



**KommAustria**  
Kommunikationsbehörde Austria

# ACCESSIBILITY REPORT

2021

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## Accessibility report 2021

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# Accessibility report 2021

## 1. Accessibility

*"Accessibility is a basic precondition for the equal participation of people with disabilities in an inclusive social life."<sup>01</sup>*

There are more than 1.5 million people with disabilities in Austria. Only a small percentage of these disabilities are congenital, or were acquired as a result of an accident or an occupational illness. The vast majority are the result of a disease or disorder.<sup>02</sup> Nor should it be forgotten that disabilities also often affect older people.

The following groups are most likely to experience restrictions to participation:

- People with vision loss or blindness
- People with hearing loss
- People with physical or motor impairments affecting the upper limbs
- People with learning difficulties

The UN Convention on the Rights of Persons with Disabilities – and the subsequent EU Directive on Audiovisual Media Services – introduced 'accessibility' as one of its foundational principles.<sup>03</sup>

In relation to media services, accessibility means ensuring that media are discoverable, accessible and usable by people with disabilities in a general and typical manner without encountering undue difficulty or requiring the aid of another person.

Guaranteeing accessibility of audiovisual content is a key requirement in the context of the obligations entered into by parties to the United Nations Convention on the Rights of Persons with Disabilities.

Accordingly, media service providers should *"actively seek to make content accessible to persons with disabilities, in particular with a visual or hearing impairment."*<sup>04</sup> Furthermore, media service providers should not neglect the needs of individuals with learning difficulties. Accessibility requirements should be met through a progressive and continuous process, while taking into account the practical and unavoidable constraints that could prevent full accessibility, such as programmes or events broadcast in real time.

The moving image – and therefore the role played by vision – plays a significant role in audiovisual media as a whole. Yet vision is not the only sense that is stimulated by audiovisual content. The 'audio' part of audiovisual media, which may include the spoken word, music and sound effects, is not merely ancillary to visual content but may itself evoke mental pictures and emotions that make the moving image perceptible to the consumer. The current focus of mass media on the primacy of video therefore entails disadvantages both for people with vision loss as well as individuals with hearing difficulties. However, these issues can be mitigated by the deployment of technical aids that accordingly allow these consumers to participate in audiovisual media. Furthermore, modern media tools also permit the creation of technical solutions – such as the incorporation of media content in simple language – that allow people with learning difficulties to access audiovisual media content and therefore participate more fully in an inclusive social and cultural life.

<sup>01</sup> Ulrike Mascher, Chair of the Advisory Council, German Disability Council (DBR)

<sup>02</sup> For figures, see the third report on the situation of people with disabilities, available as "Federal Government Report on the Situation of People with Disabilities" <https://www.sozialministerium.at/Themen/Soziales/Menschen-mit-Behinderungen/Bericht-der-Bundesregierung-ueber-die-Lage-der-Menschen-mit-Behinderung.html> (accessed 21 April 2022)

<sup>03</sup> Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive), last amended by Directive (EU) 2018/1808

<sup>04</sup> Cf. Directive (EU) 2018/1808, Recital 22

## 2. Legal basis

The Austrian legal framework comprises the Audiovisual Media Services Act (AMD-G) on the one hand and the Federal Austrian Broadcasting Corporation Act (ORF Act, ORF-G) on the other.

Pursuant to Art. 30b Par. 1 AMD-G, media service providers shall achieve a continuous and step-by-step annual increase in programmes that meet accessibility standards compared with programming as at 31 December 2020. This increase is to be achieved throughout all of their channels and programming in accordance with their economic capabilities while also accounting for the financing provided for such measures from public funds.

In terms of live content, the greater degree of effort required to ensure accessibility to this content permits certain technically justifiable exemptions to be made.

To achieve the goals of ensuring accessibility for audiovisual content, Art. 30b Par. 2 AMD-G stipulates that providers of audiovisual media services should take appropriate steps to ensure a continuous and progressive increase in the proportion of their audiovisual content that they have made accessible to people with hearing and vision loss. Media service providers must provide further details of how they intend to implement these measures by preparing an action plan in consultation with a representative organisation acting on behalf of people with vision or hearing impairments and on behalf of people with learning difficulties. This action plan must set out concrete details for a three-year time frame and build on the earlier action plan adopted for the prior period. The plan must also ensure an annual increase in the proportion of programmes meeting accessibility standards (live broadcasts excepted) within the categories of news and current affairs, entertainment, education, arts and culture, and sport. Media service providers must publish the action plan so it is easily and immediately available, and accessible at all times. The action plan must also be submitted to KommAustria in a standardised format.

Exemptions to this requirement are granted to media service providers whose prior-year earnings from their audiovisual media service did not exceed EUR 500,000. Media service providers whose programming is of an exclusively local or regional nature are also granted an exemption to this requirement for the audiovisual media services that they offer.

A failure to prepare or publish the action plan will be sanctioned through the imposition of an administrative penalty. KommAustria may also initiate a supervisory procedure in the event of an action plan not being made available or may respond to a public complaint.

Similar provisions are envisaged for the ORF by the ORF Act (ORF-G). Other key objectives are regulated by Art. 5 ORF-G.

Pursuant to Art. 5 Par. 2 ORF-G, news and current affairs television broadcasts (Art. 3 Par. 1) must be designed, in accordance with technical advances and economic feasibility, to simplify the consumption of such broadcasts by individuals with vision and/or hearing loss and persons with learning disabilities (who need content to be expressed in simple language).

Furthermore, Art. 5 Par. 2 also stipulates that the ORF shall offer at least one news broadcast in simple language during its daytime programming (9 am to 10 pm).

The ORF shall also ensure that appropriate measures are taken to ensure a continuous and progressive increase in the respective proportion of audiovisual content made accessible to people with vision and/or hearing loss, and for individuals with learning difficulties (who need content to be expressed in simple language), in comparison with programming as at 31 December 2020. The ORF may also be granted technically justifiable exemptions in the case of live content.

The ORF must provide further details of the measures intended to increase the aforesaid proportion by preparing an annual action plan in consultation with the Audience Council and with the representative organisations for people with vision or hearing loss and individuals with learning disabilities. This plan must include a detailed, three-year timetable for the annual increase in the proportion of ORF programming and online content that meets accessibility requirements (excepting live broadcasts), within the categories of news and current affairs, entertainment, education, arts and culture, and sport.

Art. 5 Par. 2 ORF-G stipulates an annual increase of at least 2.5 per cent in the categories of news and current affairs, education, and arts and culture, and of at least 4 per cent in the category of entertainment, compared with figures at the end of the prior calendar year. Special importance is attached to ensuring accessibility for all television broadcasts in early evening and main evening programming (7 pm to 10 pm), for online services, for provincial broadcasts in the news and current affairs category, for press conferences and broadcasts reporting on elections or election results, and children's programming in the categories of news and current affairs, and entertainment.

Of these, priority is given to ensuring accessibility for all television broadcasts in early evening and main evening programming (7 pm to 10 pm) as well as online services provided pursuant to Art. 4e Par. 1 No. 4 ORF-G and approved pursuant to Art. 4f Par. 1 ORF-G in conjunction with Art. 6b ORF-G. A further priority is given to provincial broadcasts in the news and current affairs category, press conferences and broadcasts reporting on elections or election results, and children's programming in the categories of news and current affairs, and entertainment.

As at 31 December 2021, a total of ten media service providers had submitted an action plan for their audio-visual media services. Two action plans were submitted in March 2022.

KommAustria is tasked with reporting on the status quo and developments in relation to the duties as described in Art. 30b Par. 1 AMD-G and in Art. 5 Par. 2 ORF-G, together with a comparative presentation of intended target values and the actual values as achieved. Both provisions require the preparation of an annual report on implementation of the measures specified in the action plan and the proportional increase achieved by 31 March of the year after the reporting period. These reports are to be published in the same way as the action plans.

Four media service providers, whom KommAustria assumes are obliged to comply with the provisions of Art. 30b AMD-G, have not submitted an action plan and procedures have therefore been initiated accordingly.

Pursuant to Art. 20b of the KommAustria Act (KOG), RTR has the following remit as a point of contact for complaints and information services relating to accessible audiovisual media services:

- Providing media service providers with appropriate information that will help them to make their content accessible to people with vision and hearing loss, and to people with learning difficulties, who need content to be provided in simplified language.
- Providing programmes of information for the general public.
- Acting as a complaints board for accessibility issues with the content of audiovisual media services, including the provision of an online complaints portal that is easily, readily and continuously available.

### 3. Reports

For affected media service providers, the reference year is 2020: current achievements in accessible content proportions are to be compared with that year. Media service providers must specify the accessible proportion of all of their programming, within the categories of news and current affairs, entertainment, education, arts and culture, and sport. In accordance with statements provided by affected media service providers, all action plans submitted were prepared following due consultation with a representative organisation acting on behalf of people with vision or hearing impairments and on behalf of people with learning difficulties.



### 3.1 ProSiebenAustria GmbH

In its action plan, ProSiebenAustria GmbH noted that it has offered accessible content for the last eight years as part of its syndicated ProSieben programming. However, the topic of accessibility receives insufficient attention in ProSieben's Austria-specific programming, broadcast for just over 110 minutes a day. In the reference year (2020), total broadcasting time amounted to 40,254 minutes, of which 0 minutes were accessible and therefore a 0 per cent proportion of overall programming.

At ProSieben Austria, the accessible proportion of television programming is broadcast in the category of entertainment. The broadcaster plans to increase its proportion of accessible content in this same category.

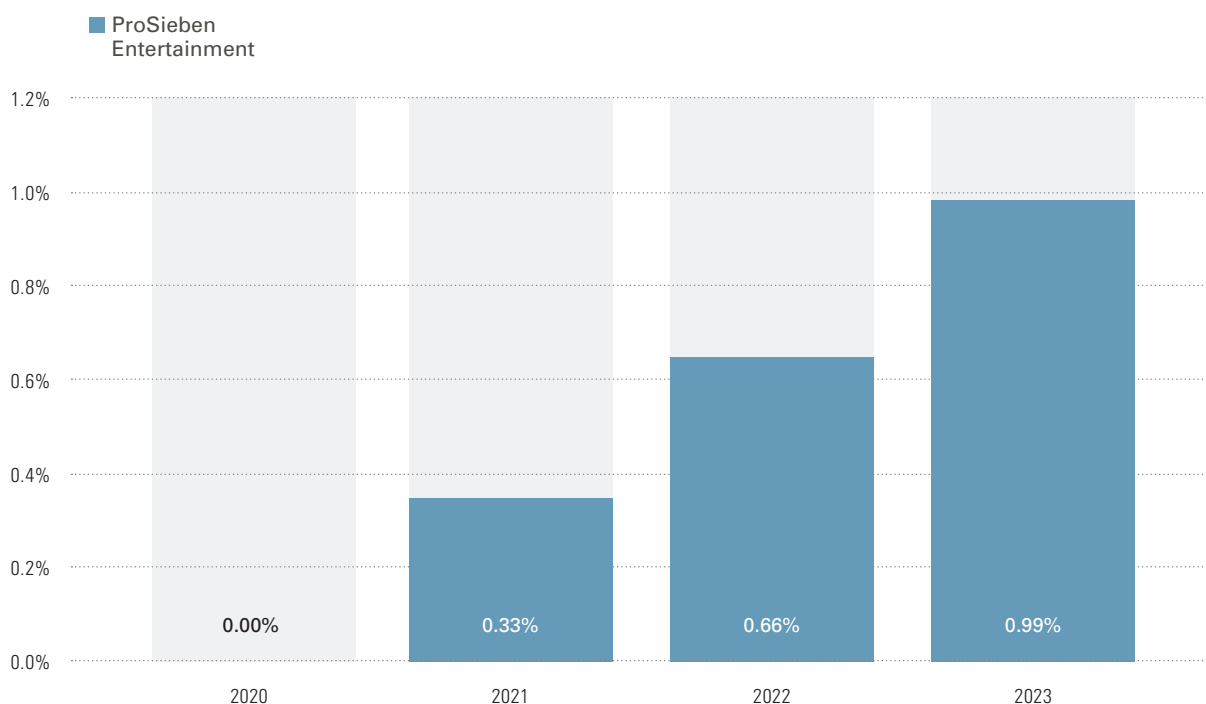
For the years 2021–2023, a progressive increase in the proportion of accessible broadcasts on ProSieben Austria is planned. Existing technical solutions from the group parent company are to be used for the teletext subtitling of entertainment formats focusing on sustainability topics.

