ITV Response to Ofcom on Subtitle Quality.

ITV's approach to access services.

We want our programmes to be enjoyed by as wide an audience as possible, including viewers with vision and hearing impairments.   We therefore spend a great deal of time and resource on access services, including subtitling. In 2012 we exceeded Ofcom's subtitling targets across all our channels.

	Ofcom quota	**Achieved (full 2012)**
ITV	90%	96.9%
ITV2	70%	93.9%
ITV3	70%	94.5%
ITV4	61.6%	76.7%
CiTV	60%	81.4%

Source: Ofcom Television Access Services: Final Report on 2012

Our subtitle providers consistently monitor the quality of subtitles in order to ensure that standards remain as high as possible.   For live subtitles, a formula which combines both accuracy and speed is used. This allows our subtitle providers to identify areas of particularly high quality and share the techniques used as best practice in order to improve performance throughout.

We also maintain regular dialogue with Action on Hearing Loss - this allows us to benefit from their research as well as obtaining feedback from their members about the access services we provide.

Enquiries and complaints to ITV Viewer Services about subtitles form a small percentage of the total. Just 0.18% of viewer contacts   to viewer services in 2012 were about subtitles.

The consultation

We welcome this consultation.   At a time when more programmes than ever before carry subtitles, it highlights the numerous challenges that broadcasters and subtitle providers face when producing subtitles – particularly for live programmes.

Ofcom's consultation document recognises that "*broadcasters and subtitling providers go to considerable lengths to ensure that subtitling is of reasonable quality and is successfully transmitted to viewers*".   Ofcom also recognises that there is no one "silver bullet" solution to the challenges of providing subtitles for live programmes. Indeed, this consultation is helpful as it underlines the fact that there is not a gold standard – one viewer may value speed while another may prioritise accuracy.

Furthermore, some quality issues are beyond our control – such as the digital receiver used or technical failures that occur due to the complexity of the transmission chain.

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, we agree with this proposal in principle - our subtitle providers already monitor the speed of live subtitling.   However, if this is to become an Ofcom reporting requirement, we would need more detail on the practicalities. For example, how much notice would we be given of the programme segments chosen by Ofcom?   As the platform and receiving equipment impact the speed of live subtitling, would these be specified by Ofcom too? Subtitling speeds will also depend on the type of live programming – whether it's sport, news, or entertainment programme for example - so some consistency would be required so that results are comparable between broadcasters and over time.   This is a particular issue for ITV as a relatively high proportion of our schedule is live programming.

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 woud they suggest different categorisations, and if so, why?

Yes, as stated above, to provide meaningful results subtitle speeds can only be compared between similar types of programme.   Therefore it would seem sensible to report separately by genre. We agree with the initial categories set out in the consultation.   Live sport and regional news are other categories worth considering.

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.

We believe that the current guidance, an upper limit of 200 wpm for dialogue requiring live subtitles, is about right. We agree that it would not be appropriate to set a maximum target for subtitle speed.

Subtitling speed interacts with other factors to determinte the viewer experience. For example, when block subtitles are used viewers can process significantly more words per minute than when scrolling subtitles are used. Therefore a setting of speed targets may skew performance in a way that doesn't necessarily result in 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.

We agree that it would not be appropriate to set a maximum target for latency.

The factors which can affect latency can occur anywhere in the transmission chain, and the type of digital receiver used is a significant factor.   As Ofcom's document says "while problems can and do occur in other parts of the transmission chain, digital receivers are arguably the most vulnerable part"

This will need to be taken into consideration, possibly with Ofcom specifying platform and receiving equipment, when requiring broadcasters to measure latency.

Furthermore, the type of programme will determine latency to a certain extent. In addition, the delay between a word being spoken and the subtitle appearing on screen, will fluctuate within a programme. Therefore Ofcom will need to take these factors into consideration when specifying the programme samples.

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?

We agree with this proposal in principle, however a methodology needs to be agreed and used by all broadcasters when measuring error rates, in order for the results to be meaningful.

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?

We are 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.

Therefore, wherever possible, our subtitle providers 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 advance preparation can be made and respeaking is used, our provider has to revert to scrolling subtitles in order to reduce latency.

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.

As the consultation document points out, the delay of live transmissions to allow better quality subtitles is a controversial suggestion. In our view it would be a wholly disproportionate measure which is most unlikely to be in viewers' interests.

The circumstances surrounding the decision to adopt this measure in the Netherlands are very different to those in the UK. In the Netherlands the decision to delay transmission was taken to allow the vast majority of the viewing public to watch a programme broadcast live in a foreign language.

The introduction of a similar measure for live programmes in the UK, broadcast in English, where the majority of the viewing public do not use subtitles, would throw up more problems than it would solve, and would be disproportionate.

This would raise issues of viewer trust in programmes where there was a competition or other form of viewer interaction.

Furthermore, TV programmes covering key news events, live sporting events, national occasions, New Years Eve etc would be perceived differently and risk not carrying the same significance if they were broadcast "almost live", particularly if viewers could follow the same events "live" on the radio.

The suggestion also raises the prospect of viewers with good hearing learning of an event via radio - the scoring of a goal in live football for example - ahead of those with hearing difficulties who were watching a delayed TV transmission of the same event. This would be a perverse outcome.

Furthermore, much of ITV's live output in peak is regional programming. Having to introduce a delay across all ITV regions and sub-regions for regional news, before returning to network programming, would introduce a degree of complexity and risk that we do not feel is justified, particularly as other factors that cause delays, such as type of receiver, are not being addressed.

On the subject of receivers, Ofcom's consultation document states "there is no single source of advice for consumers on which receivers are most suitable for subtitle users". We believe this lack of consumer information could and should be addressed. One possible way forward would be for Ofcom to work with Action on Hearing Loss, and others, to compile and maintain a list of set top boxes most suitable for subtitle users.