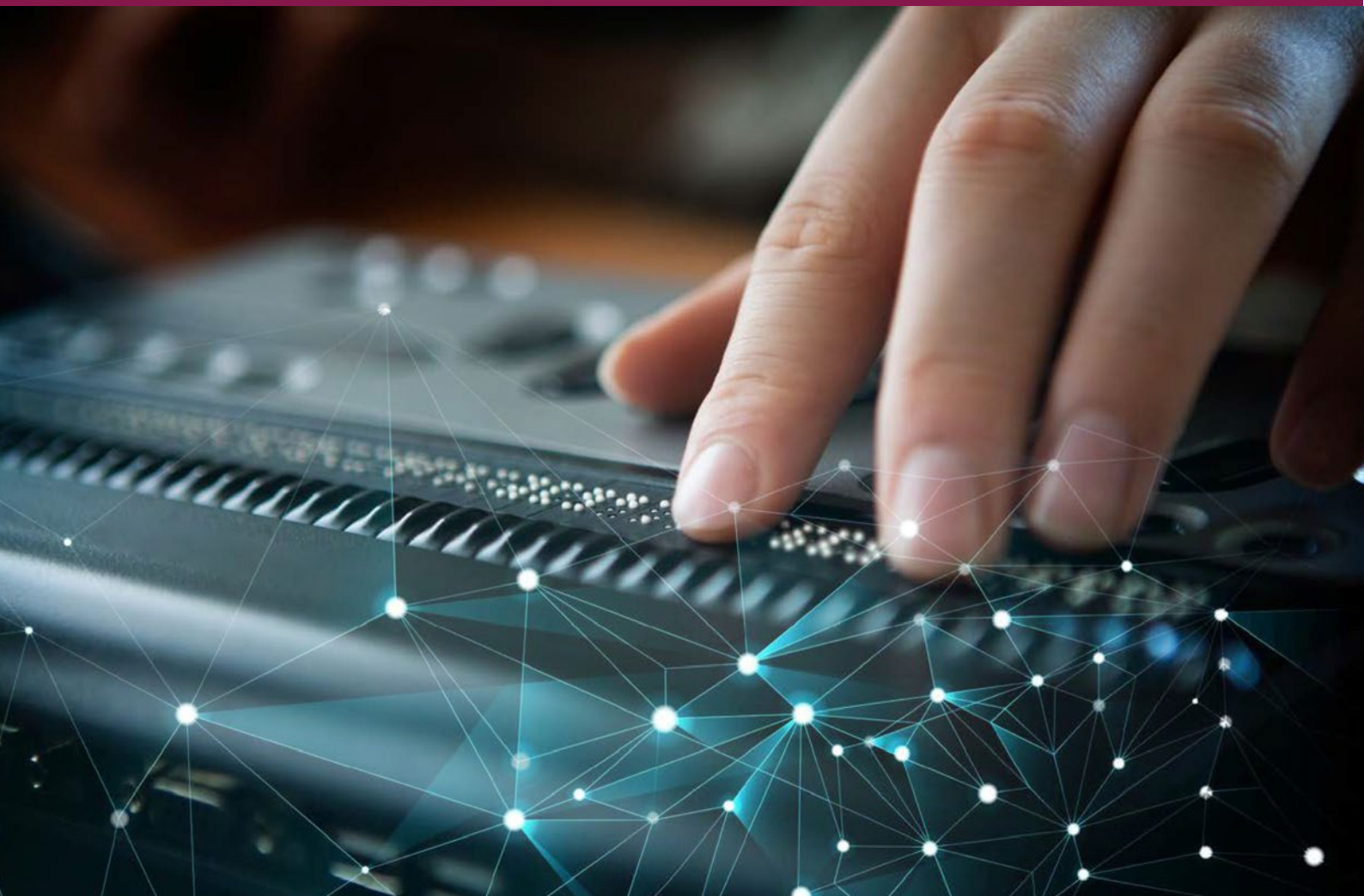


**KommAustria**  
Kommunikationsbehörde Austria

# ACCESSIBILITY REPORT

2025



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## Accessibility Report 2025

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# Report on Accessibility

Figures from Statistics Austria show that Austria is home to around 1.9 million people whose state of health affects their day-to-day lives.<sup>1</sup> Of these, around 760,300 people have ‘formally recognised’ disabilities: these are persons with various levels of disability who are reflected in official statistics based, for example, on their disabled person’s pass or their entitlement to disability benefits.<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> Nor should it be forgotten that disabilities also affect older people especially.

