



RESPONSE OF CHANNEL 5 BROADCASTING LTD TO OFCOM CONSULTATION ON THE QUALITY OF LIVE SUBTITLING

Channel 5 welcomes the opportunity to respond to this consultation. We take seriously our responsibility to deliver high quality subtitling to viewers with hearing difficulties and other users of subtitling. We have no interest in providing a worse service than it is possible to deliver.

However, as Ofcom acknowledges, the provision of live subtitling is particularly challenging, with the imperative to be accurate often in conflict with the imperative to be fast. We understand that viewers want subtitles both to be accurate and to appear as soon as possible after the audio has been transmitted. But the challenging circumstances in which subtitlers work make it impossible to be both completely timely and entirely accurate. Live subtitles inevitably involve compromise; and we believe the professional subtitlers we employ provide a commendable service in difficult conditions.

In addition, as Ofcom also recognises, we are only able to control the start of the subtitling process, while some problems may have their source elsewhere in the supply chain. Technical problems can occur throughout the journey that subtitles take via platform, multiplex, transmission network, and through the viewer's own receiver.

So we recognise the frustrations suffered by viewers and are keen to incorporate technical and operational enhancements that can lead to improvement in subtitle delivery. But having spent over a year looking into this with Ofcom, we do not think it is possible to deliver substantial increases in both the accuracy and latency of live subtitling. It is better for all parties to recognise this and accept that of necessity live subtitling will fall short of the quality of pre-recorded subtitling.

It is in this broader context that we address the specific questions in Ofcom's paper.

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?

This proposal could lead to the development of a research resource that might inform future improvements in subtitling quality. In itself, however, it is not clear how this proposal would lead to any improvements in the issues identified by Ofcom.

It is not clear from Ofcom's text and question who would measure subtitling speed; how long samples would be; what account would be taken of such factors as the speed of the subtitled speech and the difficulty of the language employed; or what account would be taken of whether subtitles had been pre-prepared.

We believe it is in the interests of broadcasters, the subtitling companies, viewers and Ofcom itself for a single methodology to be applied to the measurement of subtitling speed. This would allow speed to be measured consistently across broadcasters.

We also believe it would make sense for Ofcom to carry out this measurement work, rather than adopting a two-stage procedure in which broadcasters carry out initial work which is then repeated by Ofcom. This would lead to greater consistency of measurement.

We expect Ofcom to request programmes from us within 90 days of their original transmission, as this is the period in which our licence requires us to keep recordings. Ofcom should also be aware that the recordings it may request will be of our transmitted programmes as they leave us, so will not capture any problems that occur later in the subtitling chain.

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?

It would make considerable sense for Ofcom to select several categories of programme. This would acknowledge the difficulties of, say, subtitling a live unscripted multi-person conversation relative to a pre-scripted news report. However, Ofcom should be careful of directly comparing the subtitling speeds of different programmes, as even within genres the challenges posed for subtitlers can vary considerably.

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.

We see no grounds for reviewing the current guidance; nor do we think any problems have been identified which a change to the guidance would address.

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 do not see how a maximum target for latency could be set or enforced. We note that the technical guidance attached to the Code, in the section entitled Best Practice, says that “In live programmes, the *aim* should be to keep the inevitable delay in subtitle presentation to the minimum...” (our emphasis). We think this is a sensible expression of an ambition to minimise latency, to which all broadcasters and subtitlers can adhere. Given the technical challenges in delivering live subtitling, we do not see how it could be changed into a rule.

While we see the value in researching latency rates, we have similar concerns to those we expressed about the proposed research into speeds in our answer to Question 1. We believe Ofcom should carry out the measurement; that a range of types of programme should be included in the samples chosen; and that all programmes selected by Ofcom should be from the preceding 90 days.

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?

We do not object to this proposal in principle. However, we think it would be necessary to develop a methodology that distinguishes different types and degrees of accuracy. Inaccuracy can include misspelling of words that are nonetheless perfectly clear from the context in which they appear; omissions of words that may have some impact on the sense of what is being conveyed; and gross errors that completely change or even reverse meaning.

As with speed and latency, we believe this exercise requires a single methodology that is common across all broadcasters; that the research should be conducted by Ofcom to ensure consistency; that a range of types of programme should be included in the samples chosen; and that all programmes selected by Ofcom should be from the preceding 90 days.

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?

We think this question is best answered by subtitle users rather than broadcasters.

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.

We do not believe this proposal should be pursued further, for several reasons:

- Live broadcasting is valued in part because it is live, and believed by the audience to be live. It would be a betrayal of the trust between broadcaster and viewer for even a short delay to be introduced between broadcast and reception.
- Television competes with a range of other media. It would be absurd for viewers to have to wait to see something on their television until 20 seconds after they have learnt about it from radio or the Internet.
- Introducing a delay would create a new element in the already complex technical process of delivering television pictures to viewers' screens. It would increase the possibility of something going wrong and harming viewers' experience.

Channel 5 Broadcasting Ltd

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