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**From:** Richard Tomlinson <[REDACTED]>  
**Sent:** Monday, 11 December 2023 12:31 PM  
**To:** Phyllis Fong <[REDACTED]>  
**Subject:** Red Bee Media: Captioning Guidelines and Metric Trial Feedback

Hi Phyllis

I hope this email finds you well.

Thank you once again for organising the roundtable to discuss these important issues.

Red Bee Media is delighted that the ACMA have produced captioning guidelines.

It is particularly useful for Red Bee to have further insight into how the ACMA assess captioning on shows that have distinct program segments, whether captions must be in a particular font, how it is possible to distinguish speakers and latency issues. Red Bee has already implemented these guidelines into our training programs.

We would ask if these guidelines could continue and that broadcasters, captioning providers and the ACMA meet semi-regularly to discuss further clarifications. It's our view that as technology plays a bigger part in the industry, more scenarios will present themselves.

Red Bee would be delighted to support the ACMA with their desire to explore NER metrics, both in terms of any trial and methodological insight. NER processes have been baked into our standard operating framework for some time and we have considerable amounts of NER data that we could share. We could anonymise the data and show the amount of NERs we produce for our clients which we use to continually measure and assure the caption quality of our services. Please let me know if you have any queries or questions we can help with but we would like to support in any way we possibly can.

I would also like to extend an invitation to any staff at the ACMA who would like to understand what goes on to create captions for both live and pre-recorded broadcast programs. We ran a really successful workshop with the ACMA in 2022 and we'd be delighted to run other workshops for any staff who are either new or where unable to attend previously. Please reach out if you'd like me to arrange this.

I look forward to hearing from you with regards a metric trial and hopefully we can extend the roundtables with regards future guidelines.

Kind regards,  
Richard

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