

# Responses to the Consultation Document: Draft Access Rules for Television Broadcasting Services

Report by



September 2024

## Contents

Chapter 1: Introduction .....	3
Chapter 2: Tabled presentation of categories of respondents.....	4
Chapter 3: Introductory Sections of the draft Access Rules (Q.1) .....	5
3.1    General views .....	5
3.2    Accessible Complaints Mechanism .....	6
Chapter 4: Definitions (Q.2) .....	7
Chapter 5: General Rules Applying to All Access Provision (Q.3).....	9
5.1    Quality Standards .....	9
5.2    National Emergencies.....	9
5.3    Promotion of Access Provision.....	10
5.4    Obligation to Consult with Access Users.....	11
5.5    Annual Action Plans and Reporting.....	12
Chapter 6: Subtitling Rules (Q. 4 -5).....	13
Chapter 7:    Irish Sign Language (ISL) Rules (Q.6 -8) .....	15
7.1    ISL targets .....	15
7.2    Assessment of ISL targets.....	16
7.3    Other considerations.....	17
Chapter 8: Audio Description (AD) Rules (Q.9 -10) .....	19
8.1    AD targets.....	19
8.2    AD Rules .....	20
Chapter 9: Deletions to Sections 9 – 13 of the 2019 Access Rules (Q.11).....	21
Chapter 10: Appendices to Access Rules: Access Principles and Influencing Factors (Q.12).....	23
Chapter 11: Appendices to Access Rules: Standards Applying to Subtitling, Irish Sign Language & Audio Description (Q.13) .....	25
Annex 1 – List of Respondents by Category .....	27
Annex 2 – List of Consultation Questions.....	28

## Chapter 1: Introduction

Coimisiún na Meán (“the Commission”) is Ireland’s regulator for broadcasting, video-on-demand, online safety, and media development. The Commission was established in March 2023 under the Online Safety and Media Regulation Act 2022, which amended the Broadcasting Act 2009 (“the Act”).

The Commission has a wide range of responsibilities, which include the setting of standards and regulations for different types of media based in Ireland. One of the Commission’s key duties under the Act is to make media service rules to govern the standards and practices of broadcasters and providers of audiovisual on-demand media services.

In keeping with its statutory functions and obligations, the Commission is dedicated to engaging with relevant service users as part of its process for developing its regulatory rules and standards that will directly impact those users and their enjoyment of television programming.

A User Consultative Panel (“UCP”) was established by the Commission’s predecessor, the Broadcasting Authority of Ireland, to facilitate direct engagement on user experience in order to inform regulatory policy. The Commission has already engaged with the UCP on matters relating to the accessibility of broadcasting services and will continue to meet and engage with the UCP on an ongoing basis.

In addition, the Commission is mindful of Ireland’s ratification of the United Nations Convention on the Rights of Persons with Disabilities and the prominence that it places on the involvement of Disabled Persons Representative Organisations (“DPROs”) in the development of policy. As such, the Commission facilitated in-person meetings with relevant DPROs as part of a consultation process on the changes being proposed to the rules that require television broadcasters to enhance the accessibility and enjoyment of programming for people with disabilities (“the draft Access Rules<sup>1</sup>”).

Between 18 July 2024 and 19 August 2024, the Commission invited responses to a public consultation on the changes being proposed in the draft Access Rules.

This document provides an accessible overview of those responses. The objective of this document is not to evaluate responses, nor provide any conclusions or recommendations (legal or regulatory) or to provide or suggest any technological solutions. This document provides a summary of the representations made, but it should be noted that the Commission will have read and evaluated all responses and taken them into account in reaching any decisions.

A total of 13 responses to the consultation were received and Figure 2 below categorises responses according to the types of organisations that provided submissions. The full list of respondents and organisational type are listed in alphabetical order in Annex 1. The authors of this report have made all efforts to faithfully and fairly present the main findings and opinions expressed by all respondents in their submissions.

---

<sup>1</sup> On 18 July 2024, the Commission opened a public consultation on the Draft Access Rules for Television Broadcasting Services (Appendix II of the Consultation Document).

[https://www.cnam.ie/wp-content/uploads/2024/07/20240703\\_DraftAccessRules\\_vFinal.pdf](https://www.cnam.ie/wp-content/uploads/2024/07/20240703_DraftAccessRules_vFinal.pdf)

## Chapter 2: Tabled presentation of categories of respondents

Figure 1: Breakdown of responses from respondent generated by chapters of this report

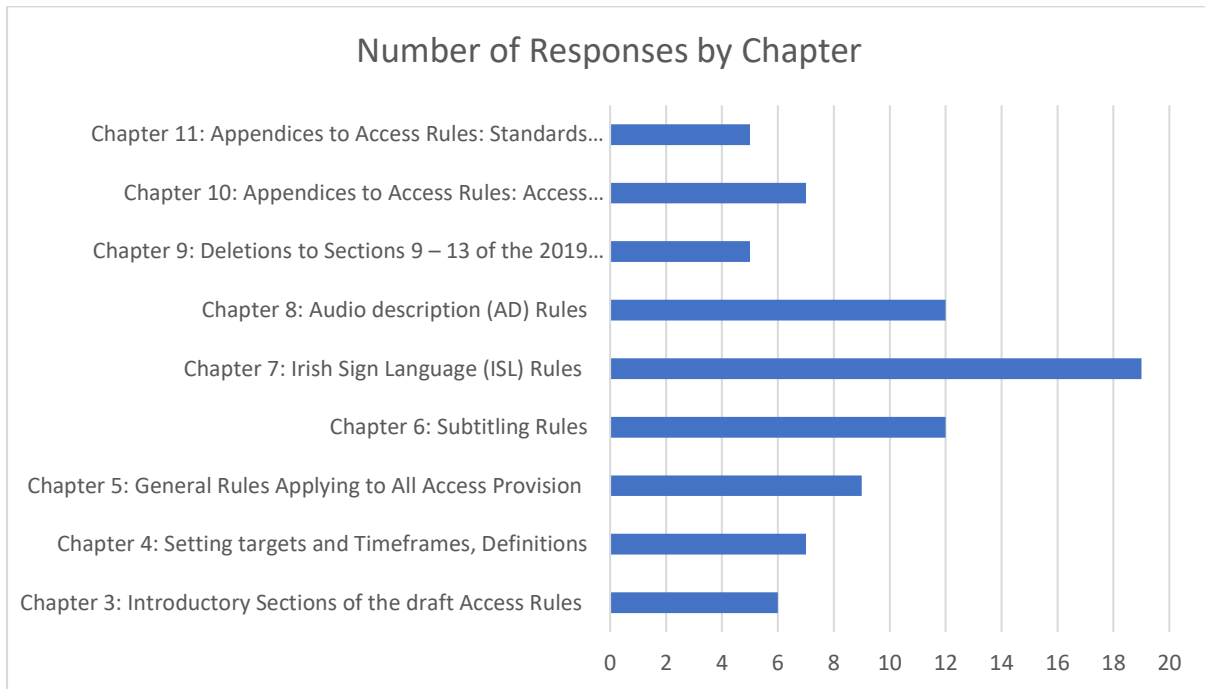
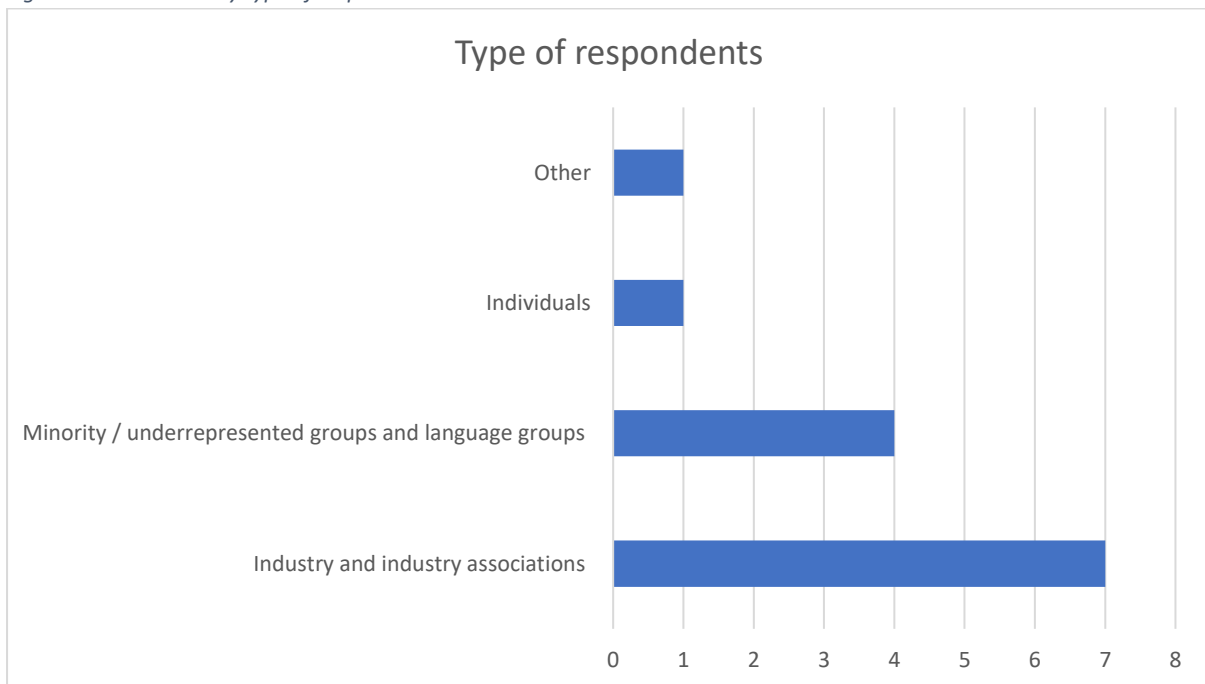


