

DCMS Review of the Statutory Requirements for the Provision of Subtitling, Sign Language and Audio Description Services on Digital Terrestrial Television: S4C Response

1. Introduction

S4C welcomes the opportunity to respond to the review of the provisions governing signing, subtitling and audio description services on digital terrestrial television (DTT). S4C is committed to ensuring greater access to television services for people who are deaf, hard of hearing, blind or partially sighted. We support the Government's aim of improving support services for these groups.

2. General Response

S4C believes that this review is timely. S4C believes that the Government should reiterate its commitment to extending services for people who have difficulty in viewing or listening to television programmes. The overall aim should be to establish a level playing field which does not discriminate between broadcasters and which does not unnecessarily constrain access to licensed services. The development of these additional services should, however, take into account the technical difficulties surrounding their delivery and their reception. Crucially, any extension to existing targets should be linked to progress in ensuring access to the relevant digital technology by people in the relevant target groups. S4C believes that the particular issue surrounding the provision of signing for Welsh language broadcasts are such as to suggest that targets should be deferred whilst further preparatory work is undertaken.

3. Background

S4C's main support for people that are deaf or hard of hearing is through subtitles 30% of S4C's digital programming is currently subtitled in English. This compares with some 70% of our output on analogue. S4C is also on target for providing audio description services. This is currently being done for test purposes given the considerable technical problems still to be overcome in this area. We are currently investigating through discussion with interested groups and others how we might tackle the technical issues surrounding the provision of a signing service associated with Welsh language broadcasts.

The review needs to consider the very real practical difficulty surrounding the development of these sorts of specialised services for a minority language broadcaster. We are anxious to continue exploring the practical issues surrounding audio description through test broadcasts. However, the only equipment in the whole of Wales able to receive this service belongs to S4C. This is currently, therefore, a service for which there is no audience whatsoever. We would be anxious to see our continuing investment in this service tied to the increased availability of the receiving equipment amongst

the audience we serve.

Continued ...

S4C is also facing particular issues surrounding the development of a signing service. According to the RNID regional office in Swansea, there are no registered qualified sign language interpreters whose first language is Welsh. At present, neither are there any registered trainee interpreters whose first language is Welsh. There are, therefore, some real recruitment and training issues surrounding the development of such a service. The information we have received is that it can take up to five years to achieve the level of qualification somebody would need to be able to deliver this service. We believe that consultation with the RNID and others needs to be an essential part of developing this service. These consultations are continuing. We remain some way off from being able to recruit the necessary personnel.

4. Detailed Comments

S4C's response to the particular questions posed by DCMS in its consultation paper is attached.

S4C
September 2000

S4C's Response to Specific Questions put by DCMS

Following the numbering in the consultation paper:

13.1 Looking at each service in turn:

- Subtitling – Existing targets should remain. If there is to be further progress in this area there should be recognition of the particular difficulties associated with providing subtitles on live programming. The position should be looked at again in five years.
- Signing – For the technical reasons set out above we are exploring whether the target for signing Welsh language services can be deferred. Any increase in the current target for the future should be linked to the take up of digital broadcasting more generally and to the availability of signers that can interpret Welsh language programmes.
- Audio Description – There should be a continuing requirement on broadcasters to develop expertise in this area. There is, however, a case for extending the current timetable so that it is linked explicitly to the take up of the specialist equipment required to receive this service.

13.2 Excluding transmission costs, the costs are on average:

- Subtitling - £600 per hour
- Signing - Information not available
- Audit description - £600 per hour

There are, therefore, significant cost implications arising from the development of these services. These need to be set alongside the practical issues referred to in this paper and in the context of the broader discussions between S4C and the Department regarding the costs of digital broadcasting.

- 13.4 This would become an issue if there was an ever increasing requirement to broadcast subtitles during live broadcasts.
14. S4C is consulting relevant groups, including the RNIB, in Wales with a view to establishing the likely demand for Welsh language services in Wales.
15. There are one or two distinctive issues surrounding the development of subtitling services in support of Welsh language broadcasts. The first is that S4C's programmes in some cases carry Welsh as well as English subtitles. This stems from the importance of making our programmes accessible to Welsh learners, less fluent Welsh speakers, as well as to Welsh viewers who do not speak or understand the language.

Making English subtitles available on Welsh programmes has the potential to give rise to complex rights issues (the subtitles have the effect of turning what would be a minority broadcast into something that can be followed by a much larger audience). We will need to retain the flexibility to be able to broadcast via satellite (where the S4C digital footprint extends outside Wales) without subtitles where that would prevent S4C acquiring the rights to particular

programmes.

Continued ...

- 18.1 S4C supports the idea of different targets for different broadcasters. Audience share and demand for the services in question should also be taken into account in setting targets.
- 18.2 It would be preferable for the general requirement to apply to all broadcasters but with the particular targets linked to thresholds below which broadcasters could be exempted.
- 18.3 The ability to bundle output across channels would be one means of responding to the difficulties surrounding the provision of subtitles on live broadcasts.
- 18.4 Audio description has a particular contribution to make in support of drama productions.
- 20.1 We should maintain the principle that broadcasters are responsible for the costs of broadcasting. It would not be sensible or appropriate for television budgets to also have to support the costs of equipping consumers.
- 20.3 Because S4C broadcasts in a minority language, we are particularly concerned that our ability to develop multi-language sound tracks and text services in support of our broadcasts. We would not wish to see this flexibility constrained still further.
- 22. The overall aim should be to establish a level playing field which does not discriminate between broadcasters and which does not unnecessarily constrain access to licensed services.
- 23. As mentioned above, signing is a real issue in relation to Welsh language broadcasts. We will not be able to offer a signing service until this matter has been addressed and resolved.
- 24. S4C would support the need for more research in this area. There would be particular merit in a centrally funded programme aimed at making the new technology as widely available as possible. Further policy in this area could then be informed by the evidence gleaned from the response to this.

S4C
September 2000