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

These restrictions to participation may influence a person’s ability to access media and therefore limit the extent to which they can inform themselves of available options and services.

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.*

1 cf. People with disabilities in Austria I (in German):

<https://www.statistik.at/services/tools/serviceangebote/publikationen/detail/1860> (accessed on 9 April 2026)

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

The Audiovisual Media Services Directive<sup>6</sup> defines media accessibility as an essential precondition for ensuring that people with disabilities can participate in cultural and social life: this law requires EU Member States to ensure that media service providers make their services progressively more accessible.

When applied to media, this means that media must be discoverable, accessible and usable by people with disabilities in a general and typical manner without encountering undue difficulty or requiring additional assistance. Providers can use a range of tools to satisfy these criteria, including subtitling, plain language, audio description and sign-language interpretation, as well as ensuring the accessible use of devices.

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.

Media service providers should “actively seek to make content accessible to persons with disabilities, in particular with a visual or hearing impairment.”<sup>7</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.

While audiovisual media primarily target the recipient’s vision and hearing—with visual content being especially important for perception and impact—such media should nonetheless be designed to ensure that their consumption is not dependent on these two senses. Nor should a person’s individual needs impede their ability to experience the range of emotions imparted by a specific piece of media.

The ever-present nature of audiovisual media and video content in contemporary society disadvantages those who are unable to follow such content. Apart from modifying the content itself (e.g. choice of font or font size), technical aids can also help to remove barriers to accessibility and facilitate participation.

## 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

<sup>6</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>7</sup> cf. Directive (EU) 2018/1808, Recital 22

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.

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 sports.

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 2025, 16 media service providers had submitted action plans for a total of 21 channels. Of these action plans, four apply to the period 2023–2025 and therefore end within the timeframe of the 2025 annual report. Thirteen plans cover the period 2024–2026, with another five starting in 2025. 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 2025. Procedures were conducted against four providers because of their failure to publish a 2024 annual report, and against one further provider on account of late submission of a report.

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) (in German). 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 AT Media Holding GmbH

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

Schlager Deluxe	Base year 2025	2026	2027	2028
Planned increase according to action plan	70.49%	70.59%	70.62%	70.66%
Actual increase according to annual reports	-	-	-	-

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

AT Media Holding GmbH did not submit a report.

## 2.2 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).

### 2.2.1 ATV

**Table 02: 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%	8.21%	-

In the 2025 reporting period, a total of 43,140 minutes (8.21%) 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.

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 minutes	43,140 minutes (8.21%)	Entertainment	Subtitling

### 2.2.2 ATV 2

**Table 03: 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%	6.86%	-

In the 2025 reporting period, a total of 36,066 minutes (6.86%) 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.

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 minutes	36,066 minutes (6.86%)	Entertainment	Subtitling

## 2.2.3 atv.at

**Table 04: 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%	1.70%

In the 2025 reporting period, ATV provided a total of 5,405 minutes (1.70%) of overall channel programming as accessible content.

The figure stated in the annual report therefore exceeds the target as stated in the action plan. The annual report also reveals that the 'Information' category cited in the action plan has since been replaced by the 'Entertainment' category. Details of the specific measures taken are not provided, however: instead, the report merely mentions the introduction of AI auto-subtitling as well as further improvements to the platform's compatibility with screen readers.

The report also notes that all atv.at content was migrated to Joyn in 2025 and is now available on that platform.

Annual broadcasting time	Accessible percentage share	Category	Measures
318,000 minutes	5,405 minutes (1.70%)	Entertainment	n. a.

## 2.3 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).

### 2.3.1 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	0.20%	0.30%	50.14%	50.86
Actual increase according to annual reports	-	-	50.00%	51.00%

In the 2025 reporting period, a total of 536,112 minutes (51.00%) of overall channel programming were subtitled.

The action plan targets were therefore exceeded.

Annual broadcasting time	Accessible percentage share	Category	Measures
1,051,200 minutes	536,112 minutes (51.0%)	Sports, news and current affairs, and entertainment	Subtitling

## 2.3.2 krone.tv

**Table 06: Planned increase for the krone.tv channel according to action plan (in %)**

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

In the 2025 reporting period, 13,918 minutes (2.27%) were subtitled on the krone.tv channel.

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

<b>Annual broadcasting time</b>	<b>Accessible percentage share</b>	<b>Category</b>	<b>Measures</b>
613,119 minutes	13,918 minutes (2.27%)	Sports, news and current affairs, and entertainment	Subtitling

## 2.4 MediaShop GmbH

**Table 07: Planned increase for the Mediashop Meine Einkaufswelt channel according to action plan (in %)**

<b>MediaShop</b>	<b>Base year 2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
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 did not submit a report.