Figure 2: Breakdown by type of respondents



## Chapter 3: Introductory Sections of the draft Access Rules (Q.1)

This chapter summarises the responses to consultation question 1 which covers Sections 1.1 to 1.5 of the draft Access Rules relating to the legislative basis, scope and jurisdiction, guidance and the new complaints processes.

**Consultation Question 1: Do you have any comments on the proposed changes to the introductory sections of the Access Rules?**

### 3.1 General views

The proposals were found to be comprehensive and helpful (DCTV) and were welcomed. (Chime)

It was deemed helpful that the Introductory Section highlighted the importance of having Access Rules and the role they play in promoting inclusivity and diversity in the Audiovisual Sector. Outlining the legislative basis for the draft Access Rules was also seen as helpful, and the usefulness of a designated point of contact for audiences was noted. (Screen Producers Ireland)

The absence of a reference to the UN Convention on the Rights of Persons with Disabilities (UNCRPD) in Section 1.1 was noted. It was argued that as the UNCRPD has been ratified by Ireland, the draft Access Rules should be guided by and adhere to the Convention, being particularly mindful of Articles 9, 21<sup>2</sup> and 30<sup>3</sup> of the UNCRPD. (National Disability Authority, Irish Deaf Society) It was argued that this was especially true for public services and is in line with the Public Sector Duty and the ISL Act 2017<sup>4</sup>. (Irish Deaf Society)

It was stressed that as the EU has ratified the UNCRPD, all EU law, including Directives, must be interpreted in a manner consistent with the Convention, confirmed by Recital 22 of the Audiovisual Media Services Directive (AVMSD), which explicitly calls for ensuring the accessibility of audiovisual content, as an essential requirement in the context of the commitments taken under the UNCRPD. Similarly, it was noted that there is no reference to the European Accessibility Act in Section 1.1 and it was recommended that this should be remedied. (National Disability Authority)

While supportive of the overall ambition to ensure that the draft Access Rules are adapted to align with changes in media consumption patterns and having demonstrated a commitment to developing and enhancing the provision of Access Services, concerns were raised about the feasibility of parity of

---

<sup>2</sup> Article 21 of the UNCRPD enshrines the right to freedom of expression and opinion, including the freedom to seek, receive and impart information and ideas on an equal basis with others and through all forms of communication of their choice.

<sup>3</sup> Article 30 of the UNCRPD specifically obliges States Parties, including Ireland, to recognise the right of persons with disabilities to take part on an equal basis with others in cultural life, and to take all appropriate measures to ensure that persons with disabilities enjoy access to television programmes in accessible formats.

<sup>4</sup> Links to several supporting documentation was provided by the Irish Deaf Society, including: ISL Act 2017, available at: <https://www.irishstatutebook.ie/eli/2017/act/40/enacted/en/print>; Register of Irish Sign Language Interpreters (RISLI), available at: <https://www.risli.ie/>; IDS Strategy Plan 2023-2026, available at: <https://irishdeafsoc.wordpress.com/wp-content/uploads/2023/06/IDS-Strategy-2023-2026-Web-Download-1.pdf>

investment or targets in the medium term, due to the financial and resource constraints faced by providers of both linear and digital services. (RTÉ)

It was noted that there are additional, substantial challenges for Irish language broadcasters relating to provision of subtitling, AD and ISL services on Irish language content. While appreciating that this difference is reflected in the quotas set out for the provision of such services, it was also noted that increases in provision of access services is very challenging due to the limited availability of service providers with expertise in dealing with content in Irish and Access services. The relative underdevelopment of Large Language Learning models and machine learning technology also puts Irish language media providers and broadcasters at a significant disadvantage to their English language counterparts. The lack of tools to enable high quality speech to text transcription was noted and it was recommended that the Commission use its influence with policy makers, service providers and national and European stakeholders, to help level the playing field in relation to technological advances for lesser used languages such as Irish. (TG4)

Given the peak time subtitling targets for each PSB, as well as the lower target for commercial channels, it was recommended that broadcasters should be required to allow the cost of subtitling as a cost over and above the tariff they provide. (Screen Producers Ireland)

It was noted that there is no reference in the draft Access Rules to the independent production sector. While not being directly impacted, the point was made that independent producers are very committed to accessibility and ensuring that the content can be enjoyed by as wide an audience as possible. It was suggested that the Commission should consider carrying out targeted communications and engagement for the independent sector addressing points such as:

- The importance of considering accessibility early in the production process.
- Additional funding from Sound and Vision Scheme to add AD and ISL to their productions, when required.
- Any updates or changes to accessibility requirements, i.e. when these guidelines are published, or the Commission no longer considers captioning for home-produced programming when assessing compliance with subtitling targets, etc. (Screen Producers Ireland)

### 3.2 Accessible Complaints Mechanism

The establishment of a Contact Centre for handling complaints related to accessibility was welcomed. While the communication with the Contact Centre is set either by phone or email, it was pointed out that these forms of contact may not be accessible to Irish Sign Language (ISL) users, particularly given the low literacy levels of some ISL users. Since the complaints processes are an essential part of service provision, it was therefore suggested that the Contact Centre considers ways of making their complaints and information services accessible to ISL users. (National Disability Authority)

## Chapter 4: Definitions (Q.2)

The chapter summarises the responses to consultation question 2 which relates to Section 3 (Definitions) of the draft Access Rules.

