

Feedback on TRAI Consultation Paper dated 2 April 2024 seeking Inputs for formulation of National Broadcasting Policy (NBP) - 2024

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I. INTRODUCTION

India: First country to leverage Same Language Subtitles (SLS) for reading literacy at population scale

All broadcast content should become accessible with simple tools like Same Language Subtitles/Captions (**SLS/SLC**) because it will benefit one billion viewers, in a number of ways. Many countries like the UK, USA, Canada, Australia, New Zealand and more recently India, have leveraged SLS/SLC for media access. No country has done so expressly for reading literacy. India is globally the first but it needs to own this purpose, and design for it along with media access.

SLS for reading is an Indian innovation. With policy ownership it could well become India's contribution to global reading literacy. We applaud the Indian Government's recent efforts to boost media access for Persons with Disabilities (**PwDs**), with their recent issuance of the [Guidelines on Accessibility Standards for Films](#) and the notification of the [Cinematography \(Certification\) Rules, 2024](#). These latest guidelines notified by the Ministry of Information & Broadcasting (**MIB**) are an opportunity for policy to own and share with the world a novel tool for mass reading, useful in both the Global South and North.

The Billion Readers (**BIRD**) Initiative at IIT-Delhi's School of Public Policy seeks to guarantee lifelong reading practice to all Indians, with a particular emphasis on underserved members of society. Interventions like SLS that benefit PwDs also stand to benefit *ALL* viewers, including the majority hearing and sighted at both national and global scales.

Same Language Subtitles/Captions (SLS/SLC)

SLS is the concept of adding subtitles on existing TV entertainment, in the "same" language as the audio. What you hear is what you read – Hindi subtitles on Hindi films, Tamil subtitles on Tamil films and so on in every Indian language. SLC additionally describes in text, non-verbal sounds. In this feedback, we use the terms SLS and SLC interchangeably.

The case of SLS and reading literacy is built on strong scientific evidence. Eye-tracking studies have demonstrated that SLS gives automatic reading practice to weak-reading viewers. The evidence from [pilot studies](#) of SLS implementation on TV in Indian languages demonstrates

that regular SLS exposure results in steadily improving reading skills among all viewers: children in and out of school, youth, and adults. A billion viewers in India watch four hours of TV every day, and will do so for life. Reading practice from SLS is incredibly cost-effective and scalable. The international acceptance of SLS is growing with global leaders like [Mr Bill Clinton](#), [Shri Narendra Modi](#), [Mr Boris Johnson](#) and [Mr Gordon Brown](#) remarking on its potential.

II. IMPLEMENTATION STRATEGY

The goal of this document is to share our strategy and rationale for the incorporation of accessibility features like SLS, Audio Description (**AD**) and Indian Sign Language (**ISL**) into content, *at the time of content production* and *at quality*, to be broadcasted across various media like films, televisions, digital Over-The-Top (**OTT**) platforms, etc.

A key point is that these features, to the extent possible, should become an integral part of the content, at the time of production, and not as an afterthought which makes it costly and cumbersome. For example, each 'content' is a collection of files or a Digital Content Package (**DCP**). We propose that the DCP for broadcast content must include the above three accessibility features as separate files which can then be turned on/off on any broadcast platform, or device, by the broadcaster and/or the consumer. On streaming and on the distribution platforms and devices of the future, the content will always remain accessible.

Presently, TRAI's consultation paper does not cover accessibility and how it also contributes to national literacy. Our recommendations may be considered for several reasons for which there is strong scientific evidence:

- (1) **Media Access:** This works to enhance media access for PwDs in consonance with the provisions of the Rights of Persons with Disabilities Act, 2016 (**RPwD'16 Act**).¹ In terms of numbers, this will unlock media access for 65 million Deaf and Hard of Hearing (**DHH**) viewers and media access for 70 million blind and visually impaired persons.
- (2) **National Literacy:** In addition to improving media access, SLS if deployed at scale and at quality across all broadcasted content will improve mass reading literacy and language skills, namely - improved reading skills for 600 million weak readers and motivation to become literate for another 250 million non-literates, 60% being female readers. Many of the weak and non-literates are concentrated in 'TV Dark' homes. The provisioning of affordable TV to these homes in TRAI's consultation paper is appreciable (see A1, p. 12) and accessible content will further enhance their reading literacy and education.
- (3) **Promotion and Protection of Indian Languages:** Indian language learning for one billion TV viewers in India can become a reality with SLS. Improved reading and language skills at population scale, as part of content that people already consume

¹ s. 42 of RPwD Act '16: Access to information and communication technology.—The appropriate Government shall take measures to ensure that,— (i) all contents available in audio, print and electronic media are in accessible format; (ii) persons with disabilities have access to electronic media by providing audio description, sign language interpretation and close captioning; (iii) electronic goods and equipment which are meant for every day use are available in universal design.

and will consume for life, will contribute to a higher quality labour force and the economy.

