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Mr. Nanao Kachi
Director, Social and Consumer Policy
Consumer Affairs and Strategic Policy
Canadian Radio-television and
Telecommunications Commission
Ottawa, ON K1A 0C8

Re: Biennial Report on Closed-Captioning Accuracy Rate – TELUS' 2016 Report

Dear Mr. Kachi,

Further to the quality standards and reporting requirements contained in Broadcasting Regulatory Policy CRTC 2012-362, *Quality standards for English-language closed captioning*, TELUS hereby files its second biennial report outlining TELUS' efforts made in-house and requests to caption providers in order to improve the accuracy rate.

TELUS is pleased to provide the following information.

Overview of TELUS' monthly closed captioning accuracy rate evaluation results.

TELUS provides a video-on-demand (VOD) service in Alberta, British Columbia and Quebec, which also houses TELUS' community programming undertakings (Optik Local in western Canada, and Télé OPTIK in Quebec). In addition, TELUS provides a linear community channel in Quebec only. TELUS did not produce any live programming over the period ending on August 31, 2016. As such, TELUS had no programming with which to evaluate live captioning accuracy rates.

In keeping with the conditions of licence for its VOD licence, TELUS ensures that 100% of the English- and French-language programs in its library are captioned. In addition, TELUS also ensures that 100% of community programming, both original licensee-produced and access programming is closed captioned.¹

¹ TELUS' conditions of licence for our Broadcasting Distribution Undertakings serving areas of British Columbia, Alberta and Quebec state that TELUS must ensure 100% of licensee-produced content must be captioned by the end of the licence term (August 2016). Over and above this requirement,

Although TELUS does not have any live programming to sample, TELUS undertakes sample testing on both its regular VOD programming and local expression programming to ensure the accuracy of closed captioning. TELUS is pleased to report that the closed captioning contained in its pre-recorded programming is of very high quality.

Specifically, in our sampling of English-language community programming, TELUS found an accuracy rate of 99.3%. And in our French-language community programming (distributed to Optik TV subscribers in our Quebec serving areas), TELUS has calculated an accuracy rate of 99.9%. As for TELUS' regular VOD assets, whether content was provided already captioned or whether TELUS employed a third-party captioning company to perform the captioning of the asset, accuracy of our most recent sample has been measured at higher than 99.9%.

Actions taken to address issues related to the quality of closed captioning, in particular with respect to the improvement of accuracy rate, and investments made in both personnel and infrastructure.

In addition to TELUS' manual validation of closed captioning quality, in January 2010 TELUS installed an automated system that confirms that a valid closed captioning stream is included in each on-demand file. In 2015, TELUS put in place additional assurance processes to further improve on the accuracy rate for closed captioning, as outlined below, and in April 2016, TELUS introduced a new team to focus specifically on ensuring and managing video-on-demand quality, which includes verification of closed captioning.

TELUS Closed Captioning Assurance Processes

Manual Validation

TELUS ensures that closed captioning is included in its titles on a manual basis by having a Quality Assurance Analyst review each title provisioned to our VOD Storefront. Each asset is first subject to a spot check of at minimum one minute to ensure CC is present. For our more popular titles and TV series, TELUS performs checks of at least five minutes at three separate points in the asset. For TELUS' top 10 TV Shows and Blockbuster movies, a TELUS employee manually watches the entire asset.

If captioning is missing completely, or materially inaccurate (*i.e.* more than a few lines are missing or contain errors), TELUS requests a replacement file from the provider or encoding house. The only scenario where inaccurate captioning may not have a better source version available is in the case of live captures. For example most recently, in the Olympics programming TELUS provided on video-on-demand, we noticed a few random lines where words were incorrect or missing. In this case, the live feed capture provider did not have a better source file for us. These edge cases are infrequent.

TELUS monitors closed captioning with such discretion that it recently noticed (as of 2016) that a few providers were having more captioning issues than usual. In collaboration with our engineers, TELUS performed a detailed investigation to uncover that three providers had an upgrade made to their encoder platform resulting in these intermittent/random captioning issues

TELUS is has ensured that 100% of both licensee-produced and access programming is closed captioned.

(randomly missing, delayed or missing completely on digital 708 CC). TELUS recommended a solution to the impacted parties (a software fix) which they are in the midst of implementing.

Automated Validation

In addition, TELUS uses an automated system that checks to confirm that a valid closed captioning stream is in the on-demand files. This system cannot guarantee with 100 percent accuracy that the closed captioning is correct to the words being spoken in the program. This is why TELUS' manual Quality Assurance processes are important to validate accuracy where automated systems cannot. In addition to checking that closed captioning racks are present, the automated system is also set to warn TELUS if there are caption dropouts of more than two minutes within the asset.

Re-Orders Resulting From Issues Caught by TELUS

For the period of January 2016 to mid-August 2016, TELUS logged a total of 307 tickets related to close captioning issues. 179 tickets were caught by either the automated system or by manual Quality Assurance checks prior to the title going live to customers. 128 tickets were caught in visual checks shortly after the title had gone live. Automated system tickets were primarily related to missing captioning tracks, while visual check tickets were primarily related to missing captioning, captioning sync issues with audio or materially incorrect captioning (more than a few lines).

As noted above, TELUS receives much of its on-demand content pre-captioned. When captioning is not provided with the asset (as is often the case with our local expression programming), TELUS employs third-party captioning companies to provide closed captioning who are confirmed to be using the current closed captioning quality standards, and targeting 100% accuracy for all programming.

Sincerely,



Ann Mainville-Neeson

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