<b>Annual broadcasting time</b>	<b>Accessible percentage share</b>	<b>Category</b>	<b>Measures</b>
n. a.	n. a.	n. a.	n. a.

## 2.5 Melodie Express GmbH

Table 08: Planned increase for the Melodie TV channel according to action plan (in %)

Melodie TV	Base year 2024	2025	2026	2027
Planned increase according to action plan	0.38%	0.44%	0.49%	0.55%
Actual increase according to annual reports	0.40%	0.46%	-	-

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

Melodie Express GmbH submitted a report, stating that 2,400 minutes (0.46%) of channel programming in 'Entertainment' were subtitled in 2025.

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 minutes	2,400 minutes (0.46%)	Entertainment	Subtitling

## 2.6 ProSiebenAustria GmbH

Table 09: 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%	1.84%	-

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

ProSieben Austria GmbH submitted a report.

In the 2025 reporting period, 944 minutes (1.84%) were subtitled on the ProSieben Austria channel.

The figures specified in the action plan were therefore exceeded both as absolute minutes and as percentages. At the same time, ProSieben Austria highlights the difference in total broadcasting time between the action plan and annual report, noting that this limits the validity of a direct comparison between the figures.

The annual report also reveals that the 'Education' category envisaged in the action plan has been replaced by the 'Entertainment' category in the current report. ProSiebenSat.1 PULS 4 GmbH

Annual broadcasting time	Accessible percentage share	Category	Measures
51,175 minutes	944 minutes (1.84%)	Entertainment	Subtitling

## 2.7 ProSiebenSat.1 PULS4 GmbH

Table 10: 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%	1.07%	-

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

ProSiebenSat.1 PULS 4 GmbH submitted a report, stating that the JOYN channel subtitled 12,888 minutes (1.07%) overall in the 2025 reporting period. Figures from the annual report show that JOYN provided 699 minutes (0.06%) of accessible content in the 'News and current affairs' category and 12,189 minutes (1.016%) in 'Entertainment'.

The figures stated here from the annual report therefore exceed the targets in the action plan.

Annual broadcasting time	Accessible percentage share	Category	Measures
1,200,000 minutes	12,888 minutes (1.07%)	News and current affairs and entertainment	Subtitling

## 2.8 PULS 4 TV GmbH & Co KG

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

### 2.8.1 PULS 4

Table 11: 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%	6.22%	-

In the 2025 reporting period, a total of 32,675 minutes (6.22%) 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.

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 minutes	32,675 minutes (6.22%)	Entertainment	Subtitling

## 2.8.2 PULS 24

Table 12: 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%	2.41%	-

In the 2025 reporting period, a total of 12,693 minutes (2.41%) were subtitled in the 'Entertainment' category on the PULS 24 channel.

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

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 minutes	12,693 minutes (2.41%)	Entertainment	Subtitling

## 2.9 Red Bull Media House GmbH

Table 13: Planned increase for the ServusTV channel according to action plan (in %)

ServusTV	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%	10.51%	-

### 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 37,277 minutes (10.51%) of accessible programmes within overall programming offered by the ServusTV service, 4,595 minutes (34.28%) were subtitled in the category of news and current affairs, 29,516 minutes (51.02%) in education, and 25 minutes (4.40%) in arts and culture. The channel also achieved 241 minutes (3.30%) in the sports category and 2,900 minutes (1.33%) 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 for 'Entertainment' and 'Arts and culture' are therefore lower than the action plan targets, although the figures for 'News and current affairs', 'Sports' and 'Education' significantly exceed the corresponding targets. Overall, the channel achieved an annual result well above the target figure.

Annual broadcasting time	Accessible percentage share	Category	Measures
354,837 minutes	37,277 minutes (10.51%)	all	Subtitling, audio description

## 2.10 Sa Fira Blue GmbH (ViktoriaSarina)

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

ViktoriaSarina	Base year 2024	2025	2026	2027
Planned increase according to action plan	8.1%	9.4%	10.8%	12.10%
Actual increase according to annual reports	8.1%	Breakdown, no details of overall increase	-	-

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

Sa Fira Blue GmbH submitted a report.

