



**KommAustria**  
Kommunikationsbehörde Austria

# ACCESSIBILITY REPORT

2024



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## Accessibility Report 2024

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# Report on Accessibility

According to a survey conducted in 2024, roughly 1.9 million people in Austria – including many senior citizens – experience health-related limitations in their day-to-day lives.<sup>1</sup> The Austrian federal administration also considers around 760,300 people as having disabilities or impairments. Such individuals receive a nursing allowance or are holders of a disabled person's pass, for example.<sup>2</sup>

Only a small percentage of such disabilities are congenital or are acquired as a result of an accident or an occupational illness. The vast majority are the result of a disease or disorder.<sup>3</sup> We need to remember that disabilities especially affect older people.

The following groups are most likely to experience restrictions to participation in society and democratic discourse:

- People with vision impairment or blindness
- People with hearing impairments
- 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>4</sup> Accessibility is a prerequisite for people with disabilities to be able to live independently, participate equally in society and exercise their rights.

Pursuant to Article 8 (1) of the UN Convention on the Rights of Persons with Disabilities (UN CPRD),<sup>5</sup> the signatory countries are committed to taking immediate, effective and appropriate measures

- a) To raise awareness throughout society, including at the family level, regarding persons with disabilities, and to foster respect for the rights and dignity of persons with disabilities;
- b) To combat stereotypes, prejudices and harmful practices relating to persons with disabilities, including those based on sex and age, in all areas of life;
- c) To promote awareness of the capabilities and contributions of persons with disabilities.

Paragraph (2) sets out measures to promote awareness, with (c) specifying the measure of encouraging all organs of the media to portray persons with disabilities in a manner consistent with the purpose of the present Convention.

Yet, in relation to media services, accessibility does not refer only to how the persons concerned are depicted. Rather, the issue here is to ensure that media are discoverable, accessible and usable by people with disabilities in a general and typical way, without undue difficulty or the aid of another person.

1 cf. People with disabilities in Austria I (in German): [https://broschuerenservice.sozialministerium.at/Home/Download?publicationId=809&attachmentName=Menschen\\_mit\\_Behinderungen\\_in\\_%C3%96sterreich\\_Teil\\_I.pdf](https://broschuerenservice.sozialministerium.at/Home/Download?publicationId=809&attachmentName=Menschen_mit_Behinderungen_in_%C3%96sterreich_Teil_I.pdf) (accessed on 25 March 2025)

2 cf. People with disabilities (in German): <https://www.sozialministerium.at/Themen/Soziales/Menschen-mit-Behinderungen.html> (accessed on 25 March 2025)

3 For figures, see the federal government's third report on the situation of people with disabilities, available (in German) at <https://www.sozialministerium.at/Themen/Soziales/Menschen-mit-Behinderungen/Bericht-der-Bundesregierung-ueber-die-Lage-der-Menschen-mit-Behinderung.html> (accessed 21 April 2022)

4 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

5 cf. <https://www.sozialministerium.at/Themen/Soziales/Menschen-mit-Behinderungen/UN-Behindertenrechtskonvention.html> (in German)

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>6</sup> Accessible pathways to content should also be created for people with other disabilities such as 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 in the case of broadcasts of live programmes or events.

In the case of audiovisual media, two human senses are paramount here, namely hearing (audio) and sight (visual). Yet the consumption and impact of such media tends to be biased towards its purely visual content. Sight should not be the only sense allowing access to media, however. Instead, media should be designed to ensure that its imagery and emotions can be experienced by anyone – regardless of their sensory skills. Although the strong presence and significance of video viewing in our society constitutes a disadvantage for people with either vision impairments or hearing impairments, this disadvantage can be mitigated by the deployment of technical aids. These enable such consumers to participate in audiovisual media. Furthermore, advanced technologies also pave the way to technical solutions – such as incorporating media content in plain language – that allow people with learning difficulties to access audiovisual media content and therefore participate more inclusively in social and cultural life.

## 1. Legal basis

The legal basis for increasing percentage shares of accessible content and for preparing action plans and reports are, first, the Audiovisual Media Services Act (AMD-G), and, second, the ORF Act (ORF-G).

Pursuant to Art. 30b Par.1 AMD-G, media service providers are to 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 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 accessible audiovisual content they provide. Media service providers must provide 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 intellectual disabilities. 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, within the categories of news and current affairs, entertainment, education, art and culture, and sports. In terms of live programming, justifiable technical exemptions from the requirement to pursue this proportional increase can be made, as make such content accessible requires additional effort. Media service providers must publish the action plan so as to be 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 audiovisual media service generated no more than EUR 500,000 in revenues in the previous year. Media service providers whose programming is of an exclusively local or regional nature are also granted an exemption from this requirement for the audiovisual media services that they offer.

6 Cf. Directive (EU) 2018/1808, Recital 22

A failure to prepare or publish an action plan is liable to sanction by administrative penalty. Where an action plan is not made available, KommAustria may also initiate a supervisory procedure or take action in response to a public complaint.

Similar provisions are envisaged for the ORF in 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, as far as technical advances and economic feasibility permit, to simplify the consumption of such broadcasts by individuals with vision and/or hearing impairments and persons with intellectual disabilities, the latter requiring content in plain language. Beyond that, the ORF is required to offer at least one news broadcast in plain language during its daytime programming (9 am to 10 pm).