### Consultation Question 2: Do you have any comments on the proposed changes to the Definitions section of the Access Rules?

The proposal to replace the term “partial sighted” in the definition of “Audio Description” with the term “vision impaired” was welcomed. The Commission’s attention was drawn to an advice paper on disability language<sup>5</sup>, which provides practical guidance for Departments and public bodies on the use of language when speaking and writing about disability and which could be utilised by the Commission. It was also recommended that Section 2 be amended to state that the targets stipulated within the draft Access Rules represent minimum obligations<sup>6</sup>. ([National Disability Authority](#))

It was noted that the definitions appear reasonable and sensible ([RTÉ](#)), and the differentiation between “broadcaster” and “television broadcast” was welcomed, as it provides more context to the type of broadcast being referred to. It was also recommended that a definition of producers and production companies was included, as it was argued that they are important stakeholders in the overall programming process. ([Screen Producers Ireland](#))

It was proposed to widen the definition of “programme” to include live events that are not sports, including commemorative ceremonies, state visits, cultural events and political proceedings/elections. ([Oireachtas TV](#))

It was noted that there was no definition of “television broadcasting services” and that “home programming” was not defined and would not count towards subtitling targets. Clarity was sought on the scope of “television broadcasting services” and whether the rules for these services apply to Section 71 contract holders, and what the legal basis is for application of the rules to Section 71 contract holders. ([Warner Bros. Discovery](#))

It was recommended that the definition of ISL should be “Irish Sign Language is the first and/or preferred language of 5000 Deaf people in Ireland and approximately 40,000 people in general will communicate in ISL (family, friends, co-workers, etc). Irish Sign Language is the indigenous language of the Deaf community and research shows that sign languages are full languages with its own complex linguistic structure, rules and features. It is a visual and spatial language with its own distinct grammar and not only is it a language of the hands, but also of the face and body. Irish Sign Language is different from all other sign languages such as British Sign Language, American Sign Language etc. Ireland is

---

<sup>5</sup> National Disability Authority (2022) NDA Advice Paper on Disability Language and Terminology, available at: <https://nda.ie/publications/nda-advice-paper-on-disability-language-and-terminology>

<sup>6</sup> In this regard, the Commission’s attention is advised to Section 4.5 of Ofcom’s Code on Television Access Services, updated in 2024, which contains the following statement: “The targets represent minimum obligations and apply on a rolling basis from each anniversary of the applicable date onwards for each service in question”. Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/broadcast-codes/code-on-television-access-services/ofcom-code-television-access-services.pdf?v=370035>

unique in that we have gender Sign language, i.e. men and women in Ireland have different Sign Languages due to being educated in separate schools. The Deaf community sees itself as a linguistic and cultural minority group as opposed to being disabled”<sup>7</sup>. ([Irish Deaf Society](#))

It was also suggested that the following segment is not required under the definition and it should be removed: “Sign Language must be presented on a screen through the use of a signer as part of the audiovisual programme content, or by the use of a signer acting as an interpreter and positioned over the images on-screen”. ([Irish Deaf Society](#))

To improve clarity for all viewers it was suggested that the terminology used (e.g. “captions” and “subtitles”) should be consistent across all platforms. ([Independent Living Movement Ireland](#))

It was recommended that the term “Deaf” with a capital letter should be used consistently throughout, particularly in sections relating specifically to ISL. “Deaf and Hard of Hearing” should be used when referring to both Deaf people and Hard of Hearing people (e.g. in the sections about subtitles). ISL is the language of the Deaf community and subtitles are also used when accessing media content. Hard of Hearing people may not use ISL as their first language and generally rely on only subtitles to access media content. ([Irish Deaf Society](#))

It was also pointed out that “hearing impairment” should be amended to “Hard of Hearing”, as the term “hearing impairment” is no longer an acceptable term. Finally, “Irish Sign Language” or “ISL” should be used throughout the document instead of “Sign Language” as this is misleading to Deaf people from other countries who may use different sign language. ([Irish Deaf Society](#))

---

<sup>7</sup> The proposed definition is available at IDS web-site: <https://www.irishdeafociety.ie/>



## Chapter 5: General Rules Applying to All Access Provision (Q.3)

The consultation responses summarised in this chapter are captured from consultation question 3 and relate to Section 4 of the draft Access Rules dealing with the proposed changes to the General Rules Applying to All Access Provision.

**Consultation Question 3: Do you have any comments on the proposed changes to the General Rules Applying to All Access Provision section of the Access Rules?**

### 5.1 Quality Standards

The proposal to take into account quality of provision in assessing the quotas for subtitling was welcomed, as was the requirement for broadcasters to engage with platform providers in resolving issues on access provision. ([Chime](#))

It was noted that broadcasters are obligated to ensure that quality standards are met and it was suggested that consideration should be given to how Coimisiún na Meán can enhance monitoring of qualitative ISL, Audio Description and subtitling targets. ([National Disability Authority](#))

In terms of ensuring quality standards for ISL, it was suggested that effective monitoring could incorporate an internal quality control system and meaningful engagement and co-creation with Irish Deaf Society. It was also suggested that the draft Access Rules should clearly state the mechanism and frequency of monitoring. ([Irish Deaf Society](#))

There was a query about whether programmatic monitoring was acceptable and whether the monitoring is expected to be performed by staff on a full-time basis. ([DCTV](#))

The establishment of robust feedback systems were recommended, involving regular consultations with the disabled community to monitor the effectiveness and quality of access services and incorporate this feedback into ongoing service improvements. ([Independent Living Movement Ireland](#))

Further clarification was sought on what is meant by captioning/quotas.<sup>8</sup> ([Virgin Media Television](#))

Clarification was sought on whether any services that are not specifically targeted at Irish audiences can avail of exemptions in relation to Irish sign language as this would represent a disproportionate cost impact on services. Clarification was also sought on how the Commission will assess targets and incremental reviews. ([Warner Bros. Discovery](#))

### 5.2 National Emergencies

The proposed introduction in Section 4.2 of a new requirement that broadcasters must provide emergency information in Irish Sign was welcomed. ([National Disability Authority](#))

---

<sup>8</sup> In relation to the Paragraph 2 of Section 4.1: “The Commission shall have regard to the quality of provision when assessing whether a broadcaster has met the quotas for subtitling (including captioning), Irish Sign Language and audio description set out in these Rules”.