Annual broadcasting time	Accessible percentage share	Category	Measures
n. a.	n. a.	Entertainment	Plain language

## 2.11 Sascha Huber GmbH

**Table 15:** Planned increase for the Sascha Huber YouTube channel according to action plan (in %)

Sascha Huber	Base year 2024	2025	2026	2027
Planned increase according to action plan	4.00%	4.25%	4.50%	4.75%
Actual increase according to annual reports	5.00%	5.00%	-	-

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

Sascha Huber GmbH submitted a report.

In the 2025 reporting period, Sascha Huber subtitled 60 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.

Annual broadcasting time	Accessible percentage share	Category	Measures
1,200 minutes	60 minutes (5.00%)	Sports	Subtitling

## 2.12 SAT.1 Privatrundfunk und Programmgesellschaft mbH

Table 16: 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%	1.65%	-

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

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

In the 2025 reporting period, a total of 871 minutes (1.65%) in the entertainment category were subtitled on the SAT.1 Österreich channel. The figures specified in the action plan were therefore exceeded both as absolute minutes and as percentages. At the same time, SAT.1 Österreich highlights the difference in total broadcasting time between the action plan and annual report, noting that this limits the validity of a direct comparison between the figures.

The annual report also reveals that the 'Education' category envisaged in the action plan has been replaced by the 'Entertainment' category in the current report.

Annual broadcasting time	Accessible percentage share	Category	Measures
52,920 minutes	871 minutes (1.65%)	Entertainment	Subtitling

## 2.13 schau Media Wien GesmbH

Table 17: Planned increase for the Kurier TV channel according to action plan (in %)

Kurier TV	Base year 2024	2025	2026	2027
Planned increase according to action plan	0.1%	0.21%	0.31%	0.42%
Actual increase according to annual reports	0.1%	0.21%	-	-

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

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

This report confirms the use of subtitling by the channel. Within the action plan period of 2025–2027, accessible programmes are to be offered in the categories of news and current affairs and entertainment.

In the category of news and current affairs, 800 minutes (0.15%) of programming were subtitled, and 300 minutes (0.06%) in entertainment.

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 minutes	1,100 minutes (0.21%)	News and current affairs and entertainment	Subtitling

## 2.14 Sky Österreich Fernsehen GmbH

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

### 2.14.1 „18+“-App

Table 18: 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%	12.34%	-

In the 2025 reporting period, 35,322 minutes (12.34%) 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.

Annual broadcasting time	Accessible percentage share	Category	Measures
286,240 minutes	35,322 minutes (12.34%)	Entertainment	Subtitling

## 2.14.2 Sky Sport Austria

Table 19: 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%	1.92%	-

In the 2025 reporting period, a total of 10,080 minutes (1.92%) 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 2025.

Annual broadcasting time	Accessible percentage share	Category	Measures
525,600 minutes	10,080 minutes (1.92%)	Sports	Subtitling

## 2.15 T-Mobile Austria GmbH

Table 20: 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%	53.52%	-

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

In the 2025 reporting period, 136,718 minutes (53.52%) of overall programming in the entertainment category were subtitled.

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

Annual broadcasting time	Accessible percentage share	Category	Measures
255,453 minutes	136,718 minutes (53.52%)	Entertainment	Subtitling

## 2.16 wedify GmbH

Table 21: Planned increase for the A1 Xplore TV video library according to action plan (in %)

A1 Xplore TV Videothek	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%	34.58%	-

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

wedify GmbH submitted a report.

In the 2025 reporting period, 339,840 minutes (34.58%) of overall programming in the entertainment category were subtitled.

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

Annual broadcasting time	Accessible percentage share	Category	Measures
982,680 minutes	339,840 minutes (34.58%)	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.

