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Manager
National Broadband Network Submissions
Department of Broadband, Communications and the Digital Economy
GPO Box 2154
CANBERRA ACT 2601

BY EMAIL: regulatory@dbcde.gov.au

Dear Sir/Madam

NATIONAL BROADBAND NETWORK: REGULATORY ISSUES

Please find attached Access Innovation Media's submission on regulatory issues concerning the National Broadband Network.

Of related interest may be our submission to the Electronic Media Access Inquiry available at
http://www.dbcde.gov.au/_data/assets/pdf_file/0011/84719/Access_Innovation_Media_-_Response_to_Media_Access_Review_2008.pdf

Yours faithfully,

Tony Abrahams
Managing Director & CEO

1. About Access Innovation Media (from www.ai-media.tv)

ACCESS INNOVATION MEDIA
develops & delivers
innovative & economical
media access solutions
creating new markets
transforming lives & strengthening society

- Access Innovation Media focuses on the needs of over 3.5 million Australians with hearing and vision impairments - providing access to education, entertainment, information and social participation opportunities. AI-MEDIA's captions can be seen on over 68,000 hours of television across 27 cable & satellite channels.
- Access Innovation Media's globally innovative business solutions connect service providers with end-users effectively opening and sustaining new markets and delivering more access.
- Access Innovation Media is at the forefront of technological innovation adapting access solutions to diverse markets with distinct needs including TV captioning, live captions to classrooms, conferences, workplaces, Internet and mobile, transcription and business-specific products and services.

OUR COMMITMENT

Social Inclusion: a shared commitment to allow and encourage each and every individual to fully be themselves – and live with dignity – as a valued member of, and contributor to, society

ACCESS to society is a fundamental tenet of Social Inclusion

Social Innovation: strategies, concepts, ideas, products and solutions that extend and strengthen civil society

ACCESS solutions remove physical and sensory barriers to participation in education, the workplace and society

SAFETY first. ACCESS second. INCLUSION follows. It makes a difference.

Access Innovation Media is an independent privately-owned Australian media access organisation.

The range of access services AI-MEDIA provides includes:

1. Closed Captioning (Offline and LIVE)
2. Open Captioning
3. Subtitling and translation services
4. Transcription services
5. Audio/Video description

The range of platforms to which we deliver our access services include:

- A. Traditional broadcast (closed captions passed through inserter) – both LIVE and offline
- B. Conferences
- C. Schools, TAFE and other educational environments
- D. Business and workplace captioning
- E. Corporate intranets
- F. Internet captioning and audio/video description - for example YouTube, Google Video and Overstream
- G. Captioning for mobile & handheld devices

Our broad range of clients, access services and delivery platforms demonstrates we have a deep understanding of the changing nature of the media landscape associated with the fragmentation of audiences and proliferation of formats and standards across multiple delivery platforms.

2. Background & Related Developments

A. New Media & Technology

---Creating and delivering accessible media content has never been technologically or commercially easier.

Over the last few years the media landscape has dramatically shifted - transforming from a largely analogue linear television viewing experience to one where consumers now have choice among a multiplicity of digital electronic media options across various platforms and on many devices. This “New Media” landscape also offers consumers the freedom and flexibility to consume content at a time and place of their choosing.

Software can now be freely downloaded to allow any content producer to add captions or mix an additional audio track to render the media accessible. Producers and distributors can also choose among a number of competitive access service providers.

The benefits of providing access services significantly outweigh the costs.

Captioned and audio/video described content can be easily distributed via the Internet using modern web-browsers. Separate digital files with captions embedded and mixed audio/video description can be easily made available for those consumers who require these specialised access services without disrupting the enjoyment of content for consumers who do not need these augmentations.

New Media options will continue to proliferate as technological and business innovation delivers increasingly targeted niche products and services. Our core business is delivering access solutions for these new media environments.

There is no reason why New Media should not be fully accessible.

B. Social Inclusion and Social Innovation: Bridging the Digital Divide

---The solution has two parts:

PART 1: Build the infrastructure

PART 2: Make the content accessible

A key tenet of the Government's Social Inclusion agenda is that to be socially included, all Australians need to be able to play a full role in Australian life – in economic, social, psychological and political terms.

Part of the Social Inclusion agenda involves closing the digital divide by building a national high-speed broadband network to provide opportunities and access to the digital world for everyone.

The Digital Education Revolution contains specific initiatives including Fibre Connections to Schools and the National Secondary School Computer Fund to build the necessary digital infrastructure.

"Access to reliable, affordable, high speed broadband connections will strengthen the capacity of students, parents, teachers and the wider community to communicate, collaborate and access resources across system, State/Territory and national boundaries." -

<http://www.digitaleducationrevolution.gov.au/broadband/> 13-06-08

The second part of the solution requires that the content delivered over the high-speed digital network be accessible to all in order to fully bridge the digital divide.

3. Recommendations

Access Innovation Media makes the following specific recommendations:

Recommendation 1: Broadband as an Essential Service to Deliver Social Inclusion and Social Innovation

- **Broadband will be the dominant delivery medium for voice, data and video services well into the future and Access Innovation Media welcomes the Government's focus on this issue.**
- **No other delivery platform can match the flexibility, reach and opportunities offered by universally available broadband.**
- **The establishment of the National Broadband Network will enable access services (such as captioning and audio/video description) to be delivered to a wide variety of end-users in multiple situations (including classrooms, remote communities, workplaces, hospitals, doctors' surgeries, public places, in homes and to mobile devices), significantly enhancing quality of life and opportunities for those people with a hearing or vision impairment.**

Comment: Delivering accessible content first requires universally available broadband across Australia. There will almost certainly be different technical solutions appropriate to deliver broadband across different geographic areas and to distinct audiences. All options should be on the table to deliver universal access. All Australians should have equal opportunity to fully participate in the emerging digital economy, as underpinned by the establishment of the National Broadband Network.

Recommendation 2: Digital Content Must be Accessible

- **Universal availability of broadband is an essential first step to ensure universal access to content for those with disabilities. Once broadband is universally available, the next step is to ensure that content delivered across the National Broadband Network is accessible (either through captioning or audio/video description).**
- **The public sector should lead by example and commit to fund captioning and audio/video description on all Government produced or distributed content carried on the National Broadband Network.**

- **All television content previously captioned and retransmitted should be equally accessible when viewed online.**

Comment: In leading by example, the Government and professional media will promote awareness of the need for the universal accessibility of digital content.

Recommendation 3: Relax Broadcasting Laws to Allow for Innovative Modes of Access Delivery via the National Broadband Network

- **Broadcasters should be permitted and encouraged to distribute accessible content over the Internet where providing access over existing legacy broadcast infrastructure is not feasible.**
- **This is particularly the case with audio/video description as delivery over legacy platforms is technically difficult.**

Comment: Existing free-to-air and subscription television infrastructure would require significant and costly investment simply to permit the delivery of audio/video description (in particular). The option of making audio/video described content available over the National Broadband Network would overcome many of the technological hurdles to delivering access to electronic media for people with vision impairments.