

**Communications Authority’s Public Consultation on
Renewal of Domestic Free Television Programme Service Licences:
Submission from Equal Opportunities Commission**

1. Since the last public consultation on renewal of domestic free television (“TV”) programme service licences was conducted in 2014, public expectation on the accessibility of domestic free TV has been growing rapidly. In this submission, by incorporating our observations on issues encountered by vulnerable groups in accessing free TV programme service, the Equal Opportunities Commission (“EOC”) suggests that the Communications Authority (“CA”) should review and enhance accessibility features including subtitling (sometimes referred to as captioning), sign language interpretation and audio description by reassessing the current requirements imposed on free TV licensees and considering whether additional licensing conditions should be included to promote good industry practices. These would enable audiences with hearing and visual impairments to have better access to free TV services. Meanwhile, some benchmarking overseas practices will also be discussed for CA’s reference.

2. The *United Nations Convention on the Rights of Persons with Disabilities* (“CRPD”) entered into force for the People’s Republic of China, including the Hong Kong Special Administrative Region on 31 August 2008. Article 21 of CRPD recognises the right of persons with disabilities (“PWDs”) to seek, receive and impart information and ideas on an equal basis with others and through all forms of communication of their choice. Specifically, the signatories should be “*providing information intended for the general public to persons with disabilities in accessible formats and technologies appropriate to different kinds of disabilities in a timely manner and without additional cost*” and “*encouraging the mass media ... to make their services accessible to persons with disabilities*”. To meet the requirements of CRPD in ensuring PWD’s access to public information, the CA may consider requesting domestic free TV licensees to take further steps to enhance the accessibility of their free TV programme service.

A. Mandating Enhancing Subtitling to Support Audiences with Hearing Difficulties

3. According to the Census and Statistics Department, there were approximately 246 200 persons with hearing difficulty in Hong Kong in 2020, with a prevalence rate of 3.3% among the total population.¹ Subtitles are necessary and essential for audiences who have

¹ Census and Statistics Department. (2021). Special Topics Report No. 63 – Persons with disabilities and chronic diseases. Accessed on 11 September 2025, https://www.censtatd.gov.hk/en/data/stat_report/product/C0000055/att/B11301632021XXXXB0100.pdf.

hearing difficulties. For example, in June 2025, when one of the licensees ceased providing subtitles for certain children’s programmes, there was public concern over the difficulties faced by children with hearing impairments in learning through watching the programmes.² This incident highlights the essential role of subtitling in providing inclusive free TV services and ensuring PWDs have sufficient access to public information.

Recommendation 1: Request Licensees to Submit Progressive Target and Timeline on Mandatory Subtitling

4. The CA is **recommended to consider requesting licensees to set a progressive range of targets in a specified period of timeframe, to provide subtitles as a mandatory requirement for licence renewal of domestic free TV programme services.** Under the current requirements, licensees are only compelled to provide subtitling for all news programmes, current affairs programmes, weather programmes and emergency programmes, as well as all programmes broadcast between 7 p.m. and 11 p.m. on their services. But there are additional programme categories that require subtitles, including educational programmes, children’s content, documentaries, and entertainment shows broadcast outside the prime time hours.

5. Indeed, various regulatory approaches exist internationally. In the United Kingdom (“UK”), The Office of Communications (“Ofcom”), the statutory body regulating TV services, requires a minimum of 80% of annual programme hours for most of the broadcasting channels to include subtitling.³ Ofcom has implemented a 10-year plan for broadcasters to incrementally achieve the subtitling target, beginning from 10% coverage in the first and second years and gradually increasing to 80% by the tenth year. The BBC, as a public broadcaster, is mandated to provide subtitles to 100% of programme hours in its channels. In Australia, statutory requirement mandates 100% captioning for all programmes on primary channels between 6 a.m. and midnight, and for all news and current affairs programmes at any time. Please refer to *Annex I* for a comparison table of mandatory requirements set out by communications regulators in several jurisdictions. The CA should evaluate feasibility of extending subtitling requirements beyond current hours to provide audience with hearing difficulties wider programme choices. The CA can encourage licensees to develop incremental targets and implementation timelines with full consideration of Hong Kong’s unique broadcasting landscape, industry capacities and audiences’ expectations.

