



Broadcasting Notice of Consultation CRTC 2011-489

PDF version

Additional reference: 2007-54

Ottawa, 15 August 2011

Call for comments on proposed French-language Closed Captioning Quality Standards

*The Commission calls for comments on proposed French-language Closed Captioning Quality Standards filed by the French-language Closed Captioning Working Group. The Closed Captioning Quality Standards are sets of standards (one for each official language market) that address the quality of closed captioning provided by Canadian television broadcasters. The deadline for comments is **14 September 2011**. The deadline for replies is **26 September 2011**.*

The Commission notes that the proposed English-language Closed Captioning Quality Standards will be considered in a separate process also announced today.

Once approved by the Commission, all television licensees will be required to adhere to the closed captioning standards through conditions of licence that have been or will be applied at the time of licence renewal or approval of a new licence.

Introduction

1. In Broadcasting Public Notice 2007-54, the Commission set out a new policy on closed captioning that required all television broadcasters, including third-language broadcasters, to caption 100% of their English- and French-language programs over the broadcast day. The Commission also directed the broadcasting industry to establish two closed captioning working groups (CCWGs), one for the French-language television market (FL-CCWG) and one for the English-language television market (EN-CCWG).
2. The Canadian Association of Broadcasters (CAB), on behalf of the broadcasting industry, coordinated the establishment of both CCWGs. These groups included representatives from private and public television broadcasters, distributors, consumer and advocacy groups representing persons who are deaf or hard of hearing, and captioning providers. Commission staff also attended the working group meetings as observers on an as-needed basis.
3. The purpose of the CCWGs was to develop and implement measures to improve the quality of closed captioning in Canada, including the development of standards in English and French that address significant concerns raised by users of captioning over the poor quality of captions, including both consistency and style issues.

4. The Commission also asked the CCWGs to develop concrete, workable solutions in regard to particular aspects of captioning quality, including reducing errors and technical problems (such as dropped or garbled captioning) or captioning that is cut off by commercials. The overall objective of the CCWGs, as set out in Broadcasting Public Notice 2007-54, was to establish captioning standards that would become conditions of licence for broadcasters, thereby ensuring consistent and reliable captioning quality throughout the Canadian broadcasting system.
5. The CCWGs first submitted proposed closed captioning standards to the Commission during the proceeding initiated by Broadcasting Notice of Public Hearing 2008-8/Telecom Public Notice 2008-8. Following the close of that proceeding, the Commission issued Broadcasting and Telecom Regulatory Policy 2009-430 (the Accessibility Policy), in which it considered that the proposed standards submitted by the CCWGs were incomplete and required further attention. The Commission directed the CCWGs to file, for Commission approval, revised and completed standards addressing the following areas:
 - speed of captions, including an appropriate speed for children’s programming;
 - captions that block or are blocked by other on-screen information;
 - acceptable rate of error; and
 - standards for digital broadcasting, including in high definition.
6. In the Accessibility Policy, the Commission also directed the FL-CCWG to do the following:
 - provide concrete evidence that the standards it develops with respect to speed of captioning, digital captioning and error rate are acceptable to the users of captioning by way of a methodologically sound validation exercise;
 - provide a description of the methodology employed and evidence that the results achieved are statistically valid and representative of the user communities;
 - include children in validation exercises for speed of captioning in children’s programming;
 - include a requirement for broadcasters to correct captioning errors in live programming before such programs, or segments within those programs, are rebroadcast;
 - ensure that all standards contain imperative language and concrete examples of what is and is not acceptable;
 - include a definition of terms, with visual illustrations as examples where appropriate; and

- eliminate inconsistent information and information not pertinent to the standards.
7. In the present notice, the Commission is seeking comments on, among other things, the appropriateness of the proposed standards for the French-language market.
 8. The Commission has placed documents relating to the development of the proposed closed captioning quality standards on the public record of this proceeding. These documents have been placed on the Commission website at www.crtc.gc.ca and include the following:
 - the final report of the FL-CCWG;
 - summaries of the FL-CCWG meetings;
 - the FL-CCWG progress report;
 - Commission letters; and
 - letters from the CAB.

