

14 September 2000

Mr David Gookey
Broadcasting Policy Division
Department for Culture, Media and Sport
2-4 Cockspur Street
London SW1Y 5DH

Dear Mr Gookey

Thank you for inviting ITFC to respond to the DCMS consultation paper to review the statutory requirements for provision of subtitling, sign language and audio description services on DTT.

ITFC are a supplier of subtitling, audio description and signing services to most broadcasters including ITV, Channel 4, BBC, Channel 5, Telewest, MTV and Carlton Digital Channels. In many ways we are pleased to see growth in these services as they of course increase those with audio and visual impairments to enjoy television but also increase business opportunities for ourselves and other similar suppliers. We are however aware of the financial and technical problems the supply of these services cause broadcasters. This response does not attempt to deal with these issues as I am sure broadcasters will respond to you with their concerns.

ITFC comments are confirmed to those that relate directly to supplier companies.

Quality of Services

It is arguable that a vast increase in targets for services by broadcasters will reduce the quality to viewers. A good example of this can be found on American television where major networks have been providing 100% of subtitling for some years and most other channels are following. The quality of American subtitling is much lower than in the UK and a high amount would not be suitable to UK viewers.

ITFC believe the reasons why quality would suffer are:

- a) lack of skilled staff and
- b) finances

Lack of Skilled Staff

All of the services: subtitling, audio description and signing have unique problems.

ITFC has employed and trained around 100 subtitlers over the past 8 years. Almost all of the staff recruited had no previous subtitling experience since there is no pool of trained subtitlers waiting to be employed. This is proved by the recruitment of a number of our trained subtitlers by other subtitling organisations who have difficulty in recruiting trained staff and have no training programme.

It takes between 6-12 months to bring a recruit with writing and language skills to become a trained subtitler. This is something that must be considered when targets are increased.

ITFC recently launched Europe's first dedicated television audio description unit. As with subtitling there are no trained audio describers available and a similar training process and period has to be undertaken.

There is also a shortage of skilled deaf BSL signers. Not all of these are available or suitable for television work and require a lengthy training period before they can present signing on television.

We strongly urge that any review of targets consider the shortage of skilled staff in all areas. Dramatically increasing targets over short-time scales will lead to a lessening of quality as more demand is put on an already thin resource.

Financial Reasons

Provision of all 3 services are costly and labour intensive to provide. As an example 1 hour of programming may take an experienced subtitler 15-20 hours to complete. This equates to a cost of between £500 to £1000 per hour. Late delivered programmes (i.e. those recorded near to transmission time, such as current affairs) and live programmes (news, sport, events such as awards ceremonies) present their own special difficulties and solutions. These programmes are significantly more expensive by virtue of the increased efforts to produce acceptable, accurate results. There are some technical and productivity solutions becoming available that may lower the costs but not dramatically. ITFC believe it is important that this is considered when reviewing targets as for some channels and programme genres the cost of providing services could be close to or even higher than the cost of programme production. This situation would not be acceptable to broadcasters.

Secondary Use of Services

ITFC would like to see encouragement given to broadcasters who are not required by legislation to provide ancillary services to carry them when they are transmitting programmes that have already been subtitled, audio described or signed. These would be available for reasonable costs from broadcasters or suppliers and would allow viewers the chance to watch programmes with services that have already been transmitted. Any revenues earned from such secondary use may encourage broadcasters to greater efforts.

Yours sincerely

Chris Higgs
Director and General Manager