Ofcom Live TV Subtitling Consultation

Main Recommendations

- Ofcom's measurement of the quality of live TV subtitles should focus on speed, latency accuracy and presentation. The will ensure a full and accurate picture of subtitles quality is established.
- Ofcom should require broadcasters to report the number of live subtitles that have a speed of 145wpm and those which are over 180wpm
- Subtitles for live programmes should be reported differently in relation to how scripted and prepared they are in advance.
- Ofcom should require broadcaster to report the number of subtitles that have delays of more than 5 seconds.
- Ofcom's requirement for broadcasters to report subtitle errors should focus on serious and standard errors.
- Prepared subtitles should become standard practice for pre-recorded programmes.

About Signature

Signature is the UK's leading provider of BSL qualifications. Our courses can be studied at over 700 locations across the country.

We have a long standing commitment to improving the everyday communication experiences of deaf people.

Signature has a 30 year track record of providing people with the skills they need to communication effectively with deaf people.

Introduction

Signature welcome's Ofcom's consultation on live TV subtitling. We believe it is an important step towards recognising the communication difficulties Deaf people experience on a day to day basis.

Television is a shared cultural experience that deaf people should be able to enjoy in the same way other people take for granted. Better quality subtitles will make a great difference to the TV viewing experiences of deaf people.

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?

Signature also agree with Ofcom's proposal to report on the speed of live TV subtitles.

We feel a performance measure should be introduced that measures the number subtitles broadcast at a rate of no more than 145wpm. This is in line with research conducted by Jenseema which showed that 145wpm was the most appropriate speed for maximum comprehension. Subtitles that have a speed of over 180wpm

should also be included in the measure. Jenseema's research clearly suggests that increasing the speed to over 180wpm significantly reduces viewer's comprehension and understanding.

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?

Signature feel that Ofcom should report separately on different types of live programming such as: news/current affairs, chat shows/quizzes and sports and entertainment.

This would classify programmes on the following basis 1) heavily scripted and prepared in advance, 2) moderately scripted and prepared and in advance and 3) minimal scripting and pre-planning. This would acknowledge the different set of challenges posed in different areas of live programming and ensure fair and accurate measurement takes place.

News and current affairs programmes are heavily scripted and pre-planned, which means there is scope for preparing some of the subtitles in advance. The importance of news and current affairs programmes in enabling deaf people to stay up to date with events means that monitoring live subtitles in this area should be done separately from other live programmes.

Chat shows and quiz's are moderately scripted, with a significant degree of their content being prepared prior to broadcast. This also means there is scope to prepare some of the subtitled content in advance. Ofcom should require broadcasters to report on these programmes in a similar way to news and current affairs

Sports and entrainment programmes have a very different set of challenges. It is not always possible to script and pre-plan in advance as broadcasters are required to comment on information that happens on a moment by moment basis. Given the different set of challenges posed by this type of broadcasting it would be more appropriate of Ofcom report on programmes lie this separately .

Signature accepts that subtitling for certain types live TV programming is more difficult for practical reasons. However it is because different types of live programmes have a different set of challenges that the reporting system should reflect this.

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.

Signature agree that a target should not be set for the time being. However we feel a appropriate performance measures should be introduced in line with our suggestions in answer to Q2 above.

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.

Signature agree that a mamxium target for latency should not be set at this stage. However we feel that a measure should be put in place that reports the number of subtitles that are delayed by more than 5 seconds. Evidence clearly suggests that delays of over 5 seconds has a negative impact of people's viewing experience.

Publication of the number of live TV subtitles that are delayed by over 5 seconds will create a disincentive for broadcasters to commit such errors. This will improve the viewing experience of deaf people.

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?

Signature support Ofcom's suggestion of reporting on error rates. We believe that broadcasters should aim to reduce all errors in live TV subtitling.

However particular emphasis should be given to standard and serious errors, as they have the greatest impact on the viewing experience and comprehension of deaf and hard of hearing people. Ofcom should make a qualitative assessment of live TV subtitling that distinguishes between the different types of errors giving greater weight and importance to standard and serious errors. The distinction Pablo Romero Fresco's work shows that standard and serious errors of subtitle inaccuracy have a greater impact on enjoyment and comprehension.

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?

Signature believe that the block method of subtitle presentation has significant advantages over the scroll method. This is consistent with research from Roehampton University shows that the block method of presenting subtitles is preferable to the scroll method for deaf people. Roehmapton University's research shows that people spend longer viewing the scrolling format, which makes the information more difficult to process and understand.

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