

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

It may not be entirely fair to say that subtitles are required because listeners are hard of hearing. An inability to hear what speakers are saying may also be due to poor quality speech, errors in recording or broadcast of the programme, or poor quality speakers in increasingly thin TVs. Can OFCOM influence any of these issues?

Errors in subtitles may be due to use of a specialised lexicon. For example, in many science fiction programmes the subtitler is clearly unfamiliar with the terms specific to that 'universe'. This is particularly aggravating for such viewers.

Programme makers may get better (and cheaper) subtitles by crowd sourcing subtitling - asking fans of the programme, who would be knowledgeable on the subject, to contribute or correct subtitles.

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. Results to be available online.

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?:

No. A simple percentage of their programmes which are subtitled would be sufficient.

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.:

I believe a maximum target for speed should be set. That or limit the number of words on the screen. Too many words can make subtitling processing difficult for both TV and viewer.

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?:

I feel that positioning of subtitles should be dictated by the layout of the image on the screen.

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.:

OFCOM should aim to reduce the delay in the presentation of subtitles to no more than two seconds.