An internal working group (Systems Germany, Scheduling and Playout Germany) is also to be set up to coordinate and implement the measures.

The action plan has been published on the corporate website at <https://www.prosieben.at/service/barrierefreiheit/barrierefreiheit-prosieben-austria>.

Please see the adjacent figure for a breakdown of the increases in figures.

**Figure 01: Planned increase for the ProSieben Austria channel according to action plan (in per cent)**



### Reporting requirements pursuant to Art. 30b Par. 3 AMD-G

ProSieben Austria GmbH fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G by the given due date. In its report, the company stated that the overall volume of Austria-specific programming via ProSieben Austria significantly exceeded the original figure planned (a broadcasting time of 40,254 minutes had been planned but was then higher for the year).

For this reason, the percentage proportion targeted by means of a fixed schedule of broadcasts with accessible content was not achieved (a figure of 0.33 per cent had originally been planned).

The company also stated that Covid-19 had restricted the production of broadcast content (with accessible content) in the second half of the year, with subtitled Austria-specific programming appearing less often as a result of rescheduling issues in syndicated programming. To compensate for this non-fulfilment, the company plans to increase the volume and exceed fulfilment targets in 2022.

In the 2021 reporting period, 49.83 minutes (0.1%) of accessible broadcasts in overall channel programming were subtitled.

ProSieben Austria GmbH provided justifications for its non-fulfilment of the measures and increases set out in the action plan. The company listed the steps that it will take to make up for lost ground and attain the original increase planned by the end of 2022, and to achieve the target increase for 2023.

## 3.2 SAT.1 Privatrundfunk und Programmgesellschaft mbH

In its action plan, SAT.1 Privatrundfunk und Programmgesellschaft mbH noted that it has offered accessible content for the last eight years as part of its syndicated SAT.1 programming. At SAT.1 Österreich, with daily Austria-specific programming of just under 120 minutes, the topic of accessibility has received insufficient attention to date. In the reference year (2020), total broadcasting time amounted to 44,056 minutes, of which 0 minutes were accessible and therefore a 0 per cent proportion of overall programming.

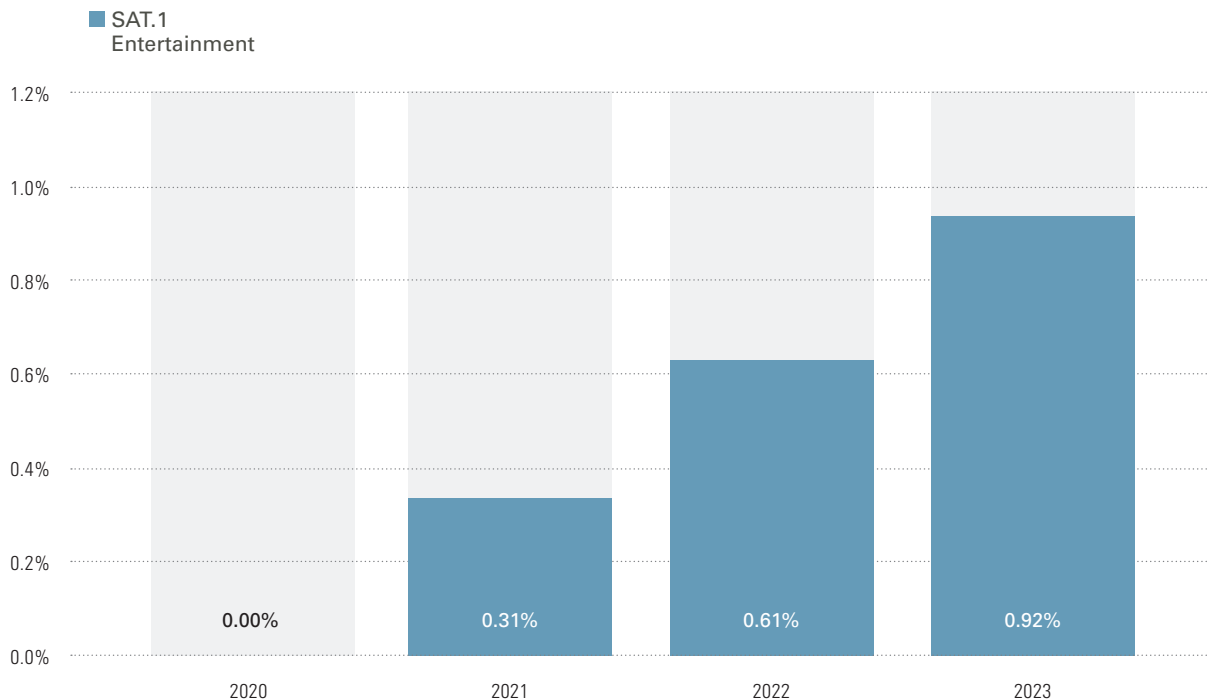
At SAT.1 Österreich, the accessible proportion of television programming is broadcast in the category of entertainment. The broadcaster plans to increase its proportion of accessible content in this category.

For the years 2021–2023, a progressive increase in the proportion of accessible broadcasts on SAT.1 Österreich is planned. Existing technical solutions from the group parent company are to be used for the teletext subtitling of entertainment formats focusing on sustainability topics.

An internal working group (Systems Germany, Scheduling and Playout Germany) is also to be set up to coordinate and implement the measures.

The action plan has been published on the corporate website at <https://www.sat1.at/service/barrierefreiheit/barrierefreiheit-sat-1-oesterreich>.

Please see the adjacent figure for a breakdown of the increases in figures.

**Figure 02: Planned increase for the SAT.1 Österreich channel according to action plan (in per cent)**


#### Reporting requirements pursuant to Art. 30b Par. 3 AMD-G

SAT.1 Privatrundfunk und Programmgesellschaft mbH fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G by the given due date. In its report, the company stated that the overall volume of Austria-specific programming broadcast via SAT.1 Österreich significantly exceeded the original figure planned (a broadcasting time of 44,056 minutes had been planned but was then much higher for the year).

For this reason, the percentage proportion targeted by means of a fixed schedule of broadcasts with accessible content was not achieved (a figure of 0.31 per cent had originally been planned).

The company also stated that Covid-19 had restricted the production of broadcast content (with accessible content) in the second half of the year, with subtitled Austria-specific programming appearing less often as a result of rescheduling issues in syndicated programming.

To compensate for this non-fulfilment, the company plans to increase the volume and exceed fulfilment targets in 2022.

In the 2021 reporting period, 49.83 minutes (0.1%) of accessible broadcasts in overall channel programming were subtitled.

Furthermore, the percentage figure in the action plan for SAT.1 Österreich for the entertainment category (0.5%) references the total broadcasting time in this category.

SAT.1 Privatrundfunk und Programmgesellschaft mbH provided justifications for its non-fulfilment of the measures and increases set out in the action plan, and listed the steps that it will take to make up for lost ground and attain the original increase planned by the end of 2022, and to achieve the target increase for 2023.



### 3.3 PULS 4 TV GmbH & Co KG

In its action plan, PULS 4 TV GmbH stated that accessible content had previously received little attention at PULS 4 and PULS 24, although some editorial content had been provided in this context in the past. In the reference year (2020), total broadcasting time at PULS 4 and PULS 24 amounted to 525,600 minutes, of which 0 minutes were accessible and therefore a 0 per cent proportion of overall programming.

At PULS 4 and PULS 24, the accessible proportion of television programming is broadcast in the category of entertainment. The broadcaster plans to increase its proportion of accessible content in this category.

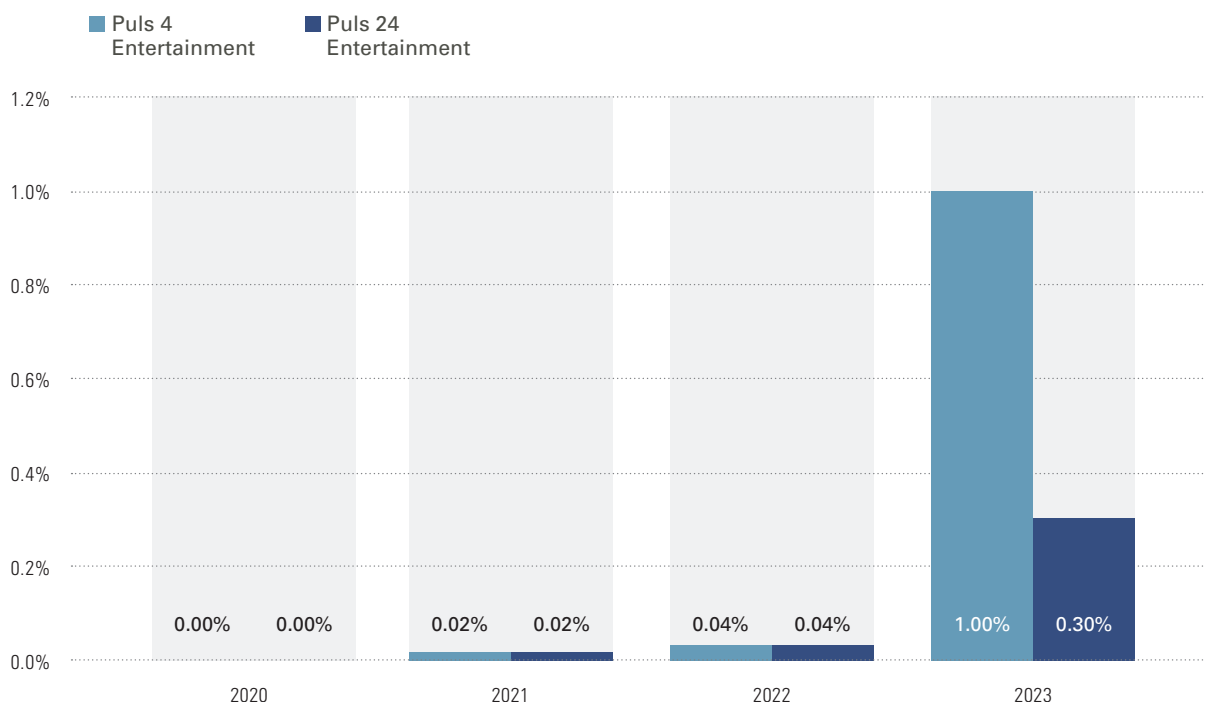
For the years 2021–2023, a progressive increase in the proportion of accessible broadcasts on PULS 4 and PULS 24 is planned. The action plan further states that an internal working group (consisting of the editorial, systems, scheduling and playout teams) was set up in 2021 to coordinate and implement the measures.

Initially, during 2021 and 2022, the annual increase is to be achieved primarily by subtitles in entertainment formats that are hardcoded into moving image content. The expansion of accessible programming is to be accelerated following the implementation of an option to show subtitles via teletext.

The action plans have been published at <https://www.puls24.at/service/barrierefreie-inhalte-aktionsplan/255811> and <https://www.puls4.com/service/nutzungsbedingungen/barrierefreier-content>.

Please see the adjacent figure for a breakdown of the increases in figures.

**Figure 03: Planned increase for the PULS 4 and PULS 24 channels according to action plan (in per cent)**



#### Reporting requirements pursuant to Art. 30b Par. 3 AMD-G

PULS 4 TV GmbH & Co KG fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G for both channels by the given due date.

On the PULS 4 channel, 88 minutes (0.02%) of broadcasts were subtitled in the entertainment category. In 2021, the target specified by the action plan was therefore achieved.

PULS 4 TV GmbH & Co KG draws attention to an error that occurred in the action plan for the PULS 24 channel, noting that the percentage figure given for total broadcasting time is incorrect although the figure for minutes is correct.

