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SUBSIDIARY LEGISLATION 350.20

REQUIREMENTS AS TO STANDARDS AND PRACTICE APPLICABLE TO CRAWLS AND CAPTIONS IN TELEVISION PROGRAMMES

22nd March, 2007

GOVERNMENT NOTICE 263 of 2007.

The title of these requirements is the Requirements as to Standards and Practice applicable to Crawls and Captions in Television Programmes.

Cittation

1. Introduction

- 1.1 These Requirements as to Standards and Practice have been made by the Broadcasting Authority in virtue of article 20(3) of the Broadcasting Act, Chapter 350 of the Laws of Malta.
- 1.2 The regulation of crawls, captions and rolling credits is a problem that has been bothering regulators for quite some time and not pertaining to local broadcasting but also to many countries. Credits scroll vary quickly sometimes at speeds that sighted viewers can hardly follow. There is an increasing tendency in television advertising to produce visually enigmatic commercials which omit the verbal identification of the product.
- **2.** General Requirements for Crawls, Captions and Rolling Credits
 - 2.1 Basic Text Display
- 2.1.1 Subtitle legibility studies result in the following requirements:
 - i. Teletext characters should be displayed in double height and mixed (upper and lower) case;
 - ii. Words within a subtitle should be separated by a single space;
 - iii. To aid readability, text can be justified left, centre or right depending on speaker position;
 - iv. The standard punctuation of print should be used. Punctuation gives valuable clues to syntactic structure and must be carefully displayed in order to be effective. One means of enhancing the effectiveness of punctuation is by the use of a single space before exclamation marks and question marks, after commas, colons, semi-colons and mid-subtitle full-stops, on both sides of dashes (but not mid-word hyphens), before opening brackets and inverted commas and after closing brackets and inverted commas.

2.2 Text Height

- TV tube screens vary in size and are measured diagonally. In teletext services there are only 24 rows of text per page in each screen and each row has only 40 characters. Whatever the size of the screen, these parameters cannot be exceeded - the number of rows cannot be increased and neither the number of text characters in each line. In teletext services 10% of the screen all around the teletext page, [i.e. 20% of the screen's height and 20% of the screen's width] is not available as opposed to 5% in normal TV layout which is taken up by the TV-set's frame around its tube.
- This results in a teletext page which uses only 80% of the screen layout divided into 24 rows where each row is 3.33% of total screen size. The best way of setting text height is by determining this as a percentage in relation to screen size for both types of TV-aspect ratios.
- In a 32-inch (81.3 cm) wide TV screen, its dimensions are 19.2" (48.8 cm) height by 25.6" (65.0 cm) in width. Setting a text standard size of not less than 3.3% of screen size would equal to a text height of 0.64" [1.6 cm] text.

2.3.1 The majority of text-background colour combinations are not satisfactory for subtitling, being insufficiently legible. The most legible text colours on a black background are white, yellow, cyan and green. Use of magenta, red and blue should be avoided on a black background. Of the combinations with coloured background, the most legible are blue on white, white on blue, red on white, white on red, cyan on blue and blue on cyan. Of these, white on red, white on blue and cyan on blue are preferable.

Formatting

maximum subtitle length of two rows is recommended. Three lines may be used if it is felt confident that no important picture information will be obscured. The normally accepted position for subtitles/crawl is towards the bottom of the screen, but in obeying this convention it is most important to avoid obscuring "on-screen" captions, any part of a speaker's mouth or any other important activity. Certain special programme types carry a lot of information in the lower part of the screen (e.g. snooker, where most of the activity tends to centre around the black ball) and in such cases top-screen positioning will be a more acceptable standard. Subtitles should be displayed horizontally, and ideally, each subtitle should also comprise a single complete sentence.

2.5 Timing and Synchronisation

It is crucial that crawls are displayed for a sufficient length of time for viewers to read them. The crawl presentation rate for pre-recorded programmes should not normally exceed 140 words per minute. Presentation rates will depend upon the programme content. For example, real-time subtitling documentaries where the speaker is not on screen, or chat shows which have a higher text complexity than drama.

2.6 Leading and Lagging

- 2.6.1 The target point for synchronisation should be at naturally occurring pauses in speech-sentence boundaries, or changes of scene. However, there are bound to be cases where this is either impractical or inapplicable. Recent research indicates the following:
 - i. Monologue Material: For hard-of-hearing people viewing programmes which consist of mainly of monologue, research has shown that perfect synchronisation is not an absolute necessity and delays of up to six seconds do not affect information retention. The same is true of leading subtitles (providing that the first subtitle of a long speech is in synchrony). It should still be recognised, however, that some viewers use subtitles to support heard speech and will require synchronisation. Therefore, the technique should not be over-used.
 - ii. Dramatic Scenes: For drama and programmes with continuous changes of shot, subtitles which lag behind dialogue or commentary by more than two seconds should be avoided.

2.7 Shot Changes

- 2.7.1 Besides the general recommendation for subtitle/speech synchronisation, there are certain other aspects of the television picture which influence subtitle timing. Subtitles that are allowed to over-run shot changes can cause considerable perceptual confusion and should be avoided. Eye-movement research shows that camera-cuts in the middle of a subtitle presentation cause the viewer to return to the beginning of a partially read subtitle and to start re-reading. In practice, it is recognised that the frequency and speed of shot changes in many programmes present serious problems for the subtitler. A subtitle should, therefore, be ianchoredî over a shot change by at lease one second to allow the reader time to adjust to the new picture. Shot changes normally reflect the beginning or end of speech. The subtitler should, therefore attempt to insert a subtitle on a shot change when this is in synchrony with the speaker.
- 2.7.2 General rules for dealing with camera-cuts are as follows:
 - Avoid inserting a subtitle less than one second before a camera-cut and removing a subtitles less than one second after a camera-cut.
 - ii. Attempt to insert a subtitle in exact synchrony with a camera-cut.
- 2.7.3 Camera fades and pans do not produce the same perceptual effect as camera-cuts, and accordingly need not influence the subtitler in the same way.
- 2.7.4 Major scene changes can cause the same problems as shot changes within a scene. A particular difficulty arises when a speaker's last line in a scene, especially a vital punch line, is

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followed instantaneously by a scene change. In this case, the subtitle should be removed before the scene change to avoid visual confusion.

2.8 Voice Overs

2.8.1 Where a voice-over is used, the person reading out a text should do so in such a way that the viewer can comprehend the exact meaning of such text and the voice-over is not read at such speed as to make it unintelligible to the viewer.