The ORF is also to ensure that appropriate measures are taken to ensure a continuous and progressive increase in the respective proportion of audiovisual content made accessible to individuals with intellectual disabilities (who require content in plain language) as well as to people with vision and/or hearing impairments, 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 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 impairments and individuals with intellectual 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 also specifies an annual increase of at least 2.5% in the categories of news and current affairs, education, and arts and culture, and of at least 4% in the category of entertainment, compared with figures at the end of the prior calendar year. Here priority is to be 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. Additional priority is to be given to regional 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 of 31 December 2024, 15 media service providers had submitted action plans for a total of 20 channels. Of these action plans, four apply to the period 2022–2024 and therefore end within the timeframe of the 2024 annual report. Yet the majority of action plans cover the 2024–2026 period. An annual report has been submitted for 19 channels.

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, by 31 March of the year after the reporting period, the preparation of an annual report on implementation of the measures specified in the action plan and the proportional increase achieved. These reports are to be published in the same way as the action plans.

Several infringement procedures were conducted in 2024. Procedures were conducted against seven providers because of their late submission and publication of the 2023 annual report, and against a further three providers on account of their failure to publish this report. Another procedure targeted a provider who had ignored applicable guidelines in preparing the annual report and also failed to submit the report.

One provider failed to prepare an action plan and was subject to a procedure that ultimately resulted in two penal decisions.

Pursuant to Art. 30b Par. 4 AMD-G, the regulatory authority's annual report (Art. 19 KOG) must present for each media service provider the status quo and any changes in terms of the requirements described in Par. 1, in the form of a comparative presentation of intended target values and the actual values achieved by the provider. The regulatory authority can enclose with this report, supported by RTR as a service point pursuant to Art. 20b KOG, a statement about further improvements to accessibility.

Pursuant to Art. 20b KOG, RTR has the remit to act as a service point for complaints and information services relating to accessible audiovisual media services and to accordingly provide information for media service providers and for the general public. This information is presented under [www.rtr.at/barrierefreiheit](http://www.rtr.at/barrierefreiheit). Furthermore, RTR serves as a complaints board for accessibility issues in relation to the content of audiovisual media services. The complaints board received no complaints relating to accessibility issues in 2024.

## 2. Reports on action plans

In accordance with statements provided by media service providers, the preparation of all action plans was preceded by a consultation with a representative organisation acting on behalf of people with vision or hearing impairments and on behalf of people with learning difficulties. The action plans are subdivided into the categories of entertainment, news and current affairs, education, arts and culture, and sports.

Most of the action plans currently in force apply to the 2024–2026 period. For many providers, this is their second three-year action plan.

### 2.1 ATV Privat TV GmbH & Co KG

ATV Privat TV GmbH & Co KG submitted one report for all of its channels (ATV, ATV 2 and atv.at).

#### 2.1.1 ATV

**Table 01: Planned increase for the ATV channel according to action plan (in %)**

ATV	Base year 2023	2024	2025	2026
Planned increase according to action plan	1.03%	3.00%	6.00%	9.01%
Actual increase according to annual reports	1.08%	3.78%	-	-

In the 2024 reporting period, a total of 19,851 minutes (3.78%) were subtitled in the 'Entertainment' category on the ATV channel.

The figure stated in the annual report thus exceeds the target in the action plan.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 min	19,851 minutes (3.78%)	Entertainment	Subtitling

## 2.1.2 ATV 2

**Table 02: Planned increase for the ATV 2 channel according to action plan (in %)**

ATV 2	Base year 2023	2024	2025	2026
Planned increase according to action plan	1.05%	3.00%	5.99%	8.99%
Actual increase according to annual reports	1.13%	3.40%	-	-

In the 2024 reporting period, a total of 17,879 minutes (3.40%) were subtitled in the 'Entertainment' category on the ATV 2 channel.

The figure stated in the annual report thus exceeds the target in the action plan.

### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 min	17,879 minutes (3.40%)	Entertainment	Subtitling

## 2.1.3 atv.at

**Table 03: Planned increase for the atv.at channel according to action plan (in %)**

atv.at	Base year 2022	2023	2024	2025
Planned increase according to action plan	0.00%	0.06%	0.08%	0.09%
Actual increase according to annual reports	-	0.12%	0.09%	-

A total of 292 minutes of overall channel programming met accessibility requirements in the 2024 reporting period.

The figure stated in the annual report thus exceeds the target in the action plan.

## 2.2 Krone Multimedia Gesellschaft m.b.H. & Co. KG

Krone Multimedia Gesellschaft m.b.H. & Co. KG submitted one report for all channels (KRONE TV, krone.tv).

### 2.2.1 KRONE TV

Table 04: Planned increase for the KRONE TV channel according to action plan (in %)

KRONE TV	Base year 2021	2022	2023	2024
Planned increase according to action plan	0.02%	0.20%	0.30%	50.14%
Actual increase according to annual reports	-	-	-	50.00%

In the 2024 reporting period, a total of 527,040 minutes (50.0%) of overall channel programming were subtitled.

In absolute minutes, this figure exactly corresponds to the action plan target. As a percentage, however, the figure is 0.14% below the planned increase stated in the action plan.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
1,054,080 min	527,040 minutes (50.0%)	News and current affairs and entertainment	Subtitling

### 2.2.2 krone.tv

Table 05: Planned increase for the krone.tv channel according to action plan (in %)

krone.tv	Base year 2022	2023	2024	2025
Planned increase according to action plan	0.00%	0.56%	1.50%	2.27%
Actual increase according to annual reports	-	-	1.50%	-

In the 2024 reporting period, 8,361 minutes (1.50%) were subtitled on the krone.tv channel.