- (4) **Furthering Reach of Indian Languages and Indian Culture:** Adding SLS, AD and ISL to all content at source makes the content accessible to diaspora Indian communities (about 18 million in strength) and attractive to global content consumers, both Indian and others. This works for both language learning and access to Indian entertainment and infotainment.

Prasar Bharti Doordarshan's [Charter](#) lays emphasis on "*providing adequate coverage in its programming to India's diverse array of languages and cultures, promoting social justice, paying special attention to the fields of education, and spread of literacy and providing comprehensive TV coverage through the use of appropriate technology*". Further, the Indian government has through various policies highlighted the importance of raising reading and Indian language skills nationally, be it through the [National Education Policy \(NEP\)](#), 2020 which rightly emphasises the need for strong Foundational Literacy and Numeracy (**FLN**) in the mother tongue; or "Nipun Bharat" - a 5-year time-bound mission to achieve strong FLN skills for all children by Class 3; or the [report](#) released by the MIB's AVGC Promotion Task Force which recommends various measures to proliferate educational, informative, and quality content for children.

The TRAI consultation paper addresses education in the context of vocational skill building in the broadcasting sector, however, the NBP covering interventions like SLS presents a strong opportunity to achieve national educational and literacy goals, through broadcasting, and to build robust and meaningful coalitions across governmental ministries (TRAI, MIB, the Ministry of Education and the Ministry of Social Justice & Empowerment) at low cost and minimal re-programming.

Assuming that future broadcast content is made intrinsically accessible, as per our first proposition above, broadcast technologies, set-top boxes, devices, etc. should allow a user to turn any one or more of the accessibility features (integral part of content) on/off. For example, the 45 million DD Free Dish set-top boxes should technically allow the consumer to select from the available subtitles and audio tracks. Such services are already being extended by DTH providers like Tata Sky, and content being made accessible at source, will only encourage more players to enable similar services.

III. SPECIFIC FEEDBACK ON TRAI'S QUESTIONS

We have provided responses to the questions raised in the Consultation Paper that are pertinent to our areas of reach and expertise, in serialised order, below:

1. **"Q1: Stakeholders are requested to provide their inputs in framing the Preamble, Vision, Mission and Broad Objectives for the formulation of the National Broadcasting Policy (NBP)" pg 10 of the Consultation Paper**

Following from the rationale in our implementation strategy provided in (II) above, we suggest adding a *fifth* objective to the high-level strategic objectives provided in 1.12 of the consultation paper, as under:

- v. **“Improving Media Access, Reading Literacy, Indian Language Learning and Promoting Inclusivity at National Scale** by adding the choice of Same Language Subtitles/Captions, Audio Description, Indian Sign Language or any other accessibility features to all content at source.”
2. **“Q4: What other policy and regulatory measures should be adopted in the policy for creation and expansion of quality Indian content to make India the ‘Global Content Hub’? Further, suggest how to extend support to local talents and content developers in terms of training, infrastructure and incentives. Provide your comments with detailed explanation.”, pg 23 of the Consultation Paper**

All video content has the audio and video as two separate tracks that can be combined or replaced (e.g. dubbed) flexibly. We recommend that the production, licensing, and distribution of all video content should additionally include an SLS file, which in the industry is technically known as an SRT file (except that this term does not define the language like SLS does). The SLS file should simply become a part of the video and ‘video’ should itself mean AVT, where ‘T’ stands for “Text” of the SLS file.

Our recommendation integrates SLS into all video content, and therefore, into the production, licensing and distribution itself. That way no broadcaster will have to worry about retro-fitting SLS into content as an afterthought. The approach we have recommended takes a long-term view for SLS integration. Once the basic SLS file is a part of the video, all future technology advances in TV networks, digital platforms, and devices will be able to build on the SLS file as a core ingredient.

There are several advantages for the industry:

- a. SLS makes content deeply searchable. A user can jump to any part of the video by searching for text. Content produced for TV also becomes ready for digital platforms that now expect SLS and it is only a matter of time before all streaming platforms too will require SLS as is the case in many countries.
- b. By widening access to content for the underserved thereby increasing demand, there will be additional knock-on effects for the industry, in terms of job creation in the content production, accessibility and AI technology spaces.
- c. Incorporating SLS on movies, TV programmes, digital content, animated shows, children’s entertainment, and educational content alike will enable Indian diaspora communities to access content in vernacular languages that they are either trying to learn, or stay connected with and can help build strong familiarity with their languages and cultures of origin. This will strengthen India’s position as a “Global Content Hub.”
- d. Exporting “SLS-ed” content outside India will also boost language learning for non-Indian persons and communities living abroad who are learning or are keen to learn Indian languages by helping them with reading practice.
- e. Content Repurposing is made possible with SLS. A transcript of a video can be adapted into a blog, an audiobook, a podcast, an email, an infographic or social

media post. Depending on the platform and the audience the TV channel is targeting, the content can take any shape or form, making it more inclusive and accessible.