To ensure emergency information is accessible it was recommended that the information should be available in multiple formats, including subtitles, sign language, and audio descriptions. Also, clear, immediate apologies and explanations for any service failures should be provided. ([Independent Living Movement Ireland](#))

The difficulties faced by broadcasters in providing accurate, live subtitles in a situation where a script may not be available or a spokesperson might go 'off-script' were highlighted. There was call for recognition that speech to text software may not be available or in use a sufficient level of accuracy for national emergencies. Given the significant cost implications for live ISL, it was suggested that responsibility could lay with the authority making the announcement to provide information or even their own subtitles and further discussion was requested. ([Oireachtas TV, Virgin Media Television](#))

It was noted that the elements of Communications around National Emergencies that are delivered in the Irish language tend to have no ISL on them, or are excluded from broadcasts by the authorities providing the information, thus excluding the Irish language audience and this disadvantages Irish language broadcasters who want to carry these communications<sup>9</sup>. ([TG4](#))

There was a request for further detail and guidance on Section 4.2 (subtitling for national emergencies). ([Warner Bros. Discovery](#))

### 5.3 Promotion of Access Provision

It was argued that, as access provision is currently indicated in print, listings and EPG, this was sufficient to indicate availability of subtitles, given that a high percentage of content is subtitled across all channels. In addition, specific AD and ISL idents are used to lead into content. Continuity announcers also indicate the availability of service and social media and a bespoke strap on main channels are used to direct viewers. ([RTÉ](#))

It was suggested that Section 4.3 should outline how broadcasters may engage with DPOs as the most effective ways of advertising for their respective communities. ([Irish Deaf Society](#))

Provisions relating to the Promotion of Access Provision by broadcasters were welcomed and it was recommended that broadcasters paid particular attention to the promotion of Audio Description. ([National Disability Authority](#))

It was recommended that Section 4.3 be amended in line with the European Accessibility Act, to require broadcasters to promote awareness of the availability of their access services by making available accurate and timely information to electronic programme guide (EPG) operators listing their services, and by providing similar information on their own website and app listings. ([National Disability Authority](#))

Furthermore, it was recommended that Section 4.3 be amended to encourage broadcasters, where unforeseen circumstances mean that scheduled access services are not available, to take steps to

---

<sup>9</sup> As an illustration of this point, an example in the case of the Covid 19 emergency communications was provided, where any comments made in Irish (which were numerous) did not have signing available. That meant that they would not be acceptable under these guidelines for broadcast.

ensure that updated information is provided to EPG operators and that audiences are given timely information on availability by appropriate and effective means. Attention was drawn to Section 6.3 of Ofcom's 2024 Code on Television Access Services in this regard. ([National Disability Authority](#))

It was noted that there was no mention of the responsibility of broadcast platforms to display access symbols in an easy to see and read format and there was a suggestion that there could be a discussion about standardising where and how these symbols could be read across diverse platforms. ([Oireachtas TV](#))

#### 5.4 Obligation to Consult with Access Users

While it was acknowledged that engagement with the groups that will be impacted should be central to the development of any guidelines document ([Screen Producers Ireland](#)), it was also noted that Section 4.4. puts responsibility for user consultation on the broadcaster and it was suggested that the current model of broadcasters inviting user groups for consultation is not effective. ([Oireachtas TV](#))

The challenges for each individual broadcaster organising consultations with user groups was pointed out ([TG4](#)) and further discussion was proposed on what a successful user consultation would look like for both user groups and broadcasters and that the Commission's role in facilitating this could be explored. ([Oireachtas TV](#), [TG4](#))

It was suggested that Section 4.4 should be developed to include a commitment to meaningful engagement and co-creation with DPOs during design, delivery, implementation and monitoring/review of policies and decisions, and of the annual accessibility action plans, in line with Article 4.3 of the UNCRPD. ([Irish Deaf Society](#), [National Disability Authority](#))

It was proposed that the draft Access Rules should require broadcasters to report on their consultations with users, and in particular to list the main issues being raised by users in a report. It was noted that there are typically no agreed records of consultation meetings between broadcasters and users and that this report could be included within the proposed Annual Accessibility Action Plans. ([Chime](#))

It was argued that it is not sufficient to rely on Deaf and Hard of Hearing people to give ah-hoc feedback or as part of a review process and broadcasters should consult with Irish Deaf Society (IDS) throughout all phases as outlined above. ([Irish Deaf Society](#))

The obligation on broadcasters to consult with access users was warmly welcomed and seen as a positive way to ensure inclusivity in content. To ensure better transparency, it was suggested that it might be useful to outline which groups are being contacted, why they are being contacted and the process involved in deciding which groups are being contacted. ([Screen Producers Ireland](#))

It was proposed that the draft Access Rules should require broadcasters to report on their consultations with users, and in particular to list the main issues being raised by users in a report. It was noted that there are typically no agreed records of consultation meetings between broadcasters and users and that this report could be included within the proposed Annual Accessibility Action Plans. ([Chime](#))

## 5.5 Annual Action Plans and Reporting

The requirement for broadcasters to develop Annual Accessibility Action Plans was welcomed and it was suggested that people with disabilities should be actively involved in developing such plans, in accordance with the UNCRPD. ([Chime, National Disability Authority](#))

In addition to outlining how the broadcaster intends to meet targets for the provision of access services under the draft Access Rules, it was advised that the Accessibility Action Plans should also detail the ways the broadcaster intends to improve the quality of the access services and how they will monitor content to ensure quality standards are met. It was further recommended that the Annual Accessibility Action Plans are made publicly available in accessible formats. ([National Disability Authority](#))

Clarity was sought about the format and the efficacy of Annual Accessibility Action Plans and the benefit of this requirement was queried. It was suggested that an alternative could be the provision of a Three-Year Plan laying out medium to long term technical developments which would be key to achieving the annual targets set. This plan, it was suggested, could be used as a benchmark for discussions during the annual reporting meetings. ([Oireachtas TV](#))

## Chapter 6: Subtitling Rules (Q. 4-5)

The information in this chapter summarises the responses from consultation questions 4 and 5 and relates to Section 5 of the draft Access Rules dealing with specific subtitling targets identified for broadcasters.

### Consultation Question 4: What are your views on the targets proposed for subtitling for the 2025 to 2027 period?

The proposed subtitling targets were welcomed and agreed with. ([Virgin Media Television](#), [Warner Bros. Discovery](#), [Screen Producers Ireland](#)) However, it was argued that any increase in subtitling requirements for broadcasters should also be met with an increase in funding made available to broadcasters, producers, and anyone involved in developing this kind of access service for programming. ([Screen Producers Ireland](#))

The setting of new targets for 2025 – 2027 was welcomed, as well as the consideration given to the size of organisation and track record. ([DCTV](#)) The introduction of three-year targets was recognised as more appropriate given the pace of change in media and technology. It was also recognised that the proposed targets generally adhered to requirements under the AVMSD. ([National Disability Authority](#))

While being broadly in favour of the proposed targets for subtitling, it was believed that the targets for RTE News Now and Virgin Media Channels were too low<sup>10</sup>. ([Chime](#))

It was noted that while high, the target of 96% subtitling for RTÉ1 remains static for the three-year period and it was suggested that there may be scope for a small but incremental increase in this target over time. ([National Disability Authority](#))

An explanation was sought about why peak time targets for RTÉ2 are lower than the overall target for this broadcaster. Also, a question was raised as to why the targets are so low for Oireachtas TV compared to the other targets outlined, since all members of society should be afforded the opportunity to view our government in action, especially important considering the threats of disinformation. ([Screen Producers Ireland](#)) It was noted that the 2023/2024 subtitling target for Oireachtas TV was set at 18%, while the 2025 target was set at 17%, and it was pointed out that this slight decline does not align with the requirement to progressively improve services. ([National Disability Authority](#))

Concern was expressed about the ability to accommodate an increase from 13% to 30% for DCTV. It was requested that the same targets be set for DCTV as are suggested for CCTV. ([DCTV](#))

---

<sup>10</sup> It was argued that RTE News Now is mainly made up of repeated News bulletins or current affairs programmes which have already been broadcast with subtitles on RTÉ 1 and should be provided automatically on the RTÉ News Channel, while much of Virgin Media's broadcasts are pre-recorded programmes where subtitle files have already been created.