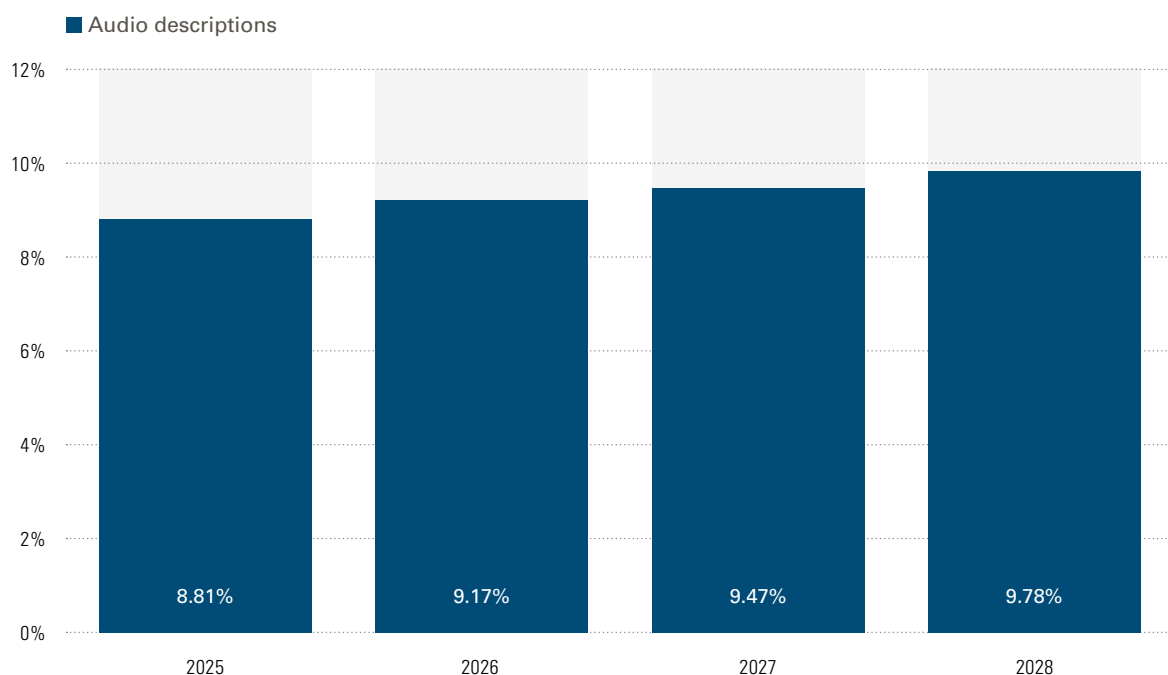
The ORF is therefore required to prepare a rolling three-year action plan on an annual basis. This action plan must include a detailed, three-year timetable for achieving annual improvements in the proportion of accessible broadcasts and online programming. Separate targets are stated for 'News and current affairs,' 'Entertainment,' 'Education,' 'Arts and culture' and 'Sports.'

The 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. The ORF published its 2025–2028 action plan at <https://der.orf.at/unternehmen/humanitarian/barrierefreiheit/aktionsplan-barrierefreiheit104.html> (in German): the baseline year for the plan is 2025, and the planned measures are described for 2026, 2027 and 2028.

The action plan highlights a number of measures that were implemented during 2025, including the following:

- As a result of talking to interest groups, more content was offered with audio descriptions in evening television.
- Live subtitling powered by AI was launched in late September. Although several issues need to be addressed here, the ORF plans to further develop and expand this service.
- Subtitling and sign-language interpretation were offered for more special broadcasts.

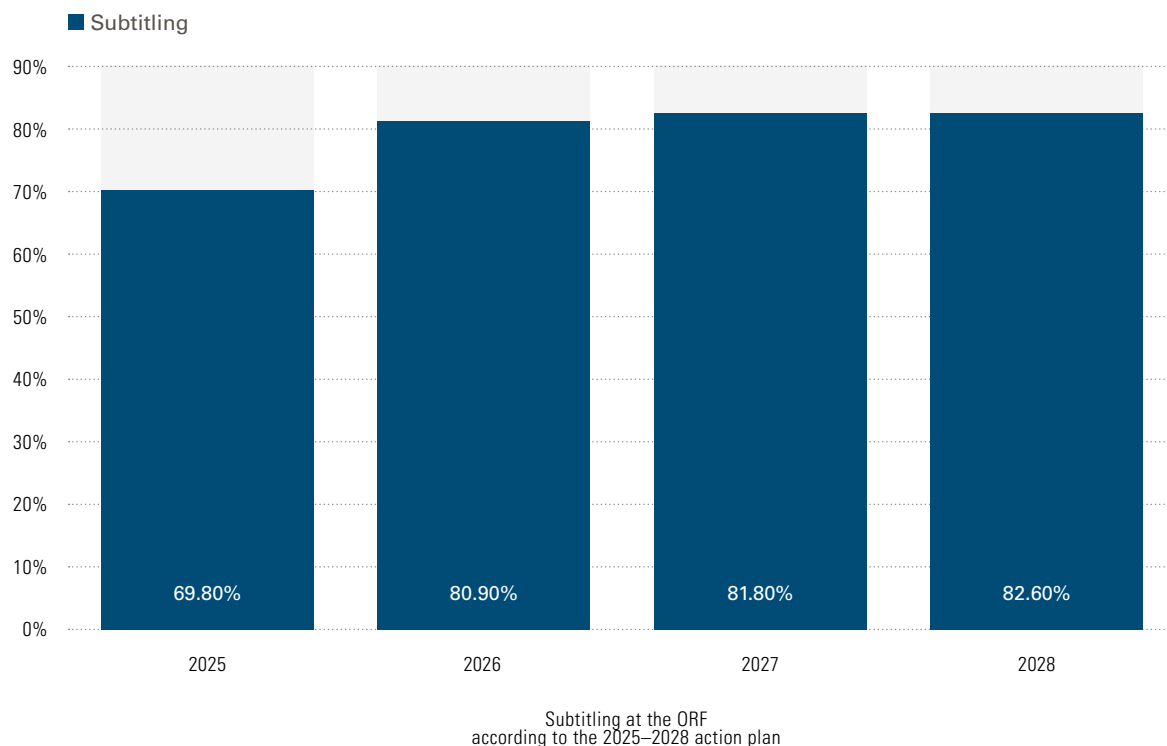
**Figure 01: Planned increase in audio descriptions across all ORF channels, according to action plan (in %)**