² Lam, M. “Accessibility concerns raised as TVB drops subtitles from kids shows.” *The Standard Hong Kong*, June 9, 2025. Accessed on 11 September 2025, <https://www.thestandard.com.hk/hong-kong-news/article/304287/Accessibility-concerns-raised-as-TVB-drops-subtitles-from-kids-shows>.

³ Applicable to all programmes, other than advertisements and programmes that have been excluded by Ofcom.

Recommendation 2: Encourage Licensees to Leverage Artificial Intelligence to Fulfil Subtitling Requirements

6. It should be noted that the provision of subtitling has been significantly enhanced through the deployment of AI technology, substantially reducing costs compared to traditional manual subtitling methods. In view of this technological breakthrough, Ofcom of the UK published a *Strategic Approach to AI* in June 2025, acknowledging the key applications of AI in generating real-time captions in broadcasting. With AI-powered captioning technologies, TV licensees are expected to meet the subtitling requirements more efficiently without unduly straining resources. An example in Australia illustrates this point. Network 10, a commercial broadcaster, has implemented AI-powered captioning workflows in partnership with a global media services company, demonstrating that such technologies can reduce per-hour captioning costs by 21% while maintaining 99%+ accuracy for live broadcasts.⁴ This clearly conveys that mandatory subtitling requirements potentially imposed by the CA would not present unreasonable compliance challenges for licensees.

7. In the Chinese context, a technology company is reported to have developed core technologies in machine translation and speech synthesis that enable real-time speech recognition, including recognition of mixed Mandarin Chinese and English speech and translation of Chinese speech into English, for TV broadcasting applications. Locally, Radio Television Hong Kong has recently collaborated with The Chinese University of Hong Kong to explore and test AI applications in broadcasting scenarios, including real-time text-to-speech and speech-to-text conversions, as well as the first controllable Cantonese Text-to-Personalised Speech Generation.⁵ Given these technological applications across multiple regions, the CA can **encourage TV licensees to explore and set aside a designated budget in similar AI technological solutions as part of their licence renewal commitments** to meet the enhanced subtitling requirements.

⁴ Red Bee Media. (2025). Red Bee Media's artificial intelligence captioning workflows deliver savings for Network 10. Accessed on 11 September 2025, <https://www.redbeemedia.com/news/red-bee-medias-artificial-intelligence-captioning-workflows-bring-costs-down-for-network-10/>.

⁵ Communications and Public Relations Office, The Chinese University of Hong Kong. (2024). Centre for Perceptual and Interactive Intelligence and Radio Television Hong Kong sign MOU to develop and apply artificial intelligence in public broadcasting services. Accessed on 11 September 2025, <https://www.cpr.cuhk.edu.hk/en/press/%E5%8D%9A%E6%99%BA%E6%84%9F%E7%9F%A5%E4%BA%A4%E4%BA%92%E7%A0%94%E7%A9%B6%E4%B8%AD%E5%BF%83%E8%88%87%E9%A6%99%E6%B8%AF%E9%9B%BB%E5%8F%B0%E7%B0%BD%E7%BD%B2%E5%90%88%E4%BD%9C%E5%82%99%E5%BF%98%E9%8C%84/>.

B. Mandating Expanded Sign Language Coverage to Support Audiences with Hearing Difficulties

Recommendation 3: Implement Targets for Including Sign Language

8. Sign language interpretation is crucial for audiences with hearing impairments to understand TV programme content. It was reported that there were about 6,000 sign language users across Hong Kong in 2024,⁶ representing a segment whose needs require targeted accommodation. This community relies on sign language as their primary mode of communication and cultural expression. To ensure equal access to publicly available information and entertainment through free TV services, the EOC **recommends that the CA introduce mandatory minimum targets for sign language interpretation in TV programmes as a condition within the new licences** issued to TV service providers.

