



TELUS
215 Slater Street, 8th Floor
Ottawa, Ontario
Canada K1P 0A6

www.TELUS.com

Ann Mainville-Neeson, LL.B.
Vice President, Broadcasting Policy and Regulatory Affairs

613 597 8308 Telephone
ann.mainville-neeson@telus.com

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Filed via GCKey

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 Report

Dear Mr. Kachi,

This is further to your letter of February 20, 2015, in which you noted that TELUS missed its first biennial report on Quality standards for English-language closed captioning, which was due August 31, 2014.

During the period in question, TELUS did not provide any live programming and accordingly, did not consider that the reporting requirement was applicable to TELUS. However, TELUS is pleased to provide the following information.

As requested, TELUS has included each question in bold, followed by TELUS' reply.

Your report should include an overview of the licensee's 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 undertaking. 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, 2014. 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 a majority and growing percentage of both original licensee-produced and access programming community programming is closed captioned.¹

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 99.999%. And in our French-language community programming (distributed to Optik TV subscribers in our Quebec serving areas), TELUS has calculated an accuracy rate of 99.8%. 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 100%.

The report should also highlight in detail the actions taken to address issues related to the quality of closed captioning, in particular with respect to the improvement of accuracy rate, and what investments have been made in both personnel and infrastructure.

In January 2010 TELUS installed an automated system that confirms that a valid closed captioning stream is included in each on-demand file. TELUS also performs frequent manual inspections on the captioning and deals with any issues brought to its attention on a case-by-case basis.

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 Vision Globale, Vubiquity and Technicolor to provide closed captioning. Each third-party company is confirmed to be using the current closed captioning quality standards, and targets 100% accuracy for all programming.

TELUS recently implemented new features for the display of closed captioning. Optik TV subscribers can now change the background and font of closed captioning, including text and background colour and opacity level and character size.

Commission staff also request that you include in your report the number of complaints received with respect to closed-captioning quality since September 2012, the main concerns raised in these complaints and the number of individuals who submitted a complaint.

TELUS has received complaints regarding closed captioning quality from four individual Optik TV subscribers since September 2012.

- The same individual is responsible for numerous complaints between October 2012 and August 2013 regarding one particular issue which Commission staff determined to have

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, TELUS is working to ensure that 100% of both licensee-produced and access programming is closed captioned in this timeframe as well.

been solved in October 2012 as a result of TELUS' efforts.² Specifically, between 2011 and 2012, TELUS experienced intermittent closed captioning errors due to software problems. The issue took some time to resolve as it required considerable effort between TELUS and Microsoft to reproduce the error described by the complainant. In October 2012, TELUS deployed a software release which solved these intermittent errors.

- A complaint was also filed with respect to the loss of captioning which occurred when the viewer clicked-through to an interactive application ("app") from the Weather Network linear channel. Doing so would reset the viewer's closed captioning settings for all channels. TELUS took immediate steps to correct this situation, re-set the subscriber's set top box remotely, and followed up with a technician's visit to assist the customer in resetting her preferred captioning options.
- In another complaint, a customer was seeing incorrect and garbled captions on the French-language Vancouver SRC channel. TELUS was able to identify the error as a unique issue with this specific channel and how our head-end equipment decodes the programming. Once identified, TELUS was able to install a new device which did not impair the captioning, thus solving the issue.
- Finally, TELUS received a complaint with respect to additional CBC coverage of the 2014 Winter Olympics that Optik TV made available through its set top box. TELUS provided access to the live CBC raw feeds which were otherwise only available on the CBC website. This enormous amount of raw content was not captioned. This complaint was received from the same primary complainant of TELUS' intermittent captioning problem described above.

Sincerely,



Ann Mainville-Neeson

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² On August 8th, 2013, TELUS staff determined that TELUS was passing through closed captioning, unaltered; which is consistent with the *Broadcasting Distribution Regulations*. As such, Commission staff considered no further action required.