

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Sense welcomes the opportunity to respond to this Ofcom consultation regarding the quality of live subtitles in relation to improving the viewer experience. For many people with dual sensory impairment good quality, timely and accurate live subtitles are vital to ensure that the live broadcast is accessible and inclusive to them.

Sense

Sense is the leading national charity that supports and campaigns for children and adults who are dual sensory impaired (deafblind). We provide expert advice and information as well as specialist services to dual sensory impaired people, their families, carers and the professionals who work with them. In addition, Sense supports people who have sensory impairments with additional disabilities.

Dual Sensory Impairment

Dual sensory impairment is a combination of both sight and hearing difficulties. The level of impairment varies from person to person and while one person may have mild hearing impairment but severe visual impairment another person may be profoundly deaf with visual impairment. Dual sensory impairment covers all combinations of hearing and sight impairment. People can be born with dual sensory impairment, or acquire impairment due to genetic or hereditary conditions, through illness, accident or in older age.

The impact that quality subtitles have in terms of speed, accuracy and latency on those with dual sensory impairment can be absolutely crucial to their ability to follow a live or recorded broadcast. The combined result of hearing and sight impairment means that when text is too fast, delays are too long and errors (including presentation errors) occur the ability to maintain focus, concentration and understanding is impeded to the point of capitulation.

While it is encouraging that the number and quality of broadcasts available with subtitles is rising, optimizing audible and all visual information is essential. Quality live and recorded subtitles help to overcome the challenge of combined sight and hearing impairment. Short delays, good visual presentation and reasonable speed are fundamental to those with dual sensory impairment.

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, Sense agrees that broadcasters should measure and report on the average times that text remains on screen. The reporting intervals should not exceed 6 months and we would like the sampling to include both scrolling and block text styles so that variations in speed, dependant on the style can be identified and reported upon.

Research carried out by Pablo Romero at Roehampton University suggesting that comprehension deteriorates as the speed of subtitles increases is based on those with single sensory impairment (hearing loss only) and provides excellent evidence for the need to

monitor subtitle speed.

A vision impairment combined with a hearing impairment will impact on the speed at which a person can comprehend subtitles. And while the general point remains true, namely that excessive speeds will hinder comprehension, more needs to be understood about the specific experience of dual sensory impaired people.

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?:

Sense agrees broadcasters should be asked to report on different types of programme and we agree with the categories that Ofcom have suggested for the initial implementation of average subtitling speed reporting. However we would also like to see Sports and Weather broadcasts considered due to the variation in speed of commentary, the frequent provision of names and the value placed on such broadcasts.

Sense also feel that it would be beneficial to review these categories periodically to ensure that they provide an adequate reflective spread of current live broadcasts.

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.:

For those with a dual impairment being able to locate and then read the text with ease at a comfortable rate is essential, yet those who were consulted in creating this response reported that they are frequently unable to keep up with the fast pace of the text. The result of which is a constant necessity to re-focus on the fast moving text, something that can be extremely difficult depending on the type and severity of visual impairment. When text is repeatedly too fast within the same broadcast the result is that the person "gives up" due to the sheer frustration and how tiring it is to concentrate, attempt to read and watch the screen all at the same time.

It is therefore essential that the speed of live subtitling is reviewed and guidance in place for those creating both live and recorded subtitles to keep within an acceptable tolerance.

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.:

Latency and delays are one of the most significant and frequently reported problems with live subtitling by people with dual sensory impairment. It is vital that the delay between what is being spoken and the live subtitle is as short as possible.

Optimizing all the information available from the image and text ensures that visual clues such as facial expression and lip pattern support the text and give clarity to the conversation; therefore correlation should be as close as possible. For example "if watching a news broadcast and they are going from one news item to another, the larger the delay, the smaller the percentage of the subtitles coming up will actually relate to the current news story being shown. This can mean about half of the time the subtitles shown still relate to the previous news story not the one actually on screen" (comment made by deafblind person). Audible and visual information that does not correlate can lead to poor or partial understanding and

therefore Ofcom should be monitoring and set a maximum target for latency ensuring that this is as short as possible within the constraints of productions.

The evidence base on subtitles and latency is based on the experience of deaf and hard of hearing people. There is a need to establish a more detailed evidence base on the impact latency has on the comprehension of subtitles for those with dual sensory impairment and Sense would welcome further research into this area.

Regular reporting of latency that includes averages and ranges will allow Ofcom, broadcasters and subtitle producers to quickly identify where improvements can and should be made to ensure that delays are kept within the guidelines. Sense agrees that at this stage it would not be appropriate to introduce a maximum target but this should be reviewed as the evidence base builds and if reporting does not drive improvements.

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?:

Errors that occur in live subtitling can be annoying to the viewer as well as fundamentally detrimental when the error changes the context of what has actually been spoken. Therefore Sense agrees with Ofcom's proposal to require broadcasters to measure and report on error rates, where reporting intervals should not exceed 6 months.

Sense would hope that Ofcom reporting on errors in a transparent manner would encourage those involved in the production of subtitles to work in collaboration with each to continue to improve services. For example the subtitle production companies should work more closely with broadcasters to ensure that speakers and presenters speak more clearly and at an acceptable speed for those listening and re-speaking the information, thus reducing some errors.

In addition to the text based errors, it would be useful if reporting could also include presentation errors such as poor positioning of the subtitle, where live subtitle positioning has blocked out important visual information such as a person's name.

The presentation of the subtitles is key to ensuring that those with dual sensory impairment are able to locate, easily read and put in to context what is being said. The use of the black box behind the text itself ensures that people can quickly identify where the subtitles are and that the text has better contrast with the background. However, its placement on the screen can then cause problems at times, especially if they move between the top and bottom of the screen. While providers and broadcasters have improved the placement of their subtitles significantly, especially when providing live subtitles to sports programmes there is still improvement that can be made. For example a live broadcast that will display a persons name will have pre - agreed the position of this display, information such as this should be communicated and taken in to account of when deciding where to then position the subtitles so that important information is not blocked by the subtitle itself. Additionally increasing the use of coloured text to differentiate between speakers would be beneficial.

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?:

For those that use live subtitles who have a dual sensory impairment a preference towards block or scrolling subtitle is often dependant on the type of visual impairment that they have

and which style is the easier to read given their visual ability. While block text is generally the easier to read for many with dual sensory impairment, overall it was the less popular choice by those asked to comment for the purpose of this consultation response because of its disadvantage of adding additional delay in the presentation of the subtitle, highlighting once again the imperative importance of reducing latency. Sense recommends that Ofcom facilitate further research in to this area, with assistance from both single and dual sensory impaired people, looking particularly at such readability issues.

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.: