



March 29, 2010

Mr. Robert Morin
Secretary General
Canadian Radio- Television and Telecommunication Commission (CRTC)
Les Terrasses de la Chaudière
Central Building
1 Promenade du Portage
Gatineau, Quebec
K1A 0N2

Re: Public Process: Broadcasting Notice of Consultation CRTC 2009-661

National Executive Director
Snookie Lomow

Dear Mr. Morin:

*2007-2010
CHHA Board of Directors*

This is a request to file a late submission to the CRTC with respect to its policy review relating to community television.

National President
Carole Willans

Vice-President
Louise Normand

Treasurer
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Secretary
Annie Lee MacDonald

Young Adult Representative
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Beverley Speight
David Spencer

Special Advisor
Colin Cantlie

Since 1982, the Canadian Hard of Hearing Association (CHHA) has been the voice for hard of hearing Canadians. This represents a significant segment of the Canadian population (Statistics Canada has determined that 10% of the Canadian population has some degree of hearing loss). With the current ageing demographics, the extent of hearing loss is expected to increase even more.

CHHA responds to the needs of the community it serves. Its membership has been indicating on a regular basis that there are significant failures in terms of captioning, both with respect to quantity and quality, in community cable television programming. It is important that the CRTC continues its support of captioning, in recognition of the reliance of many Canadians on captioning.

CHHA would like to bring to the attention of the CRTC the lack of captioning services when it comes to local community cable television networks right across Canada. Hard of hearing Canadians should be able to rely, like their counterparts who do not have a hearing disability, on local community cable television as a way to keep in touch with what is happening in their communities. Local community cable TV is important to small, medium and large size communities across Canada. It not only provides important information and entertainment, but it also provides up to date community affairs information and community/local news, and weather warnings just to mention a few of the important services they provide. It is a matter of equal access to information.



Canadian Hard of Hearing Association
Association des malentendants canadiens

CHHA respectfully requests that the attached submission be considered, in order to add to the CRTC ruling on Community Television that high quality captioning of local community programs must be provided 100% of the time or that when cable companies apply to renew their license. This should be made a requirement commencing July 2010.

The Canadian Hard of Hearing Association is ready and willing to work with the CRTC and the Canadian Association of Broadcasters to develop solutions that meet the needs of hard of hearing Canadians.

Thank you very much for your kind consideration, and we look forward to your reply.

Yours truly,

Carole Willans
National President

Snookie Lomow
National Executive Director

c.c. Jade Roy (Public Proceedings)

**Broadcasting Notice of Consultation
CRTC 2009-661
*Review of community television policy
framework***

Submission By The



Canadian Hard of Hearing Association
Association des malentendants canadiens

THE CANADIAN HARD OF HEARING ASSOCIATION

1. The Canadian Hard of Hearing Association (CHHA) has been the *voice* for hard of hearing Canadians since 1982. It is a registered charity under the *Income Tax Act of Canada*.
2. With its national headquarters located in Ottawa, the Canadian Hard of Hearing Association has developed into a strong national organization with 9 provincial Chapters, 51 regional or local Branches and 2 national virtual Networks. CHHA is governed by a National Board of Directors and its bylaws require that at least 80% of the Board be hard of hearing.

HEARING LOSS IN CANADA

3. Statistics Canada has determined that 10% or in excess of 3,000,000 Canadians have some degree of hearing loss, making hearing loss the largest disability group in Canada. Hearing loss amongst individuals who are over 65 typically increases by 45% and so as the baby boomer population is aging, the number of Canadians affected by hearing loss can be expected to significantly increase over the next decade.
4. There are varying degrees of hearing loss, ranging from mild to profound. Hearing loss occurs at all ages; it can be the result of a wide variety of causes, including genetics, trauma, illness, ototoxic medication or noise pollution.
5. A person who is hard of hearing uses spoken language (e.g., English or French) as the main form of communication is the use of a spoken language (not sign language).
6. Canadians who are hard of hearing want to enjoy television like others with normal hearing, but generally can only do so *if* accommodation is provided, namely captioning.

