

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

1. The Equal Opportunities Commission (“EOC”) recognises that audience with diverse needs should equally enjoy the right to access to public information and receive entertainment from free or pay televisions (“TV”). 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*”. Under sections 6 and 26 of the *Disability Discrimination Ordinance* (“DDO”), it is unlawful for a provider of goods, services and facilities (“GSF”), whether for payment or not, to discriminate against a PWD in the terms or conditions, or the manner, in which the GSF are provided, or in the way the GSF provider affords the PWD access to any benefits or facilities, unless to do so would impose an unjustifiable hardship on the provider. To meet the requirements of CRPD and DDO in ensuring PWD’s access to public information and pay TV services respectively, the Communications Authority (“CA”) may consider requesting the domestic pay TV programme licensee, Now TV, to take further steps to enhance the accessibility of its TV programme service.

2. In this submission, the EOC suggests that the CA should consider introducing a best practice guideline for enhancing TV programme accessibility. Meanwhile, CA may also reassess the current requirements imposed on the licence of Now TV and consider whether to include additional licensing conditions, thereby enabling audiences with hearing and visual impairments to have better access to pay TV services. Some overseas practices will also be discussed for CA’s benchmarking purposes.

**A. Overview of International Landscapes of Regulating Pay TV and /or Other Similar Subscription Services**

3. The CA may take reference to various approaches adopted by overseas jurisdictions in regulating their pay TV services. In the United Kingdom (“UK”), The *Media Act 2024* introduces a unified accessibility framework across all TV entertainment formats and sets out

that Tier 1 service providers, including major pay TV operators and streaming platforms,<sup>1</sup> should comply with the same accessibility standards, including mandatory quotas in terms of percentages of programme hours in a year, i.e. for subtitling (80%), audio description (10%), and sign language interpretation (5%), over a four-year transition period or face fines for non-compliance. The Office of Communications (“Ofcom”), UK’s statutory body regulating TV services, also mandates broadcasters to comply with the same accessibility standards. The UK’s regulatory approach is particularly noteworthy as it creates a framework ensuring audiences with diverse needs enjoy equal access to content regardless of delivery methods, while preventing regulatory gaps as viewing habits continue to evolve.

4. In the European Union (“EU”), audiovisual media accessibility is governed by both *Audiovisual Media Services Directive* (“AVMSD”) and *European Accessibility Act* (“EAA”). The AVMSD sets out content accessibility obligations for EU Member States on audiovisual media services in relation to captioning, audio description and sign language, while the EAA concerns the functional and interface accessibility requirements, ensuring platforms and user interfaces work with assistive technologies. The EAA complements AVMSD. There are no centralised mandatory accessibility quotas across EU Member States, hence, Member States enjoy flexibility to determine their own implementation approaches. For pay TV services, this dual framework results in varying implementation across these States, with some jurisdictions like France and the Netherlands proactively imposing stricter accessibility quotas.

5. In the United States, pay TV operators face binding accessibility obligations under the *Twenty-First Century Communications and Video Accessibility Act of 2010*. All video programming distributors, including pay TV operators, must provide closed captions that meet the quality standards for accuracy, synchronicity, completeness and placement set by Federal Communications Commission. The regulatory framework also extends to streaming services, transforming accessibility features like captioning from optional to mandatory, after a judicial challenge, with full implementation phased in by 2014.

6. In Australia, a more lenient regulatory approach is adopted for subscription TV services on captioning requirements under *Broadcasting Services Act 1992*. Subscription TV has tier requirements ranging from 10% to 80% depending on channel categories and content types, making its captioning quotas less stringent than those for free-to-air broadcasters which are required to provide captions for 100% of programmes broadcast on primary channels between 6 a.m. and midnight, and for all news and current affairs programmes at any time. The Australian Communications and Media Authority enforces these legally binding captioning standards, while providing non-binding guidelines on captioning best practices.

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<sup>1</sup> Typical examples include major pay TV operators, such as Sky and Virgin Media, as well as streaming platforms, such as Netflix, Disney plus and Amazon Prime Video.

7. The EOC acknowledges CA's current light-handed and market-driven approach in regulating pay TV services. **To benchmark with international best practices where stricter regulations have become the norm, the CA may modify its regulatory approach by introducing a best practice guideline and incremental or voluntary accessibility targets, which can serve as a starting point for the pay TV service licensee to comply. In the long run, more mandatory requirements may be introduced to provide the needed environment for a more equitable access to pay and free TV services, while not disincentivising the pay TV service licensee to operate its TV business.**

## **B. Best Practices to Support Audiences with Hearing Difficulties and Visual Impairments**

### **Recommendation 1: Develop a Best Practice Guideline for Enhancing TV Programme Accessibility**

8. 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. Both domestic free and pay TV service licensees could refer to such a guideline, enabling them to better align expectations among the CA as regulator, TV licensees, and audiences requiring accommodation on accessibility requirements. The presence of such guideline offers TV licensees greater flexibility to enhance accessibility and shares know-hows, bringing Hong Kong closer to international trend of strengthening regulations.