- ii. **“Q6 What broad guiding principles, measures and strategies should be considered in the NBP to strengthen India’s public service broadcaster (i.e. Prasar Bharati) to promote quality content creation, dissemination of DD and AIR channels and maximizing its global outreach? Also suggest, what support and measures should be provided for the proliferation of television and radio broadcasting services provided by the public service broadcaster in fulfilment of its mandate?”, pg 26 of the Consultation Paper**

We support the AVGC Task Force report’s recommendation that Prasar Bharti create a dedicated children’s content channel. We further recommend that accessibility features like SLS, AD and other accessibility features be incorporated into this content, at the time of content creation. Further, this channel would have “default – on” SLS on its content (which can be switched off at will by the user) to help boost reading at scale.

- iii. **“Q7 What policy measures and regulatory aspects should be adopted in the NBP to nudge the growth of Indian regional content through OTT platforms?”, pg 28 of the Consultation Paper**

A 2022 study we conducted of the top 5 OTT platforms showed that almost all English language content had SLS, whereas over 90% of the Indian language content was lacking SLS.² As pointed out in the consultation paper, OTT platforms can leverage subtitles and dubbing for gaining national reach (see 2.60, page 27).

We recommend that the mandate to incorporate accessibility features like SLS, AD etc. be extended to content on OTT platforms. With a long term and systems view, the focus of this implementation should remain on accessibility features integrated into content and not be platform or device specific. It is easier to implement accessibility features on OTT platforms than on linear TV. The video content overlap between TV and OTT is close to 90%, so logically the standards should apply to all audio-visual content irrespective of distribution on TV and/or streaming platforms.

- iv. **“Q18 What role the broadcasting sector should play to fulfil social and environmental responsibilities? Provide in detail the key focus areas and the strategies the sector should consider. Also provide strategies on the following specific issues:**
i. To empower Person with Disabilities (PwDs) to access the information and entertainment programmes....”, pg 77 of the Consultation Paper

BIRD celebrates the recent policies released by the MIB to streamline accessibility features incorporation into films on March 15, 2024. We enthusiastically await similar and harmonious guidelines vis-à-vis television programming and digital content to be notified by the Indian Government. We also propose the following interventions to empower PwDs and all viewers at a national level to benefit from content that is accessible and inclusive:

² <https://www.thehindu.com/data/data-the-superpower-of-ott-platforms/article67233905.ece>

- a. MIB's [Accessibility Standards, 2019 for TV](#) were released in a draft form in 2021 for public feedback however these are yet to be notified. These standards had mandated the implementation of the stated accessibility features on 50% of all entertainment content on TV by 2025. Consistent with the RPwD Act, 2016, the 2024 accessibility guidelines and certification rules for films, the NBP must consider framing an umbrella mandate for a provision of choice of SLS, AD and ISL on **all** broadcast content, irrespective of media.
- b. In the long run, there is a need to adopt universal design principles in the creation and implementation of Accessibility Standards, guided by a broader recognition of the range of purposes and audiences the standards will serve viewers, over a lifetime. India's Accessibility Standards should ideally be harmonised and be applicable to all content irrespective of broadcasting platform, and will aim to serve every Indian.
- c. The NBP should address creating a task force that will, through consultation with all stakeholders, create and publish a handbook for best practices for creating SLS, AD, ISL and other accessibility features at quality. This will contribute to the above two recommendations.
- d. Television and OTT content should have "default-on" SLS that can be switched off at will. To begin with, and for the purpose of improving mass reading literacy, this can be focussed on children's content and content that women enjoy on these platforms, and then expand to all forms of content.

IV. CONCLUSION

The National Broadcasting Policy framework offers India the opportunity to:

- (1) make the broadcasting sector accessible for all viewers; and
- (2) incorporate reading and literacy initiatives into all broadcasting content and technology, at quality, low cost and scale.

Lifelong reading practice, language learning and media access delivered via SLS/SLC, AD and where possible, ISL, has scale and equity built into the solution. The adoption of universal design principles in the creation and implementation of the Accessibility Standards will not only empower PwDs but all viewers at population scale. Only when the broadcasting sector sees the benefit in SLS/SLC and AD for all viewers, will these features become an integral part of all entertainment content and the experience will shift at nation scale toward lifelong inclusion.