Audio descriptions at the ORF  
according to the 2025–2028 action plan

Audio descriptions clearly target the (early) evening television slot, with mainly films and series suitable for being made accessible in this way.

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



Live subtitling powered by AI was launched fairly late in the year and therefore had little impact on figures for 2025. It should also be noted that 99.5% of children’s programming was provided with subtitles during the reporting year.

Consultations with interest groups highlighted the need to offer sign-language interpretation for a more content in the areas of service as well as news and current affairs. To achieve this goal, the ORF increased the number of interpreters it works with and also plans to introduce sign-language interpreting for another broadcast in 2026.

The proportion of accessible content in the ORF’s streaming services is similar to that found in the broadcaster’s linear programming. This stems from the fact that much of this content is first broadcast in (or, as a live stream, simultaneously with) the linear format. The ORF is therefore planning to increase the proportion of accessible content in its online-first programming and archive materials.

### **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 22: Accessible share of TV programming for the ORF in 2025 (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	81.1%	0.3%	10.7%	0.3%	81.1%
Entertainment	98.5%	17.4%	0.07%	0.0%	98.5%
Education	99.7%	2.4%	6.4%	0.0%	99.7%
Arts and culture	74.5%	6.3%	0.93%	0.0%	74.5%
Sports	28.3%	8.2%	0.3%	0.0%	28.3%
Channels overall	69.8%	8.8%	2.5%	0.05%	69.8%

**Table 23: Accessible proportion on ORF ON in 2025 (percentages)**

Accessible proportions on ORF ON	Subtitling	Audio description	Sign language (ÖGS)	Plain language	Total accessible percentage share
News and current affairs	76.8%	0.3%	9.7%	0.4%	76.8%
Entertainment	97.8%	20.6%	0.08%	0.0%	97.8%
Education	99.2%	3.7%	9.8%	0.0%	99.2%
Arts and culture	68.8%	8.8%	1.4%	0.0%	68.8%
Sports	27.4%	12.4%	0.4%	0.0%	27.4%
Channels overall	72.1%	11.3%	3.4%	0.1%	72.1%

## 4. Statement about further improvements to accessibility

In the case of four providers, 2025 was the first year of their new action plan. One other provider became subject to the provisions of Art. 30b AMD-G for the first time in 2025.

Alongside the annual action plan and annual report from the ORF, five new action plans were therefore received at the end of 2025. Only 19 annual reports were submitted, with two media service providers thus failing to submit their report.

Action plan targets were achieved or exceeded in 18 cases; in the last case, a performance analysis could not be completed.

Several channels exhibited discrepancies in broadcasting time between 2025 and previous years. This fact prevents a direct comparison between the figures as stated in the action plan and the numbers achieved in the years before. In these cases, the accessible proportion actually achieved in 2025 was applied instead.

Once again, 'Entertainment' content was given preferential treatment for accessibility, with 17 annual reports mentioning this category, followed by 'Sports' and 'News and current affairs' (five reports each). One provider increased the proportion of accessible content in 'Education', and another provider did the same for the 'Arts and culture' category. The overall situation for people needing accessible content therefore saw few material improvements in 2025, and only limited content is available. On the other hand, more content in news and current affairs is indeed now accessible compared with 2023. In this context it also needs to be mentioned that, among the channels subject to the provisions of Art. 30b of the Audiovisual Media Services Act (AMD-G), not all categories are equally represented.

As in previous years, subtitling remains the broadcaster's tool of choice for improving accessibility, with this measure being mentioned in 17 reports. This is in stark contrast to the figures for audio description and sign language (two reports each) and plain language (none).