This figure from the annual report therefore matches the target as stated in the action plan.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
557,381 min	8,361 minutes (1.50%)	Sports, news and current affairs, and entertainment	Subtitling



## 2.3 MediaShop GmbH

**Table 06: Planned increase for the Mediashop Meine Einkaufswelt channel according to action plan (in %)**

MediaShop	Base year 2023	2024	2025	2026
Planned increase according to action plan	1.12%	1.21%	1.30%	1.40%
Actual increase according to annual reports	-	1.21%	-	-

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

MediaShop GmbH submitted a report, stating that various measures had been implemented during the reporting period. A total of 3,920 minutes (0.75%) were subtitled, 545 minutes (0.10%) were sign-interpreted and 1,912 minutes (0.36%) were provided with an audio description. All of the content on this channel is provided in the 'Entertainment' category. The action plan targets were therefore met, both in minutes and as a percentage.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 min	6,377 minutes (1.21%)	Entertainment	Subtitling, sign interpreting, audio description

## 2.4 Melodie Express GmbH

**Table 07: Planned increase for the Melodie TV channel according to action plan (in %)**

Melodie TV	Base year 2021	2022	2023	2024
Planned increase according to action plan	0.10%	0.19%	0.29%	0.38%
Actual increase according to annual reports	0.10%	0.21%	0.34%	0.40%

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

Melodie Express GmbH submitted a report, stating that 2,100 minutes (0.40%) of channel programming in 'Entertainment' were subtitled in 2024. These figures therefore exceed the targets from the action plan.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 min	2,100 minutes (0.40%)	Entertainment	Subtitling

## 2.5 ProSiebenAustria GmbH

**Table 08: Planned increase for the ProSieben Austria channel according to action plan (in %)**

ProSieben Austria	Base year 2023	2024	2025	2026
Planned increase according to action plan	0.99%	1.29%	1.60%	1.90%
Actual increase according to annual reports	0.99%	1.03%	-	-

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

ProSieben Austria GmbH submitted a report.

In the 2024 reporting period, 526 minutes (1.03%) were subtitled on the ProSieben Austria channel.

The action plan target for absolute minutes was therefore exceeded. This is not reflected in the percentage values, however, because of differences in total broadcasting times between the action plan and annual report.

Changes to channel programming had resulted in subtitling being split between the news and current affairs and entertainment categories, and not – as had been planned originally – between the categories of news and current affairs, education, arts and culture, and sports.

Some 296 minutes of accessible programming were provided for wide-reach feature films. The targeted expansion of accessible programming to 519 minutes, stated in the ProSieben Austria action plan for 2024, was nonetheless achieved.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
51,175 min	526 minutes (1.03%)	News and current affairs and entertainment	Subtitling

## 2.6 ProSiebenSat.1 PULS4 GmbH

**Table 09: Planned increase for the JOYN channel according to action plan (in %)**

JOYN	Base year 2023	2024	2025	2026
Planned increase according to action plan	0.00%	0.01%	0.10%	0.20%
Actual increase according to annual reports	-	0.02%	-	-

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

ProSiebenSat.1 PULS4 GmbH submitted a report,

stating that the JOYN channel subtitled 242 minutes (0.02%) overall in the 2024 reporting period.

The figure stated in the annual report thus exceeds the target in the action plan.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
1,200,000 min	242 minutes (0.02%)	News and current affairs and entertainment	Subtitling

## 2.7 PULS 4 TV GmbH & Co KG

PULS 4 TV GmbH & Co KG submitted one report for all channels (Puls 4 and Puls 24).

### 2.7.1 Puls 4

Table 10: Planned increase for the PULS 4 channel according to action plan (in %)

Puls 4	Base year 2023	2024	2025	2026
Planned increase according to action plan	1.00%	3.00%	5.99%	8.99%
Actual increase according to annual reports	1.02%	3.71%	-	-

In the 2024 reporting period, a total of 19,517 minutes (3.71%) were subtitled in the 'Entertainment' category on the Puls 4 channel.

The figure stated in the annual report thus exceeds the target in the action plan.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 min	19,517 minutes (3.71%)	Entertainment	Subtitling

### 2.7.2 Puls 24

Table 11: Planned increase for the Puls 24 channel according to action plan (in %)

Puls 24	Base year 2023	2024	2025	2026
Planned increase according to action plan	0.30%	1.20%	2.40%	4.79%
Actual increase according to annual reports	0.38%	1.20%	-	-

In the 2024 reporting period, a total of 6,317 minutes (1.20%) were subtitled in the 'Entertainment' category on the Puls 24 channel.

The figure for minutes stated in the annual report thus exceeds the respective target in the action plan, although this is not reflected by the percentage values.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 min	6,317 minutes (1.20%)	Entertainment	Subtitling

## 2.8 Red Bull Media House GmbH

As Red Bull Media House GmbH has discontinued its Servus TV Deutschland channel, this channel is no longer included in the analysis.