9. Under CA's current requirement, TV licensees shall provide sign language interpretation and traditional Chinese subtitles for a comprehensive news programme in Cantonese of not less than 25 minutes each day. This duration accounts for only about 1.7% of total daily hours. However, sign language users should have the basic right to enjoy a wider variety of programmes beyond news content. For comparison, in the UK, Ofcom has introduced a 10-year target for signing, gradually increasing from 1% of total programme hours annually for the first two years to 5% by the tenth year. This 5% equates to approximately 72 minutes per day of round-the-clock programme broadcasting, excluding advertisements. In this sense, imposing more progressive targets for sign language may not necessarily be an impossible task for TV licensees to comply. The CA may consider establishing targets in renewed TV licences that appropriately balance the needs of sign language users and the business interests of TV licensees in Hong Kong as an international city.

Recommendation 4: Encourage Licensees to Leverage Artificial Intelligence to Complement Sign Language Human Interpreters

10. The EOC acknowledges the practical constraint that, in 2024, only 50 to 60 sign language interpreters were registered in List of Sign Language Interpreters maintained by the Hong Kong Joint Council for People with Disabilities and the Hong Kong Council of Social Service. However, the EOC also recognises the emergence of AI technologies, which presents an opportunity for TV licensees to incorporate more sign language interpretation elements in their programming without solely relying on human sign-language interpreters. For example, a company based in the United States employs natural language processing to convert text to sign language and utilises 3D animation to generate avatars capable of signing video content in real-time using American Sign Language, demonstrating technology's potential to expand

⁶ The University of Hong Kong. (2024). A voice for the deaf. *HKU Bulletin* 26(1), 40-41. Accessed on 11 September 2025, <https://bulletin.hku.hk/knowledge-exchange/a-voice-for-the-deaf/>.

sign language coverage in TV broadcasting. In China, several major TV channels have implemented AI-powered digital avatars to provide real-time sign language translation during live broadcasts of some international sporting games in 2022, further illustrating practical applications of AI technologies.

11. Given that AI technologies can evolve dramatically within just a few years, the current licence renewal window, which occurs only once every 12 years, presents an ideal time for the CA to establish requirements for licensees to leverage technological advancement to enhance sign language accessibility across TV programming. The CA is **recommended to encourage licensees to explore these innovative solutions through pilot projects and research partnerships, and to include these proposals in the licensees' six-year investment plans**. AI offers significant cost-effective solutions for real-time interpretation, reducing the financial burden of having human interpreters working intensively during live broadcasts. Conversely, for pre-recorded programmes, where production timelines are less pressured, the TV licensees can deploy human sign language interpreters, complemented by AI technology, to perform sign language interpretation for a wider range of content other than the currently-required 25-minute news programme. From the CA's regulatory perspective, this dual approach fosters the inclusion of sign language interpretations in more TV programmes without compromising the quality.

C. Enhancing Audio Description to Support Audiences with Visual Impairments

Recommendation 5: Request Licensees to Submit Plans on Mandatory Provision of Audio Description for a Certain Percentage of TV Programme Hours

12. Currently, there are no mandatory requirements for TV licensees to make programmes with audio descriptions. There has been a continuous public call for free TV service providers to provide channels or programmes with audio description from time to time. In view of this, the EOC **recommends the CA to introduce mandatory audio description requirements as part of the licence renewal conditions for free TV services**. The UK provides a valuable referencing point, where Ofcom requires audio description for 10% of programme hours for free TV licensees under its regulatory framework. In New Zealand, Ministry for Culture and Heritage is also currently proposing legislation requiring TV broadcasters to implement progressive targets for audio descriptions, with enforcement expected in 2026.