This summary does not apply to the ORF, as its legal duties arising from the ORF-G differ to those imposed by the AMD-G. Specifically, the ORF is required to offer specific percentages of accessible programming while such accessible content also must meet certain standards. One of those requirements addresses children's programming. The 2025 annual report states that the ORF achieved a 99.5% subtitling rate in children's programmes and provided audio descriptions for some children's content.

Although the overall picture resulting from the annual reports submitted for 2025 resembles that from previous years, it is nonetheless noteworthy that many media service providers were able to meet and exceed their self-imposed targets. Measures were also adopted beyond the duties set out by the AMD-G, with a greater focus being placed on both usability and discoverability. This was achieved by clearer links to accessible programming in media libraries, for example, together with quality improvements to the content itself.

Technological progress—foremost in the form of artificial intelligence (AI)—also features prominently in action plans and annual reports alike. At present, AI is used mainly for automated subtitling, although several providers have already expressed an interest in exploring its potential further. At the same time, providers openly acknowledge the teething troubles with the technology or even question its readiness for production use.

Success here will be critically dependent on the participation of target audiences.

## 5. Measures adopted

Action plans and annual reports must provide details not only of the subject categories in which efforts will be made to improve accessibility but also of the measures to be adopted with the aim of achieving this goal. Accordingly, media service providers must state which of the following measures they will use in their programming:

- Audio description
- Plain language
- Sign language
- Subtitles

All these measures ensure greater participation on the part of various audiences, yet the degree to which they are used is anything but uniform—as explained under "[4. Statement](#)". Technological progress has made it easier to implement measures to enhance accessibility in a number of areas. However, as several reports make clear, the practical application of these technologies is not without its challenges.

## 5.1 Plain language

The term *plain language* refers to the conscious avoidance of complex grammar or rarely used words such as foreign vocabulary. 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>8</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: to make content easier to understand.

As in 2024, only one media services provider other than the ORF stated that they had offered content in plain language during 2025. The ORF has a legal requirement to broadcast at least one news program in plain language between the hours of 9 am and 10 pm. Although the ORF also applied this measure to radio broadcasts, the overall range of news and current affairs content in plain language remains limited.

Artificial intelligence can be used to translate text into plain language or easy language—at least in theory. To date, however, no media service has stated that they are using or intend to use a product of this kind.

## 5.2 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. 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 thus 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.

Reports from media service providers increasingly highlight the benefits of using AI-generated subtitles. Easy to generate, subtitles are therefore inexpensive. On the other hand, providers do mention problems such as excessive latency or the difficulties subtitling tools have with dialect speech. Last but not least: AI-generated subtitles are mere transcriptions and do not meet applicable subtitling standards (use of colours, etc.).

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>9</sup> In January 2015, public television broadcasters in Austria, Germany and Switzerland agreed on a set of uniform standards for subtitling.<sup>10</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.

8 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)

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

10 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)

## 5.3 Sign language<sup>11</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>12</sup>

Two media service providers mentioned the use of Austrian Sign Language (ÖGS) in their 2025 annual reports but did not provide figures. Aside from these providers, only the ORF offers a channel with ÖGS, which focuses mostly on news and current affairs.

### 5.3.1 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 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% of the screen area.
- Interpretation should also be simultaneous. If delayed, information is often lost.<sup>13</sup>

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

### 5.3.2 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/> (in German).

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. Criticisms raised include the lack of facial expressions and cultural context, which avatars cannot convey as well as their human counterparts.<sup>14</sup>

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

11 Austrian Association of the Deaf (ÖGLB): "Welcome!" (in German) <https://www.oeglb.at/> (accessed on 21 April 2022)  
 12 ÖGSDV: "Deafness and sign language" (in German) <https://www.oegsdv.at/web/gehoerlosigkeit-gebaerdensprache/> (accessed on 2 May 2022)  
 13 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)  
 14 Oeglb.at: 'Statement from the Austrian Association of the Deaf (ÖGLB) on the avatar at the Danube Island Festival and on Austrian Sign Language (ÖGS) vocabulary used by hearing people' (in German) <https://www.oeglb.at/stellungnahme-des-oeglb-zu-avatar-am-donauinsel-fest-und-oegs-vokabeln-von-hoerenden-personen/?hilit=Avatar>

## 5.4 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>15</sup> The accessibility benefits provided by audio descriptions do vary widely according to the material, however: if the spoken word predominates or the content is itself acoustic in nature—as it is with documentaries—then an audio description is not necessarily the tool of choice.