9. In the UK, Ofcom has issued a non-statutory accessibility best practice guideline that includes technical specifications for subtitle presentation, accuracy, and synchronicity, recommended approaches for different programme 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 the types and quality of signing. The CA may refer to the framework and adapt the content of the UK's guideline to suit Hong Kong's social context.

## **C. Enhancing Subtitling to Support Audiences with Hearing Difficulties**

10. 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.<sup>2</sup> Subtitles are necessary and essential for audiences who have hearing difficulties to have sufficient access to public information.

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<sup>2</sup> Census and Statistics Department. (2021). Special Topics Report No. 63 – Persons with disabilities and chronic diseases. Accessed on 21 January 2026, [https://www.censtatd.gov.hk/en/data/stat\\_report/product/C0000055/att/B11301632021XXXXB0100.pdf](https://www.censtatd.gov.hk/en/data/stat_report/product/C0000055/att/B11301632021XXXXB0100.pdf).

## **Recommendation 2: Introduce Optimal Level of Mandatory Subtitling**

11. The CA is **recommended to consider introducing a mandatory requirement for the licensee to provide subtitling for a certain proportion or scope of programmes, such as news programmes and current affairs programmes.** For subscribed channels which are operated by TV operators outside Hong Kong, where the licensee may have limited control over source content, the CA may advise the licensee to utilise artificial intelligence (“AI”) (see **paragraphs 12 and 13** below for details) to generate captions and encourage licensee to review and proofread captions before broadcast. If provision of full subtitling is not immediately achievable, in the interests of audiences, providing captions that summarise the news and current affairs programmes, or outline key messages in business programmes, would still be preferable to offering no captions at all. The CA can encourage the licensee to develop incremental targets and implementation timelines with full consideration of Hong Kong’s broadcasting landscape, industry capacities and audiences’ expectations.

## **Recommendation 3: Encourage Licensee to Leverage Artificial Intelligence to Enhance Subtitling**

12. 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. In Australia, 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.<sup>3</sup> This clearly conveys that requesting a submission of subtitling targets would not necessarily present unreasonable operational challenges for the licensee.

13. 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.<sup>4</sup> Given these technological applications across multiple regions, the CA

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<sup>3</sup> Red Bee Media. (2025). Red Bee Media’s artificial intelligence captioning workflows deliver savings for Network 10. Accessed on 21 January 2026, <https://www.redbeemedia.com/news/red-bee-medias-artificial-intelligence-captioning-workflows-bring-costs-down-for-network-10/>.

<sup>4</sup> Communications and Public Relations Office, The Chinese University of Hong Kong. (2024). Centre for

can encourage the pay TV licensee to explore similar AI technological solutions to generate captions and meet potential new mandatory requirements.

#### **D. Expanding Sign Language Coverage to Widen Audiences' Choices**

14. 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,<sup>5</sup> representing a segment whose needs require targeted accommodation. This community relies on sign language as their primary mode of communication and cultural expression. However, there is no current requirement on the provision of sign language interpretation.

#### **Recommendation 4: Encourage Licensee to Implement Targets for Including Sign Language with the Use of Artificial Intelligence**

15. To ensure equal access to publicly available information and entertainment through pay TV services, the EOC **recommends the CA to require the licensee to provide a self-initiated target with feasible timeline to gradually increase sign language interpretation in TV programmes.**

16. 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 licensee 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 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.

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Perceptual and Interactive Intelligence and Radio Television Hong Kong sign MOU to develop and apply artificial intelligence in public broadcasting services. Accessed on 21 January 2026, <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/>.

<sup>5</sup> The University of Hong Kong. (2024). A voice for the deaf. *HKU Bulletin* 26(1), 40-41. Accessed on 21 January 2026, <https://bulletin.hku.hk/knowledge-exchange/a-voice-for-the-deaf/>.

17. The CA is **recommended to encourage the licensee to explore these AI innovative solutions through pilot projects and research partnerships**. 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 like those available in video-on-demand channels, where production timeline is less pressured, the TV licensee can deploy human sign language interpreters, complemented by AI technology, to perform sign language interpretation for a wider range of content. From the CA's regulatory perspective, this dual approach fosters the inclusion of sign language interpretations in more TV programmes without compromising the quality. In this sense, imposing more progressive targets for sign language may not necessarily be an impossible task for TV licensee to comply.