On the PULS 24 channel, 88 minutes (0.02%) of broadcasts were subtitled in the entertainment category. Accordingly, the figure achieved for the PULS 24 channel exceeds the target in the action plan.

### 3.4 ATV Privat TV GmbH & Co KG

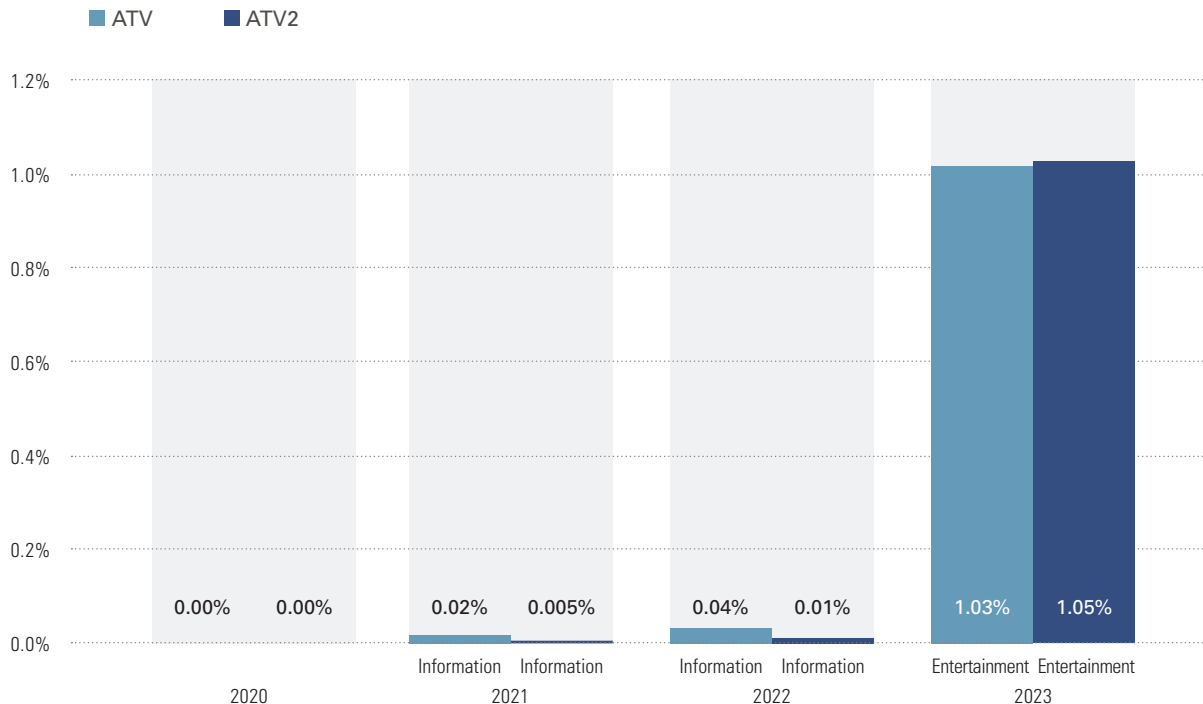
ATV Privat TV GmbH & Co KG stated that the topic of people with disabilities had received little attention at ATV and ATV2 in the past. The broadcaster had therefore implemented very few accessibility measures in the 2020 reference year.

During the period 2021 and 2022, the progressive increase in the proportion of accessible broadcasts on ATV and ATV2 is to be achieved primarily by the inclusion of sign language interpreters in chat shows. From 2023 onwards, the main focus will be on the subtitling of entertainment formats.

After increasing accessible content primarily in the news and current affairs category, the focus will switch to the entertainment category from 2023.

The action plans have been published at <https://www.atv.at/service/nutzungsbedingungen/aktionsplan-barrierefreie-inhalte>.

Please see the adjacent figure for a breakdown of the increases in figures.

**Figure 04: Planned increase for the ATV and ATV2 channels according to action plan (in per cent)****Reporting requirements pursuant to Art. 30b Par. 3 AMD-G**

ATV Privat TV GmbH & Co KG fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G for both channels by the given due date.

The percentage figure in the ATV action plan for the news and current affairs category (0.3%) references the total broadcasting time in this category.

For 2021, the figure for accessible broadcasts as a proportion of overall programming in the news and current affairs category on ATV was 104 minutes (0.02%). While this means that the target given for minutes in the action plan was exceeded, according to the annual report, this did not affect the percentage.

Aside from its action plan, ATV Privat TV GmbH & Co KG mentions a further measure introduced, namely providing recordings of 'ATV aktuell – Der Talk' with signing online at <https://www.atv.at/tv/atv-aktuell/atv-aktuell-der-talk-2021/atv-aktuell-spezial-der-talk-vom-10122021/atv-aktuell-spezial-der-talk-vom-10122021> and <https://www.atv.at/tv/atv-aktuell/atv-aktuell-der-talk-2021/atv-aktuell-spezial-der-talk/atv-aktuell-spezial-der-talk-vom-03122021>. This step is to be taken even though website revenues did not in fact oblige ATV to do so (pursuant to Art. 30b AMD-G) in 2021.

The percentage figure in the ATV2 action plan for the news and current affairs category (0.5%) references the total broadcasting time in this category.

Sign language interpreters accompanied broadcasts in the news and current affairs category on ATV2. For 2021, the figure for accessible broadcasts as a proportion of overall programming in the news and current affairs category on ATV2 was 104 minutes (0.02%). For the ATV2 channel, the minutes given in the annual report also exceeded the minutes target in the action plan. This achievement did not affect percentage figures, however.

### 3.5 Sky Österreich Fernsehen GmbH

Starting in autumn 2021, Sky Sport Austria has broadcast the top match in the Austrian Football Bundesliga every week live with subtitles. After reviewing technical data on this 2021 pilot phase, Sky Österreich Fernsehen GmbH plans to broadcast the following matches with live subtitling in 2022: all top matches on Sunday plus the top matches at the start of the first and second halves of the season.

In 2023, live subtitling services will be further expanded to broadcasts of the Bundesliga match commentary and analysis shows.

Since Sky Sport Austria is a sports channel, targets can only be achieved in the sport category.

According to Sky Österreich Fernsehen GmbH, Blue Movie is the largest legal adult entertainment channel in German-speaking Europe. Programming for this channel is managed by an all-female team.

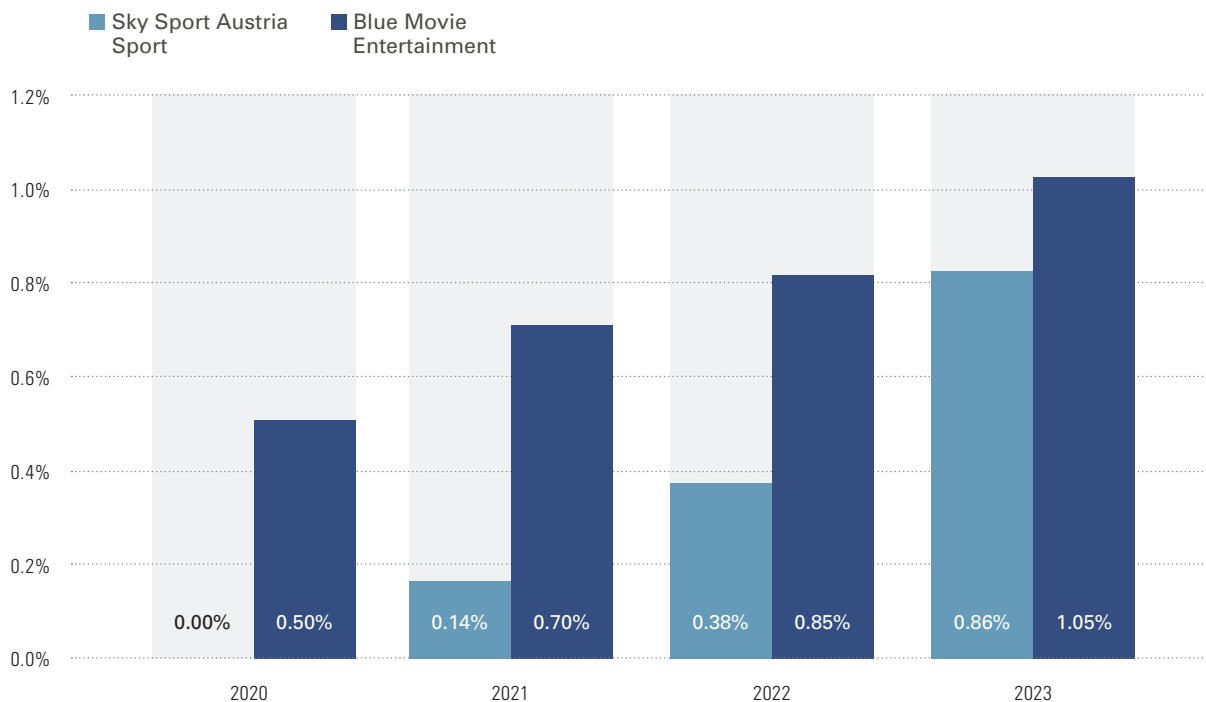
While Blue Movie will also be focusing on subtitling for the period 2021–2023, the topic of accessibility will also be considered during licensing negotiations for new content.

Since Blue Movie is a pure-play entertainment channel, targets can only be achieved in the entertainment category.

The action plan has been published at [https://www.sky.at/static/img/abonnieren/Sky-AT\\_Aktionsplan\\_Barrierefreiheit\\_2021-2023\\_NEU.pdf](https://www.sky.at/static/img/abonnieren/Sky-AT_Aktionsplan_Barrierefreiheit_2021-2023_NEU.pdf).

Please see the adjacent figure for a breakdown of the increases in figures.

**Figure 05: Planned increase for the Sky Sport Austria and Blue Movie channels according to action plan (in per cent)**



### Reporting requirements pursuant to Art. 30b Par. 3 AMD-G

Sky Österreich Fernsehen GmbH fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G for both channels by the given due date.

During the reporting period, subtitles were created and added to content by an external service provider. Finalisation and playout on the channel were then handled by SKY Technology.

In the 2021 reporting period, 900 minutes (0.17%) of accessible broadcasts in overall programming for the Sky Sport Austria channel were subtitled. Accordingly, the figure stated in the annual report exceeds the target in the action plan.

In the 2021 reporting period, 3,461 minutes (1.57%) of accessible broadcasts in overall programming for the Blue Movie channel were subtitled. Here too, the figure stated in the annual report thus exceeds the target in the action plan.

## 3.6 A1now TV GmbH

A1now TV GmbH provides the A1 Xplore TV service. The A1 video library forms part of this service, and provides films and series in a video on demand format. As of this writing, content held in the A1 video library includes around 2,000 films (cinema films), 7,200 TV series, 2,100 series for children and 2,500 erotic films for adults (18+).

Viewers can access a large number of television broadcasters with A1 Xplore TV. Additional features provided include access to streaming apps such as ORF TVthek, Amazon Prime Video and YouTube, as well as electronic programme guides and recording functionality.

A1 Xplore TV subscribers are provided with a dedicated box that can be connected directly to the TV set or can also be used as an app on mobile end-user devices. A1 Xplore TV also plans to extend access to smart TVs in the future.

