

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

It is worth noting that not all pre-recorded programmes have pre-recorded subtitles. I often watch pre-recorded tv comedy only to discover that frequently the subtitles are produced live. This is unacceptable, especially on comedy programmes where the punch line of a joke relies so heavily on timing. In addition, I work in TV news, there is no reason why the scripts of 'packages' & most 'reads' cannot be sent to subtitlers before transmission. News is always subtitled LIVE, but this could be drastically improved if scripts were sent in advance.

Question 1: 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? :

Yes

Question 2: 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?:

Yes

Question 3: 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.:

Yes

Question 4: Do consultees agree that it would not be appropriate at this stage to set a maximum target for latency? If not, please explain why.:

No. I see no reason why some LIVE non News programmes could not be delayed by a few seconds to allow subtitles to be in sync.

Question 5: 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?:

Yes

Question 6: 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?:

Block is great for pre recorded subtitles, scrolling for live.

Question 7: What are the factors that might facilitate or hinder the insertion of a delay in live transmissions sufficient to improve the quality of subtitling? Ofcom would particularly welcome the views of broadcasters on this question.:

I see no reason why this could not be achieved.