Concerns were also expressed about reaching peak time targets when those times included a high percentage of live sports and other live programming such as news bulletins, with very little capacity and expertise available to deliver live subtitling in Irish language. Therefore, it was proposed to maintain the current targets, with an understanding that every effort will be made to exceed them in the future where possible. (TG4)

A stark contrast between subtitling and ISL targets were observed with 96% versus 6% (RTÉ 1 & 2 for 2025) respectively. It was noted that of all of the output with ISL interpretation, much is repeated with little new programming, hence clarification was requested on the decided targets and the increments e.g. by 2027 the aim is 10% for RTÉ 1 & 2. Considering it will be ten years after the passing of the ISL Act, this was deemed extremely concerning. Further, it was recommended that the targets should include provision of daily ISL News and the development of more deaf and ISL-related documentaries to promote awareness and understanding to the general public. (Irish Deaf Society)

The question was raised as to whether poor quality subtitling should count towards targets. It was pointed out that while the quality of subtitling can be guaranteed as it leaves its platform, the quality received by a viewer is ultimately dependent upon their platform provider and its technical infrastructure, including the set top boxes. It was argued that there are variances between how users access subtitling with the infrastructure of other providers that are not within the control of public service broadcaster, which has invested significantly in upgrading the live subtitle broadcast infrastructure and the pre-recorded subtitling software systems, with resilience/back-up paths built in and output to all platforms being monitored on transmission. It was recommended that this issue was addressed more explicitly in the Rules. (RTÉ)

Further guidance regarding any anticipated targets for broadcasting services was deemed necessary, in particular on HD and +1 channels. (Warner Bros. Discovery)

**Consultation Question 5: Do you have any further comments on the proposed changes to the Subtitling Rules section of the Access Rules?**

While recognising the efforts of the Commission and broadcasters, it was advised that an increase in subtitling targets must also be accompanied by improved quality of subtitling. The Statutory Review highlighted that access users consider that significant levels of subtitling provision are not of an appropriate standard (especially for live programming). (National Disability Authority)

In relation to Section 5 of the draft Rules where it states that “*Captioning may count towards satisfying subtitling targets for broadcasters, but not for new home-produced programming, which must be subtitled appropriately*”, it was pointed out that much of RTÉ’s Irish Language content contains sections As Gaeilge with onscreen English translation captions. The English sections of content are provided by closed caption subtitles. (RTÉ)

## Chapter 7: Irish Sign Language (ISL) Rules (Q.6-8)

The information in this chapter summarises responses from consultation questions 6, 7, and 8 and relates to Section 6 of the draft Access Rules dealing with Irish Sign Language Rules.

### 7.1 ISL targets

**Consultation Question 6: What are your views on the proposed targets for ISL for the 2025 to 2027 period?**

The proposed increase in overall ISL targets for 2025-2027 was broadly welcomed, but it was argued that the increases should be greater in 2025 in order to be consistent with the UNCRPD. ([Chime](#))

There was agreement on the proposed targets ([Virgin Media Television](#), [Warner Bros. Discovery](#)), while calling for further guidance as to their implementation. ([Warner Bros. Discovery](#))

While acknowledging that ISL provision for programming is much more intensive and costly compared to other forms of accessibility access service, it was also observed that the target levels are strikingly low when compared to targets set for other access services, considering the importance of this service to some members of the audience. ([Screen Producers Ireland](#))

It was pointed out that the Statutory Review found that targets for Irish Sign Language remain modest with continued scope to increase these levels. It was acknowledged that the proposed targets for ISL for the 2025 to 2027 period broadly represents incremental progress, but it was noted that the 2023/2024 ISL target of 2% for Virgin Media 1 remains the same for 2025. ([National Disability Authority](#))

Concern was expressed that the percentage increase required will be challenging to achieve from an operational perspective. It was pointed out that aside from the financial, technical and human resource aspects, ISL provision is highly specialised and there is a limited pool of qualified ISL interpreters - and ISL interpreters are in high demand for all aspects of life. It was also noted that the draft Access Rules do not acknowledge the significant time required to create an ISL version of a programme. ([RTÉ](#)) It was suggested that there should be an increase in relevant funding for broadcasters, producers, and anyone involved in developing this kind of access service for programming. ([Screen Producers Ireland](#))

It was suggested that the draft Access Rules should acknowledge there are genuine challenges in the availability of qualified ISL interpreters at this time ([RTÉ](#)) and it was suggested that the Commission should explore the possibility of increasing the number of ISL interpreters in partnership with other sectors involved in training ISL interpreters in Ireland. ([Screen Producers Ireland](#))

There was a call for more specific sub-targets within the overall targets, including a minimum of 2% of ISL presented news and current affairs programmes. It was pointed out that the majority of ISL presented programmes were 'light entertainment' programmes with comparatively very little news and current affairs and members of the Deaf community felt that they receive a 'dumbed down'

version of the news. There was also a call for the restoration of some form of magazine programme aimed at the Deaf community which was, up until 2014, a feature of RTE's provision for the Deaf community. ([Chime](#))

## 7.2 Assessment of ISL targets

**Consultation Question 7: What is your view on the change to the assessment of ISL targets based on an 18-hour day, from 7am to 1am?**

The proposed provisions were very much welcomed and provided a response to a long-running request from the Deaf community. ([Chime](#), [National Disability Authority](#))

It was noted that this change would implement a key measure of the NDA review of the ISL Act 2017. Section 8 of the Irish Sign Language Act 2017 requires broadcasters to adhere to principles of equality, dignity and respect when promoting and broadcasting of programmes with ISL provision. It was argued that the broadcasting of these programmes at times when people can be expected to be asleep amounted to unequal treatment and was facilitated by the 2019 Access Rules which assessed ISL provision based on a 24-hour day, unlike subtitling and AD which were based on a 18-hour day. ([National Disability Authority](#))

There was agreement that the hours in which ISL is provided should avoid being very late at night. ([DCTV](#)) It was argued that the change takes account of audience behaviours and as such will increase the amount of ISL programming available to audiences. ([Screen Producers Ireland](#))

It was pointed out that the change to assessment based on an 18-hour day will be challenging. While the change was welcomed ([Virgin Media Television](#), [Warner Bros. Discovery](#)), a request was made for clarification on the exceptions or the specific rules, since such broad accessibility requirement (particularly for providers that are not targeting Irish audiences) impose significant resource and cost requirements to meet these quotas. ([Warner Bros. Discovery](#)) It was also noted that producers of live content may find it difficult to provide accurate scheduling details at all times, given the unpredictable nature of the content. This could result in some scheduled ISL content being broadcast after 1am and negatively impacting targets. It was requested that consideration be given to this point in future deliberations. ([Oireachtas TV](#))