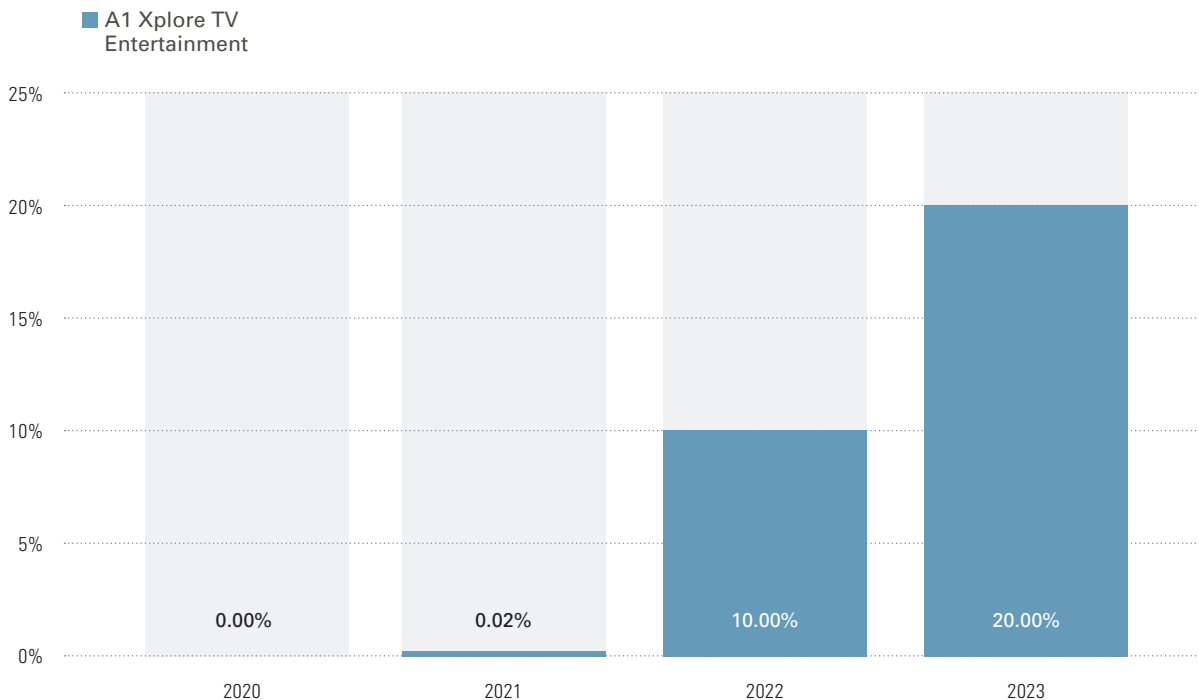
A remote control is provided for use with the A1 Xplore TV Box and this is also used to access the video library.

This remote control can be used to activate subtitles: the user accesses a page showing details of the film to find out whether subtitles are supported and in which languages. The language for the audio track or for the subtitles can then be selected in the settings. While the film is running, option buttons are also available for selecting audio and subtitle language variants.

The only category served by the video library is the category of entertainment.

The action plan has been published on the corporate website at <https://www.a1.net/agb>.

Please see the adjacent figure for a breakdown of the increases in figures.

**Figure 06: Planned increase for the A1 Xplore TV channel according to action plan (in per cent)****Reporting requirements pursuant to Art. 30b Par. 3 AMD-G**

A1now TV GmbH fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G by the given due date, also noting that technical requirements for displaying subtitles on its platform (user interface/database) had been implemented in the fourth quarter of 2021.

Aside from the action plan, preparatory work had also been completed on voice control of the A1 Xplore TV Box as an alternative to the remote control.

In the 2021 reporting period, 297 minutes (0.03%) of accessible broadcasts in overall channel programming were subtitled. Accordingly, the figure stated in the annual report exceeds the target in the action plan.

**3.7 T-Mobile Austria GmbH**

Magenta On Demand offers thousands of films and series in a transactional video on demand (TVOD) format for Magenta customers throughout Austria.

Transactional video on demand services utilise a billing format whereby the audiovisual media service offers access to individually streamable titles from the overall catalogue (or parts thereof), which are billed to the respective service user according to the content as accessed.

This video on demand service not only encompasses films and series but also other kinds of TV content that are licensed from major studios (Disney, Universal, Warner Bros, Sony, MGM) and independent studios (e.g. Constantin, Splendid, Ascot Elite, Hoanzl) as well as from producers and TV channels.

All content provided by Magenta On Demand is classified as entertainment, so targets can only be achieved in the entertainment category.



In the 2020 reference year, subtitles were provided for 4,894 hours and 22 minutes of total entertainment content.

With the introduction of electronic sell-through (EST), T-Mobile Austria GmbH plans to increase the proportion of content with subtitling over the next three years.

For some customers, voice control is already available in connection with the Entertain Box 4K. This allows users to navigate through the menu with voice commands and will be further expanded over the next few years.

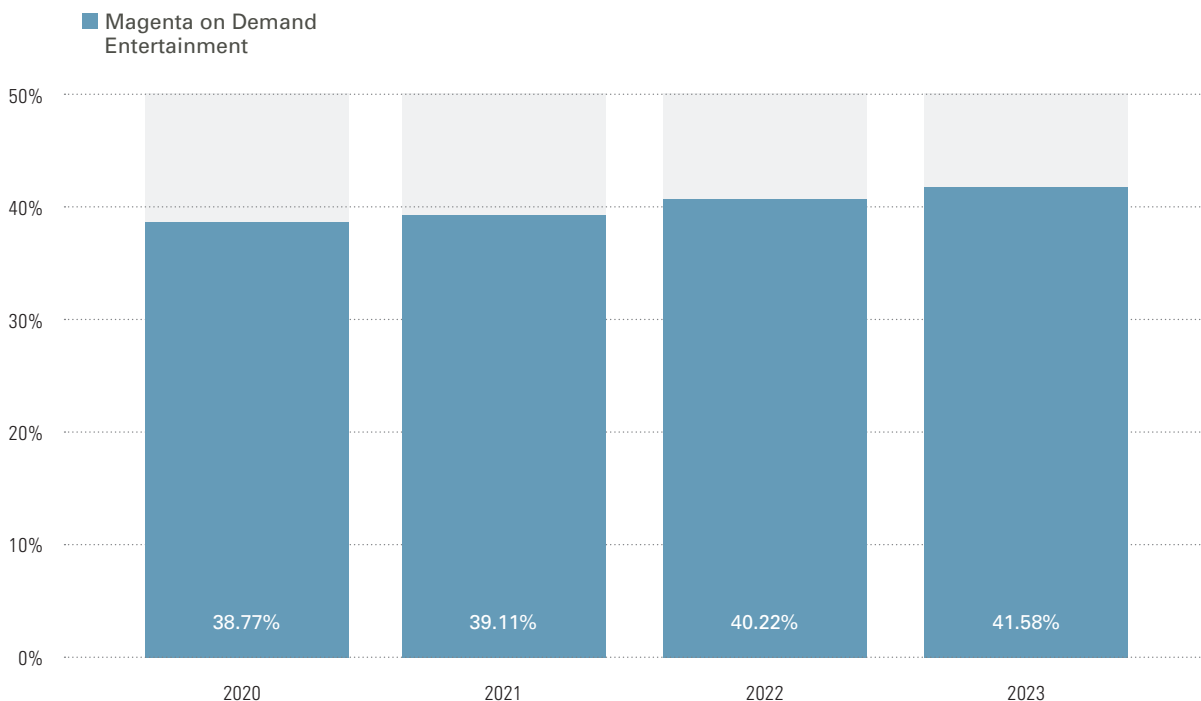
Since Magenta On Demand does not produce content itself, T-Mobile Austria GmbH notes that there is a key dependency on content suppliers. However, all contracts with content suppliers and film studios already contain provisions that subtitled content should be offered wherever possible. T-Mobile Austria GmbH further notes that it has prioritised discussions about audio descriptions with its content suppliers, although this does presuppose the existence of an audio description at the point of content delivery.

Since this is not always the case, T-Mobile Austria GmbH is negotiating a partnership with the GRETA app, which provides audio descriptions and subtitles for many productions. In 2022, the company is planning key negotiations with interested parties as well as the app company Greta & Starks Apps GmbH.

The action plan has been published on the corporate website at [https://www.magenta.at/faq/entry/~technische-anfrage~fernsehen~features/~MagentaTV\\_Barrierefreiheit~master](https://www.magenta.at/faq/entry/~technische-anfrage~fernsehen~features/~MagentaTV_Barrierefreiheit~master).

Please see the figure below for a breakdown of the increases in figures.

**Figure 07: Planned increase for the Magenta On Demand channel according to action plan (in per cent)**



### Reporting requirements pursuant to Art. 30b Par. 3 AMD-G

T-Mobile Austria GmbH fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G by the given due date. T-Mobile Austria GmbH noted that, aside from Magenta On Demand, it also pursues a strategy of simplifying access to content for affected groups of individuals in its linear TV programming. This is achieved by providing content with closed captions (CC) and an audio description (AD) wherever possible.

The voice search functionality helps customers to select channels, open a variety of apps and navigate within the user interfaces, as well as offering controls for the player (scrub, pause, record and play).

Outside of its action plan, T-Mobile Austria GmbH also seeks to expand its portfolio of accessible content by integrating external services such as the GRETA app.

In the 2021 reporting period, 297,900 minutes (39.11%) of accessible broadcasts in overall channel programming were subtitled. Accordingly, the figure stated in the annual report meets the target in the action plan.

## 3.8 Red Bull Media House GmbH

Red Bull Media House GmbH states that it has decided to deploy teletext as a platform for its accessible linear TV content.

Viewers can use the existing teletext service to manage subtitles for the respective broadcasts. The TV remote control can be used to select an audio description as a second audio track.

The ServusTV and ServusTV Deutschland channels broadcast many types of programming, including news and current affairs, documentaries, live sport, other sports events and sports reporting. Feature films and classic movies are also offered as part of channel commissioning, and in-house productions are also made available.

Red Bull Media House GmbH offers its ServusTV media library at [www.servustv.com/mediathek](http://www.servustv.com/mediathek), comprising videos from current ServusTV programming in the categories of news and current affairs, the arts, nature, sport, entertainment, science and popular culture.

In the baseline year, the proportion of accessible programming in all five categories was 0 minutes.

In the period addressed by the action plan (2021–2023), accessible content proportion targets are to be reached by implementing technical measures with the teletext service.

In the first year, subtitling will be handled from a technical perspective by integrating the ServusTV media library as required. This is to be provided as a time-shifted service. Following this, the activation of subtitles in linear TV programming should be achievable in the course of 2022.

The overall target for increasing the proportion of audiovisual content made accessible to individuals with hearing and vision loss is 5.4 per cent of total ServusTV time, excluding nighttime and live programming.

In 2021, the increase in audiovisual content made accessible to individuals with hearing loss is to be achieved in the news and current affairs category.

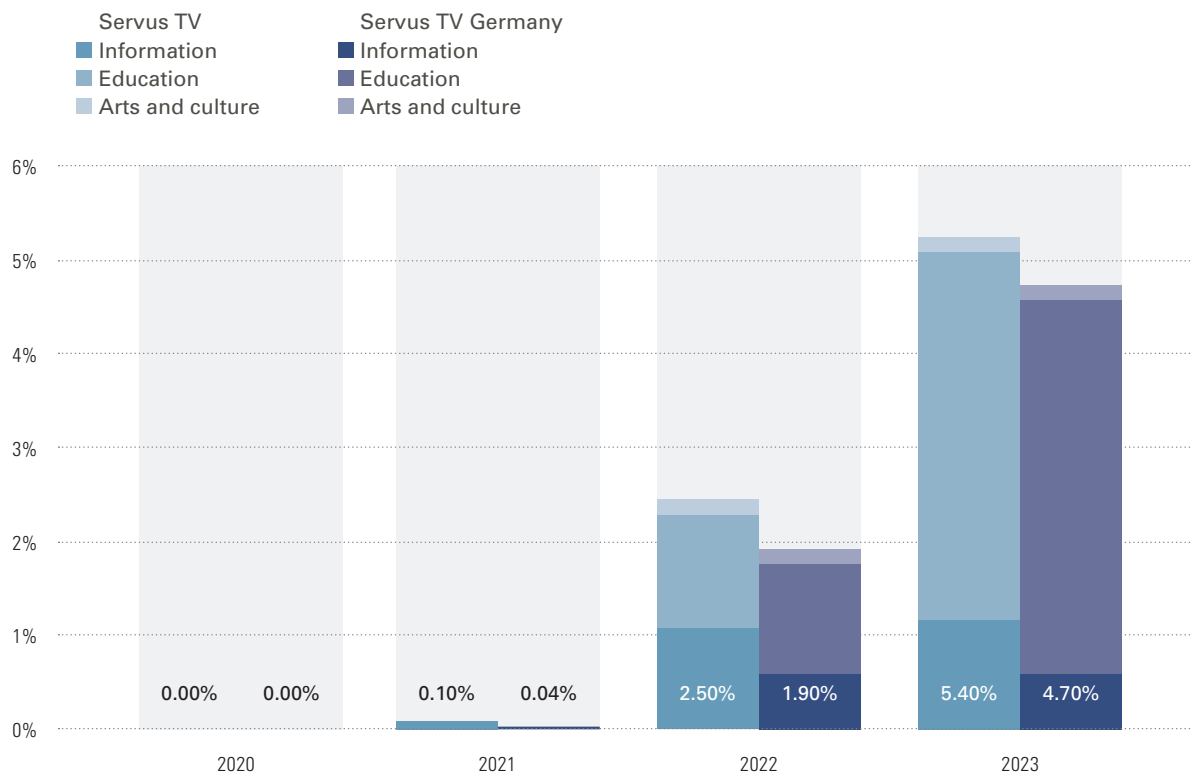
Starting in the second quarter of 2022, broadcasts in the category of education (Hoagascht, Terra Mater and documentaries) will also be offered with subtitles. A subtitled programme will also be broadcast in the category of arts and culture (KULTour).

