

## **Quality of Live Subtitling – Improving the viewer experience**

### **Introduction**

The National Association of Deafened People (NADP) welcomes the opportunity to respond to the consultation on the Quality of Live Subtitling. NADP is a national support and campaigning organisation for people with a hearing loss who use spoken and written language for communication. In this response we will therefore concentrate on issues that are relevant to those people.

We are pleased that Ofcom is consulting on this subject, as NADP receives more complaints from its members on this issue than on any other topic, both on the lack of accuracy of the subtitles and also on the delay before they appear, both of which greatly reduce the enjoyment and comprehension of programmes. We therefore fully support any measures that may be taken to improve the quality of live subtitles. Below we will respond to the questions posed in the consultation document.

#### **Q1. Do consultees agree with the proposal to require broadcasters to measure and report every six months on the average speed of live subtitling in a variety of programmes, based on a sample of segments selected by Ofcom?**

NADP agrees with the proposal to require broadcasters to report on the average speed of live subtitling and that a six month reporting period is acceptable. We would however wish to point out that the actual speed of subtitles is perhaps the least important factor in quality as far as the viewing experience is concerned. Latency and accuracy are of greater importance to our members.

NADP appreciates that editing of verbatim speech is necessary to achieve viewable subtitles, but what is important is how much editing is carried out to reduce the speed and what content has been edited, i.e. have the right things been omitted in the editing process. The need to edit verbatim speech is also affected by the speed of the original utterance – more editing would be expected if the original speaker is talking very fast than if the original speaker is talking quite slowly. We do not therefore believe that a straight measurement of speed is sufficient, but the factors mentioned above must also be included.

#### **Q2. Do consultees consider that broadcasters should be asked to report separately on different types of live programming? If so, do they agree with the suggestions in paragraph 6.19, or would they suggest different categorisations, and if so, why?**

NADP agrees it is sensible that there should be some degree of separate reporting on different categories. We would also agree that the quality of news live subtitling is of the highest importance and therefore we agree that reporting on this should be a separate category. We would like to have more explanation as to what might be included in the chat show category – would that include political discussion programmes such as the Andrew Marr Show and Newsnight as well as pure chat shows such as Graham Norton? Entertainment programmes

is a very wide category that could be further broken down. For example there is a world of difference between the live subtitling of Big Brother and Have I Got News for You in terms of how they may be enjoyed and comprehended by viewers with live subtitling. Quiz programmes are another possible category.

**Q3. Do consultees consider that the guidance on subtitling speeds should be reviewed? Do consultees agree that, for the time being, it would not be appropriate to set a maximum target for the speed of live subtitling? If not, please explain why.**

NADP feels the current guidance is helpful and sees no great benefit in reviewing or changing it at the present time. We also agree that it would not be appropriate to set a maximum target at the present time. As we said above, how the content is edited to achieve an appropriate speed is of greater importance than the speed itself.

**Q4. Do consultees agree that it would not be appropriate at this stage to set a maximum target for latency? If not, please explain why.**

We note that paragraph 6.22 proposes that broadcasters be required to measure both the average latency and the range, presumably on the same basis as reporting on average speed, but there is no question on that. NADP would like to state that reporting on latency is absolutely vital, and probably more so than average speed, so we fully support this proposal. While we accept that there is likely to be a range of latency we also feel that if latency goes beyond a certain range there can be little or no comprehension of the programme through the subtitles. It would therefore be helpful to set a maximum target, though we appreciate that further work may be needed before this can be done.

We fully support the current guidance which is to keep the delay to a minimum consistent with accurate presentation, and note that this is currently set as “no more than 3 seconds”. We do actually agree that is what it should be, but we do not believe that this is ever actually met at the present time. Latency is always more than five seconds and usually around 7-10 seconds, and often more than that. It would therefore appear that the current guidance is not being met at any point. That does not mean the current target should be revised, because we believe it is what should be happening, but we would like to see greater efforts made by broadcasters to achieve what the guidance says they should be achieving.

**Q5. Do consultees agree with the proposal to require broadcasters to measure and report every six months on error rates, on the basis of excerpts selected by Ofcom from a range of programmes?**

NADP agrees that broadcasters should be asked to report on both gross error rates and the number of more serious errors. We do however also note the discussion in paragraphs 3.23 and 3.24 on various types of error and how some have greater impact than others. This is of great importance, and a simple count of errors is therefore not sufficient – there needs to be further breakdown as to the type and severity of those errors.