CLOSED CAPTIONING OF TELEVISION PROGRAMMING

7. The Commission's leadership role in ensuring that all television programming seen on over-the-air and specialty television channels is closed captioned has made it possible for all Canadians with hearing loss to enjoy the same programs that most Canadians take for granted.
8. The CRTC has come to recognize the importance of providing captioning. Community channel programming, however, is one significant sector of programming not presently included in the Commission's policy regarding closed captioning requirements. CHHA considers to be an important omission.
9. CHHA members have been pointing out to us on a regular basis the lack of captioning on community channels. The Canadian hard of hearing community uses local and cable television as a way to keep in touch with what is happening in local communities. Local and cable TV is important to small, medium and large size communities across Canada. It not only provides entertainment but also links our country culturally, provides up to date community affairs information, community/local news, and weather

warnings just to mention a few of the important services to the hearing community that is not accessible to persons who are hard of hearing. It is a matter of equal access to public information.

SELECTED COMMENTS FROM CHHA MEMBERS

10. CHHA member regularly decry the lack of captioning or the poor quality of captioning of television programs both local and otherwise. Here are some highlights:

Ian... CHHA Newfoundland member: I have met with a local Rogers's station in the past as part of CHHA-NL advocacy for captioning on local channels in Newfoundland. While they were very interested they felt they could not absorb the cost of captioning. Cost was a major factor for them.

Linda... CHHA Hamilton member: Shaw cable: at present time CHCH TV is not captioning anything but the news. They are saying it is too expensive. Cable 14, our community channel does not appear to have captioning as they are a non-profit.

Ian... CHHA New Brunswick member: Rogers is the cable company here in New Brunswick, They provide nothing in the way of captioning for any programming that I have viewed to date Annie. PEI Captioning of Community Channels keeps me informed about community events so because we don't have that I feel I do not have accessibility to the community.

11. From a member in Newfoundland on December 18, 2009:

"Bell/Aliant sent a lowly technician to my place today. He said that he knows what captioning is, but hasn't a clue about fixing it. At least he was honest. We had quite a chat and he understood the situation much better. He said that he would take the matter back to his boss and explain it to him. And so the run-around begins anew. I shall keep you informed."

12. Another from a member living in Calgary on August 25, 2009:

"Can you please assist me on an issue? Reference to the CRTC ruling Broadcasting and Telecom Regulatory Policy CRTC 2009-430, are cable companies in Canada expected to comply with the CRTC captioning requirements? If not, why not? By what I am reading this seems to be a rather nebulous issue which needs to be shored up. In the CRTC 2009-430 there is reference to Rogers but only as it applies to the TV station operations of CityTV and OMNI. Oh and by the way, what of the foreign language TV broadcasters in Canada... shouldn't they have captioning for their audience? This is going to be something that I will be pursuing in Calgary and other centres thus ensuring that cable companies provide captioning on their programming broadcasts as is the case with other commercial companies. Cable providers provide their own broadcasts on a 24 hour basis in some Canadian centres and many do not provide captioning. I have no idea what the captioning stats are on the cable broadcaster or even if there are any. As for the satellite operators, I believe they are only a relay conduit and not a broadcaster of their own programming but I could be incorrect. If they are broadcasters as well then I would expect the companies to fulfill the intention of the captioning regulations. Your reply is appreciated. "

13. From the CHHA National Executive Director; Feb 25, 2010:

"It is easy to understand there is a tremendous lack of information and training regarding captioning. What needs to be developed is a set of best practices for what is required, what works best; how it works and how best to deliver the various types of services to the community at large without adding to a huge increase to the operating costs."

FUNDING OF COMMUNITY PROGRAMMING CAPTIONING

14. CHHA realizes that most community channels are funded by the 2% of revenues generated from broadcast operations that cable BDU's would otherwise direct to the Canadian Television Fund. It also recognizes that the likely reason that captioning has not yet evolved on community television is because of the cost relative to the number of hours of community programming produced each year. It is for this reason that CHHA recommends to the CRTC that community television stations be allowed to sell closed captioning sponsorships in addition to other advertising if required to offset the cost of closed captioning. Closed captioning sponsorships were very effective in bringing captioning to commercial television and while community television audiences are generally smaller than commercial audiences, it is considered that the concept is viable even in the context of community television.
15. It is understood that, for economic and operational reasons, closed captioning of community programming might have to be phased in over a reasonable period of time. However this journey must begin at the earliest possible time with the goal of achieving 100% captioning within the next few years.
16. The Canadian Hard of Hearing Association has been a member of the Canadian Association of Broadcasters Working group on Closed Captioning and is ready and willing to work with the CRTC and the community television producers to develop a program that offers the best possible solution to meet the needs all hard of hearing Canadians.
17. We thank the Commission for the opportunity to participate in the important consultation.



Carole Willans
National President



Snookie Lomow
National Executive Director

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