In 2023, the broadcaster plans to further expand measures implemented to date and to provide subtitles to another programme in the education category.

The action plans have been published at <https://richtlinien.servus.com/policies/Servus/202112291520/de/imprint.html>.

Please see the figure below for a breakdown of the increases in figures.

**Figure 08: Planned increase for the Servus TV and Servus TV Deutschland channels according to action plan (in per cent)**



### Reporting requirements pursuant to Art. 30b Par. 3 AMD-G

Red Bull Media House GmbH fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G by the given due date.

The broadcaster noted that, in the first reporting year, subtitling was handled from a technical perspective by integrating the ServusTV media library. As part of continued technical expansion, although delayed as a result of the general supply chain difficulties experienced in the market, the activation of subtitles in linear TV programming should be achievable during 2022.

Since 6 December 2021, Servus news programmes have been provided in the media library as subtitled recordings to meet targets in the news and current affairs category.

In the 2021 reporting period, 342 minutes (0.1%) of accessible broadcasts in overall channel programming for ServusTV were subtitled. The figure stated in the annual report therefore exceeds the target given in the action plan.

In the 2021 reporting period, 193 minutes (0.04%) of accessible broadcasts in overall programming for the ServusTV Deutschland channel were subtitled. Here too, the figure stated in the annual report exceeds the target given in the action plan.

### 3.9 ViktoriaSarina

The YouTube channel ViktoriaSarina publishes videos that are generally intended for a young audience. Videos of around ten minutes in length are uploaded twice a week on average.

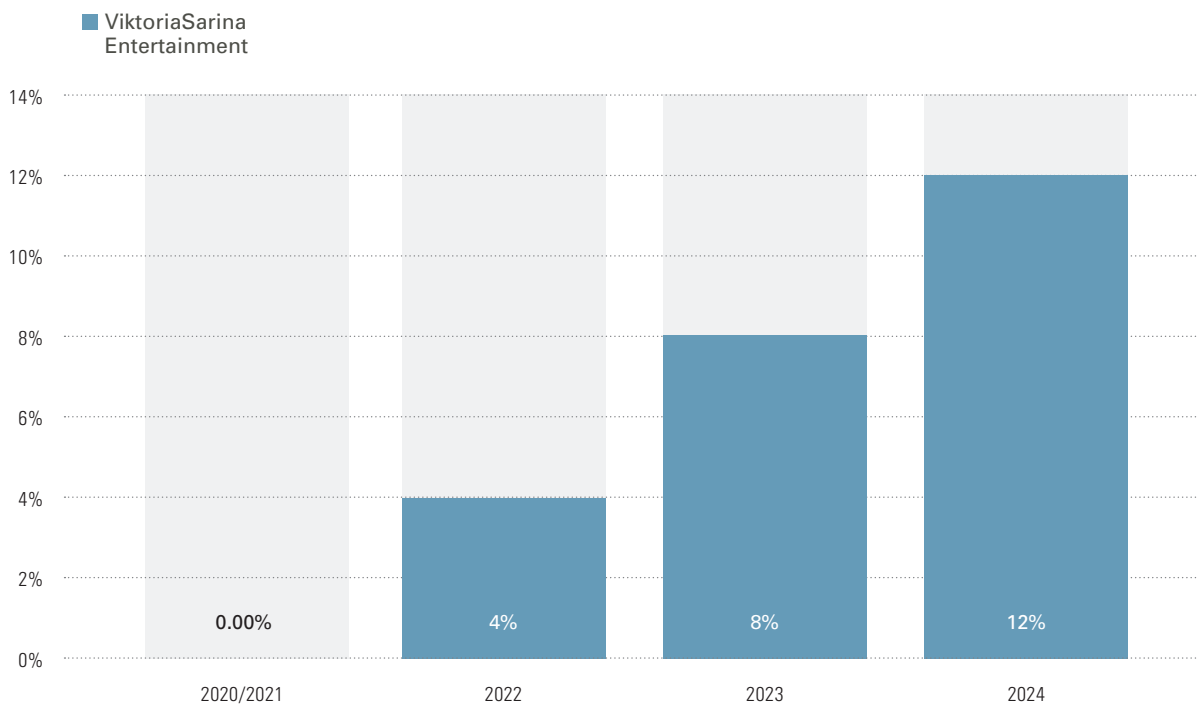
Until 2021, no specific measures had been introduced in order to improve accessibility to this on-demand service. On the other hand, the language used in videos uploaded to date is relatively straightforward and descriptive, since the channel is aimed at younger viewers.

The proportion of videos using simple language will be progressively increased during 2022–2024. A stepwise increase is planned, with one video per quarter, two videos per quarter and three videos per quarter being uploaded in the years 2022, 2023 and 2024, respectively.

Since the ViktoriaSarina channel only publishes entertainment videos, targets are fulfilled only for this category. The action plan has been published at <https://www.youtube.com/c/ViktoriaSarina/about>.

Please see the figure below for a breakdown of the increases in figures.

**Figure 09: Planned increase for the ViktoriaSarina YouTube channel according to action plan (in per cent)**



#### Reporting requirements pursuant to Art. 30b Par. 3 AMD-G

The media service provider for this channel, Sa Fira Blue GmbH, fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G by the given due date.

In 2021, a comparatively simple and descriptive language was used in the channel's videos.

The figure stated in the annual report meets the target in the action plan.

### 3.10 MediaShop GmbH

MediaShop GmbH operates the teleshopping channel MediaShop Meine Einkaufswelt.

MediaShop Meine Einkaufswelt broadcasts sales infomercials 24 hours a day.

In the baseline year, the proportion of accessible programming in the category of entertainment was 0 minutes.

As a first step, a working group on accessibility was set up so as to institutionalise the issue at a company-wide level.

The company envisages expanding its accessible programming by making changes to both technical aspects and content, such as technical improvements to image quality.

The size of fonts used in infomercials will be increased and keywords describing the image content will also be increasingly used in new infomercial productions.

Where feasible in terms of content, MediaShop GmbH will involve disability associations in the evaluation and increased use of simple language in infomercials.

From the second quarter of 2022, the information provided will be kept short and simple, with guidance for viewers being improved by means of newly introduced station IDs and on-air promotion trailers. The use of simple language will be expanded as a general strategy. Screenwriting and scripts will be increasingly evaluated for accessibility, technical jargon will be reduced and abbreviations will be explained in more detail.

The use of audio descriptions will be expanded accordingly, with programme panels accompanied by speech renditions and telephone numbers spoken out loud.

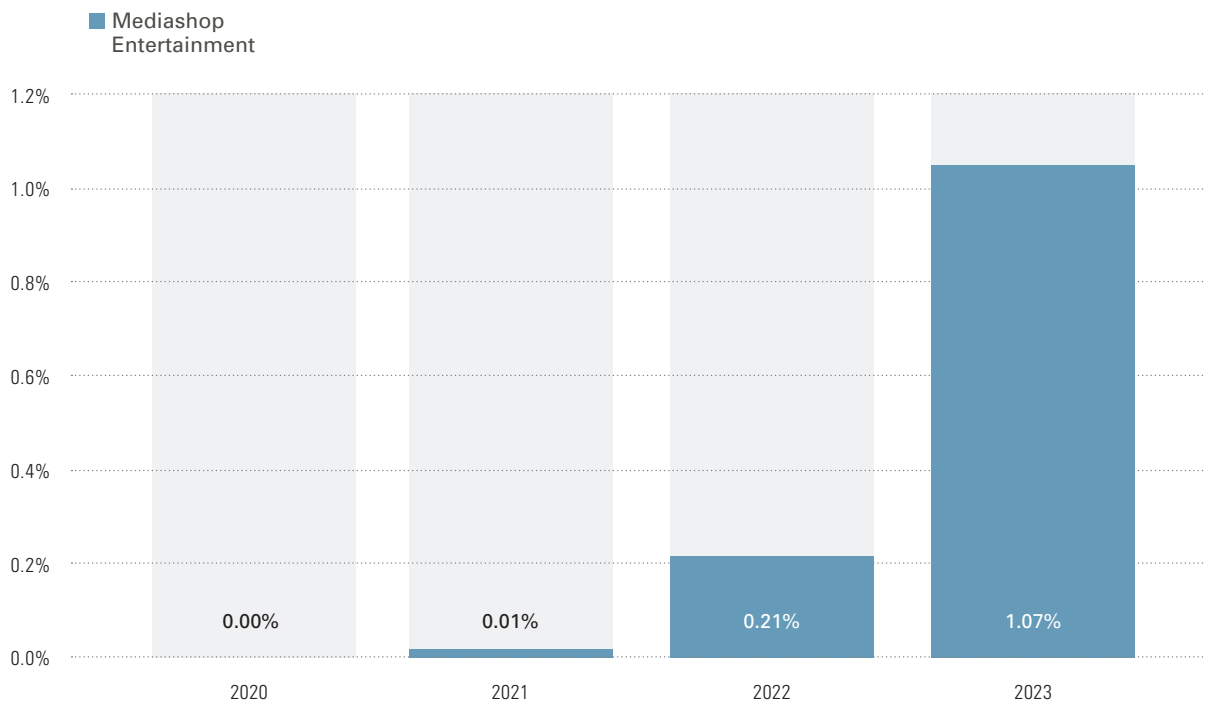
The introduction of programme items and information services with subtitles hardcoded into the image material is also planned.

From the second quarter of 2023, programme items with subtitles will be further expanded and certain informative trailers will be simultaneously interpreted using sign language.

The action plan has been published at <https://www.mediashop.tv/?ste=barrierefreiheit>.

Please see the figure below for a breakdown of the increases in figures.

**Figure 10: Planned increase for the Mediashop Meine Einkaufswelt channel according to action plan (in per cent)**



#### Reporting requirements pursuant to Art. 30b Par. 3 AMD-G

Media Shop GmbH fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G by the given due date.

The broadcaster noted that it had improved its image quality from 1.3 Mbps to 2 Mbps in September 2021. As a result, the broadcaster significantly improved the legibility of key items of information (fonts, graphics and ordering options), with technical improvements now establishing a general basis for further measures.

The broadcaster also stated that it had launched an electronic programme guide (EPG) to offer viewers guidance and information about products shown in the channel (product name, short description) in December 2021, in partnership with technical service provider dmb GmbH deutsche mailbox.

As the MediaShop Meine Einkaufswelt channel does not offer a teletext service, this measure would therefore provide a basic navigation aid.

In the 2021 reporting period, 25 minutes (0.01%) of accessible broadcasts in overall channel programming for Media Shop Meine Einkaufswelt were subtitled. Accordingly, the figure stated in the annual report meets the target in the action plan.



### 3.11 Melodie Express GmbH

Melodie Express GmbH operates the Melodie Express television channel.

In terms of technical implementation, Melodie Express GmbH notes that music videos containing subtitles have been successively created by hardcoding the subtitles into the video track.

