

## Your response

Question	Your response
<p><b>Question 1: Do you have any comments on our proposed approach to making these changes?</b></p>	<p><i>N</i></p> <p>Agree, especially the <b><u>extension of accessibility requirements to VoD/streaming platforms</u></b> (and I note Ofcom’s research showing that even older people are increasingly moving to those). Some channels are better than others, e.g. Alibi shows on NowTV have NO subtitles, whereas I gather the live realtime version on Sky does - so why isn’t it possible to include subtitles on NowTV too? And please see my answers to Q4 below.</p>
<p><b>Question 2: Do you have any comments on our proposed additions to the TV Access Services Code?</b></p>	<p><i>N</i></p> <p>Agree (and thank you for providing a document with tracked changes, it’s much easier to follow and more user-friendly (and accessible!) than other approaches that say, on p.2 change X to Y etc).</p> <p>On 4.7 please see my answer to Q4 below</p>
<p><b>Question 3: Do you have any comments on any of the following proposed changes/additions? Please provide any additional evidence you think we should take into account.</b></p> <ul style="list-style-type: none"> <li>• Understanding audiences</li> <li>• Developing strategies</li> <li>• Programme selection and scheduling</li> <li>• National emergencies and important on-screen information</li> <li>• Promoting awareness</li> <li>• Accessibility and diversity in production</li> <li>• Training</li> <li>• Monitoring of quality</li> </ul>	<p><i>N</i></p> <p>No quotas, but ALL streaming services should be required to use auto-generated subtitling as the technology is now readily available</p>
<p><b>Question 4: Do you have any views on how developments in technology may inform the production of access services in the coming years?</b></p>	<p><i>N</i></p> <p>Yes. 4.15 to 4.18 could go further.</p> <p>1. Given the availability of AI, machine-generated subtitles/closed captions can easily be added automatically to ALL streaming content. I feel strongly that this should be <b><u>mandatory</u></b> (see e.g.</p>

YouTube's automated subtitling). I appreciate they may not be 100% accurate or in sync, YouTube's aren't always, **but including 80% accurate subtitles slightly out of sync is far, far better for hard-of-hearing viewers than having NO subtitles at all.** Just include a disclaimer/warning about accuracy etc for automated subtitling, please please don't let some over-obsession with "quality" prevent Ofcom from requiring the use of these very helpful technologies, which clearly now exist - people have brains and can often discern the meaning from the context and the subtitles, which at least they can read even if the speech is difficult to hear!

I know you said "ASR on its own is currently not generally considered sufficient" but, as a viewer, I don't know who exactly doesn't "consider" ASR on its own sufficient, and would reiterate that **ASR on its own is better than *not* providing any subtitles at all!**

2. Platforms should be required to **remember and always apply users' accessibility preferences.** For about a year from 2022-23, with NowTV I always had to turn subtitles on manually for **every** single show/movie, even the same one - if I stopped watching it and then went back to it later, I had to enable subtitling all over again. Their accessibility team (whose email was shown at the end of some programmes) said that wasn't anything to do with them, and another team I tried to contact claimed NowTV hadn't changed anything (when previously it the NowTV app remembered my subtitling ON preference). It's remembering my preference now, but it wasn't doing so for about an entire year. I'm sure it was down to their changes to their app, as the most recent version remembers my preference.

3. "Atmospheric" background sounds/music often drown out or make it harder to hear speech/dialogue. Platforms should be able to offer filters or settings that users can enable to make sound falling within the range of the human voice louder and clearer, and reduce other frequencies. This could be implemented in TV/audio hardware. I recently bought a Roku Streambar specifically to use its speech clarity

