewing our websites to consider what things can be done to ensure we take into account considerations regarding accessibility</li> </ul>
Jim Pattison Group	<ul style="list-style-type: none"> <li>● Our website was designed to be easily accessible</li> <li>● In discussions with one of our ISPs we are not aware of web content accessibility such as W3C.</li> </ul>
Golden West	<ul style="list-style-type: none"> <li>● We do not stream any of our radio stations over the internet and no plans to do so in the future.</li> <li>● The company website is a vehicle to provide general information about the company and is almost entirely text-based.</li> </ul>

<sup>1</sup> The OMNI website is not currently W3C compliant but will move to a new platform by late 2009/early 2010 at which time it will be approximately 80% compliant.

<sup>2</sup> The Citytv websites (CityNews.ca and Citytv.ca) move to a new platform (a new content management system) mid 2009 and should be approximately 80% compliant.