# Charter for the quality of subtitles for the deaf and hard of hearing

After the application by television service publishers of the quantitative provisions arising from the law of 30 September 1986 on freedom of communication, aiming to make programmes accessible to people with a hearing disability from 12 February 2010, the Conseil supérieur de l'audiovisuel (CSA/ARCOM today) set about implementing measure 37 of the 2010-2012 disability plan, relating to improving the quality of subtitling on television. To this end, after consultation with all the partners, the present charter on the quality of subtitling for the deaf or hard of hearing was drawn up.

Programs should be subtitled specifically for deaf and hard-of-hearing people according to the following 16 criteria.

## **FOR ALL PROGRAMS**

- 1 Respecting the meaning of speech.
- 2 Complying with the French language's spelling, grammar, and conjugation rules.
- 3 Respecting the image. Subtitles, limited to two lines for pre-recorded programs and three lines for live programs, should not conceal embedded textual information<sup>1</sup> or important elements of the image<sup>2</sup>.
- 4 Broadcasting subtitles through DTTV following the standard DVB\_Subtitling (EN 300 743), in compliance with the order regarding signals from December 24<sup>th</sup>, 2001.
- 5 Perfect readability. It is recommended to display subtitles over a black translucent band and whenever possible in letters lined in black, regardless of the network and especially on DTTV.

### FOR PRE-RECORDED STOCK PROGRAMS

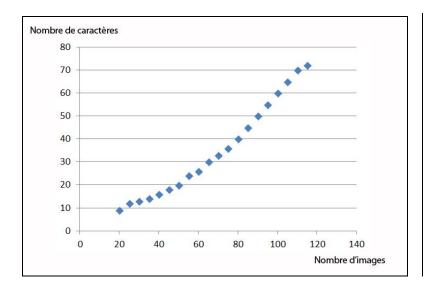
6 – Appropriate reading speed: 12 characters for one second, 20 characters for two seconds, 36 characters for three seconds, 60 characters for 4 seconds.<sup>3</sup>

Studios are encouraged to follow these criteria with a 20% tolerance margin.

<sup>&</sup>lt;sup>1</sup> Introduction of speakers, titles, definitions, credits...

<sup>&</sup>lt;sup>2</sup> The speakers' lips to allow for lipreading, visual information such as geographical maps or explanatory diagrams, etc.

<sup>&</sup>lt;sup>3</sup> One second being made up of 25 images.



Images	Caractères
20	9
25	12
30	13
35	14
40	16
45	18
50	20
55	24
60	26
65	30
70	33
75	36
80	40
85	45
90	50
95	55
100	60
105	65
110	70
115	72

- 7 Consistent use of dashes to indicate a change of speakers.
- 8 Placement of subtitles as close as possible to the audio source.
- 9 Compliance with color coding defined for subtitles:
  - White: the speaker is visible on screen (even partially);
  - Yellow: the speaker is not visible on screen (offscreen);
  - Red: sound indications;
  - Magenta: music indications and song lyrics;
  - Cyan: thoughts of characters or a narrator in fiction, off-camera commentary in news reports or documentaries;
  - Green: to indicate the use of a foreign language<sup>4</sup>.

Particularity: programs (documentaries excepted) which are entirely dubbed<sup>5</sup> should be subtitled according to this color coding and not in green.

- 10 Indicating sound 6 and music 7 information. 11 Use of parentheses to indicate whispering or dialogue spoken as an aside.
- 12 Use of uppercase when dialogue is spoken by several people (uppercase should not be used for any other reason apart from certain acronyms and initialisms).
- 13 Logical sentence breaks. When a sentence is transcribed over several subtitles, the breaks should respect units of meaning in order to make overall understanding easier8.
- 14 Following shot changes. Subtitles should be discreet and respect as much as possible the editing pace of the program.

#### FOR PROGRAMS BROADCAST LIVE OR IN LIVE CONDITIONS

<sup>&</sup>lt;sup>4</sup> If transcription in the language in question is not possible, three green dots are inserted at the left of the screen after specifying which language is spoken.

