

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

About us

UKCoD is an umbrella organisation representing a broad spectrum of community and voluntary sector organisations working with deaf people.

As part of UKCoD, Deaf Access to Communications is a special interest group of individuals and organisations with a remit to shape and respond to the telecommunications and broadcasting issues deaf people face.

This response has been drafted and commented on by DAC members.

General Comments

UKCoD welcomes Ofcom's attempts to seek improvements to live subtitling.

For deaf people subtitles are as important to participating in the TV experience as the vision and sound. Ofcom's proposals represent an important step in ensuring that problems with subtitles are treated in the same way as problems with the sound or vision.

Ofcom proposals aim to incentivise broadcasters and access service providers to identify and act on areas which call for improvement. In particular it is important that broadcasters reduce the number of pre-recorded programmes that are accepted late and so need live subtitling.

Measuring and reporting in this area is a step forward. Prepared subtitles should become the recognised industry standard for pre-recorded programmes.

Reporting problems with subtitles can be a frustrating experience exacerbated by the complex transmission train. Transparency about the causes of technical failures is certainly in the public interest. The public should have a clear, fast, easily understandable route to highlight problems and receive explanations for failures. Social media, apps, and online reporting could all benefit deaf people.

Conclusion

We very much hope the proposals Ofcom has put forward drive improvements in live subtitling, and that researchers and broadcasters continue to identify ways and means to produce all forms of subtitles at speeds that are readable, with latency and error rates that maximise the viewing experience.

In particular UKCoD hopes to see:

- Improvements in live subtitling evidenced by consistent reporting
- A reduction in pre-recorded programmes requiring live subtitling
- Greater transparency for people highlighting errors and receiving explanations for failures.

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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? :

UKCoD agrees with the proposal. As Ofcom highlighted, research has shown that comprehension decreases when speeds of subtitling increase above 180wpm. The method used to measure speed should be transparent and used consistently by different broadcasters so that all those using the data can understand what has been measured and how to enable comparisons to be made.

Ofcom makes reference to the complex transmission chain involved in broadcasting and that chain starts with the presenter / actor who originally speaks the words that need to be subtitled. Their speed of delivery has an impact and while it is outside the scope of this consultation some guidance may be useful in this area.

UKCoD assumes that the reporting will be publicly available.

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?:

UKCoD believes it is important that reporting should address different types of live programming. The suggestions in paragraph 6.19 make sense, with news and current affairs being particularly important. Further suggestions have been made by our members, including weather and sports programmes. Monitoring of live programmes should also include the voiceovers between programmes. It should be noted that many chat shows are pre-recorded and so would not be appropriate for reporting on live subtitling as UKCoD would prefer to see pre-recorded programmes broadcast with pre-recorded subtitles.

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.:

UKCoD agrees a maximum target is not appropriate at this stage but we would want assurances that excessively high speeds do not become the norm and that where they do occur action is taken to reduce the speed to a more comprehensible level.

It is important that the Code on Television Access Services reflects the latest knowledge about subtitling speeds. Certainly the phrase 'not normally exceeding' could be strengthened to encourage improvements and positive action in this area.

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.:

UKCoD notes Action on Hearing Loss's report that identified latency as the biggest cause of problems for people using subtitles.

Reporting on both average latency and the range is vital so Ofcom's proposals are welcomed.

It is also clear from Ofcom's consultation and from others that we need to find out more about what is possible in terms of limiting latency, and at what point latency starts to have a negative impact on comprehension.

It is important broadcasters follow the current guidelines, and while UKCoD does not believe a maximum target by itself will drive improvement, it is important that action follows where it is identified latency exceeds the current guidelines.

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?:

UKCoD agrees with the proposal. Clarity is needed about what would happen to follow up reporting on error rates and in particular the action that is possible if error rates remain consistently high, or if action identified by broadcasters is not followed up.

It is important the error reporting takes account of the research evidence, distinguishes between the total number of errors and the categories within that and particularly the standard and serious errors.

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?:

The research quoted by Ofcom does suggest block subtitles are preferred but in some cases, particularly live subtitling, scrolling subtitles are necessary.

Ofcom and others should continue to find out more about the respective advantages and disadvantages of scrolling and block subtitling and whether improvements in subtitling over time mitigate against any of the disadvantages.

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.:

UKCoD looks forward to the broadcasters views on the factors involved with the idea of a delay in live transmission. As discussed in Ofcom's consultation and in Action on Hearing Loss's report, latency is a key issue.

We note there are already small discrepancies around when a viewer receives a live transmission (for example between digital TV and live internet broadcast).

One of the likely factors is public acceptability of any delays. We hope the response to this question is open and creative, exploring a number of alternatives.