**Table 12: Planned increase for the Servus TV channel according to action plan (in %)**

Servus TV	Base year 2023	2024	2025	2026
Planned increase according to action plan	6.17%	6.50%	6.95%	7.51%
Actual increase according to annual reports	5.89%	7.78%	-	-

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

Red Bull Media House GmbH submitted one report for both channels by the due date.

From a total of 27,720 minutes (7.78%) of accessible programmes within overall programming offered by the ServusTV service, 4,600 minutes (33.82%) were subtitled in the category of news and current affairs, 13,780 minutes (16.37%) in education, and 600 minutes (21.90%) in arts and culture. The channel also achieved 7,000 minutes (32.71%) in the sports category and 1,740 minutes (1%) in the entertainment category. The percentages specified in brackets for the categories each relate to the specified category. The figures given in the annual report therefore exceed the targets from the action plan in all categories except the category of entertainment, where the figure given equals the action plan target.

The 2024–2026 action plan and 2024 annual report have been published at [https://richtlinien.servus.com/policies/1e96add-376c-4204-8261-d466bae5faa2/202503281352/de\\_AT/imprint.html](https://richtlinien.servus.com/policies/1e96add-376c-4204-8261-d466bae5faa2/202503281352/de_AT/imprint.html).

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
356,130 min	27,720 minutes (7.78%)	all	Subtitling, audio description

## 2.9 Sa Fira Blue GmbH (Viktoria Sarina)

Table 13: Planned increase for the ViktoriaSarina YouTube channel according to action plan

ViktoriaSarina	Base year 2020	2021	2022	2023	2024
Planned increase according to action plan	0.00%	0.00%	4.00%	8.00%	12.00%
Actual increase according to annual reports	-	0.00%	4.3%	No details given for broadcast minutes	-

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

Sa Fira Blue GmbH did not submit a report for 2024.

## 2.10 Sascha Huber GmbH

Table 14: Planned increase for the Sascha Huber YouTube channel according to action plan (in %)

Sascha Huber	Base year 2021	2022	2023	2024
Planned increase according to action plan	1.00%	2.00%	3.00%	4.00%
Actual increase according to annual reports	-	4.00%	5.00%	5.00%

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

Sascha Huber GmbH submitted a report.

In the 2024 reporting period, Sascha Huber subtitled 50 minutes (5%) of overall channel programming in the sports category. Both the minute and percentage figures given in the annual report thus exceed the respective action plan targets.

### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
1,000 min	50 minutes (5.00%)	Sports	Subtitling

## 2.11 SAT.1 Privatrundfunk und Programmgesellschaft mbH

Table 15: Planned increase for the SAT.1 Österreich channel according to action plan (in %)

SAT.1 Österreich	Base year 2023	2024	2025	2026
Planned increase according to action plan	0.92%	1.20%	1.49%	1.79%
Actual increase according to annual reports	1.16%	1.02%	-	-

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

SAT.1 Privatrundfunk und Programmgesellschaft mbH have presented a report.

In the 2024 reporting period, a total of 541 minutes (1.02%) in the entertainment category were subtitled on the SAT.1 Österreich channel.

The action plan target for absolute minutes was therefore exceeded. This is not reflected in the percentage values, however, because of differences in total broadcasting times between the action plan and annual report.

Changes were made at SAT.1 Österreich in terms of both programming and content. As a result, subtitling was offered for wide-reach feature films, thus falling under the entertainment category. This contrasts with the original plans to offer subtitling for the news and current affairs, education, arts and culture, and sports categories. The targeted expansion of accessible programming to 527 minutes, stated in the SAT.1 Österreich action plan for 2024, was nonetheless achieved.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
52,920 min	541 minutes (1.02%)	Entertainment	Subtitling

## 2.12 schau Media Wien GesmbH

Table 16: Planned increase for the Schau TV channel according to action plan (in %)

Schau TV	Base year 2021	2022	2023	2024
Planned increase according to action plan	0.43%	0.91%	1.14%	1.26%
Actual increase according to annual reports	-	0.59%	0.10%	0.10%

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

schau Media Wien GesmbH submitted a report by the due date.

In relation to technical implementation, schau Media Wien GesmbH states that subtitles are in use. Within the action plan period of 2022–2025, accessible programmes are to be offered in the categories of news and current affairs and entertainment.

In the category of news and current affairs, 390 minutes (0.07%) of programming were subtitled, and 160 minutes (0.03%) in entertainment. Thus, the action plan targets in terms of minutes were met, even though this fact is not reflected in the percentage values because of varying overall broadcasting times. The action plan target was therefore achieved in terms of minutes but not percentages.

The action plan has been published (in German) at <https://kurier.tv/info/kurier-tv-barrierefreiheit/402135966>.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 min	550 minutes (0.10%)	News and current affairs and entertainment	Subtitling

## 2.13 Sky Österreich Fernsehen GmbH

Sky Österreich Fernsehen GmbH submitted one report for all of its channels (18+ App, Sky Sport Austria).

### 2.13.1 „18+“-App

Table 17: Planned increase for the „18+“-App channel according to action plan (in %)

„18+“ App	Base year 2023	2024	2025	2026
Planned increase according to action plan	2.04%	3.56%	3.70%	3.87%
Actual increase according to annual reports	3.77%	9.00%	-	-

In the 2024 reporting period, 23,535 minutes (9%) of all broadcasts in the entertainment category were subtitled on the 18+ App (Blue Movie) channel.

