

# Consultation Response

## The quality of live subtitling (Ofcom) 26 July 2013

### About us

Action on Hearing Loss is the new name for RNID. We're the charity working for a world where hearing loss doesn't limit or label people, where tinnitus is silenced – and where people value and look after their hearing.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

### Comments

Action on Hearing Loss welcomes the opportunity to comment on Ofcom's consultation regarding the quality of live subtitling. We are very pleased with Ofcom's decision to investigate this issue as it has long been a source of complaint for our members and people with hearing loss more generally. With the quantity of subtitles increasing, it is vital that the issue of quality is considered to ensure that the subtitling provided is comprehensible and useful to people with hearing loss.

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 it is important to measure the average speed of live subtitling in a variety of programmes. Research by Pablo Romero at Roehampton University has shown that comprehension decreases as the speed of the subtitles increase from 180wpm to 220wpm.

TV programmes can contain large pauses where there is no speech, for a variety of reasons (credits, gaps between sections). Therefore,

for accuracy and for comparisons the averages should only be measured over “fully spoken” excerpts.

It is important to identify programmes which may be less comprehensible to people with hearing loss due to speed so that the producers and broadcasters are able to take action to address these issues. We therefore hope this information will be published on the broadcasters and Ofcom’s website so that members of the public are able to access this information.

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?

We agree that broadcasters should be asked to report separately on different types of live programming. Different programmes will have different time pressures and content speeds and therefore it is important to consider these separately. We agree with the suggestions in paragraph 6.19, however we also urge the inclusion of weather programmes as a separate group as this is often a segment of the programme broadcast at the highest speed.

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.

Whilst we agree a maximum target for live subtitling speed is not appropriate, we do believe that action should be taken to limit excessively high speeds. Where programmes are shown to have consistently high speeds, the reasons should be examined and action taken where possible to reduce the speed of the speech in line with a more comprehensible level.

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.

It is vital that broadcasters are required to measure the latency on their programmes and we welcome Ofcom’s proposal that this will happen. Our research found latency to be the biggest cause of problems for people when watching programmes with subtitles, with

three fifths of problems experienced with subtitles due to delays. If latency extends too much then comprehension of a programme is limited or even lost completely.

We believe that further research would be useful to establish the optimum latency levels which do not have a negative impact on comprehension. We believe that whilst a maximum target for latency may not be suitable, it is important that broadcasters are encouraged to follow the guidelines and keep the subtitles to within 3 seconds where possible.

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 broadcasters should be required to measure and report on error rates. We also believe that where error rates are found to be high, Ofcom should request further information to clarify the problem and to establish what can be done to reduce or prevent the error rate in future.

We also welcome the proposal to ask broadcasters to provide information on the incidence, severity and causes of failures in the provision of subtitles. We believe there should be much greater transparency around this issue, which will help to build trust with the audience.

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 believe there should be further research into this issue. We understand that scrolling subtitles are used as a method to reduce latency. However, Pablo's research finds that scrolling subtitles means the viewer spends more time reading the subtitles and less time looking at the picture. Block subtitles require less reading time and therefore more time can be spent looking at the picture. Therefore, where possible, we believe that block subtitles should be used.

To help to reduce the need for scrolling subtitles it is important that production companies provide the subtitlers with as much information about the live programme in advance, including scripts where possible. We are aware that the amount of information provided varies hugely.

However, we recognise that scrolling subtitles are necessary for live subtitling where no preparation can be done in advance.

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.

We welcome the further exploration of this issue as it could help to reduce the delay inherent in live subtitles. Latency was the key complaint from our research, 'Getting the full picture?' and therefore an extremely small delay in broadcasting could help to significantly improve comprehension for people using subtitles.

We understand that until the technology improves substantially, there will always be a trade-off between accuracy and latency with live subtitling. We believe that broadcasters should aim for increased accuracy and use different delivery methods to correct the delay. The delivery methods could be delaying the audio visual content from the source or delivering it so that the user can delay a programme to better fit with the subtitles.

We are aware of some concerns around whether this delay would cause problems in terms of synchronicity. For example, someone may watch a football match on the television and listen to a radio broadcast as well. However, there are already discrepancies in timing between radio and television and therefore we do not believe this will have a substantial impact.

We would also suggest investigating whether it is possible for an individual user to delay a programme to better fit with the subtitles.

### **Other comments**

We welcome Ofcom's decision to gather information on pre-recorded programmes which are subtitled live. Reducing the number of programmes which are unnecessarily subtitled live will help to reduce the delays and errors in subtitles inherent with live subtitling.

**Conclusion**

We are very supportive of Ofcom's proposals to improve the quality of live subtitles. People with hearing loss will be able to benefit from these proposals and we would be happy to have further discussions with Ofcom on this issue.

**Contact details**

Laura Matthews

Senior Research and Policy Officer

19-23 Featherstone Street, London, EC1Y 8SL

[laura.matthews@hearingloss.org.uk](mailto:laura.matthews@hearingloss.org.uk)