

**Ofcom may publish a response summary:**

Yes

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

Yes

**Additional comments:**

**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? :**

In consultation with our clients, we currently monitor the speed of live subtitling as part of our QA process. Whilst speed is certainly one metric which can be used to measure of the quality of a live subtitling service, other factors such as presentation style, accuracy and positioning also play pivotal roles in the viewer experience and should be considered.

**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?:**

Given the different live subtitling challenges presented by categories of programme, it would seem sensible to report separately by genre. Additional categories which could be considered are live sport and local news.

**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.:**

As outlined in response to Question 1, subtitling speed is only one part of the viewer experience, ie when block subtitles are used viewers can process significantly more words per minute than when scrolling subtitles are used. Therefore aiming to deliver subtitles at a maximum rate for all live subtitling may not deliver the best service to viewers in all cases.

**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.:**

Agree. The factors which can affect latency can occur anywhere in the transmission chain, which makes calculating a maximum target for latency challenging. Additionally, latency can be significantly affected by the ability to prepare subtitles in advance of TX. (See Q.6 response)

**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?:**

Deluxe Media will support our clients on any reporting requirements they feel appropriate. Deluxe Media's current QC processes assess both error rates and error types. This data, when combined with other metrics including subtitling speed, are used to form an overall view on the subtitling quality.

**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?:**

At Deluxe Media we have been aware of research that shows block captions are significantly easier to read and allow more time for viewers to focus on the image on screen. The research carried out by Pablo Romero at the University of Roehampton indicates that a viewer needs to spend considerably less time focusing on the subtitles and is able to take in more of the images on screen when block subtitles are used. This is in accordance with feedback we have received from the Deaf community.

In light of this, wherever possible we prepare block subtitles in advance of TX from a variety of sources; newsroom downloads, scripts, repeated news items from earlier in the day, rehearsals. These block subtitles are then transmitted by the subtitler.

When no preparation can be done in advance and respeaking is used, we revert to scrolling subtitles to reduce the latency as much as possible. This involves a combination of presentation styles within one programme.

For late-delivery pre-recorded programmes where there is not sufficient time to prepare a subtitle file, we prepare block captions to key out live. This often involves a team of live subtitlers working right up to, and beyond the TX time. We feel this is important as it comes closer to meeting viewers' expectations of the subtitles for a pre-recorded programme.

**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.:**

Deluxe Media always work with our clients on any technical changes that can impact on the service we provide.