The figure stated in the annual report thus exceeds the target in the action plan.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
261,505 min	23,535 minutes (9.00%)	Entertainment	Subtitling

## 2.13.2 Sky Sport Austria

**Table 18: Planned increase for the Sky Sport Austria channel according to action plan (in %)**

Sky Sport Austria	Base year 2023	2024	2025	2026
Planned increase according to action plan	0.86%	1.25%	1.58%	1.80%
Actual increase according to annual reports	0.98%	1.32%	-	-

The 2024–2026 action plan and 2024 annual report have been published at <https://www.sky.at/barrierefreiheit>.

In the 2024 reporting period, a total of 6,930 minutes (1.32%) in the sports category were subtitled on the Sky Sport Austria channel. Sky Österreich Fernsehen GmbH therefore exceeded the target from the action plan for 2024.

### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 min	6,930 minutes (1.32%)	Sports	Subtitling

## 2.14 T-Mobile Austria GmbH

**Table 19: Planned increase for the Magenta On Demand channel according to action plan (in %)**

Magenta On Demand	Base year 2023	2024	2025	2026
Planned increase according to action plan	40.32%	41.2%	43%	44%
Actual increase according to annual reports	40.32%	41.2%	-	-

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

T-Mobile Austria GmbH submitted a report.

In its 2024–2026 action plan, T-Mobile Austria GmbH announced a significant decrease in the video minutes to be provided in 2024 when compared with the same figure for the 2023 reporting year. T-Mobile Austria GmbH cited structural changes in its content acquisition strategy as the reason, stating that the majority of films offered directly via OTT partnerships would not be licensed separately for Magenta on Demand from 2024 onwards. T-Mobile Austria GmbH also stated that audience demand – and therefore the programming offered – has shifted to much shorter broadcasts as measured in average minutes, while the planned rollout of EST (electronic sell-through) has also been further postponed. In 2024, EST rollout was accordingly unable to compensate for the impacts from the above-mentioned factors.

In the 2024 reporting period, 198,100 minutes (41.2%) of overall programming in the entertainment category were subtitled.

The figure from the annual report therefore corresponds exactly to the target given in the action plan.



In its 2024 annual report, T-Mobile Austria GmbH cited subtitling as a measure for ensuring an accessible proportion of its programming. The 2024–2026 action plan states that other measures envisaged – such as audio descriptions and optimisation modules – are in planning.

The 2024–2026 action plan and 2024 annual report have been published (in German) at <https://www.magenta.at/faq/entry/%7Etechnische-anfrage%7Efernsehen%7Eallgemein/%7EMagentaTV-Barrierefreiheit%7Emaster>.

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
480,800 min	198,100 minutes (41.2%)	Entertainment	Subtitling

## 2.15 wedify GmbH

Table 20: Planned increase for the A1 Xplore TV video library according to action plan (in %)

A1 Xplore TV video library	Base year 2023	2024	2025	2026
Planned increase according to action plan	16.0%	21.0%	23.0%	25.0%
Actual increase according to annual reports	16.01%	31.36%	-	-

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

wedify GmbH submitted a report.

With reference to the A1 Xplore TV video library, the 2023 accessibility report had stated that the target envisaged by the action plan had not been achieved. To achieve this target in 2024, wedify GmbH planned to intensify its negotiations with content suppliers, with the aim of being able to purchase more films with subtitles. Another planned step had been to replace older films offered on its video platform by versions with subtitles and/or audio descriptions. As a result of implementing these plans, wedify GmbH was able to subtitle 301,440 minutes (31.36%) of overall programming in the entertainment category in the 2024 reporting period.

Accordingly, the figure stated in the annual report exceeds the target in the action plan.

The action plan for 2024–2026 has been published (in German) at [https://cdn21.a1.net/documents/37417/790784/Aktionsplan+Barrierefreiheit+2024-2026\\_A1+Xplore+TV+Videothek.pdf](https://cdn21.a1.net/documents/37417/790784/Aktionsplan+Barrierefreiheit+2024-2026_A1+Xplore+TV+Videothek.pdf).

#### Key data for 2024

Annual broadcasting time	Accessible percentage share	Category	Measures
961,080 min	301,440 minutes (31.36%)	Entertainment	Subtitling