Final report – French-language Closed Captioning Working Group

9. On 18 March 2011, the FL-CCWG submitted its final report to the Commission, in which it stated that it had reached consensus on the proposed standards. The working group's report divided the standards into two categories: (1) "mandatory standards" that should be imposed as conditions of licence, and (2) "universal standards" that it suggested are more appropriately considered as best practices or guidelines and that should not be imposed as conditions of licence (henceforth to be known as guidelines/best practices).
10. The mandatory standards proposed by the FL-CCWG address the following:
 - captioning of emergency alerts;
 - an appropriate lag time (time delay between the spoken word and the captions appearing on the screen) for captioning of live programming;
 - positioning of captions on the screen;
 - quality of captioning for pre-recorded programming;
 - a maximum rate of error, including definition and methodology for live programming;
 - correction of errors prior to rebroadcast of live programming;
 - a consistent way of identifying a new speaker; and
 - speed of captions.

11. The guidelines/best practices as submitted by the FL-CCWG touch on areas such as how to caption false starts, utterances and repeated words; the appropriate number of captioning lines (for example, when to display two or three lines); how to divide a long sentence when using pop-on captions; the appropriate use of spaces; and the appropriate use of colour, italics and upper and lower case letters.
12. The Commission also notes that, while the FL-CCWG was asked by the Commission to develop standards for digital broadcasting, the working group submitted that the issues relating to the provision of captions in a digital environment are related to the distribution of captions by broadcasting distribution undertakings, as well as user knowledge of the new digital technologies. It submitted that the standards it has proposed would therefore apply regardless of whether programming is provided in an analog or digital format.
13. The FL-CCWG recommended the continuation of working group activities in order to ensure the success of the standards. The specific propositions are set out below.
 - **Accuracy rate:** The FL-CCWG proposed that broadcasters, when testing the accuracy rate of captions, evaluate two live programs per month, including one live news program and one live program whose nature is similar for all broadcasters. It also proposed that broadcasters and user representatives meet again in order to establish which live programs, other than news programs, are appropriate for testing the error rate.
 - **Definition and calculation of an error:** The FL-CCWG proposed to reconvene before January 2014 to determine how to include grammar and spelling errors in the error rate calculation.
 - **Children's programming:** The FL-CCWG proposed to reconvene before January 2014 to re-evaluate the format and speed of captioning for children's programming.
 - **Overall review of standards:** The FL-CCWG proposed to review the quality standards no later than January 2017.

Call for comments

14. The Commission calls for comments on the appropriateness of the proposed Closed Captioning Quality Standards for the French-language television market and any related action that should be taken in the future. The Commission notes that all French-language television licensees will be required to adhere to these closed captioning standards, once approved by the Commission, through conditions of licence that have been or will be imposed at the time of licence renewal or approval of a broadcasting licence for a new service. In light of the discussion above, the Commission seeks comments in regard to the following:
 - a) the appropriateness of distinguishing between mandatory standards and guidelines/best practices;

- b) the appropriateness of the content of the mandatory standards and guidelines/best practices proposed by the FL-CCWG;
- c) whether any of the guidelines/best practices should be considered mandatory standards;
- d) whether additional standards are needed;
- e) the appropriateness of the follow-up actions proposed by the FL-CCWG as they relate to 1) the accuracy rate; 2) the definition and calculation of an error; 3) children's programming; and 4) an overall review of the standards;
- f) whether further action is required for the following:
 - to develop concrete, workable solutions with respect to other outstanding captioning quality issues, including the reduction of errors and technical problems such as dropped or garbled captioning, and captioning that is cut off by commercials;
 - as proposed by the EN-CCWG, to focus on areas related to the access to closed captioning in a digital environment, including methods to educate consumers more effectively on how to access captions depending on the format of the program signal and set-top-box, adoption by equipment manufacturers of an "inclusive design" approach, the feasibility of simplifying how users activate closed captions for display on a given program, and issues pertaining to the role of distributors in the delivery of closed captions for digital television; and
- g) if further action is proposed, whether the mandate of the working group should be extended for these purposes or if an alternative approach should be adopted.

15. The Commission notes that in Broadcasting Notice of Consultation 2011-488, also issued today, it calls for comments on the Closed Captioning Quality Standards proposed by the EN-CCWG for the English-language television market.

Procedure

16. The new *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* (the Rules of Procedure) set out, among other things, the rules for the content, format, filing and service of interventions, and the procedure for filing confidential information and requesting its disclosure. Accordingly, the procedure set out below must be read in conjunction with the Rules of Procedure and its accompanying documents, which can be found on the Commission's website under "CRTC Rules of Practice and Procedure." The Commission notes that Rule 26(2) sets out the requirements as to form, content and service of interventions.