It was pointed out that unlike subtitles and Audio Description, which are opt-in/opt-out services, an ISL interpreter cannot be switched on/off. It was argued that much of the content broadcast during the current late night ISL blocks would not be suitable for broadcast during the daytime schedule and members of the user community were able to record content they wish to access for later viewing, and that the content is also available to view on RTÉ Player. It was suggested that there may be an issue with sourcing and providing content that is suitable while also being mindful and respectful of those members of the audience who may not wish to have an ISL interpreter as part of their viewing. ([RTÉ](#))



### 7.3 Other considerations

#### **Consultation Question 8: Do you have any further comments on the proposed changes to the Irish Sign Language (ISL) Rules section of the Access Rules?**

It was seen as appropriate that the national broadcaster has prime responsibility for delivering the bulk of ISL presented programmes under the draft Access Rules. However, it was also pointed out that as technology and other processes develop, and the overall costs associated with producing ISL presentation on programmes reduces, it will be reasonable and proportionate to expect more access to ISL programmes across more channels and broadcasters. ([Chime](#))

Concern was expressed that broadcasters might use repeat programmes to try and meet the increased ISL targets and it was recommended that the draft Access Rules should be amended to require balance in the ratio of repeated and non-repeated content and to provide a diversity of content equivalent to that provided to other viewers. It was also recommended that an increase in ISL targets must also be accompanied by improved quality of ISL provision. ([National Disability Authority](#))

As outlined in the response to consultation question 6, it was further argued that in order to be achieved, the additional targets will carry a significant additional cost. ([RTÉ](#))

The support by the Commission through the Sound & Vision programme for ISL provision on Irish language content was welcomed. It was noted that pilot projects such as “Saol Ella ISL” have helped develop new and improved workflows and expertise to enable further development of ISL versions of Irish language content in future. ([TG4](#))

The shift in timeline from 3 years to 5 years was welcomed and it was predicted that it would allow for faster changes to policy and will make it easier for stakeholders and the Commission to address issues raised while implementing the proposed targets. It was recommended that the “setting off against” point should be clarified and outline more clearly in what context it is acceptable. ([Screen Producers Ireland](#))

It was recommended that the sentence: “A person interprets and signs live or recorded programmes or programme segments” (page 30) could be replaced with: “An ISL Interpreter (including Deaf Interpreters) interprets and signs live or recorded programmes or programme segments ([Irish Deaf Society](#))

It was argued that stating “sign language” alone is misleading to Deaf people from other countries who may use a different sign language, therefore ‘sign language presenter’ should be replaced with ‘ISL Presenter’ (p. 30). ([Irish Deaf Society](#))

There was a call for clarification about how broadcasters will ensure signing competence. ISL Interpreters must be fully qualified and accredited by the Register of Irish Sign Language Interpreters (RISLI). There should also be an internal quality control system by means of ISL Consultants. These are usually qualified Deaf Interpreters who monitor the output of the ISL Interpreter or ISL Presenter. The Council of Irish Sign Language Interpreters (CISLI) have a sub-committee comprising Deaf Interpreters who could be contacted by broadcasters to consult on matters relating to quality. ([Irish](#)

[Deaf Society](#)) It was recommended that high competence standards for sign language interpreters are regularly updated and enforced to ensure accuracy and fluency. ([Independent Living Movement Ireland](#))

It was suggested that the sections outlining synchronisation (p. 31) and speaker identification (p. 32) can be removed as qualified, CISLI-accredited ISL Interpreters will be aware of these as fundamental skills of interpreting. ([Irish Deaf Society](#))

Consistency was recommended in relation to how the ISL Interpreters are displayed. It was suggested that the size of the in-vision box must be consistent across all programmes and of a size that allows for easy and accessible visualisation of the ISL Interpreter. ([Irish Deaf Society](#)) It was also recommended that the size and resolution of sign language inserts were increased to improve the visibility of the interpreter's expressions and gestures, and consideration could be given to making the interpreter window a minimum of one-sixth of the screen. ([Independent Living Movement Ireland](#))

It was suggested that ISL Interpreters wear plain, contrasting clothing and that they are placed against non-distracting backgrounds to enhance visibility and reduce viewer fatigue. ([Independent Living Movement Ireland](#))

## Chapter 8: Audio Description (AD) Rules (Q.9-10)

The information in this chapter is a summary of responses from consultation questions 9 and 10 and relates to Section 7 of the draft Access Rules dealing with Audio Description Rules.

### 8.1 AD targets

#### **Consultation Question 9: What are your views on the proposed targets for AD for the 2025 to 2027 period?**

Full support for the proposed provisions was expressed ([Chime](#)) with a request for training with Irish exemplars in Audio Description where newcomers and independent TV producers could be trained on the skills needed to provide quality AD. ([DCTV](#))

It was noted that the proposal includes a significant increase for the AD targets, especially given any additional AD requirement for Video-On-Demand. It was pointed out that turnaround time for creation of quality AD is significantly longer than for subtitling, as the audio describer must watch content, script and record AD, premix and embed AD tracks on the broadcast media file. Despite the additional work, the proposed targets were seen as challenging but attainable. ([RTÉ](#))

It was argued that AD is relatively inexpensive and as a result the target percentages should be higher, noting that AD targets are significantly lower than subtitling requirements. It was also noted that any increase in AD requirements should also be met with an increase in funding for broadcasters, producers, and anyone involved in developing this kind of access service for programming. ([Screen Producers Ireland](#))

It was recommended by one respondent that the AD targets for 2025-2027 should be 25% audio described programming by 2027 for RTÉ One/RTÉ2 and RTÉ Jr. 15% for Virgin Media, 10% for TG4 and starting targets of 5% by 2027 for the new children's channel Cúla4. ([Voice of Vision Impairment](#))

While it was acknowledged that there are instances where it is possible to provide additional AD on content if it has been commissioned through the Sound & Vision fund, based on past performance, it was suggested that a 1% yearly increase would be preferable/appropriate. ([Virgin Media Television](#))

While the proposal was welcomed, further guidance regarding any anticipated targets for broadcasting services was deemed necessary, in particular on HD and +1 channels. ([Warner Bros. Discovery](#))

It was noted that the proposed AD targets broadly represent incremental progress, however, it was suggested that the 2023/2024 AD target for Virgin Media 1 is 5%, while the 2025 target is 4%, which does not align with the requirement to progressively improve services. ([National Disability Authority](#))

## 8.2 AD Rules

### **Consultation Question 10: Do you have any comments on the proposed changes to the Audio Description (AD) Rules section of the Access Rules?**

It was pointed out that while the provision to provide AD on end credits is retained from the 2019 Rules, the difference is the application of this in the context of a statutory complaints process. It was argued that it could result in a suboptimal experience for the user audience if there is a continuity voiceovers/cross-promotion during end credits/squeezebacks. This was deemed confusing and distracting from the main message, which is why providers avoided doing it. [\(RTÉ\)](#)