13. Beyond regulatory developments, technological advancements are also making audio description increasingly feasible and cost-effective. For example, in the UK, the Royal National Institute of Blind People has partnered with Google to develop AI-powered audio

descriptions for Formula E racing content. To be specific, Google has developed models that accurately transcribe live race commentary and analyse this transcription alongside live timing data and other official race information to generate fact-based race summaries. The research team then applies advanced text-to-speech technology to create polished audio reports delivered in natural and expressive speech. This innovation approach demonstrates how AI technologies could be applied to generate high-quality audio descriptions for various TV programmes, including live broadcasts, by identifying key visual elements and translating them into descriptive narration in a cost-effective way. Given these international regulatory trends and technological innovations, the CA is **recommended to request licensees to submit proposals with self-initiated targets to increase audio description coverage in their six-year investment plans**, with specific emphasis on incorporating appropriate technologies to enhance accessibility for audiences with visual impairments.

D. Best Practices to Support Audiences with Hearing Difficulties and Visual Impairments

Recommendation 6: Develop a Best Practice Guideline for Enhancing TV Programme Accessibility

14. The CA is **recommended to consider developing a referencing guideline showcasing best practices for enhancing accessibility for audiences with diverse needs, including those with hearing and visual impairments**. Such guideline would help align expectations among the CA as regulator, TV licensees and audiences requiring accommodation regarding accessibility requirements. This alignment would minimise potential disputes and prevent complaints from arising in the first place. In the UK, Ofcom issued an accessibility best practice guideline that includes technical specifications for subtitle presentation, accuracy and synchronicity, recommended approaches for different program genres, guidance on optimal timing and readability, as well as standards for describing non-speech information. The guideline also advises on the style of audio description, the visual information that should be described, as well as types and quality of signing. Although this guideline is not a statutory one, it helps licensees identify good practices to follow, guides licensees to better comply with the statutory *Code on Television Access Services*, and provides a framework for regulatory body to compare the performance of different licensees. Also, instead of imposing hard and fast rules to comply, the presence of best practice guideline offers TV licensees greater flexibility to enhance accessibility while pursuing profit or other commercial objectives. When considering developing a guideline specifically for Hong Kong, the CA could incorporate elements that address broadcasting conditions while reflecting universal accessibility principles.

September 2025

Table 1: A Summary of Regulatory Regimes on Free TV Domestic Services in the United Kingdom, Australia and the United States of America

Aspect	United Kingdom	Australia	United States of America
Primary Regulatory Body	Office of Communications (Ofcom)	Australian Communications and Media Authority (ACMA)	Federal Communications Commission (FCC)
Legal Status of Regulator	Statutory body under <i>Office of Communications Act 2002</i>	Statutory body under <i>Australian Communications and Media Authority Act 2005</i>	Independent government agency established by the <i>Communications Act of 1934</i>
Key Legislation	<ul style="list-style-type: none"> ▪ <i>Communications Act 2003</i> ▪ <i>Media Act 2024</i> 	<i>Broadcasting Services Act 1992</i>	<ul style="list-style-type: none"> ▪ <i>Communications Act of 1934</i> ▪ <i>Twenty-First Century Communications and Video Accessibility Act (CVAA) of 2010</i>
Presence of Codes			
● on broadcasting	<ul style="list-style-type: none"> ▪ <i>The Broadcasting Code</i> 	<ul style="list-style-type: none"> ▪ <i>Commercial Television Industry Code of Practice</i> 	
● on accessibility	<ul style="list-style-type: none"> ▪ <i>Code on Television Access Services</i> bound by S.303 of <i>Communications Act 2003</i> (mandatory to comply) ▪ <i>Accessibility Best Practice Guidelines</i> (non-statutory) ▪ Both guidelines updated in 2024 	<ul style="list-style-type: none"> ▪ <i>Broadcasting Services (Television Captioning) Standard 2023</i> (statutory) ▪ <i>Captioning quality guidelines</i> (supplementing <i>Standard</i> above) 	<ul style="list-style-type: none"> ▪ Part 79 of Title 47 of the <i>Code of Federal Regulations</i> (on accessibility rules for TV broadcasting, on closed captioning and audio description requirements) ▪ <i>Closed Captioning of Programming on Television: Quality Standards, Responsibilities, Registration and Certification, and Complaint Procedures</i> (established by FCC)
Current Requirements on Accessibility	<ul style="list-style-type: none"> ▪ Set in <i>Code on Television Access Services</i>, mandatory targets (in general) for almost all TV programmes (in terms of percentages of programme hours in a year): <ul style="list-style-type: none"> ● Subtitling (80%) 	<p>Subtitling</p> <ul style="list-style-type: none"> ▪ 100% captioning for all programmes on primary channels of free-to-air broadcasters between 6am and midnight and all news and current affairs programmes (for all aired time) (bound by Part 9D of <i>Broadcasting Services Act 1992</i>) 	<p>Subtitling</p> <ul style="list-style-type: none"> ▪ For non-exempt English language programming, 100% of new and 75% of pre-rule programming must provide closed captioning.