### 3. Austrian Broadcasting Corporation (ORF)

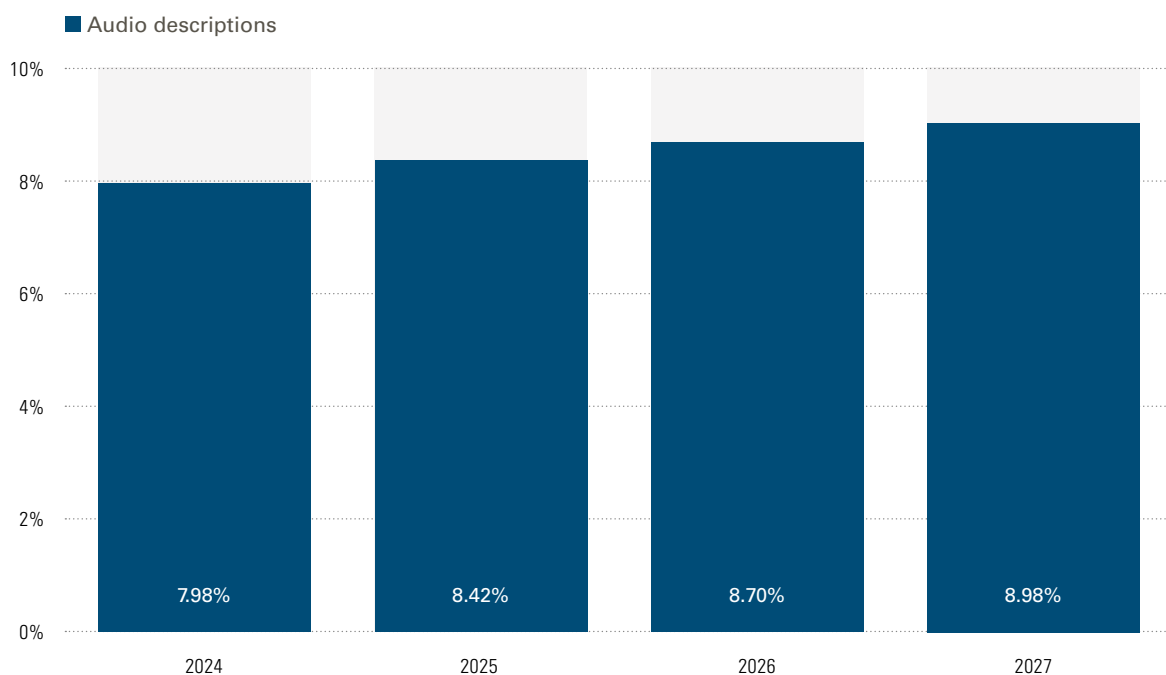
As noted above in section 2, the ORF is subject to the provisions of Art. 5 Par. 2 ORF-G.

Unlike other media service providers, the ORF is legally obliged to prepare an annual action plan that includes a detailed three-year timetable for achieving year-on-year increases in its proportion of accessible broadcasts (with the exception of live broadcasts) and online programming. Targets are stated separately for news and current affairs, entertainment, education, arts and culture and sports. This action plan must be published so as to be easily and immediately available and accessible at all times, and the regulatory authority must be notified of publication. In 2025, an action plan with 2024 as a reference year was subsequently published, which charts the planned increases for the years 2025 to 2027.

In the action plan, the ORF gives details of several new initiatives from 2024 as well as planned improvements.

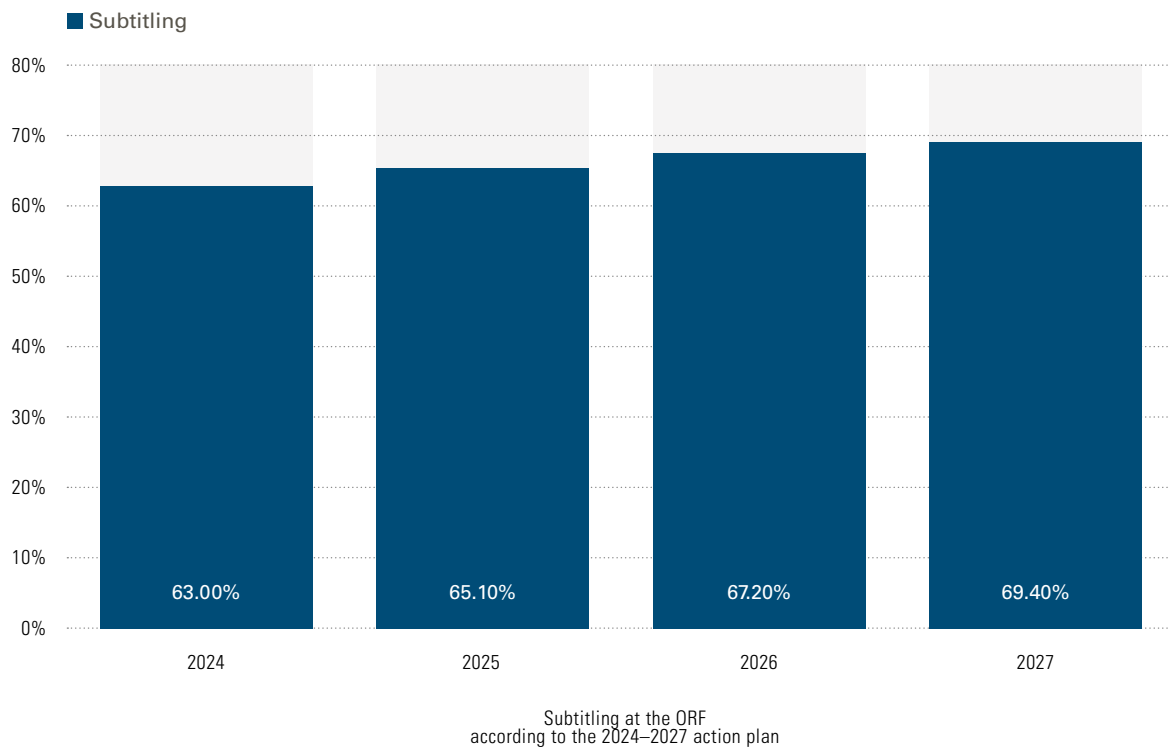
- The ORF KIDS children's channel was launched with a subtitling rate of 98.8%.
- Broadcasts of events surrounding the National Council election on 29 November 2024 put special emphasis on Austrian Sign Language (ÖGS) as well as interviews in plain language.
- For the Olympic Games in Paris, the ORF offered live subtitling and live audio descriptions. The ORF plans to focus more on automated live subtitling for its ORF SPORT+ channel in future.

