Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

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 - but 160 wpm of gibberish / out of sync subtitles is different to 160 wpm of accurate in sync subtitles.

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?:

Yes

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.:

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.:

A maximum target for latency SHOULD be set.
The subs should be in sync and accurate with the 'speaker' as far as possible.
A delay of a few seconds can make the subs useless.
Delayed subs lead to situations where speaker A is 'attributed' Speaker B's lines - e.g a political argument is reduced to farce. .
The 'viewer' work load is increased dramatically if the subs are out of sync by seconds..
I have to memorize what I think I heard / lipread / saw a few seconds ago with what the subs say a few seconds later - and I still have to memorize / lipread the current lipread current speaker ready for the next set of delayed subs !

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?:

Yes

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?:

I prefer block subs - sync'd with the speaker.
I have to :-
watch the video, try and hear , lipread speakers and read the subs.
Having to find the relevant section of text in scrolling subs adds to my work load - I'd prefer block subs that are in sync with the speaker.

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.:

For video on demand (eg iplayer) the broadcaster already has HAD the 'delay' option - and still the subs can be out of sync.
The broadcaster having spent time and money on subs - synchronisation of subs is a relatively simple matter of delaying / advancing the subs - and makes a big difference to subtitling usability.