## **E. Enhancing Audio Description to Support Audiences with Visual Impairments**

### **Recommendation 5: Request Licensee to Submit Plans on Increasing Audio Description Coverage**

18. Currently, there are no mandatory requirements for TV licensees to make programmes with audio descriptions. There has been a continuous public call for both pay and 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 request the pay TV licensee to submit plans with self-initiated targets to increase audio description coverage**, with specific emphasis on incorporating appropriate technologies to enhance accessibility for audiences with visual impairments.

19. Technological advancements are indeed 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. The CA can proactively take stock and share international good practices with pay and free TV licensees for their planning and implementation.

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

Aspect	United Kingdom	Australia	United States of America
<b>Primary Regulatory Body</b>	Office of Communications (Ofcom)	Australian Communications and Media Authority (ACMA)	Federal Communications Commission (FCC)
<b>Legal Status of Regulator</b>	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>
<b>Key Legislation</b>	<ul style="list-style-type: none"> <li>▪ <i>Communications Act 2003</i></li> <li>▪ <i>Media Act 2024</i></li> </ul>	<i>Broadcasting Services Act 1992</i>	<ul style="list-style-type: none"> <li>▪ <i>Communications Act of 1934</i></li> <li>▪ <i>Twenty-First Century Communications and Video Accessibility Act (CVAA) of 2010</i></li> </ul>
<b>Presence of Codes in relation to Accessibility</b>	<ul style="list-style-type: none"> <li>▪ <i>Code on Television Access Services</i> bound by S.303 of <i>Communications Act 2003</i> (mandatory to comply)</li> <li>▪ <i>Accessibility Best Practice Guidelines</i> (non-statutory)</li> <li>▪ <i>Ofcom's Guidelines on Providing Television and On-Demand Access Services</i> (non-statutory)</li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>Broadcasting Services (Television Captioning) Standard 2023</i> (statutory)</li> <li>▪ <i>Subscription Broadcast Television Codes of Practice</i> (self-regulated, non-statutory)</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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)</li> <li>▪ <i>Closed Captioning of Programming on Television: Quality Standards, Responsibilities, Registration and Certification, and Complaint Procedures</i> (established by FCC)</li> </ul>
<b>Current Requirements on Accessibility</b>	<ul style="list-style-type: none"> <li>▪ 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"> <li>• Subtitling (80%)</li> <li>• Audio description (10%)</li> <li>• Sign language (5%)</li> </ul> </li> </ul>	<p><b>Subtitling</b></p> <ul style="list-style-type: none"> <li>▪ Tiered captioning quotas ranging from 10% to 80% of programming hours annually, depending on the channel category</li> <li>▪ Detailed provisions on quality, readability, accuracy and comprehensibility of captions are stipulated in <i>Broadcasting Services (Television Captioning) Standard 2023</i></li> </ul>	<p><b>Subtitling</b></p> <ul style="list-style-type: none"> <li>▪ For non-exempt English language programming, 100% of new and 75% of pre-rule programming must provide closed captioning.</li> <li>▪ 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.</li> <li>▪ Pre-recorded programming must be captioned before aired, while live programming may adopt real-time captioning techniques.</li> </ul>

Aspect	United Kingdom	Australia	United States of America
		<p><b>Audio Description / Sign Language</b></p> <ul style="list-style-type: none"> <li>No mandatory requirements from the regulator</li> </ul>	<p><b>Audio Description</b></p> <ul style="list-style-type: none"> <li>Subscription TV systems with 50,000 or more subscribers must provide 87.5 hours of audio description per calendar quarter (approximately 7 hours per week) on top five most-watched non-broadcast networks</li> <li>Must be 50 hours during prime time or children’s programming, with 37.5 hours between 6am and 11:59pm local time</li> </ul> <p><b>Sign Language</b></p> <ul style="list-style-type: none"> <li>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)</li> </ul>
<p><b>New Development / Future Plans</b></p>	<ul style="list-style-type: none"> <li><i>Media Act 2024</i> extends accessibility obligations to Tier 1 service providers (including major pay TV operators) with phased compliance</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing reviews of content quotas, while some periodic updates to accessibility standards as needed</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing expansion of audio description requirements from current top 110 TV markets to all 210 US markets by 2035</li> <li>Periodic reviews of captioning quality standards</li> </ul>

Note: Regulations that are applicable to domestic pay TV broadcasting are included, while those which only cover free-to-air TV or streaming platforms are not addressed.