



Red Bee has provided captioning services to audiences in Australia since 2005. We also provide captions for audiences in the UK, Spain, France the Netherlands and the United States. Each year we provide over 200,000 hours of captions.

Quality has always been central to our service delivery and is integral in our operations, our recruitment, training and continual assessment of employees. We know that quality is vital as it ensures accessibility to the content.

As a supplier of broadcast captions to our customers, Red Bee has contractual standards which must be achieved and reported on. These support our customers in complying with the *Broadcasting Services (Television Captioning) Standard 2013* and the *Broadcasting Services Act 1992*. Additionally, our customers have continued to raise the contractual quality standards and quality is a key part of the procurement process.

Today, while content is ever more accessible, we inversely see very few complaints concerning quality.

To inform this feedback for the ACMA (Australian Communications and Media Authority), Red Bee once again hosted representatives from all our broadcast clients at a roundtable in Sydney on 31st May 2023.

Question 1: If the Standard were to be remade as currently drafted, would it be appropriate for it to be accompanied by an accompanying a commitment to:

- **support industry to further examine the introduction of a metric measurement model in the future, particularly given the faster evolution in captioning related technology in the coming years?**
- **provide further guidance on the interpretation of key elements of the Standard?**

Red Bee believes that if the Standard were to be remade as currently drafted, this would need to be for the shortest time possible, preferably one year, to enable further examination of a metric measurement. Red Bee believes that there are key elements of the current Standard which should not be redrafted. Specifically, these are:

- Section 6(b) regarding distinct program segments within a television program
- Section 7 (b) (iv) regarding positioning of captions
- Section 9 (b) (i) regarding whether the captions clearly identify and distinguish individual speakers

We note ACMA's findings that most respondents were satisfied or very satisfied with the quality of live and pre-prepared captioning services for the programs they watched. This position agrees with Red Bee's experience that complaints concerning the quality of captions are incredibly low. Red Bee wants to retain this position and feels that the changes to the Standard outlined would increase users' accessibility and choice of captioned programs.

Captioning is still a very human process with a range of factors involved, and there will inevitably be errors and editorial decisions which must be made. Section 6 (b)'s application can, at times, mean a

breach finding for a small part of a total program. It would be appreciated if these stories were seen in totality to the program and the whole program judged on this. Please see later responses on NER as a metric measurement.

With regards to Section 7 and 9; the media landscape is changing dramatically. Many media companies are now global – where international borders are invisible to content. Caption users are becoming more accustomed to consuming captions on different platforms without this affecting their comprehension. Australians have become used to viewing overseas caption files through subscription video on demand services and Blu-ray discs or DVDs.

For users of Australian free-to-air broadcast captions, the requirements for broadcast services—the only services to which the captioning quality standard applies—remain prescriptive – for example, in terms of fonts and colours. Captions on many streaming services are all white, with no colour differentiation for speakers. We would argue that users are comfortable with these captions and they do not impair their comprehension of the content.

Global media companies have access to a significant amount of overseas pre-recorded caption files for their content and these currently must be repurposed for the Australian market.

OFCOM carried out a feedback process on caption quality in 2015. The outcome of that was that OFCOM only states 'best practice' in terms of quality. Quality measurement is not covered in its guidelines and recommendations.

[Ofcom's Guidelines on the Provision of Television Access Services](#)

If followed by the Australian market, this approach could allow free-to-air broadcasters to provide more captions for programs as they would not need to be reversioned for the Australian market, which has a cost implication.

Red Bee would support the examination of a metric measurement model (accompanied by a separate latency measurement) as it is our belief that this would ensure consistency and allow valid comparisons with regards to the quality of captioning. Red Bee would be happy to assist any trial with our overseas experience, especially as a service provider in the UK, USA, Spain, France and the Netherlands.

Red Bee would welcome the further guidance on the interpretation of key elements of the Standard as it would be productive to have a discussion with the ACMA about how we operationalise the standard.

Although guidance is welcomed, we do not believe that the guidance should replace the exclusion of the sections we have highlighted from the Standard but be in addition to the exclusions.

Question 2: Is the clarification that broadcasters have indicated they would like about elements of the Standard best achieved through informal guidance rather than redrafting the Standard? Why or why not?

No. Red Bee believes that formal guidance is required, however we do refer to our response to Question 1 that we believe that the Standard only be redrafted excluding the sections outlined.

Question 3: If the ACMA did provide guidance to broadcasters about the application and interpretation of the Standard (in addition to information in published investigation reports), what would be an appropriate mechanism to achieve this? Please provide details.

Red Bee's preference would be for formal guidance on ACMA's website which could, for example, provide details of questions that broadcasters or service providers have asked and ACMA's response. It would also be incredibly useful if there was a helpline so service providers and / or broadcasters could ask advice and discuss unique situations to ensure the best possible service for our users and to ensure broadcasters do not breach the Standard unintentionally.

Time-sensitive support would prevent avoidable breaches, benefiting caption users.

In the instance of newly formed regulation or changes to existing regulations it would be useful for broadcasters and service providers to meet with ACMA for information sessions on what the new changes are and how they are to be applied, as part of a change management effort.