Aspect	United Kingdom	Australia	United States of America
	<ul style="list-style-type: none"> • Audio description (10%) • Sign language (5%) ▪ BBC, as a public broadcaster, is mandated to provide subtitles for 100% of programme hours on its channels, exceeding the standard 80% requirement. 	<ul style="list-style-type: none"> ▪ Only few programmes, e.g. music-only programmes, non-English programmes, unscheduled live sports programmes, are exempted from this requirement. ▪ Detailed provisions on quality, readability, accuracy and comprehensibility of captions are stipulated in <i>Broadcasting Services (Television Captioning) Standard 2023</i> <p>Audio Description</p> <ul style="list-style-type: none"> ▪ Two public broadcasters funded by the government, ABC and SBS, have launched audio descriptions since 2020, committing to providing around 14 hours per week of audio-described programmes (but not legally mandated) <p>Sign Language</p> <ul style="list-style-type: none"> ▪ Free TV Australia and ASTRA, industry’s self-regulated bodies, published guidelines for TV licensees on inclusion of Auslan interpreters in frame during emergency broadcasts where it is practicable (non-mandatory) 	<ul style="list-style-type: none"> ▪ Some programmes are exempted from captioning, such as those primarily textual, broadcasting between 2am and 6am, non-vocal musical, with no repeat value, in neither English nor Spanish. ▪ Pre-recorded programming must be captioned before aired, while live programming may adopt real-time captioning techniques. <p>Audio Description</p> <ul style="list-style-type: none"> ▪ Four broadcast networks and top five non-broadcast networks must provide 87.5 hours of audio description per calendar quarter (approximately 7 hours per week). ▪ Must be 50 hours during prime time or children’s programming, with 37.5 hours between 6am and 11:59pm local time <p>Sign Language</p> <ul style="list-style-type: none"> ▪ No mandatory federal requirements (FCC only acknowledges the provision of American Sign Language interpreter services in some state and local government’s televised emergency announcements and encourages video programmers to ensure the interpreter is visible on the TV screen)
Future Plans	<ul style="list-style-type: none"> ▪ <i>Media Act 2024</i> sets out updated regulatory framework for broadcasting, including accessibility provisions 	<ul style="list-style-type: none"> ▪ Ongoing reviews of content quotas, while some periodic updates to accessibility standards as needed 	<ul style="list-style-type: none"> ▪ Ongoing expansion of audio description requirements from current top 110 TV markets to all 210 US markets by 2035 ▪ Periodic reviews of captioning quality standards

Note: Only regulations on free domestic TV broadcasting are included, while those which cover digital TV or streaming platforms are not addressed.