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Submission to the consultation regarding Draft Captioning Quality Guidelines

Australian Communications and Media Authority

Submitted on behalf of Soundfair Australia Ltd.

Background

Soundfair welcomes the opportunity to respond to the Draft Broadcasting Services (Television Captioning) Standard 2023 - Captioning Quality Guidelines. In this submission, Soundfair presents positions and recommendations centred on the experiences and needs of people living with hearing loss or who are hard of hearing.

Soundfair has been making hearing seen and people heard for over 90 years. Our mission is to amplify lived experiences voices to change social attitudes. We build capacity, create connections, and mobilise the community.

For the context of this feedback, we highlight that that majority of people who are hard of hearing do have some level of hearing and use this hearing either acoustically, or with the aid of devices (around 4 million people). That is, people accessing broadcast material and accessing captions are both listening and reading - meaning that if the quality of captions is not of a high standard, they can be put in a worse position in accessing the broadcast program and with a higher cognitive loading having to process two forms of competing information, rather than complimentary. This is true of the general population who use captions and the number of people who use no volume or do not use their hearing is relatively (though very important) small (16,000 people across Australia). Captions are, for most people, critical supplements to the audio and images, not an alternative viewing option.

We provide our feedback across four areas, summarised below. We would welcome the opportunity to discuss this in further detail.

1. Scope of the Standards

In terms of the General Approach, and what the ACMA determined as 'meaningful', we agree with the requirement to be readable, accurate and comprehensible. We would add that these should occur in line with the full context of the program. That is, meaning is content, context and emotion, and as we indicated in our preface, most viewers would be using captions in combination with audio cues and therefore, considering captions separate to the audio does not capture the potential degraded meaning or loss or meaning created by the combination of both audio and captions.

2. Latency and timing of captions

We believe the standard must specify maximum tolerable duration of latency and duration of caption presentation, and that this duration should consider that most users would be using a combination of both sound and captions. Given the expectation that captions be 'meaningful', specifying acceptable latency is critical. Most viewers are using a combination of the captions and visual cues. Any latency destroys a viewer's ability to lip read and understand the emotional context

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supported by captions. A delay, creating different messages places a heavy listening/reading fatigue on the viewer.

We agree with the ACMA determination of 'breach' in Example 3 in that most people who are hard of hearing are expected to cope with missing cues of humour and are often excluded from enjoying face paced, humorous conversations. Being able to access this content equitably is important and captions should reflect the pace of the show, giving enough duration on screen for the person to read the lines of captions.

We disagree with how the ACMA determined a 'no breach' in Example 4 where they found that they delay did not impact comprehensibility. If a person what listening to speech and comprehending for example 50% of this and relying on the captions for full access, their ability to comprehend the program is significantly impaired and would not be viable.

Regarding timing, ensuring that the captions are present on the screen for long enough for people who have lower literacy and visual processing delays is important (especially if captions are presented on top of the image, rather than a high contract black or white background).

3. Formatting

The standards should specify the minimum requirements for caption style and formatting, that align with standards for accessibility for people with visual impairments. That is, appropriate contrast, size, and preferred font styles. These minimum standards benefit all viewers allowing for optimal clarity and speed of reading and ensure equal access to content. minimum standards should consider average reading level and literacy level and speed of reading for the Australian population.

Placement of captions is critical as they often are placed over other written information of relevance to the reader.

Block captioning that allows for both faster and slower readers is preferred, and reduced the visual strain of additional movement (new words being added and words moving across the page).

We agree that being able to distinguish between speakers and or contextual cues (music, noises, changes in environmental sounds) are critical to what is 'meaningful'. At a minimum, we expect the standards to require clarity on which speaker is speaking using colour, font or starting new lines (like a stenographer's captions) would all be acceptable, but identification by name is preferred.

4. What is missing from the guidelines:

We acknowledge that these guidelines focus on quality, but we emphasise that guidelines and regulation around when captions are required by free to air, advertising and subscription services are needed to ensure fair access to broadcasted material and we would welcome a conversation about this.

To further discuss this submission, please contact Dr Caitlin Barr, CEO Soundfair on



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