Red Bee recently had an unclear situation during the coverage of Queen Elizabeth II's death. Our client was transmitting rolling footage of Buckingham Palace overnight and was unsure whether captions were required for rolling footage. Our client, in their uncertainty, contacted Red Bee in the hope we could clarify the requirements, and as we were unable to do so, we eventually contacted ACMA for assistance. Fortunately, the ACMA was able to advise on how to proceed, however, they also advised that moving forward this support would not be available as the protocol is to refer to the Standards.

It is this guidance that should be published in full, so all broadcasters and service providers are fully aware.

There can be situations where if broadcasters are in any doubt, then they will not offer the service, therefore impacting the user and impacting their accessibility to services. We are seeing this with new technological advances in the provision of automated captioning.

Question 4: In the current legislative context, would a metric model be an appropriate alternative to the Standard's current approach to measuring the quality of captioning? If so, why and how?

Red Bee believes that some limited legislative change is needed to create a distinction, as in other territories, between live and pre-recorded measurements.

A metric model would be an appropriate alternative to the Standard's current approach as it is vital for all parties involved in captioning to have the measurements for quality agreed upon.

To measure quality, considering available technologies, a common quantitative methodology should be considered as a common standard for the industry. This would ensure consistency and allow valid comparisons with regards to the quality of captioning.

NER methodology would be an important model to consider because:

- NER is a quantitative approach
- NER approaches quality from the viewers' perspective
- NER removes the criticism that able-bodied people are making decision about whether something is comprehensible and accessible for deaf and hearing-impaired people
- NER methodology is used in the broadcast industry for contractual KPIs

- NER works as a percentage and therefore allows an assessment of the whole program, instead of current situation where one significant error in a segment can lead to a breach
- NER is the commonly adopted standard in the UK, Spain, Canada and Italy

Not having a common standard is impacting audiences directly as it means that broadcasters may be reluctant to implement innovative technology (for example automated captioning, which could improve accessibility) as they are uncertain about the potential approach to this by the regulator. This may hamper innovation.

NER KPIs are increasingly being included in contracts by broadcasters with the specific aim of improving the quality of captions. Each month Red Bee completes, as part of its contract commitments, a range of NER reports across its clients' output.

As discussed later, there would also be a need to have an addition latency measurement as NER does not measure synchronicity.

Question 5: What benefits, if any, would a metric model have for viewers compared to the Standard's current approach to measuring the quality of captioning? Would viewers who are concerned about the quality of captioning be able to determine whether a captioning service has met a metric measure while they are watching a television program? If so, how?

The current complaint-based system would still operate. There is no need for an audience member to know how NER works. As now, any viewer who would like to make a complaint about the quality of the captions can either contact the broadcaster or the ACMA. The only judgement that a viewer needs to make either now or if a metric model was used, is whether they think that the captions are not of a quality for their understanding.

The NER model is viewer centric. NER decides how bad an error is by the impact that the error has on a viewers' understanding of the program. Errors are given weightings, with clear factors determining which weighting should apply.

It is our belief that adopting an NER system, with the subsequent viewer education, will help accessibility groups so they can understand exactly what is being measured. We believe that it will give greater clarity on standards and will give groups a language in which to discuss captioning which currently does not exist today. Overseas groups have welcomed NER as a tool to discuss quality as it is straightforward and easy to understand.

Question 6: What, if any, metric model would be the most appropriate to assess the quality of captioning? Please explain how it would address the BSA requirements of readability, accuracy and comprehensibility.

Red Bee recognises the need for a measurement for latency, in addition to NER, as this is an important part of comprehensibility. For our broadcast contracts, alongside a NER KPI we also have a latency KPI which must be regularly reported.

Question 7: Metric models used or considered overseas do not include details about the latency or synchronicity of captioning (although these are addressed in other elements of the legislative framework). Should these issues also be addressed by a standard dealing with the quality of captions?

Please see above.

There should be a distinction between production latency and other causes of latency.

Often these complaints, when investigated, are caused by other issues, such as environmental issues, set-top box issues or other equipment issues but viewers must be free to register their complaint and they will be investigated.

Question 8: How should compliance with a metric model be measured and monitored?

We would point to ACMA's research that viewers believe caption quality is high, therefore we do not see the need to move away from the current complaint led model.

We would however be happy to help with any audits that would be required during a trial period of the metric model.

Question 9: What arrangements would need to be in place to provide confidence in the results of a trial of a metric model?

Red Bee would see the following as necessary to the success of a trial of a metric model:

- A timeline that is understood prior to the start of the trial
 - This is a fast-moving sector and any delay could cause loss of accessibility for the audience
 - Red Bee would recommend a trial duration of no longer than 12 months
 - Agreement that if trial is successful, need for legislative change
 - Agreement that some sections of current standard would be removed
- Visibility of trial progression with clear milestones and published updates
- A clear understanding of what success or failure looks like prior to the start of the trial
- Without prejudice
- Participation from service providers and broadcasters
- Participation for accessibility groups
- A latency measurement to be part of the conversation
- Engagement with caption audience (deaf and hard-of-hearing groups)