

Nordic Entertainment (NENT) response to MPRT draft report with a decision model before the forthcoming decision on accessibility requirements.

Linear Services

Broadly we support the proposed requirements and agree that where NENT has not made provision of forms of access service on our channels in previous years e.g. for Spoken Text in general and for Sign Language on the majority of our channels, these should be phased in.

Since 2013 NENT has made large investments into accessible content on our channels, focused on a diverse range of content including formats/programmes that are popular with our viewers as this is about providing them with a helpful service. For example in 2020 an average 17% of all content on the channels proposed to have special requirements had audio description. This content and investment is discounted by the new regulations applying to Swedish language content only.

Other services which have had different requirements relating to Swedish language content have had more time to make content in their catalogues accessible according to MPRT requirements (meaning less requirement for new investment/expenditure) and this should be reflected in the regulation. All content with existing accessibility options will continue to be offered when and where they are aired.

In relation to the exemption for subtitling for live sports we would like this to confirm this applies to both fast reruns/highlights broadcast on the same day and to other forms of live programming which may be unable to provide live subtitling, provided the reasoning is included in the respective annual reports on accessibility per channel/territory.

On Demand

NENT is committed to making more programming accessible on our platforms and welcomes the flexible approach afforded to those services without special requirements. For Viaplay.se it is important to recognise that technical developments are complicated and difficult to implement across the board. For example, Viaplay can be accessed via Web, IOS, Android, Chromecast etc. It should be sufficient for accessibility options to be available on one of our platforms e.g. web, as we understand this is the case for SVT.

We also believe there should be a review of these requirements in light of how often these services are used. If it proves that the uptake of accessible programming is very limited, then special requirements should be relaxed in line with other services where there is flexibility in how they are offered.

NENT is committed to bringing the best in diverse Nordic storytelling to as many of our viewers as possible.