



OUTtv Network Inc.
Toronto Office
130 Merton Street, Toronto, ON M4S 1A4
647-728-4208
Vancouver Office
53 East 6th Avenue, Vancouver, BC V5T 1J3
604-874-4300 fax 604-874-4305
www.outtv.ca

FILED ELECTRONICALLY

March 26, 2015

Canadian Radio-television and
Telecommunications Commission
1 Promenade du Portage
Les Terrasses de la Chaudière
Central Building
Gatineau, Québec K1A 0N2

Attention: Nanao Kachi, Director, Social and Consumer Policy

Dear Sir or Madam:

RE: Biennial Report on Closed Captioning Accuracy Rate

1. This is the report of OUTtv Network Inc. ("OUTtv") to the Canadian Radio-television and Telecommunications Commission (the "Commission") regarding closed captioning accuracy on programming broadcast by OUTtv.

Accuracy Rate Tests – Programs Containing Live Content

2. OUTtv does not broadcast any programming containing live content, and as such, has not conducted an accuracy rate test for live content closed captioning.

Actions Taken by OUTtv to Address Issues Related to the Quality of Closed Captioning

3. OUTtv currently works with two third-party closed captioning service providers, Sync Media and Gigecast. Sync Media has been OUTtv's primary service provider since November 2014. When there is an extreme rush turnaround required for obtaining closed captioning, we also use Gigecast.

4. We spoke with both services regarding the Commission's expectation that captioning should strive for 100% accuracy. This was Sync Media's response:

"I have read a phrase where CRTC communicates that captioning should strive for 100% accuracy, but providing 100% accuracy in a real world scenario is impossible as the definition of error is very subjective. Here is a statement from what I gathered from the CRTC website:

"As indicated in Broadcasting Regulatory Policy 2011-741, the Commission considers that there is no reason why the captioning for pre-recorded programming should not accurately reflect the audio. However, the Commission is of the view that imposing a strict 100% accuracy rate, as proposed by the EN-CCWG, would be inappropriate given that even the most minor error would cause a licensee to be in non-compliance. The Commission considers that the wording set out in the Appendix will ensure that the captioning of pre-recorded programming is of high quality while allowing for unforeseen technical or other problems that can occur from time to time. The Commission expects such problems to be rare and, when they occur, to be addressed promptly. (Source: <http://www.crtc.gc.ca/eng/archive/2012/2012-362.htm>)"

In terms of the captioning industry, we have a very good system in place where each show goes through three different sets of eyes before reaching you. A transcriber transcribes the show, captioner times the show and then we have a dedicated QC department which watches the shows for errors. We believe that most of the errors are handled this way but captioning can be very subjective sometimes and specially audio for reality or talk shows can be pretty erratic.

We haven't had any complaints on accuracy from our broadcasters yet as we do strive for the 100% mark."

5. The following is an excerpt from a letter provided by Gigecast in response to our request that they provide an explanation of the steps they take to ensure the highest quality captions:

"From the point that the video asset is received from our clients, the video is checked for integrity and continuity. The asset is then sent to be transcribed. The transcription is completed and then the transcription file is QC'd by a different transcriptionist for the following: words per minute, formatting, timing and content.

The asset and transcription then moves to be captioned. The captioning is completed and then another QC check is completed by a different closed caption specialist for the following: words per minute, formatting, timing, content, graphic, and frame rate (as that can differ occasionally from client to client).

As a final check, we have a supervisor perform one final QC check for the following items before it is sent off to the client: words per minute, formatting, timing, content, graphic and frame rate..."

6. In addition to the steps taken by our closed captioning service providers, a further check is done at OUTtv's master control facility, BlueAnt MCR, as follows:

"Every closed captioning file receives a QC spot check from a BlueAnt MCR op before it is passed for broadcast. Furthermore, our linear feed is monitored 24/7 by MCR ops, and any closed captioning errors are logged and noted for us in the daily DDR."

Number of Complaints Related to Closed Captioning Quality Since 2012

7. OUTtv has received three complaints from one individual since September 2012 regarding the quality of closed captioning. The same individual has complained to OUTtv about spelling errors in our e-newsletter and BDU-related technical issues that are beyond OUTtv's control. The complainant is not a member of the deaf community, promotes himself as an accessibility expert, and has over the years repeatedly tried to convince OUTtv that he should be the closed captioning service provider for OUTtv.

8. Two of the complaints related to programming closed captioned by Gigecast, a company that the complainant appears to have a great personal animus against. One of these two issues was related to an audio problem in the program file itself, and was not the fault of Gigecast.

9. The third complaint related to a program that was delivered to us already closed captioned by the producer.

10. The last complaint regarding closed captioning quality that OUTtv received was in November 2014.

Conclusion

11. OUTtv takes its obligation to provide accurate closed captioning for all programming broadcast on the service very seriously. We work hard with our closed captioning partners and master control service provider to meet the 100% accuracy rate expected by the Commission. There may occasionally be errors, but we try to avoid them wherever possible.

12. Over the last four years we made changes that resulted in the following increases in programming aired with closed captioning:

From 2011 to 2012 – we increased the amount of on-air captioning by 69%

From 2012 to 2013 - we increased the amount of on-air captioning by 224%
From 2013 to 2014 - we increased the amount of on-air captioning by another 20%


From 2011 to 2014 we increased the amount of on-air captioning by 560%

13. We are now working on providing closed captioning for all our interstitial material, and are putting steps in place to ensure that all our promos are aired with closed captioning in 2016 onwards, if not before. We are also working with advertisers to ensure that all advertising material contains closed captioning.

14. If you require any further information, please do not hesitate to contact us at any time.

Yours truly,

OUTtv NETWORK INC.

A handwritten signature in black ink, appearing to be 'Brad Danks', with a large, stylized initial 'B' and a long horizontal stroke extending to the right.

Brad Danks
Chief Operating Officer