<sup>&</sup>lt;sup>5</sup> The voices of the actors reading the translation of dialogue cover the original voices.

<sup>&</sup>lt;sup>6</sup> Description of meaningful noises which cannot be deducted from the image (it is not necessary to indicate "explosion" if the explosion is visible on screen).

<sup>&</sup>lt;sup>7</sup> Transcription of French or foreign songs. By default, the singer's name and song title are specified.

<sup>&</sup>lt;sup>8</sup> Excessive or inappropriate breaks may severely compromise the correct understanding of speech. Rather than « He hates young / girls », « He hates / young girls » is to be favored.

15 – Speakers should be differentiated by indicating their names at the start of their intervention and using appropriate colors, especially when programs include exchanges between several people which may be confusing.

16 – Decreasing the gap between speech and subtitles with the aim of reducing this gap to under 10 seconds. Meaningful portions of the text should not be omitted in order to reduce the gap with the live broadcast, but they can be adapted if need be. All meaningful speech should be transcribed.

**Executed in Paris** 

On December 12, 2011.

## In the presence of:

The Minister of Culture and Communication Monsieur Fréderic MITTERRAND

The State Secretary of Solidarity and Social Cohesion Madame Marie-Anne MONTCHAMP

The Head of the Higher Council for the Audiovisual Sector (CSA) Michel BOYON

# Signatories:

For the National Union for the Social Integration of the Hearing-Impaired (UNISDA) Monsieur Cédric LORANT, Head

For the National Union of French Hearing-Impaired (FNSF) Monsieur Philippe BOYER, Head

For the French Hearing-Impaired Movement (MDSF) Monsieur René BRUNEAU, Head

For the Coordination Office of the Hearing-Impaired Associations (BUCODES) Monsieur Richard DARBERA, Head

For Médias-soustitres Madame Sophie DROUVROY, Editorial Manager

For the National Union of Parents of Hearing-Impaired Children Associations (UNAPEDA) Madame Nicole GARGAM, Head

For the Group of Audiovisual Adapters for the Hearing-Impaired (CAASEM) Monsieur Denis POUDOU, Head

For the French Association for the Information and Defense of the Orally-Expressing Hearing-Impaired (AFIDEO)

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For Teletota Monsieur Thierry FORSANS, Head

For Dubbing Brothers
Monsieur Mathieu TAIEB, Sales Manager

For Titra Film Paris and TVS Madame Isabelle FRILLEY, Managing Director

For Cinekita

Madame Madeleine KOUADIO – TIMMERMAN, Manager

For Nice Fellow Monsieur Stéphane BUHOT, Manager

For LVT

Monsieur Claude DUPUY, Manager

For Cinecim

Madame Catherine MERIC, Manager

For Imagine

Monsieur Pierre-Yves COLLIGNON, Head

For Blue Elements

Monsieur Christophe LARTILLEUX, Head

For ST'501

Monsieur Dominique POUZET, Manager

For Multimédia France Productions (MFP) Monsieur Martin AJDARI, Managing Director

Television channels

For TF1, Eurosport and LCI Monsieur Nonce PAOLINI, Managing Director

For TMC and NT1, Madame Caroline GOT, Managing Director

For France Télévisions, Monsieur Rémy PFLIMLIN, Managing Director

For Canal + Group, Monsieur Frédéric MION, Chief Administrative Officer

For M6 Group, Monsieur Nicolas de TAVERNOST, Head of the Board of Directors

For NRJ 12, Monsieur Gérard BRICE-VIRET, Executive Manager of the television hub

For Direct 8 et Direct Star, Monsieur Yannick BOLLORE, Managing Director of Bolloré Média

For BFM TV Monsieur Alain WEILL, Head

For Lagardère Active Group,
Monsieur Antoine VILLENEUVE, Managing Director of French and International Channels

For ACCeS, Monsieur Xavier SPENDER, Head