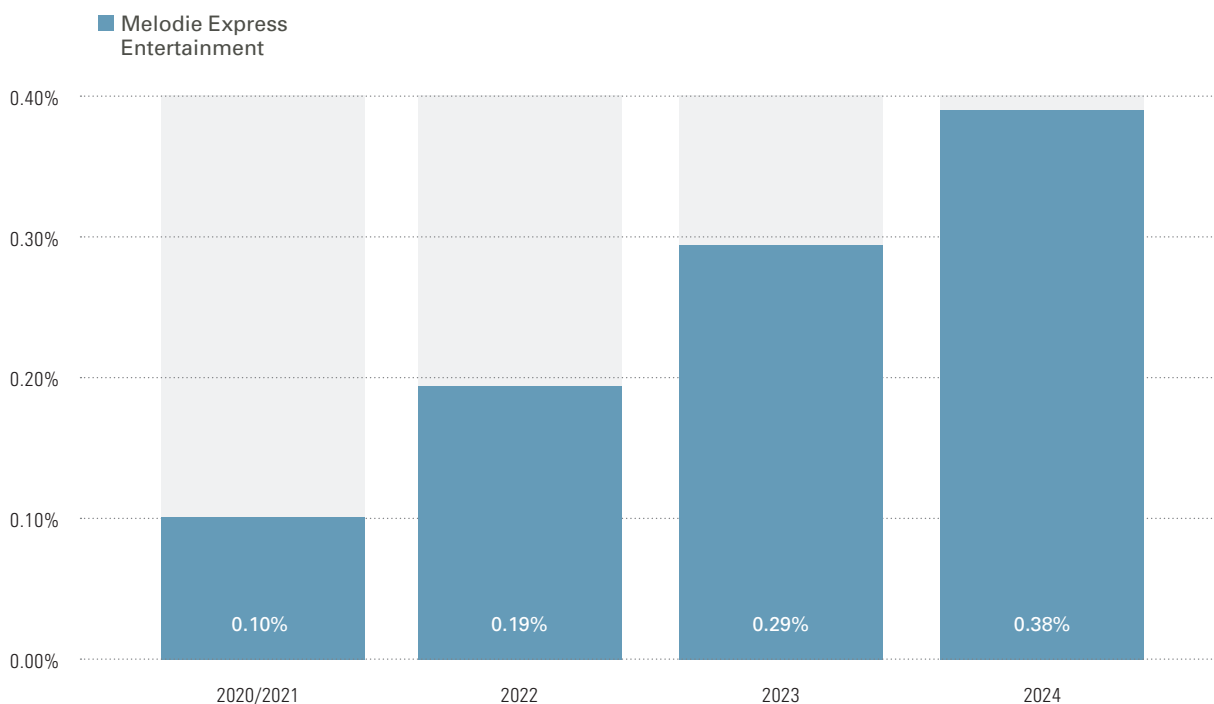
Within the action plan period of 2021–2023, accessible programmes are to be offered in the category of entertainment.

The broadcaster also states that the Austrian Federation of the Blind and Partially Sighted (BSVÖ) has confirmed in writing that no changes need to be made for Melodie TV programming.

The action plan has been published at <http://www.melodie.tv/cms/index.php/programmplan/medien/barrierefreiheit>.

Please see the figure below for a breakdown of the increases in figures.

**Figure 11: Planned increase for the Melodie Express channel according to action plan (in per cent)**



#### Reporting requirements pursuant to Art. 30b Par. 3 AMD-G

Melodie Express GmbH fulfilled its reporting duties pursuant to Art. 30b Par. 3 AMD-G by the given due date.

The report cites the technical implementation strategy set out in the action plan.

Aside from the action plan, the broadcaster also notes that all Melodie TV programming is ideally suited to a blind or partially sighted audience.

In the 2021 reporting period, 519 minutes (0.1%) of accessible broadcasts in overall channel programming for MelodieTV were subtitled. Accordingly, the figure for minutes stated in the annual report exceeds the action plan target. This did not affect the percentage figure, however.

### 3.12 Austrian Broadcasting Corporation (ORF)

As noted above in section 2, the ORF is subject to the provisions of Art. 5 Par. 2 ORF-G.

In its action plan, the ORF stated that current measures to provide accessible services at the ORF encompass subtitling, audio descriptions, Austrian sign language and simple language.

All of these measures will be progressively expanded. This expansion to accessibility will be supported by technical advances, which will include automated voice recognition software and avatars capable of sign language interpreting.

Within the scope of opportunities available to it, the ORF is planning to provide support for the development and expansion of these technical solutions. This will take the form of market analyses aimed at broadening the knowledge base in this field.

In addition, journalists working for the ORF will be appropriately trained in order to raise awareness about the importance of equal participation for people with and without disabilities.

Another point of focus involves engaging in dialogue with other media bodies and industry experts.

Selected measures in planning:

- Use of speech-to-text solutions (both in linear TV and online)
- Funding for the development of an Austrian language model for the automated generation of subtitles
- Synthetic voice audio descriptions
- Signing avatars
- Further expanding the proportion of accessible content in evening prime-time
- Increased focus on election reporting and children's programmes
- Focus on programming incorporating Austrian sign language interpreting

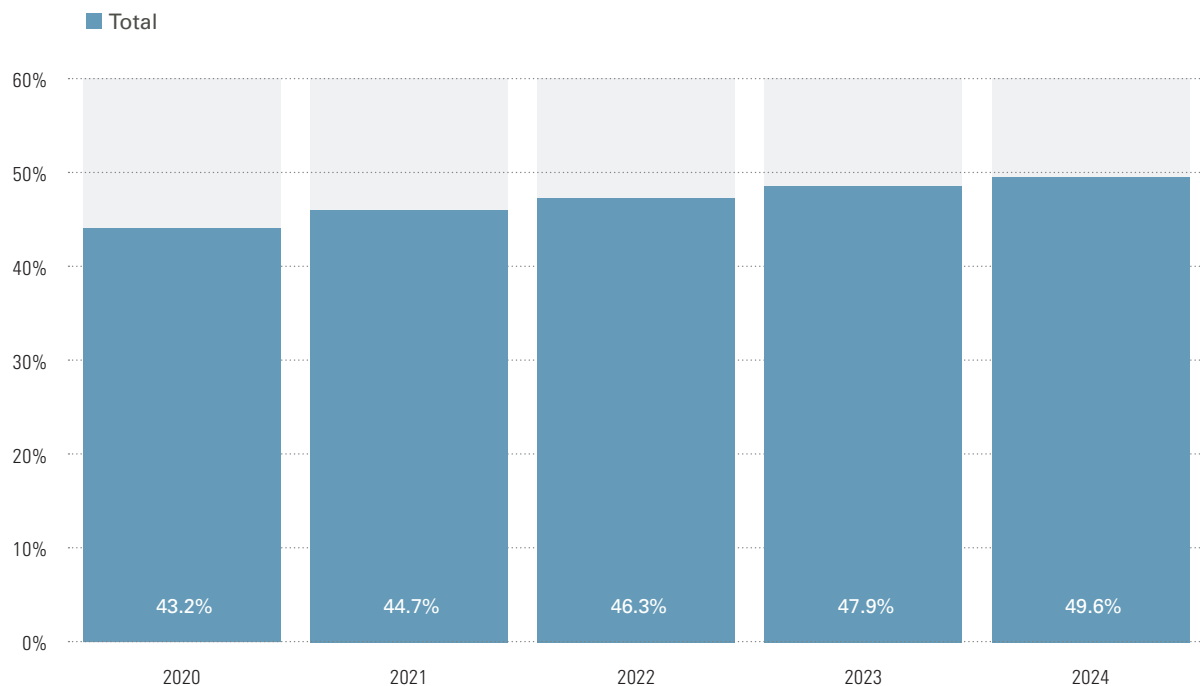
According to the action plan, the ORF fulfils its legal duties, and meets targets for the categories of news and current affairs, entertainment, education, and arts and culture.

Initial values from the year 2020 for subtitling, audio descriptions and signing:

Subtitling as a percentage of overall programming:

- ORF 1: 66.1 per cent or 5,810 hours of broadcasting
- ORF 2: 72.6 per cent or 6,376 hours of broadcasting
- ORF III: 32.9 per cent or 2,886 hours of broadcasting
- ORF Sport+: 1.27 per cent or 112 hours of broadcasting

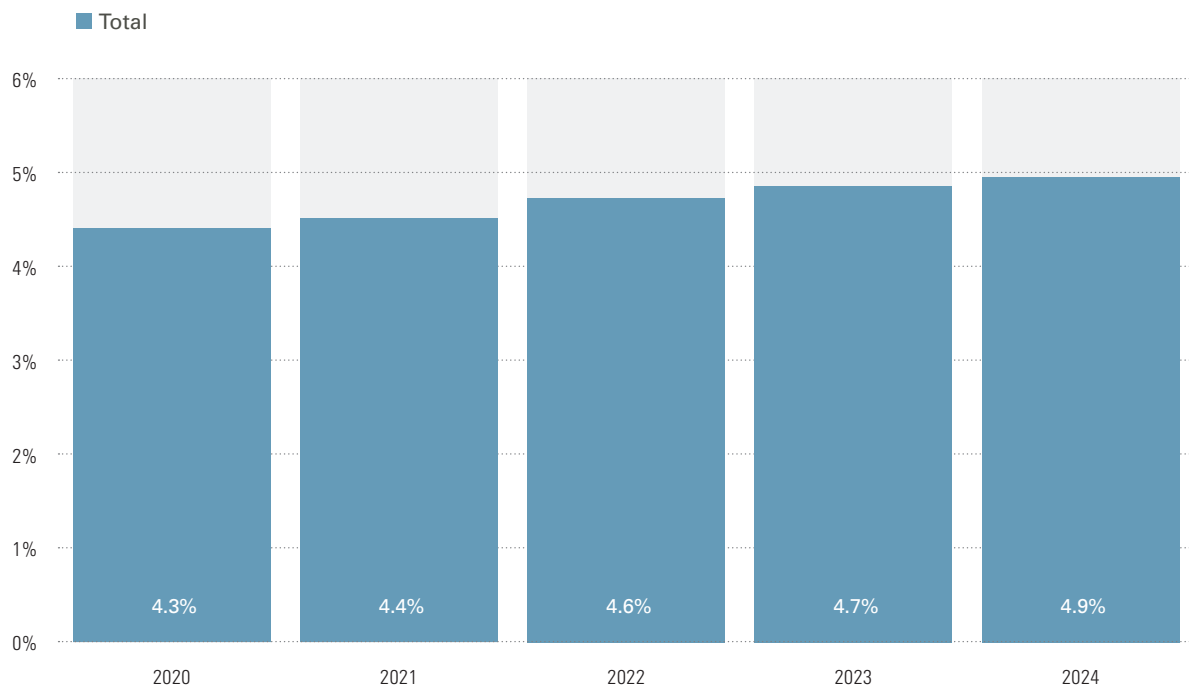
**Figure 12: Planned increase in subtitling across all ORF channels, according to action plan (in per cent)**



**Audio description and audio commentary:**

- ORF 1: 7.8 per cent or 688 hours of broadcasting
- ORF 2: 7.9 per cent or 695 hours of broadcasting
- ORF Sport+: 1.3 per cent or 115 hours of broadcasting

**Figure 13: Planned increase in audio descriptions across all ORF channels, according to action plan (in per cent)**



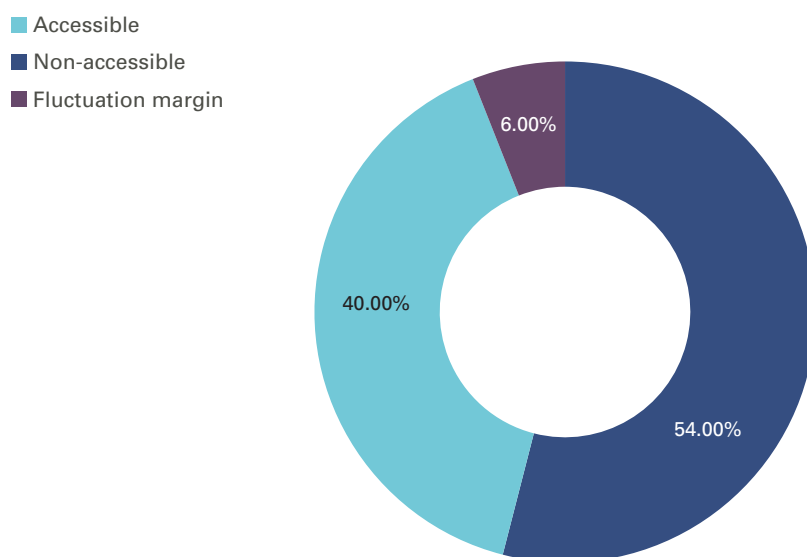
Austrian sign language:

- ORF 2, ORF III and ORF 2 Europe: 596 hours

The ORF TVthek media library is not an independent online service. An increase in accessible programming in television and associated measures will typically lead to an increase in accessible content available from the ORF TVthek.