**Figure 01: Planned increase in audio descriptions across all ORF channels, according to action plan (in %)**



Audio descriptions at the ORF  
according to the 2024–2027 action plan

Figures for audio descriptions are influenced by the launch of ORF KIDS, as the proportion of content provided with audio descriptions is lower than that achieved by the other ORF channels. In absolute figures, there has been an increase in the broadcast minutes provided as accessible content with audio descriptions.

**Figure 02: Planned increase in subtitling across all ORF channels, according to action plan (in %)**

As can be seen from the 2024–2027 action plan, the aim is to increase subtitled content by just under 10%, compared with the same target as given in the 2023–2026 action plan. Reasons for this change include the introduction of the ORF KIDS channel as well as the fact that the previous target had already been exceeded in recent years. Launched in 2024, ORF KIDS achieved a 98.8% rate for subtitling, strongly skewing the figures for ORF programming as a whole. If ORF KIDS is excluded from the statistics, the proportion of subtitled programming is 55.0% and therefore slightly more than announced.

It should also be noted that the ORF expects to achieve a subtitling rate of 100% in each of its entertainment and education categories over the next few years. For 2024, the ORF significantly exceeded its planned increase, with only 53.70% being forecast in the previous year. The ORF plans to roll out automated live subtitling based on artificial intelligence (AI) and potential software is now being tested.

In 2024, the ORF started its ORF ON streaming platform, which features a separate overview page for channels with accessible programming. Steps have also been taken to ensure that broadcasts which are offered 'online first' are made accessible as soon as possible.

The action plan for 2024–2027 has been published (in German) at <https://der.orf.at/unternehmen/humanitarian/barrierefreiheit/aktionsplan-barrierefreiheit104.html>.

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

The ORF submitted reports for all channels with reporting requirements by the due date.

**Table 21: Accessible share of TV programming for the ORF in 2024 (percentages)**

Percentage shares of accessible content in the ORF (linear programming)	Subtitling	Audio description	Sign language (ÖGS)	Plain language	Total accessible percentage share
News and current affairs	74.0%	0.2%	7.6%	0.31%	74.0%
Entertainment	92.2%	18.7%	0.08%	0.0%	92.2%
Education	94.6%	4.8%	11.0%	0.0%	94.6%
Arts and culture	65.3%	5.7%	0.69%	0.0%	65.3%
Sports	9.3%	7.8%	0.1%	0.0%	9.3%
Channels overall	55.0%	8.9%	2.0%	0.05%	55%

**Table 22: Accessible proportion on ORF ON in 2024 (percentages)**

Accessible proportions on ORF ON	Subtitling	Audio description	Sign language (ÖGS)	Plain language	Total accessible percentage share
News and current affairs	70.2%	0.1%	12.0%	0.4%	70.2%
Entertainment	90.2%	20.4%	0.14%	0.0%	90.2%
Education	95.5%	3.8%	15.1%	0.0%	95.5%
Arts and culture	62.2%	6.6%	1.06%	0.0%	62.2%
Sports	13.6%	11.5%	0.2%	0.0%	13.6%
Channels overall	61.4%	10.6%	4.2%	0.1%	61.4%

**Table 23: Accessible proportion on ORF KIDS in 2024 (percentages)**

Percentage shares of accessible content in the ORF (FLIMMIT)	Subtitling	Audio description	Sign language (ÖGS)	Plain language	Total accessible percentage share
News and current affairs	97.4%	0.0%	32.4%	0.0%	97.4%
Entertainment	98.6%	6.6%	0.0%	0.0%	98.6%
Education	99.2%	0.0%	0.0%	0.0%	99.2%
Arts and culture	98.9%	0.0%	0.0%	0.0%	98.9%
Sports	100.0%	0.0%	0.0%	0.0%	100.0%
Channels overall	98.8%	3.9%	1.6%	0.0%	98.8%

## 4. Statement about further improvements to accessibility

For many media service providers, 2024 was the first year of their new action plan.

Alongside the ORF, which is required to produce an annual action plan as well as an annual report, another 19 annual reports were submitted for 2024. These 19 annual reports stem from 15 separate providers; one provider did not submit an annual report.

Figures from the annual reports submitted show that the targets stated in the action plan were achieved or exceeded in 17 cases. In two cases, an increase in broadcast minutes meant that while the minute target was achieved, this was not reflected in the percentage figure.

When looking at the various measures adopted by the providers, the figures from the 2024 annual reports show no substantial changes compared with previous years. Subtitling continues to be the option most commonly used, with other measures used much less often. Meanwhile, the comments in the action plans and annual reports point to a clear trend towards the increased testing or rollout of new technologies. This includes planned use of automated subtitling (even for live content) and AI as inexpensive techniques for making content accessible. At present, these systems are not yet refined enough to meet the requirements of media consumers. One provider of several channels reports of experience with testing AI-generated subtitles, concluding that the results are still not reliable enough for use.

The specific categories featuring a greater proportion of accessible content have also remained largely unchanged from previous years: most of this content is to be found in entertainment programming. It should also be noted that, among the channels subject to the provisions of Art. 30b of the Audiovisual Media Services Act (AMD-G), certain categories are still underrepresented. Accordingly, people with disabilities continue to be faced with a situation where they can access only a limited range of audiovisual content.