It was hoped that by 2026, RTÉ and Virgin Media would have developed their technical capacity to broadcast live AD, and that live AD would be in regular operation by 2027. It was recommended that from 2027, all events designated as must carry Free to Air would include live AD, (e.g., All-Ireland finals, the Olympics etc). It was also suggested that any future evolution of the Sound & Vision Scheme would expand the current access criteria for drama and children’s programming. It was also suggested that if AD is available for a programme, the continuity link before the programme airs should acknowledge this. There was also a call to include in the 2026 guidelines, a requirement whereby when a promo contains a voice over with the show name, the voiceover should also contain the information that “audio description for the blind and visually impaired is available”. Finally, it was suggested that by 2027, a dedicated list of ‘must describe’ events would be in place, including events of significant importance to disabled people such as the Paralympics. [\(Voice of Vision Impairment\)](#)

It was noted that the language on AD targets for home-produced programming (Section 7.4) remains unchanged, stipulating that the Commission is to agree with each broadcaster the proportion of the total increase in AD provision on an annual basis which will relate to home-produced programming. There were calls to prioritise the provision of additional AD for home-produced programming. [\(National Disability Authority\)](#)

It was suggested that AD must be precise and well-timed and should avoid hurried speech. Descriptions should fit naturally within pauses in dialogue. Describers should subtly convey necessary emotions to match the scene’s mood and should maintain neutrality to avoid personal bias. Detailed descriptions of characters, actions, and settings should be encouraged while overly technical terms like “the camera pans left” should be avoided to focus on providing a comprehensive understanding of the scene. [\(Independent Living Movement Ireland\)](#)

## Chapter 9: Deletions to Sections 9 – 13 of the 2019 Access Rules (Q.11)

The information in this chapter is a summary of the responses to consultation question 11 and relates to the proposed deletion of Sections 9 to 13 from the 2019 Rules, including “Complying with these Rules”; “Support for the Implementation of the Rules”; “Effective Date” and “Guidance on the Rules for Broadcasters”.

### **Consultation Question 11: Do you have any view on the proposed deletions to Section 9 to 13 of the 2019 Access Rules?**

There was agreement with the proposed deletion of Section 9 – 13 of the 2019 Access Rules. ([RTÉ, Virgin Media Television](#)) The reduction of the size of the document was seen as increasing its accessibility and conciseness. However, it was suggested that it would be useful to reintroduce the sections to the document in a stripped-back version so there is a specific heading on compliance. ([Screen Producers Ireland](#))

Support was also expressed for the deletion of Sections 9 and 10 of the 2019 Access Rules and the provision for a single and easily accessible point of contact for providing information and receiving complaints regarding accessibility issues was welcomed. The proposal that the implementation of the Rules is supported via consultation and the proposed requirement for broadcasters to produce Annual Accessibility Action Plans were also welcomed. ([Chime](#))

There was a call for a more robust framework to achieve implementation and it was proposed that Annual Accessibility Action Plans would refer to the expectations and wishes of users. ([Chime](#))

While acknowledging that Section 9 required some legislative amendments, it was considered that there was merit in retaining information on how the Commission intends to evaluate, measure and report performance against the Access Rules, and how it plans to enforce compliance. ([National Disability Authority](#))

Acknowledging the significantly more robust compliance and enforcement framework of the Online Safety and Media Regulation Act 2022, it was noted that Section 1.4 of the draft Access Rules only makes a cursory reference to compliance and enforcement compared to the compliance activities outlined the Section 9. ([National Disability Authority](#))

It was also recommended that the draft Access Rules include a reference to the Commission’s statutory obligations to include within its annual report a report to the Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media on progress made towards increasing the accessibility of audiovisual media services to people with disabilities, and in particular, on progress made to achieve the intended outcomes relating to such accessibility set out in any media service rules; and prepare a report for the Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media on the operation of the media service rules every 3 years. ([National Disability Authority](#))

There was an objection to the proposed deletion of Section 10, as support measures are an important facilitator to effective implementation of the draft Access Rules and this deletion would have the net effect of removing all references to support for implementation of the Rules. It was argued that the wording used in the 2019 Access Rules is flexible. Retention of an amended form of these words was recommended in order to recognise the Commission's commitment to supporting the implementation of the Access Rules on an ongoing basis, and to engaging with Disabled Persons Representative Organisations, broadcasters, its User Consultative Panels and other relevant stakeholders on specific measures to support implementation of the Rules. ([National Disability Authority](#))

## Chapter 10: Appendices to Access Rules: Access Principles and Influencing Factors (Q.12)

The information in this chapter is a summary of responses to consultation question 12. It relates to the “Access Principles and Influencing Factors”, an additional document appended to the draft Access Rules, setting out the principles that guide the Commission’s approach in making the rules, and the influencing factors that are considered by the Commission in determining the specific targets placed on individual broadcasters.

**Consultation Question 12: Do you have any comments on the proposed changes to the “Access Principles and Influencing Factors” section of the Access Rules?**

A question was raised about whether the Sound and Vision funding rules could be looked at to help fund the additional costs for access provision for new productions. The current cost of including access provision on new productions can push the overall project budget into a higher cost bracket with implications for producer. (DCTV)

While acknowledging that that the draft Access Rules recognises that there will be “Influencing Factors” that affect the provision of access services, concern was expressed that the impact of the “Influencing Factors” could be more substantial than anticipated in the document, especially in relation to the provision of ISL which may be totally contingent on technical, financial and human resources. It was strongly argued that the Commission should, in any final document, more explicitly acknowledge – for users – that there will be technical, financial and human resource issues in delivery. In particular, it was recommended that the Commission should acknowledge that there is a specific issue with the availability of trained ISL interpreters which may impact on capacity to deliver – an aspect which is outside the control of broadcasters (RTÉ) and this should also be considered when setting targets. (TG4)

It was noted that under the Access Principle ‘Incremental progression’ that there are “*a number of issues other than funding which need to be addressed in order to increase access provision*”. It is recommended that these issues be explicitly mentioned. (National Disability Authority)

A similar point was made in relation to the Access Principle ‘Incremental progression’ where it was noted that it will be very challenging to incrementally increase provision of subtitling where a large proportion of the output is live content in Irish. It was argued that the current threshold for subtitling of Irish language content has reached maximum capacity, due to the lack of capacity and expertise in the sector to provide these services, and should not be increased until the support services have been developed to facilitate the provision of live Irish language subtitling. It was suggested that the Commission could play an influential role with stakeholders in relation to the development of Large Language Models and Machine Learning capabilities which could support both broadcasters and audiences. It was argued that this should be considered in line with the following ‘Influencing Factors’: i) the nature of the broadcaster and broadcasting service(s) provided, ii) type of programming schedule and iii) the technical and human resource cost. (TG4)

It was recommended that the Commission clearly elaborates on how these principles and factors will be assessed to give providers full clarity on scope. ([Warner Bros. Discovery](#))

The change from *“all indigenous broadcasters coming under the jurisdiction of the rules”* to *“all broadcasters under the jurisdiction of the state are covered in principle by the rules”* was welcomed. Similarly, including a differentiation between broadcast services and broadcasters was seen as a useful way of ensuring that the widest amount of programming would need to comply with these regulations. Also, it was felt that the shift from a 5-year time frame to a 3-year time frame for incremental progression would allow for easier tracking of progress and make it easier for the Commission to implement changes more quickly. ([Screen Producers Ireland](#))



## Chapter 11: Appendices to Access Rules: Standards Applying to Subtitling, Irish Sign Language & Audio Description (Q.13)

The information in this chapter is a summary of responses to consultation question 13 and relates to the second additional document appended to the draft Access Rules, setting out in detail the general and technical standards expected from broadcasters when providing subtitles, ISL, and audio description.