17. The Commission invites interventions that address the issues and questions set out above. The deadline for interested persons to file interventions is **14 September 2011**. Parties may file a reply on or before **26 September 2011**.
18. Parties are reminded that, in accordance with the Rules of Procedure, if a document is to be filed or served by a specific date, the document must be actually received, not merely sent, by that date. A document must be filed with the Commission by 5 p.m. Vancouver time (8 p.m. Ottawa time) on the date it is due. The Commission takes no responsibility for postal delays and will not notify a party whose intervention is received after the deadline date. Late interventions will not be considered by the Commission and will not be made part of the public file.
19. Interventions must be filed by sending them to the Secretary General of the Commission by **only one** of the following means:

by using the
[\[Intervention/comment/answer form\]](#)

or

by mail to
CRTC, Ottawa, Ontario K1A 0N2

or

by fax at
819-994-0218

20. Submissions longer than five pages should include a summary.
21. Electronic submissions should be in HTML format. Alternatively, Microsoft Word may be used for text and Microsoft Excel for spreadsheets.
22. Each paragraph of the submission should be numbered. In addition, where the intervention is filed by electronic means, the line *****End of document***** should be entered following the last paragraph of the document, as an indication that the document has not been altered during electronic transmission.

Important notice

23. All information that parties provide as part of this public process, except information designated confidential, whether sent by postal mail, facsimile, e-mail or through the Commission's website at www.crtc.gc.ca, becomes part of a publicly accessible file and will be posted on the Commission's website. This information includes personal information, such as full names, e-mail addresses, postal/street addresses, telephone and facsimile numbers, and any other personal information parties provide.

24. The personal information that parties provide will be used and may be disclosed for the purpose for which the information was obtained or compiled by the Commission, or for a use consistent with that purpose.
25. Documents received electronically or otherwise will be put on the Commission's website in their entirety exactly as received, including any personal information contained therein, in the official language and format in which they are received. Documents not received electronically will be available in PDF format.
26. The information that parties provide to the Commission as part of this public process is entered into an unsearchable database dedicated to this specific public process. This database is accessible only from the web page of this particular public process. As a result, a general search of the Commission's website with the help of either its own search engine or a third-party search engine will not provide access to the information that was provided as part of this public process.
27. The Commission encourages parties and interested persons to monitor the record of the proceeding, available on the Commission's website, for additional information that they may find useful when preparing their submissions.

Examination of documents

28. A list of all interventions will also be available on the Commission's website. The list is accessible by selecting "View all proceedings open for comment" from the "Public Proceedings" section of the Commission's website and clicking on the "Interventions/Answers" link associated with this notice.
29. The public may examine public interventions and related documents at the following Commission offices during normal business hours.

Location of Commission offices

Toll-free telephone: 1-877-249-2782

Toll-free TDD: 1-877-909-2782

Les Terrasses de la Chaudière
Central Building
1 Promenade du Portage, Room 206
Gatineau, Quebec
J8X 4B1
Tel.: 819-997-2429
Fax: 819-994-0218

Regional offices

Metropolitan Place
99 Wyse Road
Suite 1410
Dartmouth, Nova Scotia
B3A 4S5
Tel.: 902-426-7997
Fax: 902-426-2721

205 Viger Avenue West
Suite 504
Montréal, Quebec
H2Z 1G2
Tel.: 514-283-6607

55 St. Clair Avenue East
Suite 624
Toronto, Ontario
M4T 1M2
Tel.: 416-952-9096

360 Main Street
Suite 970
Winnipeg, Manitoba
R3C 3Z3
Tel.: 204-983-6306
Fax: 204-983-6317

2220 – 12th Avenue
Suite 620
Regina, Saskatchewan
S4P 0M8
Tel.: 306-780-3422

403 – 4th Avenue South-West
Suite 100
Calgary, Alberta
T2P 3N2
Tel.: 403-292-6660
Fax: 403-292-6686

858 Beatty Street
Suite 290
Vancouver, British Columbia
V6B 1C1
Tel.: 604-666-2111
Fax: 604-666-8322

Secretary General

Related documents

- *Call for comments on proposed English-language Closed Captioning Quality Standards*, Broadcasting Notice of Consultation CRTC 2011-488, 15 August 2011
- *Accessibility of telecommunications and broadcasting services*, Broadcasting and Telecom Regulatory Policy CRTC 2009-430, 21 July 2009
- *Unresolved issues related to the accessibility of telecommunications and broadcasting services to persons with disabilities*, Broadcasting Notice of Public Hearing CRTC 2008-8/Telecom Public Notice CRTC 2008-8, 10 June 2008
- *A new policy with respect to closed captioning*, Broadcasting Public Notice CRTC 2007-54, 17 May 2007