Relevant additional online services such as online video archives should also be made more accessible in the ORF TVthek.

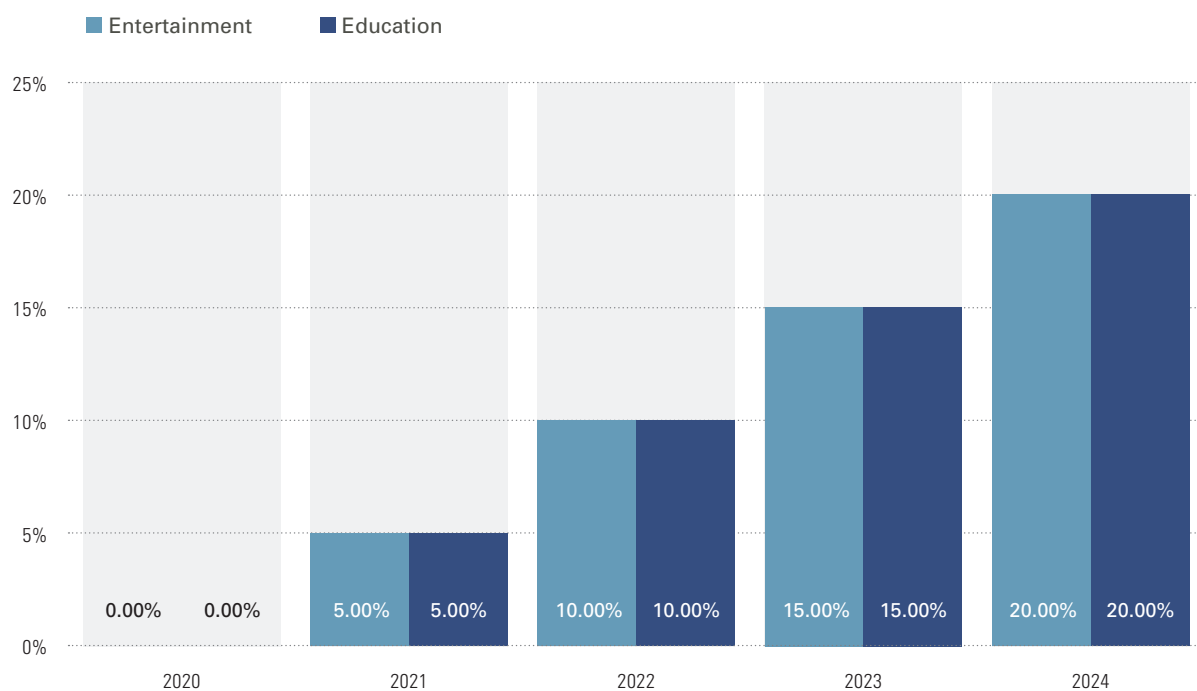
**Figure 14: Accessible and non-accessible content in the ORF TVthek in the 2020 reference year (in per cent)**



In the case of the independent Flimmit online platform, an average of 6,500 titles (with a total length of some 4,900 hours) were available at the time the action plan was created.

An annual increase of 5 per cent is planned here.

**Figure 15: Planned increase for the FLIMMIT platform according to action plan (in per cent)**



The action plan for the ORF's channels has been published at [https://zukunft.orf.at/show\\_content2.php?s2id=548](https://zukunft.orf.at/show_content2.php?s2id=548). By law, the ORF is also required to notify the regulatory authority about publication. This is achieved by submitting the action plan.

### Reporting requirements pursuant to Art. 5 Par. 2 ORF-G

The ORF fulfilled its reporting duties for all channels with reporting requirements by the given due date.

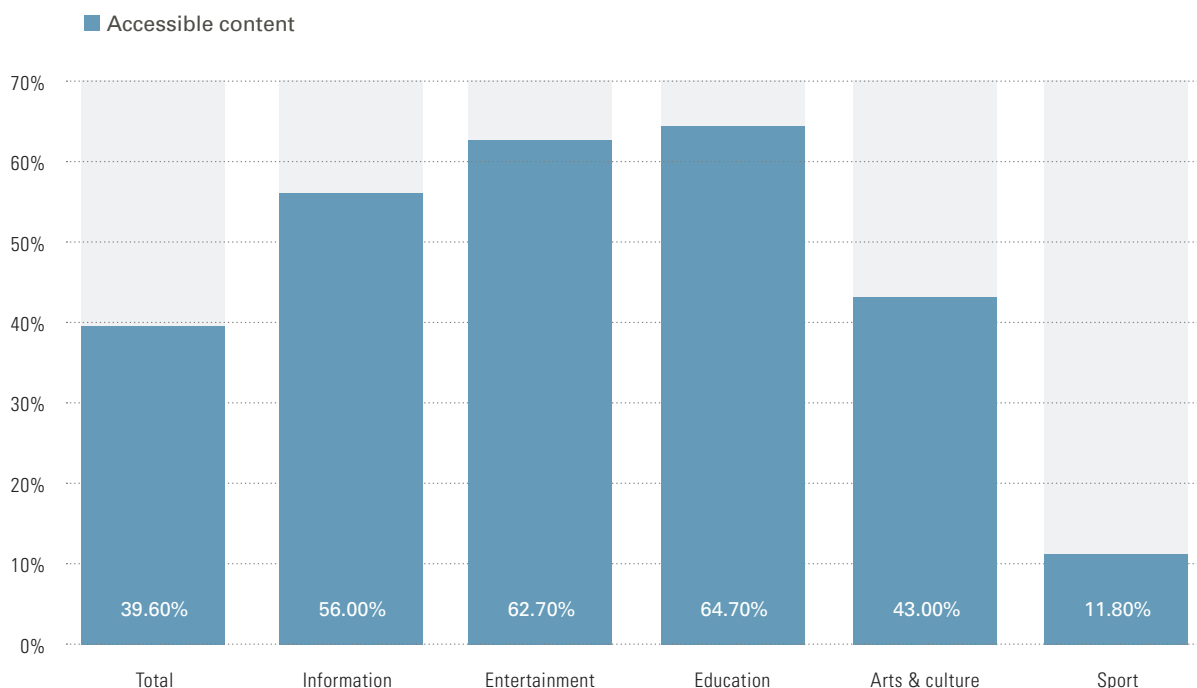
#### Flimmit:

In the 2021 reporting period, 15,240 minutes (5.9%) of accessible content in the overall Flimmit platform catalogue were subtitled. Of this figure, 11,640 minutes (5.1%) were in the entertainment category and 3,600 minutes (0.8%) were in the education category.

#### ORF TVthek:

Overall, 348,120 minutes (39.6%) of content from the media library as a whole were made accessible and subtitled, while 37,320 minutes (4.2%) of programmes simultaneously featured on-screen sign language interpretation of programme content. A total of 70,320 minutes (8%) were provided with an audio description while 478 minutes (0.1%) utilised simple language.

**Figure 16: Proportion of accessible content by category in the ORF TVthek in 2021 (in per cent)**





Overall, 56 per cent of content in the news and current affairs category in the ORF TVthek was made accessible in 2021, along with 62.7 per cent in entertainment, 64.7 per cent in education, 43 per cent in arts and culture, and 11.8 per cent in sport. As a result, 39.6 per cent of all ORF TVthek content was accessible.

### **Channels (ORF 1, ORF 2, ORF III and ORF SPORT+)**

According to the annual report, some 40 per cent of all ORF channel programming (ORF 1, ORF 2, ORF III and ORF SPORT+) in 2021 included at least one form of accessibility – whether this involved subtitling, an audio description and/or use of Austrian sign language.

The reports states that the ORF provided a total of 839,340 (39.92%) subtitled minutes in 2021, corresponding to 40 per cent (2020: 43.2%) of all programmes broadcast by the ORF.

The ORF noted that the financial consequences of the pandemic, together with cost-cutting measures necessary in previous years, had left their mark in 2021. Furthermore, the amendment to accessibility legislation that entered into force on 1 January 2021 had been adopted by the National Council at a point in time (December 2020) at which budget planning for 2021 was already final.

Despite a decline in the overall proportion of subtitled content, the proportion of wide-reach evening programming (6 pm to 10 pm with subtitles amounted to around 95.1 per cent on ORF 1 and 89.8 per cent on ORF 2, and so maintained the prior-year level (2020: ORF 1: 95.7%, ORF 2: 89.2%). In the case of news and current affairs, and children's programmes, the ORF states that the respective proportion of broadcasts with subtitling was increased (news: 48% in 2020 vs. 51% in 2021; children: 49% in 2020 vs. 54% in 2021).

There are plans to make up for this decline by the end of the following calendar year while simultaneously achieving the target increase for that year. To this end, the ORF plans to augment its externally sourced subtitling budget by 29 per cent year-on-year (with additional budgetary resources being primarily spent on entertainment content such as films and series), and make a one-time investment in order to compensate for the difference between 2020 and 2021 while also expanding its deployment of advanced technologies (such as speech-to-text).

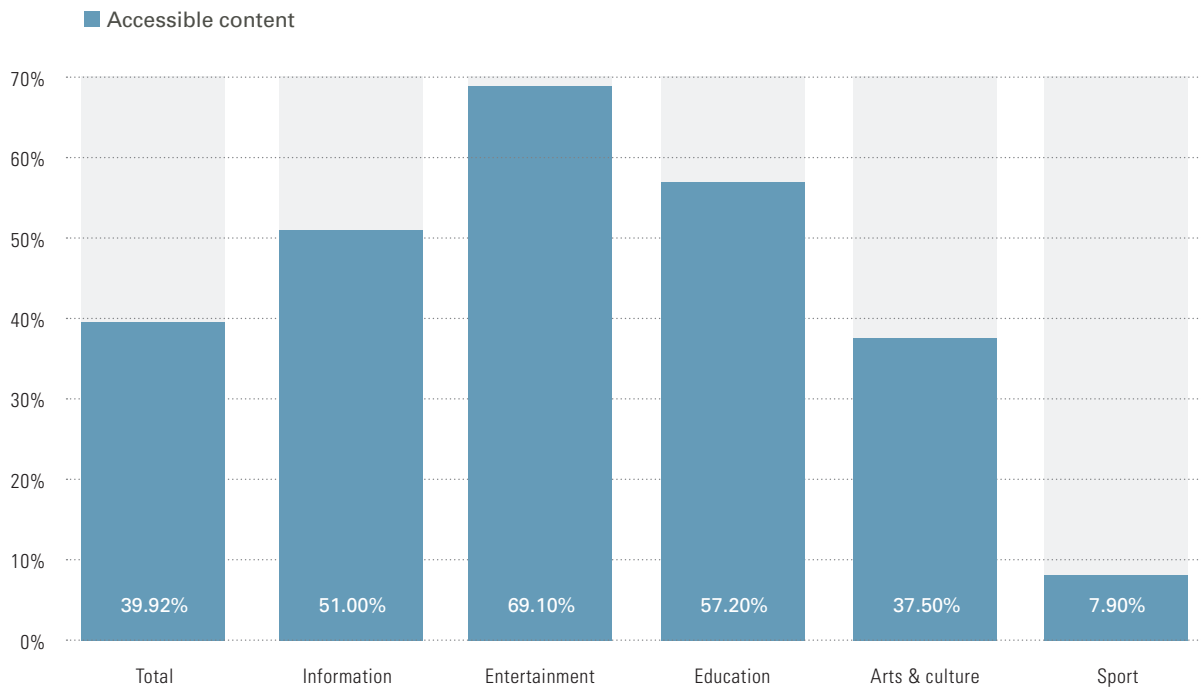
As regards the subtitling target, the ORF provided justifications for its non-fulfilment of the measures and increases set out in the action plan. The company listed the steps that it will take to make up for lost ground and attain the original increase planned by the end of 2022, and to achieve the target increase for 2023.