### **Consultation Question 13: Do you have any comments on the proposed changes to the “Standards Applying to Subtitling, Irish Sign Language & Audio Description” section of the Access Rules?**

While appreciating that the production of live subtitles in real time is challenging, it was suggested that the quality of live subtitling offered by Irish broadcasters was below standard and in many cases, not fit for purpose. It was suggested that low quality provision should not be accepted for the purposes of meeting quotas. (Chime) The issue of poor quality ISL and AD was also raised in relation to productions that resulted from the Sound and Vision scheme. It was strongly recommended that to avoid a situation where broadcasters have to retrofit ISL and/or AD to commissioned programmes, the Commission must outline a clear policy on how it will deal with Sound and Vision commissions in terms of standards for access services, and where liabilities lie for costs in correcting any deficiencies and whether the programmes would count towards quotas. (RTÉ)

It was argued that improved synchronisation of subtitles with audio and video is needed, particularly for acquired programmes, and that implementing AI-driven tools to enhance accuracy and reduce delays should be a priority. (Independent Living Movement Ireland)

It was reiterated that subtitling standards should focus equally on quality and quantity, and quality should be included among targets, as an imperative and a default. One of the biggest issues for Deaf and Hard of Hearing people is missing information due to inconsistencies in the subtitles, while the quality issues are even more apparent for live TV. Therefore, the question was raised as to how the subtitles are checked and published, noting that subtitles alone do not constitute full access, being in English, the second language of the Deaf community. (Irish Deaf Society)

The importance of live subtitling on certain programmes, such as news broadcasts, was underlined and it was suggested that strategies such as cueing text or using pre-loaded subtitles for pre-recorded news segments could be used more to improve synchronicity and transition from pre-loaded segments to live segments and vice versa. A time delay of a few seconds in visual transmission of live programmes was suggested, to aid synchronicity of subtitling on live transmissions, in addition to the consideration of “antenna delay” or “as-live broadcast”, to facilitate improved quality of live subtitling. (Chime)

It was noted that in relation to timing and synchronisation of subtitles, the use of human subtitlers (as is preferred by the user groups) for live subtitling will always cause a delay between the live feed to the viewer compared to the live feed for the subtitler which is then broadcast with a 3-5 second delay. (Virgin Media Television)

Further, and relative to ISL quality, some broadcasters are currently investigating suggestions made by the user groups in relation to Signers appearing on screen via Green Screen as opposed to in a separate frame on screen. ([Virgin Media Television](#))

It was noted that there was no proposal to update the provisions in the ISL Standards relating to monitoring and that the quality of ISL is not actively monitored due to lack of ISL skills within the regulator. As the monitoring of the quality of ISL interpretation for broadcast content is essential to ensure language preservation, it was argued that monitoring should be conducted independently by ISL-accredited individuals on the same basis as other quality checks by the Commission and it was advised that the ISL Standards be amended to make provision for same. ([National Disability Authority](#))

Given that the legislation now allows for complaints in respect of Access Services, concern was raised in respect of ISL interpretation. Past experience shows that different users and groups can take very different views of an ISL interpretation, including of particular interpreters. ([RTÉ](#))

Concern over the following wording was expressed: *“the level of competence and fluency in ISL required by broadcasters should be informed by user and representative groups and other people or organisations that have expertise in this area.”* (Page 30) It was felt that this wording could potentially be seen by some users (or user groups or experts) as conferring on them a role, or influence or control in defining or determining what constitutes an appropriate standard of fluency and/or competence. This has a clear resonance where complaints are possible under the legislation. The Commission was therefore strongly urged to amend/replace the wording to make it clear the Commission, and the Commission alone, will be the arbitrator of the appropriate standards of competency/fluency. ([RTÉ](#))

It was suggested that there should be customisable subtitle options for users including options available to adjust subtitle speed and complexity, especially for children and viewers with cognitive impairments. When it comes to music and sound effects, it was argued that there should be standardised markers to indicate music and sound effects, while the hash symbol (#) should be replaced with musical notes (♪). As for the descriptive music subtitles, they should provide more detailed descriptions of music, including mood or genre (e.g., “melancholic piano music”), while the subtitles should clearly indicate long pauses or silences with descriptive captions (e.g., “[long reflective pause]”). ([Independent Living Movement Ireland](#))

Further guidance was requested on when simplified subtitles should be used on children's programmes (i.e. when would these be considered for an audience of children under 11 years) and guidance on an appropriate strategy to reduce length of sentences was also requested. There was also a query about what rules apply to live broadcasts where there is a requirement to translate real time subtitling and what the Commission's expectations were for ISL on live/linear broadcasts (particularly when foreign languages are used). In relation to AD Standards, clarity was sought about how to achieve the requirement that vocabulary and sentence construction should be suitable for age group for whom the programme is intended. ([Warner Bros. Discovery](#))

A question was also raised about TV broadcasters not giving permission to TV platforms to allow users to record TV programmes, or if recording is allowed, subtitles are not available. ([Individual](#))

## Annex 1 – List of Respondents

### List of Respondents by Category

Category	Respondent name
<b>Industry and industry associations</b>	<ol style="list-style-type: none"><li>1. DCTV</li><li>2. Oireachtas TV</li><li>3. RTÉ</li><li>4. Screen Producers Ireland</li><li>5. TG4</li><li>6. Virgin Media Television</li><li>7. Warner Bros. Discovery</li></ol>
<b>NGOs, national bodies and related Associations</b>	<ol style="list-style-type: none"><li>1. Chime</li><li>2. Independent Living Movement Ireland (ILMI)</li><li>3. Irish Deaf Society</li><li>4. National Disability Authority (NDA)</li><li>5. Voice of Vision Impairment</li></ol>
<b>Individuals</b>	Private Individual

## Annex 2 – List of Consultation Questions

### Consultation on Draft Access Rules

**Question 1:** Do you have any comments on the proposed changes to the introductory sections of the Access Rules?

**Question 2:** Do you have any comments on the proposed changes to the Definitions section of the Access Rules?

**Question 3:** Do you have any comments on the proposed changes to the General Rules Applying to All Access Provision section of the Access Rules?

**Question 4:** What are your views on the targets proposed for subtitling for the 2025 to 2027 period?

**Question 5:** Do you have any further comments on the proposed changes to the Subtitling Rules section of the Access Rules?

**Question 6:** What are your views on the proposed targets for ISL for the 2025 to 2027 period?

**Question 7:** What is your view on the change to the assessment of ISL targets based on an 18-hour day, from 7am to 1am?

**Question 8:** Do you have any further comments on the proposed changes to the Irish Sign Language (ISL) Rules section of the Access Rules?

**Question 9:** What are your views on the proposed targets for AD for the 2025 to 2027 period?

**Question 10:** Do you have any comments on the proposed changes to the Audio Description (AD) Rules section of the Access Rules?

**Question 11:** Do you have any view on the proposed deletions to Section 9 to 13 of the 2019 Access Rules?

**Question 12:** Do you have any comments on the proposed changes to the “Access Principles and Influencing Factors” section of the Access Rules?

**Question 13:** Do you have any comments on the proposed changes to the “Standards Applying to Subtitling, Irish Sign Language & Audio Description” section of the Access Rules?