

Streaming Accessibility Readiness Checklist

Accessibility is two layers on one map: caption and audio-description tracks on the content, and apps that meet WCAG 2.1 AA — built once and checked against the law in each market you serve. Engineering guidance, not legal advice; confirm caption, audio-description, and accessibility obligations per territory with counsel.

1 · CAPTIONS (CONTENT TRACK)

- Caption every title, not only TV-derived** — FCC §79.4 covers TV-aired video; the ADA and EAA cover the rest.
- Meet the quality bar** — accuracy, synchronicity, completeness, placement (FCC §79.1) — not just 'captions on'.
- Signal the track in the manifest** — WebVTT / IMSC in HLS / DASH so every client renders it.
- Live needs live captions** — WCAG 1.2.4 AA; never ship 'captions to follow'.

2 · AUDIO DESCRIPTION (CONTENT TRACK)

- Ship a described-audio rendition** — a separate track in the ladder, signaled like any language.
- US: it is law and growing** — FCC §79.3; DMAs 111-120 from 1 Jan 2026, all markets by 2035.
- EU: it is on the service** — the EAA puts audio description on you, not only the broadcaster.
- Budget it in acquisition** — describe new originals; AD is not optional polish.

GO-LIVE GATE — BEFORE EXPOSING CONTENT IN ANY MARKET

Confirm every title carries captions that meet accuracy, synchronicity, completeness, and placement, plus a described-audio rendition where required — both signaled in the manifest so every client renders them. Confirm the apps — sign-up, catalog, search, and player — meet WCAG 2.1 AA (build to 2.2 AA) on web, mobile, and TV, where the remote's D-pad counts as a keyboard, verified with real assistive technology (VoiceOver, TalkBack, a remote with the screen reader on). Confirm accessibility features are exposed as per-title metadata so users can find what they can use — the European Accessibility Act now requires this. Confirm you know which law reaches which content: the US FCC caption rule (47 CFR 79.4) covers only TV-derived video, the ADA reaches streaming originals, and the EU's European Accessibility Act (from 28 June 2025, measured by EN 301 549 / WCAG 2.1 AA) can withdraw a non-compliant service from the market. This is engineering guidance, not legal advice; confirm caption, audio-description, and WCAG obligations for each territory with qualified counsel.

3 · WCAG — THE INTERFACE

- Target WCAG 2.1 AA, build to 2.2** — the near-universal legal bar; 2.2 is backward-compatible.
- Keyboard + visible focus** — 2.1.1 / 2.4.7; the TV remote's D-pad is a keyboard.
- Contrast and target size** — 1.4.3 (4.5:1) and 2.5.8 (24px) across web, mobile, TV.
- Test with real assistive tech** — VoiceOver, TalkBack, and a remote with the screen reader on.

4 · THE LAW BY REGION

- US: CVAA + ADA** — FCC complaints for Part 79; ADA lawsuits (NAD v. Netflix) for the rest.
- EU: European Accessibility Act** — since 28 Jun 2025; EN 301 549 → WCAG 2.1 AA; can pull from market.
- Indicate features per title** — the EAA requires showing which titles have captions / audio description.
- Confirm per territory** — UK Equality Act and others add local duties; check with counsel.