

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

S4C is a Welsh language broadcaster. Many of our subtitles appear in English. Our live subtitlers are therefore required to translate as well as subtitle, so our experience of live subtitling is quite different to other broadcasters and the extra process of translating the narrative will inevitably result in a slightly longer delay than simply subtitling in the same language.

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? :

We agree that broadcasters should be required to report on the speed of subtitling in six monthly periods. We are aware that it can be highly frustrating for the viewer when the subtitles fall behind and are struggling to catch up with the programme. However, it is imperative that different genres of programmes are considered separately. Live subtitles on S4C programmes are done by three different companies and we tend to do some spot checks a few times a year. A requirement to report on the speed of subtitling would allow us to share and gain information from other broadcasters should the results be made public.

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?:

It is imperative that Ofcom require broadcasters to report separately on various types of programmes - different types of programmes present different challenges. The suggestion in paragraph 6.19 of two or three categories of programmes might need to be expanded upon. Even the same genres of programmes can vary enormously - in sport, the pace of snooker or golf is much slower than sports such as rugby or football and are therefore easier for the subtitlers to catch up with the action. Commentators tend to use less words also on the slower paced sports. The average speed of subtitling in heavily scripted programmes should be faster than a programme that is hardly scripted at all. Broadcasters should be able to report on how much information was available to the subtitling team beforehand in the form of scripts, running orders etc.

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.:

The age-old debate of speed versus accuracy applies here. We do not feel that it would be appropriate to set a maximum target for the speed of live subtitling as there are so many variations in the types of programmes that require live subtitling. If subtitlers were pressured into achieving specific speeds for every programme, it is possible that might impact on the accuracy of subtitles and therefore cause more frustration to the viewer who relies on the subtitles if they become incomprehensible.

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.:

Again, we do not feel that it would be appropriate to set a maximum target for latency as there are so many variations in the types of programmes that require live subtitling. Latency is not such a problem with some programmes such as chat shows as it is in fast paced programmes such as a rugby game, for example. The subtitles need to appear as the action is happening in such programmes. We have been experimenting with different types of live subtitles over the last few weeks and have found that due to the translation element, latency is inevitable, therefore commentary-type subtitles, which explain the action on the field, work better with some programmes than subtitles which attempt to track the spoken words.

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?:

We agree that it would be beneficial to all if broadcasters were required to report on error rates twice a year. All subtitling errors are logged at S4C and reported on. More often than not, these errors are technical and our technical staff are usually able to respond quickly when such problems arise. It would be beneficial to us to share and gain information with other broadcasters should Ofcom decide to share the information gathered.

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?:

We are very much in favour of block subtitles. Although scrolling subtitles might appear on screen very slightly earlier than block subtitles, the experience of reading scrolling subtitles requires more concentration from the viewer and can take their attention from the picture on screen. We have found that very often, the viewer can guess the narrative from looking at what is happening on screen. This also enriches the viewing experience as the viewer gets so much more out of the programme - for example, facial expressions and so on add so much to a programme but can be difficult to convey in subtitles.

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.:

Our live subtitling team have carried out several tests recently using a delay in live transmission (mock-up situation) on a live event programme. We experimented with a delay of 30 seconds and 12 seconds. The improvement in the 30 second delay experiment was significant. The subtitlers found that not only was it possible to cue the subtitles out at the right time, avoiding a delay, they were also able to correct any mistakes and fill in any gaps where the information was missed. Although they were not quite up to the standards of our pre-prepared subtitles, they were close. The experiment with a delay of 12 seconds proved to be successful as well. The subtitlers were able to get the subtitles on screen on time and correct most mistakes but there was not enough time to fill any gaps. We feel that if such a delay was introduced, around 25-30 seconds would work best in terms of the preparation of subtitles.

Although the improvements to the subtitles would be significant, we cannot ignore the fact that such a delay would cause problems to our presentation and technical staff. The risks involved with introducing such a delay has the potential to compromise the overall viewing experience. We are already processing a delay of around seven seconds and the arithmetic of having to add to this delay would make things complicated when counting into commercial breaks and so on - we use time-of-day timecodes on live broadcasts. A delay of this sort would cause significant problems if we were experiencing technical breakdowns, especially during high profile live rugby games as we use a back up split source using Radio Cymru's coverage which would be unlikely to be delayed. Very often, we broadcast the same matches as the BBC, therefore Ofcom would need to ensure consistency across all broadcasters. We often broadcast back-to-back matches which could be impacted by such a delay. Social media could also pose a problem with live sporting events, with the risk of developments being commented on via social media before they have been aired on television. This could detract from the 'live' experience for the television viewer. We do not currently have the equipment to make such a delay a reality and would need to invest a sizeable amount before it would be possible.