	<p>feature <a href="https://support.roku.com/en-gb/article/360009553774">https://support.roku.com/en-gb/article/360009553774</a>. But it should be possible to offer these settings in streaming platforms' <b>apps</b>, not just hardware. Please make it mandatory for TV manufacturers or at least streaming platforms to provide these <b>vocal clarity options</b> in their apps. Again, as with AI, the technology for this now exists.</p> <p>4. Ads are too loud, they deliberately pump the volume up when ads play, then reduce it again when the show/movie resumes, making users constantly have to change their TV volume settings. <b>Please ban this practice</b>, for both terrestrial and streaming TV. It's counterproductive as people may just end up completely muting over-loud ads!</p>
<p><b>Question 5: What do you think about the proposed list of external sources/ guidelines in Annex 3? Are there any additional sources which Ofcom should refer to?</b></p>	<p><i>N</i></p> <p>Any sources re live machine-generated subtitling and voice/speech clarity tech.</p>
<p><b>Question 6: Do you have any comments on the following suggested changes relating to subtitling? Please provide any additional evidence that you think we should take into account.</b></p> <ul style="list-style-type: none"> <li>• <b>Subtitling speeds</b></li> <li>• <b>Live programming</b></li> <li>• <b>Subtitling presentation</b></li> <li>• <b>Sound and music descriptions</b></li> <li>• <b>Language of subtitling</b></li> </ul>	<p><i>N</i></p> <p>Agree.</p> <p>If you remove quotas, machine-generated subtitling should be <u>mandatory</u> for all streaming platforms that don't provide more sophisticated subtitling, given its ready availability including for live subtitling.</p> <p>Yes, it may not indicate who is speaking but AI subtitles are still better than none at all (users can see whose mouth is moving!). Obviously do favour better human subtitling whenever possible, but when it's not then AI subtitling should <b>always</b> be used as standard.</p> <p>Subtitles' location - if credits or English translations appear at the bottom (e.g. for non-English shows/movies), move the subtitles to the top so they don't overlap/obscure each other, as they do in too many programmes/films.</p>

Question 7: Do you have any comments about the other proposed changes to the subtitling guidelines, as summarised in Table 1 (Annex 1)?

*N*

Yes I agree with “encourage providers to consider enhancing dialogue audibility and/or providing options to customise sound levels in programmes where possible” but it should go further and be mandatory as much as possible; also, options to customise shouldn’t be confined to “sound levels” but frequency boosting/reduction should be customisable too, with presets to enhance vocal clarity, see my answers to Q4. And, **increasing ads volume should be banned.**

Question 8: Is there anything additional that you think should be added to the revised guidelines on subtitling?

*N*

Yes 2.5 of proposed Guidelines on Providing Television and On-Demand Access Services on accessibility preferences, e.g. subtitles always on, **MUST** always be remembered and used by default, not just “should” (see my Q4 answer no. 2 about travails with NowTV).

**Complaints routes** should be made much clearer (and providers should actually **deal with queries/complaints about accessibility properly** rather than effectively say “Go away” - please see my answer to Q4, no.3 where I had to struggle with NowTV for a year).

Question 9: Do you have any comments on the following suggested changes relating to audio description? Please provide any additional evidence that you think we should take into account.

*N*

- Approaches to/ styles of audio description
- Describing visual features
- Describing information about diversity characteristics
- Additional audio accessibility features

<p><b>Question 10: Do you have any comments about the other proposed changes to the audio description guidelines, as summarised in Table 2 (Annex 1)?</b></p>	<p><i>N</i></p>
<p><b>Question 11: Is there anything additional that you think should be added to the revised guidelines on audio description?</b></p>	<p><i>N</i></p>
<p><b>Question 12: Do you have any comments on the following suggested changes relating to signing?</b></p> <ul style="list-style-type: none"> <li>• Meeting the signing requirements</li> <li>• Selection/ scheduling of signed programmes</li> <li>• Use and preferences for different types of signed programmes among d/Deaf children</li> <li>• Ensuring the quality of sign-interpretation</li> <li>• Size of sign interpreter image</li> </ul>	<p><i>N</i></p>
<p><b>Question 13: Do you have any comments about the other proposed changes to the signing guidelines, as summarised in Table 3 (Annex 1)?</b></p>	<p><i>N</i></p>
<p><b>Question 14: Is there anything additional that you think should be added to the revised guidelines on signing?</b></p>	<p><i>N</i></p>

Please complete this form in full and return to [accessibility@ofcom.org.uk](mailto:accessibility@ofcom.org.uk).