Red Bee Media response to Ofcom's Consultation on the Quality of Live Subtitling 26/07/13

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?

While it would of course be possible to report on the average speed of live subtitling across a sample of programmes, Red Bee questions the usefulness of this data in the debate about live subtitling quality. There is always a tension in live subtitling between speed, delay and the degree of editing undertaken and as a subtitle supplier we are constantly looking at these areas and developing both our operational processes and our technology in order to deliver ongoing improvements to deaf and hard-of-hearing viewers. We are unconvinced about what an average speed figure (by broadcaster) would add to the debate since like-for-like comparisons between programmes shown by various broadcasters would inevitably be difficult. Even comparisons between evening news bulletins across different broadcasters could give rise to varying results simply because of the speed at which some newsreaders and reporters speak by comparison with others. Secondly, the number of hours of live subtitling shown by each broadcaster varies enormously so establishing an appropriate sample size for this measure could be problematic.

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?

We would refer you to our answer to Q1. If reporting were in place, it would be important to compare like with like and the suggestions in paragraph 6.19 may need to be further refined so that the degree to which the subtitle providers had access to scripts and running orders and the proportion of the bulletin that was "realtime" (in the case of evening news bulletins, for example) could be taken into consideration. Sport is also a category of programming which accounts for a significant proportion of the live subtitling broadcast in the UK and should logically also form part of any analysis of live subtitling speed. The speed of subtitling on live golf, football, athletics, horse-racing, tennis and cricket coverage can vary greatly, as can the editorial approach taken in order to make the action accessible. Coming to a conclusion about the speed of subtitling on each of these sports, or across all sports, could therefore be challenging.

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.

Red Bee would be happy to engage in further discussion with Ofcom on the issue of live subtitling speeds. We agree that it would not be appropriate to set a maximum target for the speed of live subtitling because we believe that using the physical techniques of live respeaking and broadcast stenography it is difficult to create live subtitles at speeds which are too fast for the average viewer to read. The speed at which journalists, presenters and interviewees speak when on air does of course vary widely and we see our role as access services providers as being to provide maximum access to what is being said with the minimum of delay between the audio and the subtitles. Rarely do subtitle users tell us as a service provider that they think our live subtitles are too fast. They generally tell us that they prefer as little editing as possible – only as much as will keep the subtitles

reasonably in synch with who is speaking on screen and with the pictures. While we agree with Pablo Romero-Fresco's point that using subtitles should not turn watching television into a reading experience, some of the fastest sections of speech to subtitle can be during live news interviews or debates where the primary focus for hearing viewers is on what the people are saying rather than the images in the background. Thus the degree to which a deaf viewer's attention is focused on the visual aspects of what's on screen will vary according to the type of live programme being subtitled. We think that Ofcom's existing guidance on live subtitling speed, namely that "dialogue which would require subtitles faster than 200 wpm would be difficult for many viewers to follow" continues to be fit for purpose and that setting a maximum target could lead to both an undesired increase in subtitle editing and increased subtitle latency on certain programmes.

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.

Red Bee agrees that it would not be appropriate to set a maximum target for latency. We feel that Ofcom's guidance on latency in Annex 4 to the Code on Television Access Services is still helpful and it is our experience that broadcasters and subtitle providers work effectively together in this area to ensure that latency is kept to a minimum.

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?

As a supplier of live subtitling services to a number of broadcasters, Red Bee feels that robust mechanisms are already in place contractually between ourselves and our clients regarding live subtitling accuracy. In addition, we have rigorous internal monitoring processes which measure the live accuracy rate of every subtitler every month as well as stringent procedures around error correction and error reporting. And we have a detailed programme of continuous improvement in place, the cornerstone of which is our new live subtitling system, Subito, which is designed to drive up live subtitle accuracy through the use of Nuance's Dragon Naturally Speaking software and Stenograph's Case CATalyst product, greater integration with newsroom systems and the increased use of block subtitles on scripted live or late-delivering pre-recorded programmes. We feel that it is not for Red Bee to express a view on whether Ofcom should or should not require broadcasters to report on error rates – that is a matter for the broadcasters to comment on.

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?

Red Bee is of the view that block subtitles are preferable to scrolling subtitles and should be used wherever possible. In live programmes which contain scripted elements, the aim should be to deliver those scripted elements to viewers as block subtitles. And certainly on very late-delivering pre-recorded programmes, cued-out block live subtitles give viewers far more effective access to certain genres of programming than scrolling subtitles. However in realtime subtitling, for example live news interviews, live sports coverage, etc, respeaking or steno-ing straight to air as blocks carries with it an inherent additional delay. For realtime subtitling we therefore feel that scrolling subtitles provide better access.

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.

Red Bee feels that this question falls outside our remit as an access services supplier. We do not have a view on the factors relating to the insertion of a delay in live transmissions – that is a matter for the broadcasters to comment on.