

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

Radio programmes are also very difficult for hearing loss listeners. Spoken English has become very indistinct - consonants seem to have been overlooked.

**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?:**

**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.

A few months ago Emmerdale on ITV's subtitles were 8 seconds behind the action on screen for about 2 weeks - most times the action had moved on to the next scene and therefore the whole programme was a shambles.

**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.:**

**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?:**

Probably scrolling would be better.

**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.**