

DCMS CONSULTATION: THE PROVISION OF SUBTITLING, SIGN LANGUAGE AND AUDIO DESCRIPTION SERVICES ON DIGITAL TERRESTRIAL TELEVISION

A RESPONSE FROM INTELFAX LIMITED, AUGUST 2000

1. INTRODUCTION

Intelfax is pleased to be invited to respond to the consultation paper issued by the DCMS on the matter of providing support services for the deaf and hearing-impaired and for the blind and partially-sighted.

This company has been providing support services for broadcasters since 1982 and has wide experience both in producing high quality subtitling for a wide range of television companies and in dealing with groups representing the deaf and hearing-impaired.

Additionally, our subsidiary company, Intelfax Developments Ltd., designs, sells and supports production, management and transmission systems for the provision of subtitling and audio description services.

2. STATUTORY TARGETS

We wholly support the Government's stated aim to achieve the highest practicable amounts of subtitling, signing and audio description on Digital Terrestrial Television. We acknowledge, of course, that our own business interests may be advanced by the growth in the requirement for such services – but we also genuinely believe that there is a moral obligation to provide those less fortunate with the widest possible access to television which is, after all, the most powerful mass communications tool invented to date.

The DCMS consultation document poses a number of questions and we have set out our responses on the following pages.

1. *Should the targets be changed or are they about right?*

Overall, we believe that it would be appropriate to increase the targets for the provision of subtitled programmes but not for provision of audio description or signing services.

Subtitling is the most straightforward and best established of the different services and has already been proven to work in the digital domain from a technical viewpoint. Given the acknowledged technical problems which have affected the introduction of both signing and audio description services, we believe it would be sensible to leave the targets for these services unchanged at the levels specified by the Act.

Subtitling is also targetted at reaching the largest group of people who suffer difficulty in gaining access to television programmes – the hard of hearing.

Signing for the profoundly-deaf will aid the enjoyment and information flow for less than 0.05% of the UK population. Audio description for the blind and partially-sighted will do likewise for less than 1%. Subtitling, on the other hand, services the needs of nearly 15% of the population who suffer from some degree of hearing loss.

Another factor to be borne in mind concerns the frequency of repeated material which is generally to be found on DTT. Many channels – particularly those offering feature films – will regularly re-broadcast their catalogues. Thus subtitles prepared for a two-hour feature film may well be re-used anywhere between eight and ten times in a relatively short time period. It is therefore less costly for such channels to be asked to meet higher subtitling targets than for channels which repeat material less often.

If asked to assess a suitable level for the revised target, we would suggest an increase in the general subtitling target requirement on DTT to 80% of programmes by the tenth anniversary of the commencement of digital services in 2008. This would bring DTT services closer to the target set for analogue terrestrial services for 2004.

However, we would also refer you to our comments in the clause on whether to have different targets for different broadcasters, below.

One point we should like to make is that the requirement to meet target quotas for support services on a *weekly* basis is unhelpful and difficult to administer. In practical terms we believe the methodology used to assess analogue subtitling – i.e. of achieving an average level across the course of a year – is infinitely preferable.

In practice, the ability to go slightly under the quota over two or three weeks in order to provide support services for a high profile programme or series in another part of the year, has great advantages. It makes production easier to plan; it means less administrative work on the part of the broadcaster and the service production company and, most importantly, it means that those with sensory disabilities can be offered access to high profile programmes when they are broadcast. We would therefore urge the Government to consider abandoning weekly quotas in favour of an average target across the year.

Finally, in this area, we would also urge the Government to look further at the possibility of extending the requirements for the provision of support services to other digital platforms – i.e: satellite and cable. If the Government's intention is to involve those with sensory disabilities in the day-to-day fabric of life in the UK, then surely it is right to make it possible for them to access all programme types regardless of the delivery method chosen?

2. *If the Targets Remain Unchanged, When Should a Further Review Take Place?*

Technological development is occurring at an ever-increasing pace. It is quite conceivable that within the next five years we shall see further advances in the techniques for the production, transmission and reception of subtitling, signing and audio description which will render today's operations virtually obsolete.

We therefore believe that it would be sensible for the Government organise a further review of the situation in 2005.

3. *What are the Costs of Delivering and Receiving the Services?*

From the point of view of production companies like Intelfax, the answer to the question of the cost of producing and delivering subtitles represents commercially sensitive information. (We are not qualified to make any comment on the cost of receiving equipment). However, the ITC has already gone on record stating that the average price for the production of subtitling is approximately £500 per programme hour and we have no argument with that assertion. The actual price for producing subtitling for the deaf and hard of hearing may vary significantly from channel to channel depending on the type of programmes to be subtitled (e.g: a half-hour duration topical discussion programme with few pauses and very dense speech may well take longer to subtitle than a two-hour adventure movie with lots of action but relatively little dialogue). Other factors which will affect the production cost include:

- the amount of live or semi-live content to be subtitled (because this may require stenographic techniques which are more expensive than "normal" pre-recorded subtitling production techniques)
- the lead time available between the delivery of the programme for subtitling and its scheduled transmission date (e.g: programmes delivered well in advance of transmission are easy to fit into a production work schedule; programmes delivered four hours before transmission are extremely disruptive and may require several subtitlers to stop what they are doing and work on segments of the late programme just to get it completed in time)
- whether or not a script is available for the programme and, if so, whether it is in hard copy or electronic format (having a script – particularly

in electronic format – can significantly reduce production time)

Many of these issues will similarly affect the cost of producing and delivering audio description and signing services.

Developments which should enable the cost of producing subtitling to be reduced include the availability of effective and reliable speech recognition systems that will enable the production of text from the spoken word.

