

BT welcomes the opportunity to answer the questions contained in Ofcom's consultation document, "The quality of live subtitling".

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?

BT can understand the difficulties experienced by some people with hearing disabilities with regard to subtitling quality. It is relevant that Ofcom's report outlines the improvements made by broadcasters to bring access services such as subtitling and audio description to their channels. As Ofcom says, over 70 channels now provide subtitling. As more subtitling becomes available then we can expect related problems to arise.

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If Ofcom wish to analyse the quality of subtitling of broadcasters, there is an option for them to do so through monitoring the broadcast output themselves or through a third party. This would not require broadcasters to measure and report on their own performance.

Because of the reasons above, we do not agree with this proposal. However one method to improve the general standard of subtitling might be for Ofcom to encourage more people to look at speech to text translation for further training or as a career.

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?

Notwithstanding the point made in our answer to Q1 that we do not agree that broadcasters are the best people to be monitoring their own performance, if Ofcom proceed with their proposals, we do agree that specific categories should be selected. We also agree that the examples suggested, news, chat shows and entertainment programmes would be an appropriate selection.

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.

In general we think Ofcom's guidance is useful and should be updated if there is new evidence. With regard to the question on subtitling speeds, we do not see a need to

set a maximum target yet but Ofcom should keep this under review as subtitling becomes more widely provided by broadcasters.

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 agree with Ofcom that it would not be appropriate to set a maximum target for latency.

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?

As in our answer to question one, we do not agree that broadcasters should carry out checks of subtitling accuracy. If Ofcom think they are necessary then Ofcom could do the checks themselves or use a third party to do the analysis.

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?

This is mainly a question of personal preference and best answered by the users of subtitling.

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? Ofcom would particularly welcome the views of broadcasters on this question.

BT's interest in this question relates to the impact of a time delay on the broadcasting of live sports. The value to viewers of watching a live event such as a Premier League football match on BT Sport lies in seeing action as it happens without delays. An artificial delay inserted to improve subtitling quality would result in a substantially poorer viewing experience when compared to other means of watching or listening to a sporting event such as on a radio broadcast without the added delay.

For example the value of a live sports broadcast would be diminished significantly if viewers could find out or be informed of goals or other incidents before seeing this for themselves as part of the TV broadcast.

We would strongly disagree with any proposal to insert a time delay.

British Telecommunications

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