Unlike the provisions set out in the AMD-G, the obligations imposed on the ORF require not only specific percentages of accessible programming but also that such accessible content meets certain requirements. One such obligation requires the ORF to place special emphasis on accessibility in the context of election coverage. In 2024, the ORF duly complied by broadcasting a greater volume of content – such as election debates – featuring ÖGS sign interpretation. Interviews were also held with leading political figures in plain language. Another requirement states that the ORF must prioritise the inclusion of accessible content in children's broadcasts in the news and current affairs and entertainment categories. In response, ORF KIDS was launched with a subtitling rate of 98.8%.

Overall, while the figures submitted by providers are largely similar to those from previous years, a number of new trends can nonetheless be identified. The use of AI to improve accessibility is an approach now being trialled in many places. Although some issues have yet to be ironed out, a number of providers are planning to deploy similar systems in the near future. It is still too early to say whether these new technologies will indeed rapidly fulfil hopes of improving accessibility. To achieve further progress here, feedback from target groups is especially valuable.

The action plans and annual reports also clearly include measures that exceed the requirements as set out by the AMD-G and even address a number of additional aspects. One media service provider mentions using larger and more legible fonts for overlays, for example, while another emphasises the intent to portray the real-life experiences of people with disabilities in their programming. The Austrian Accessibility Act (BaFG), which will enter into force in the course of 2025, will establish an additional legal framework for improving accessibility in media usage. The scope of the act is in fact wider, covering devices and services that enable access to audiovisual media.

## 4.1 Plain language

The term plain language refers to the conscious avoidance of complex grammar or rarely used words. While there is no universal consensus on what constitutes plain language, a standard that sets out some governing principles and guidelines for authoring documents in plain language was published by Austrian Standards International in 2025. This standard can also be utilised for the preparation of other communications products, such as podcasts and videos.<sup>7</sup>

In contrast to plain language, easy language makes use of a predefined ruleset that governs the use of loanwords or the length of lines and paragraphs, for example.

Both approaches nonetheless have the same goal in mind: making content easier to understand.

When designing accessible programming, media service providers make very little use of plain or easy language: only one provider mentions the regular use of such language in their annual reports. By law, the ORF is required to broadcast at least one news programme in plain language between 9 a.m. and 10 p.m. The broadcaster has also stated the intention of expanding the use of plain language to other areas such as radio and online.

## 4.2 Subtitling

Subtitling provides a written version of spoken-word elements such as dialogue and (on-/off-camera) commentary, as well as music and sound effects. In this way, subtitles provide details of content that would otherwise be heard. Depending on the method used, subtitles can either be hardcoded directly into the video and therefore permanently visible or can be activated as required. Digital subtitling is an especially versatile approach and is becoming increasingly widespread.

It is interesting to see how subtitling is a measure focused on by all media service providers. Within programmes, subtitles are made available in various formats, including teletext subtitles, subtitles hardcoded into video material or live (real-time) subtitles.

A common set of subtitling guidelines that address teletext and DVB subtitling at the preproduction stage were published for the German market in 2013. These guidelines are recommended by the Austrian Association of the Deaf (ÖGLB) and the Austrian Council of Associations for Hearing Loss (ÖSB).<sup>8</sup> In January 2015, public television broadcasters in Austria, Germany and Switzerland agreed on a set of uniform standards for subtitling.<sup>9</sup> These encompass a series of basic principles for the presentation of subtitles in German-speaking countries, relating to aspects such as format, font size, colours and overlays.

7 Austrian Standards International "Plain language. Part 1: Governing principles and guidelines"  
<https://www.austrian-standards.at/de/shop/onorm-iso-24495-1-2025-01-15~p4009154> (accessed on 8 April 2025)

8 Untertitelrichtlinien.de "Common subtitling guidelines for German-speaking countries" (in German)  
<http://www.untertitelrichtlinien.de/index.html> (accessed on 21 April 2022)

9 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)

## 4.3 Sign language<sup>10</sup>

Sign language is an officially recognised language based on a visual-manual modality that is used by people with hearing impairments 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>11</sup>

### 4.3.1 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 are not cut off during the broadcast because of the camera angle.
- 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% of the screen area.
- Interpretation should also be simultaneous. If delayed, information is often lost.<sup>12</sup>

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

### 4.3.2 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 take a critical view. 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>10</sup> Austrian Association of the Deaf (ÖGLB): : "Welcome!" (in German) <https://www.oeglb.at/> (accessed on 21 April 2022)

<sup>11</sup> ÖGSDV: "Deafness and sign language" (in German) <https://oegsdv.at/gebaerdensprache/gebaerdensprache/> (accessed on 2 May 2022)

<sup>12</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)

## 4.4 Audio description

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

Provided on an extra audio channel, an audio description helps people with vision impairments 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>13</sup>

The basic principles to follow when preparing audio descriptions is set out in an understanding signed between the ARD, the ORF, the SRF, the ZDF, Deutsche Hörfilm GmbH, Hörfilm e.V. and audioskript. The various providers have supplemented this document with their own, more individual rules.<sup>14</sup>

### 4.4.1 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, allowing especially people with vision impairments to use audiovisual media content.

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.

### 4.4.2 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.

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

14 der.orf.at: "Listening to images: video for the blind and partially sighted"  
<https://der.orf.at/kundendienst/service/audiodeskription104.html> (accessed on 18 March 2025)



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