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The Manager

Diversity, Localism and Accessibility Section Broadcasting Safeguards Branch
Australian Communications and Media Authority
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Via email: captioning@acma.gov.au

ACCAN thanks the Australian Communications and Media Authority for the opportunity to contribute to its Review of the Television Captioning Standard

ACCAN is anecdotally aware that many consumers who rely on captions when viewing television continue to be unhappy with the quality of live captions. Our consultation with members of the Deaf and hearing impaired communities indicate that there is a strong level of complaint-fatigue regarding captioning on Australian television. ACCAN believes that the reasons for this fatigue are manifold; consumers have been making complaints about captioning for many years with only incremental progress, the methods for lodging complaints about poor quality captions are onerous and unclear for many consumers, complaint outcomes rarely result in tangible improvements, and the time it takes the ACMA to resolve a complaint is too long. ACCAN recommends that the ACMA undertake an ad-hoc survey of captioning of live programming across all broadcasters in order to develop a realistic understanding of the depth of this problem.

ACCAN has contributed to a number of committees, reviews and inquiries regarding television captioning and while there have been a number of improvements for consumers who rely on captions when watching television the level of live caption quality continues to be woefully inadequate in many instances. An example of how poor live captions can be and the significant influence this can have could be seen on the ABC's live broadcast of the recent Federal leadership spill in September. The frequently incomprehensible captions provided during the broadcast of such an important public interest story highlight the significance of this ongoing problem for Australians who rely on captions.

ACCAN is concerned that this inquiry may be premature in its expectation that the question of how to define quality captions for all programming can be achieved without further research. Without clear and transparent data from television broadcasters and caption providers on the levels of accuracy and synchronicity achievable, it is not possible for ACCAN or other stakeholders to make informed recommendations on which Option is most

appropriate. ACCAN recommends that the ACMA engage with broadcasters to identify current practice and benchmark current levels of accuracy and synchronicity for live captions.

As indicated in the discussion paper, both of the proposed Options have a number of significant disadvantages. By considering only the criteria outlined in the Standard - readability, comprehensibility and accuracy - to determine whether the captions are meaningful, the evaluation does not consider the broader context of viewer experience. This approach is solely focused on the technical aspects of providing captions for television programs and has little understanding of the usability of these captions for consumers.

ACCAN is concerned that in trying to 'fit' all program types into the one 'meaningful' model, the experience of viewers who rely on captions is being overlooked.

While ACCAN understands that the ACMA is somewhat constrained by the legislation, in that there is an expectation that there is no allowance for different levels of caption quality irrespective of the caption delivery mode, the inherent nature of live captioning makes this expectation unrealistic.

Quality captions are essential for those viewers who rely on captions regardless of the type of program, be that live, part-live or pre-recorded. It is broadly acknowledged that pre-prepared block captions provide the best viewing experience for viewers who rely on captions - providing greater accuracy, synchronisation and overall readability. Live captions are more prone to inaccuracies, greater lag time and can be difficult to follow, thereby providing an inferior viewing experience.

Given this disparity in viewer experience, it is not clear to ACCAN, without further explication, how the current Standard can be an effective tool to ensure that consumers receive the level of caption quality necessary for full understanding of the program.

Response to Options

Option 1: A non-metric standard for determining the quality of Captioning services

The difficulties foreshadowed in the discussion paper for Option 1 are considerable. If the ACMA were to adopt Option 1 - its preferred model - ACCAN would expect that there be a number of additional clauses inserted. In the first instance ACCAN would expect that there be an explicit statement that when considering the quality of live captions they should be in regard to truly live broadcasts. Without such a statement it is likely that there will be an increase in live captioning of non-live programming under this option.

Secondly, ACCAN would recommend the inclusion of a statement indicating the ACMA's expectation that technical advancements will improve the underlying shortcomings with current live captions over time.

Option 2: Metric based standards for determining the quality of Captioning services

In regard to Option 2, as stated above, ACCAN considers the lack of data a barrier to making informed recommendations as to the appropriate metrics. Additionally, as two of the criteria used in the Standard to evaluate whether captions are meaningful are subjective i.e. readability and comprehensibility, it is unclear to ACCAN how the ACMA would be able to utilise metrics other than those for accuracy to evaluate the meaningfulness of captions, in particular live program captions.

Recommendation

As an alternative to these two options, ACCAN recommends that the ACMA undertake research, similar to that undertaken by OFCOM¹, to establish the current live captioning metrics for accuracy and time lag. As outlined in the discussion paper, the data collected by OFCOM indicates that there are a number of options available to broadcasters which can improve the quality of live captions; including a short delay of live broadcasts to allow for editing of captions, pre-prepared captions for scripted segments of part-live broadcasts and the possibility of an “alternative technical solution that could reduce latency significantly”. If the ACMA were to undertake such research the resulting information would likely allow stakeholders to make informed recommendations on how the ACMA could best ensure that live captions are meeting quality levels appropriate for consumers.

ACCAN is available to discuss these comments further if needed.

Sincerely

Wayne Hawkins
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¹ http://stakeholders.ofcom.org.uk/market-data-research/other/tv-research/live-subtitling/sampling_results_4/?utm_source=updates&utm_medium=email&utm_campaign=Ofcom-publishes-final-report-on-quality-of-live-TV-subtitles&utm_term=tv%2C%20subtitle%2C%20quality%2C%20research%2C%20ofcom%2C%20report