The ORF uses an audible signal and a visual indicator – by overlaying a corresponding logo – to mark audio descriptions, which are broadcast using a dual-channel mode for channel audio. In 2021, the ORF broadcast a total of 127,020 minutes (6.04%) across all four channels with a dedicated commentary for viewers with partial or total vision loss. On daily average, the ORF therefore provided 5 hours and 48 minutes of programming with audio descriptions in 2021. The figures stated in the annual report therefore exceed the targets given in the action plan.

The annual report states that a total of 36,600 minutes (1.74%) of broadcasts were provided with Austrian sign language, most being news programmes featuring press conferences given by the federal government on its Covid-19 measures. In 2020, this amounted to 35,760 minutes; accordingly, the figure given in the annual report exceeds the prior-year figure.

Content featuring simple language was also further expanded during 2021. Supplementing news programmes already provided in simple language (workdays at 7:25 pm on ORF III, every Sunday on Radio Vienna at 1:30 pm and 2:30 pm, daily in a special popup window on news.ORF.at, and, since summer 2017, in ORF TELETEXT, p. 470 ff. and p. 480), a recap of the week's news is also broadcast in simple language on Radio Styria every Friday. This is put together jointly by the Inclusive Editorial Training Team at Lebenshilfe Steiermark and ORF's regional Styrian studio.

**Figure 17: Proportion of accessible content by category on the channels ORF 1, ORF 2, ORF III and ORF Sport+ in 2021, as annual percentages**



Overall, 51 per cent of content in the news and current affairs category on the ORF 1, ORF 2, ORF III and ORF Sport+ channels was made accessible in 2021, along with 69.1 per cent in entertainment, 57.2 per cent in education, 37.5 per cent in arts and culture, and 7.9 per cent in sport. As a result, 39.92 per cent of all content on the ORF 1, ORF 2, ORF III and ORF Sport+ channels was accessible.

#### 4. Statement about further improvements to accessibility

Alongside the action plans submitted by the ORF, action plans for 15 channels from eleven media service providers were also received. A total of 15 annual reports followed, with the action plan and report being submitted together in two cases.

From the 15 reports submitted, it can be seen that only two media service providers were unable to attain the target set out in their action plan. At the same time, targets were actually exceeded in nine of these reports.

On account of failure to prepare an action plan, procedures were initiated against media service providers subject to legal requirements.

The proportion of accessible content was not increased equally in each of the five categories of news and current affairs, entertainment, education, arts and culture, and sport. This is partly a result of the fact that some media service providers do not offer content in every category. Indeed, the action plans from five media service providers state that they only provide content in the category of entertainment, for example.

Looking at the 15 action plans as a whole, an increase in accessible content took place twelve times in the entertainment category, four times in the news and current affairs category, twice each in the categories of education and arts and culture, and once in the sport category.

From this, it can be seen that improvements to accessibility take place significantly more often in entertainment than in the other categories. Only one media service provider, who operates two channels, intends to increase the proportion of accessible content in the categories of education, and arts and culture.

An increase in the proportion of accessible content in the sport category has occurred only in the case of one broadcaster, whose entire channel programming falls into the sport category. It should also be recalled that live broadcasts may constitute justifiable exemptions pursuant to Art. 30b Par. 1 AMD-G and therefore do not need to be made accessible. This is justified by the increased effort that would be required in order to make this kind of content accessible. As sporting events are often broadcast live, it can be assumed that media service providers do not envisage achieving an increase in the sport category for this reason – if indeed they offer any content in this category at all.

Also of interest is the fact that an increase in the proportion of accessible news and current affairs content is achieved on only four channels offered by two media service providers. This severely restricts the options available to individuals requiring accessible content when they wish to stay informed about current events – although Art. 30a Par. 1 AMD-G does require public service announcements in crises and disasters to be accessible. As regards other news and current affairs programming, only the ORF is required by law to make certain kinds of programmes accessible. An overall picture emerges whereby most providers are achieving an increase in accessible content solely in the entertainment category.

Excepted from this summary is the ORF, who, as a result of the legal obligations correspondingly discussed in section 2, must comply with specific provisions concerning the minimum increase to be achieved in all categories – with the exception of the category of sport. The ORF is obliged in particular to ensure accessibility for main evening programming (7 pm to 10 pm) and election broadcasts in general.

## 4.1 Subtitles

Subtitling provides a written version of spoken-word elements such as dialogue and (on-/off-camera) commentary, as well as music and sound effects. Subtitles therefore provide details of content that would otherwise be heard. Depending on the technical approach taken, subtitles can either be hardcoded directly into the video and therefore permanently visible or can be activated as required. While digital subtitling offers a wide range of options, this technique is not yet widespread in Austria.

It is noteworthy that measures for subtitling were a key point of focus for all media service providers. Subtitles are available in various formats in the services provided, including teletext subtitles, subtitles hardcoded into video material or live (real-time) subtitles.

In 2013, a common set of subtitling guidelines was published for the German market, which addresses teletext and DVB subtitling at the preproduction stage. These guidelines are recommended by the Austrian Association of the Deaf (ÖGLB) and the Austrian Council of Associations for Hearing Loss (ÖSB).<sup>05</sup> In January 2015, public television broadcasters in Austria, Germany and Switzerland agreed on a set of uniform standards for subtitling.<sup>06</sup> These encompass a series of basic principles for the presentation of subtitles in the German-speaking market, relating to aspects such as format, font size, colours and overlays.

<sup>05</sup> Untertitelrichtlinien.de, "Common subtitling guidelines for German-language use" (in German) <http://www.untertitelrichtlinien.de/index.html> (accessed on 21 April 2022)

<sup>06</sup> P. Chojnacki et al.: "Subtitling standards at ARD, ORF, SRF, ZDF" (in German) [http://www.untertitelrichtlinien.de/pdf/Untertitel-Standards\\_ARD\\_ORF\\_SRF\\_ZDF\\_Version\\_1.3.pdf](http://www.untertitelrichtlinien.de/pdf/Untertitel-Standards_ARD_ORF_SRF_ZDF_Version_1.3.pdf) (accessed on 21 April 2022)

## 4.2 Sign language<sup>07</sup>

Sign language is an officially recognised language based on a visual-manual modality that is used by people with hearing loss to communicate with one another. The language employs a combination of gestures, facial expressions and bodily posture. Many distinct sign languages exist as well as many dialects. For children who grow up signing, sign language is their native language.<sup>08</sup>

### 4.2.1 Sign language interpreters

Sign language interpreters, if used at all, are typically brought in to interpret for news programmes and press conferences.

The following points should be considered for their use:

- Camera positions should give a full view of the sign language interpreter, so that both hands are easily visible and cannot be cut off during the broadcast as a result of problematic angles.
- Ideally, a single camera will be used to cover the sign language interpreter and speaker so that they will stand next to one another. A bright background is also useful to make the interpreter's movements more easily visible.
- As an alternative, the interpreter can be shown in a box overlay, which should take up at least 25 per cent of the screen area.
- Interpretation should also be simultaneous. If delayed, information is often lost.<sup>09</sup>

An increased use of sign language interpreters would be very welcome since this would achieve a greater degree of inclusion.

### 4.2.2 Signing avatars

The Austrian Association of the Deaf has published a guideline for signing avatars on its website at <https://www.oeglb.at/leitfaden-fuer-gebaerdensprach-avatare/>.

Briefly summarised, it can be said that, while the association does not reject the use of such avatars, it does highlight several key issues. In particular, such avatars are not a substitute for human sign language interpreters.

More information about the research project and the guideline is available from <https://avatar-bestpractice.univie.ac.at/>.

<sup>07</sup> Austrian Association of the Deaf: "Welcome!" (in German) <https://www.oeglb.at/> (accessed on 21 April 2022)

<sup>08</sup> ÖGSDV: "Deafness and sign language" (in German) <https://www.oegsdv.at/web/gehoerlosigkeit-gebaerdensprache/> (accessed on 2 May 2022)

<sup>09</sup> Presentation given on 30 June 2021 by Helene Jamer, accessible from <https://www.youtube.com/watch?v=K7di95kQTZA&t=3s> (accessed on 21 April 2022)

## 4.3 Audio description

Rather like an audiobook, audio description means audibly communicating imagery that makes visual material comprehensible for people with vision loss.

Provided on an extra audio channel, an audio description helps people with vision loss to follow visual content by describing visual aspects of the action that takes place and its setting, as well as the appearance of individuals, and their facial and bodily gestures.<sup>10</sup>

### 4.3.1 Dual-channel mode

Dual-channel mode is an audio transmission technique whereby two separate audio channels are broadcast simultaneously. One of the two audio channels can be used to provide an acoustic description of the broadcast image and so make audiovisual media content readily consumable by people with vision loss.

A number of apps have also been published that give users access to an audio description. The GRETA app provides access to audio descriptions and subtitling, as was mentioned in one of the action plans.

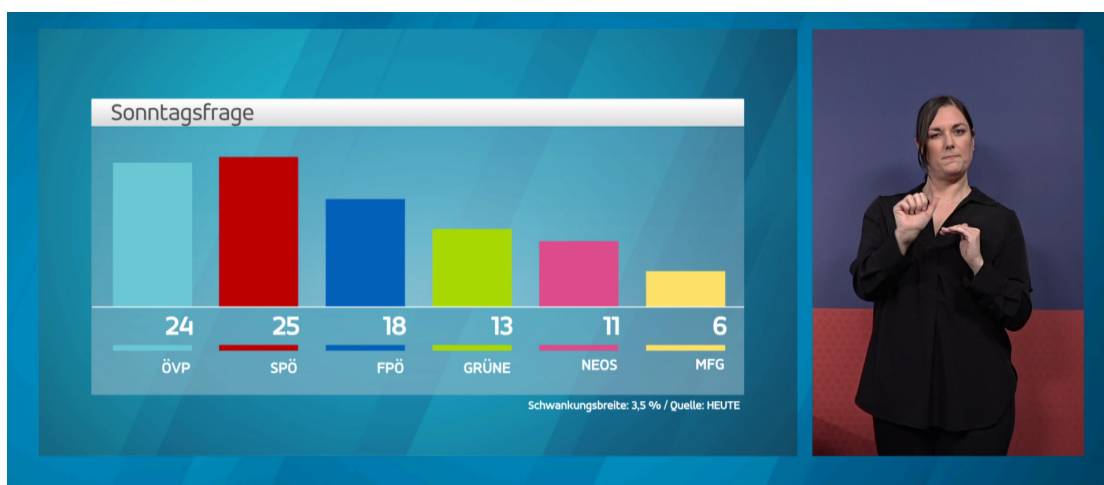
### 4.3.2 Synthetic voice audio description

With this type of audio description, the visual content is not described by a human voice but by a synthetic (artificial) voice instead.

<sup>10</sup> Blindenverband.at: "Audio description. Still plenty that needs to be done" (in German)  
<https://www.blindenverband.at/de/aktuelles/865/Adiodeskription> (accessed on 21 April 2022)

## 5. Examples from industry practice

An example showing the inclusion of a sign language interpreter is presented below.



Programmes with subtitles and sign language interpretation on-screen at the same time are very rare.





## Publishing information

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Austrian Regulatory Authority for Broadcasting and Telecommunications

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cibus Kreativagentur

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