At the present time, there are some speech recognition packages in the marketplace (indeed, Intelfax was the first company to use a speech recognition package to subtitle a networked programme when we combined IBM's "Via Voice" package with our own ISIS subtitling workstation to subtitle Channel 4's coverage of cricket in 1999) but they are far from being perfect.

Even when speech recognition technology improves significantly, we believe it will still be necessary to involve a subtitler in the production process because of the need to provide edited text at a reading speed of no more than 140 words per minute as specified by the ITC after consultations with deaf lobby groups.

It has been established through research carried out by the RNID and the British Deaf Association that those suffering from hearing impairment generally read at a slower speed than those with normal hearing. Particularly where the viewer has both to understand events occurring on screen and read and digest the subtitle information, simply offering verbatim subtitling proves too difficult a task.

4. Will the Quality of Subtitling be Affected if Targets are Increased?

The honest answer is: "Not necessarily". The key will be the quality standards set and monitored by the ITC. If these are maintained at their current (and we believe appropriate) levels, then broadcasters and subtitle production companies will have to adhere to them.

It is our view that clear presentation, use of colour to indicate different speakers, appropriate positioning of the subtitles on screen, use of simple English wherever possible and attention to detail (e.g: ensuring that sound effects and off-screen dialogue are both subtitled; ensuring that subtitles do not cross "shot changes", etc) all simplify the process of assimilating information for the hard of hearing viewer.

(This methodology is different from that adopted by other subtitle originators – for example American captions are all in white, generally in upper case, displayed in the centre of the screen and are verbatim.)

Intelfax has increased the amount of subtitling it provides for Channel 4 from approximately eight hours per week in 1992 to approximately 70 hours per week in the current year without suffering any quality erosion. Indeed, we would suggest that growing experience with subtitling actually improves quality.

What is likely to happen as the targets for support services increase beyond the level of, say, 75% is that the costs of providing such services will rise. This will largely be caused by reduced lead times as more short turn-round and live programmes have to be subtitled in order to meet the growing targets.

5. *Should There be Different Targets for Different Broadcasters Based on Audience Share?*

We do support the idea that some broadcasters should be allocated lower targets for support services than others. This may be achieved, as the DCMS consultation paper suggests, by basing targets on audience share – although this may prove difficult to police as audience shares go up and down. It might also be possible to allocate different targets based on the degree of difficulty (and hence level of cost) that will be encountered in providing services for those with sensory disabilities.

For example, a 24 hour news channel would almost certainly have to use stenographic or other recognised techniques for producing live subtitling which will undoubtedly prove more expensive than, say, a film channel which is able to provide copies of the programmes to be subtitled several weeks in advance of transmission – along with electronic scripts – to its subtitle provider.

6. *Should New Channels be Exempt from Targets – or have Lower Targets at First?*

We do not believe that new channels should be completely exempt from targets for providing these support services. If a broadcaster proposes to launch a new DTT channel, then the cost of providing support services ought to be factored into the business plan. After all, the requirements for support services on DTT have been known since the Broadcasting Act became law. We cannot believe that commercial success or failure of a broadcast service will be determined by the need to provide small percentages of such support services

We would suggest that it may, however, be appropriate to vary the targets in circumstances where the programme content to be offered will consist of material which it is more difficult to subtitle, sign or audio describe (e.g: live news or sport.)

Equally, some types of programming are easier to understand than others – particularly for the deaf. Horse racing, for example, always includes a significant number of on-screen captions and other information in the form of lists of runners and riders, betting information and results which make it easier to follow without subtitles or signs.

7. *Should Multi-Channel Broadcasters be able to Bundle their Subtitling Output Together across Several Channels?*

Yes – this seems reasonable and pragmatic. It will provide a cost effective method of offering support services and will enable broadcasters to target their most popular programmes for support services.

8. *Which Programmes or Channels Should be Priority for Subtitling, Signing and Audio Description?*

At a succession of conferences and seminars we have attended over the years the answer to the question: “which programmes do you want subtitled first?” has always been “All of them”. In our experience, the deaf, hearing-impaired, blind and partially-sighted generally do not have tastes that are fundamentally different from the rest of the UK population. They stretch across the whole gamut of interests and sensitivities. It is therefore somewhat disingenuous to seek to “ghetto-ise” these groups.

Logically, it would seem sensible to try to ensure that the disabled groups who will benefit from the provision of these services are able to keep up to date with topical events and news as a priority. A deaf or blind person will have just as much interest in the efforts to rescue Russian sailors trapped in a sunken submarine as a person with normal hearing or sight. Having said that, of course, it is news and current affairs programmes which are the most difficult (and hence the most costly) to subtitle, sign and audio describe.

Obviously this is a matter on which groups representing the interests of the disabled will have a particular view and it is not really a matter on which Intelfax feels able to comment further.

9. *What Would Encourage People with Disabilities to Take Up Digital Services?*

The RNID has carried out research over time which has shown that many hard of hearing people are simply unaware that subtitling even exists.

We believe that more information should be widely available through periodicals, especially the listings magazines, leaflets, the web and teletext services.

The use of the “888” logo and, more recently, the word “subtitles” on programme lead-ins has certainly helped matters but the profile needs to be raised in other quarters too.

Regular short promotional trails explaining how subtitles may be accessed on digital television would certainly help to increase the usage of this service, but we appreciate that there is great pressure on air time for broadcasters in the multichannel world. (In the past, Channel 4 and the BBC have both run successful campaigns in the analogue domain aimed at increasing awareness of the service)

The same can also be said for signing and audio description services, with the

obvious caveat that the technology for reception must be correctly in place and freely available before such campaigns begin.

3. Conclusion

We hope that our views, set out above, provide a constructive set of answers to the questions posed by the DCMS. We should be pleased to take part in any further consultations the Department may consider appropriate.

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August 2000**