Alongside the ORF, two media service providers mentioned the use of audio descriptions, although one provider did not provide figures in the annual report.

In an understanding signed between the ARD, the ORF, the SRF, the ZDF, Deutsche Hörfilm GmbH, Hörfilm e.V. and audioskript, the basic principles to follow when preparing audio descriptions is set out. The various providers have supplemented this document with their own, more individual rules.<sup>16</sup>

### 5.4.1 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.

Apps are also available 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.

### 5.4.2 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. These artificial voices are now sounding increasingly lifelike.

15 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)

16 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)

## Publishing information

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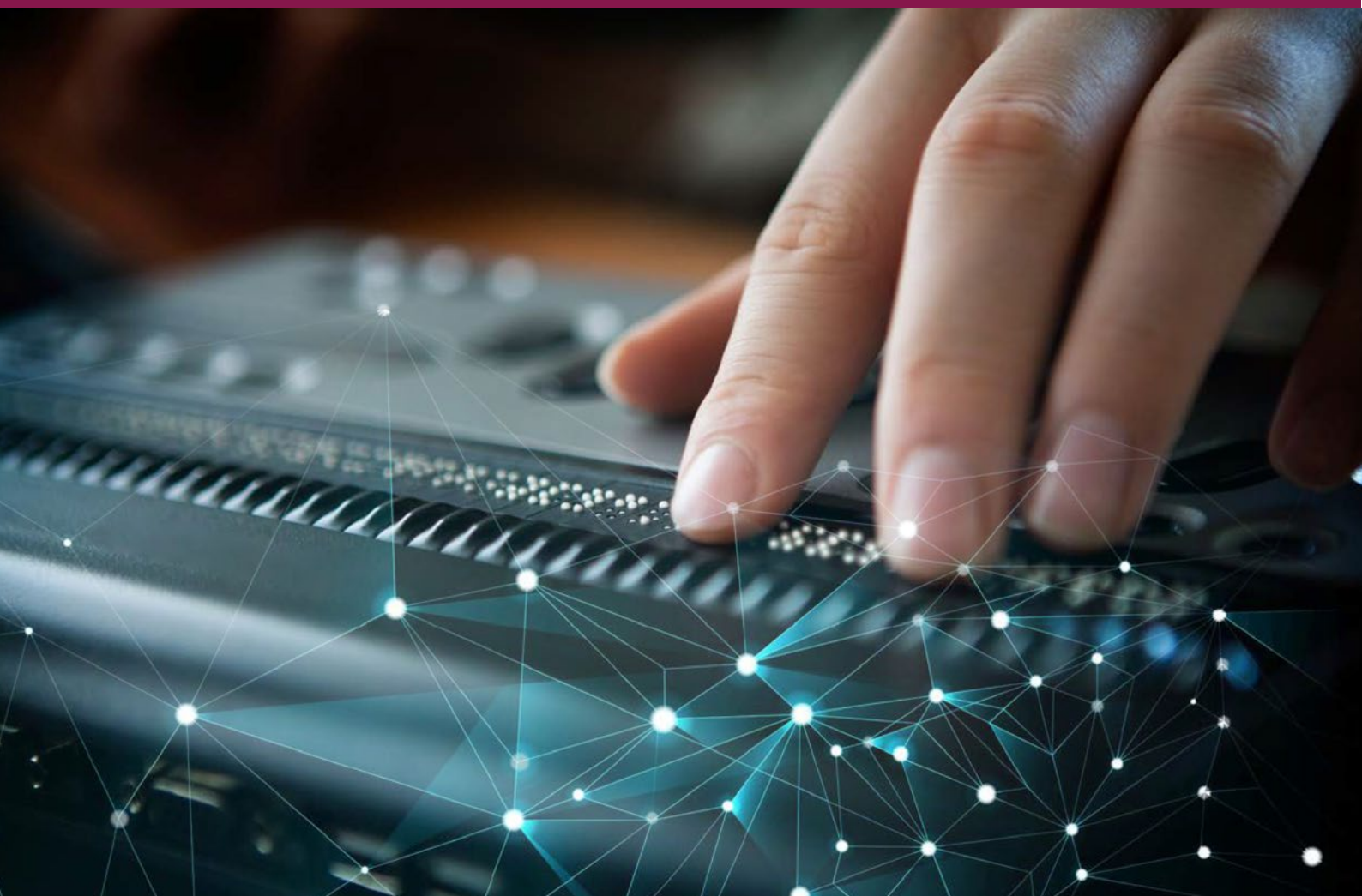
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