NADP receives many complaints about the increased error rate in the subtitling of regional programming, and particularly regional news programmes, which viewers believe falls below the standard of national news subtitling quality. We would therefore propose that statistics of the error rates of news programmes from various regions are kept and compared with those for national news to see whether there is a decrease in quality in such cases. Full and accurate subtitling of such regional programmes is of great importance in these times of uncertainty.

One annoying trait that is not mentioned in the consultation is the way in which respeakers attempt to correct errors, often making three or four attempts to do so, all of which increase the latency of what follows. Quite often the actual meaning can easily be deduced and therefore the attempt at correction is not needed. We know that many viewers wish the respeaker would simply get on with it and not waste time with such corrections, which just cause annoyance. We also know that trying to make corrections is often an instinctive reaction and that this is difficult to overcome. We would welcome some way of including the number of corrections made in this measurement process.

**Q6. Do consultees have any views on the advantages and disadvantages of scrolling versus block subtitles for live subtitled programmes? Taking account of both the advantages and disadvantages, which approach would consultees prefer, and why?**

NADP is aware that many studies of the comprehension of block versus scrolling subtitles have been carried out and that all have shown higher comprehension rates where block subtitles are used. We are also aware that these studies show that block subtitles also allow more time to look at the picture, whereas with scrolling subtitles nearly all the time is spent reading the subtitle rather than looking at the picture. It therefore seems to follow that, all things being equal, block subtitles are preferred.

However, the major drawback with the current system in using block subtitles is latency, since the whole block must be ready before the subtitle is displayed. We have already commented above on latency and how reducing this as far as possible is essential. So if the use of block subtitles leads to greater latency then the continued use of scrolling subtitles is required.

NADP understands that the new Subito software being rolled out by Red Bee Media should allow the use of block or scrolling subtitles as well as improving latency (though the results of use of the new software so far have proved to be disappointing). The proposals in 6.42-6.45 which we comment on below could also overcome this problem. To sum up, NADP would prefer the use of block subtitles but only if there is no appreciable increase in the problems caused by latency.

**Q7. What are the factors that might facilitate or hinder the insertion of a delay in live transmissions sufficient to improve the quality of subtitling?**

We appreciate that this question is mainly aimed at broadcasters, but would like to comment from the viewer's perspective. We would firstly note that what is being proposed has been misunderstood by a number of those who have read the consultation. What is being proposed is actually a delay in the transmission of the picture and sound, not a delay in the subtitles per se, which would of course increase the latency problem. From what is said in paragraph 6.43 about the delay used in Big Brother we take it that such a delay is technically feasible. Has the delay with that programme actually been used to experiment in delivering improved subtitles? It would seem an ideal way to test this out.

Certainly any measure that would allow a decrease in latency and an increase in accuracy would be welcomed by viewers, and NADP would therefore support the proposal, although we can appreciate there will be some technical problems to overcome. The fact this has been successfully done in the Netherlands would seem to indicate it is worth exploring further.

**Late delivery of programmes.**

Although a whole section of the consultation is devoted to this issue in 6.30-6.39 there appears to be no question about it. This is a growing cause of annoyance for viewers as the number of such programmes appears to be on the increase. We would also include in this category programmes which are live subtitled to give the appearance of being live when they are not, such as the Strictly Come Dancing Results Show, which everyone knows is recorded the previous day, or the Friday broadcast of the Graham Norton Show, which is always recorded earlier in the week. NADP believes that guidance in this area is needed now, and that basically it should not be allowed to happen at all. While we are pleased that Ofcom is proposing that broadcasters report on the period between July and December 2013 we do not agree this should be a one off report – it should be a regular report on the same lines as the others proposed. We also believe there should be sanctions against broadcasters who deliver programmes too late to be broadcast with pre-prepared subtitles, and that they should not count towards their subtitling quotas.

**Other points.**

NADP is aware that broadcasters keep a log of subtitle errors. We would like to see an independent audit of those logs carried out, as we feel they could help to indicate recurring problems and areas where improvement is required.

NADP would also like to see the number of complaints received about subtitling publicised so that viewers can see which broadcasters receive the most complaints and in which areas they are made.

It would also be helpful to viewers if an onscreen apology could be shown when there is a loss of subtitles or when other problems occur. This is sometimes done, but with no consistency.

**Conclusion.**

We welcome this consultation from Ofcom and believe that this is an area in which a great deal of improvement needs to be achieved, both in the reduction of latency and the improvement of accuracy. NADP looks forward to working with Ofcom as this process is developed.

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