

Closed Captioning Quality Requirements

In 2014, the FCC issued clear standards for closed captioning quality, to which both broadcast and IP video captions will be held. It is the video producer's responsibility to ensure that closed captions meet quality standards at the time they are delivered to the distributor.

Caption quality is assessed on four factors: **accuracy, timing, completeness, and placement.**^{xi}

FCC Rules for Caption Accuracy

The FCC states, "In order to be accurate, captions must match the spoken words in the dialogue, in their original language (English or Spanish), to the fullest extent possible and include full lyrics when provided on the audio track."

Specifically, they require captions to include all words spoken in the order spoken (i.e., no paraphrasing).

Captions must use proper spelling, spacing between words,

YouTube's automatic captions are not accurate enough to meet CVAA standards

capitalization, and punctuation.

Accurate captions must also convey the tone of the speaker's voice and intent of the content.

The goal here is for captions to maintain the impact of the performance so that the overall message is not lost on the viewer.

Captions of essential nonverbal information (sound effects, music playing, audience reactions, who is speaking) must be provided if they are to be considered accurate.



FCC Rules for Caption Synchronicity

The FCC states, "In order to be synchronous, captions must coincide with their corresponding spoken words and sounds to the greatest extent possible." Captions must display at a speed that can be reasonably read by viewers. And, if a program is edited for rebroadcast, captions must be reformatted to provide accurate synchronization.

FCC Rules for Program Completeness

The FCC states, "In order for a program's captions to be complete, captions must run from the beginning to the end of the program, to the fullest extent possible."

Consumers have complained that captions drop off in the middle or before the end of programming. Now, any program that does not include captions up to its conclusion will be in violation of these standards.

FCC Rules for Caption Placement

In response to complaints that some captions obscure important information, the FCC states that “captions should not block other important visual content on the screen including, but not limited to, character faces, featured text (e.g., weather or other news updates, graphics and credits), and other information that is essential to understanding a program’s content when the closed captioning feature is activated.”

For example, if you are watching a documentary and there is text in the bottom of the screen that states who the speaker is and what their profession is, closed captioning cannot be placed over this text, as it would obscure the information. Instead, that caption frame should be placed at the top of the screen (see below).



The new guidelines go on to require that captions not run off the edge of the screen and that the text be sized appropriately for legibility.

Caption Style and End-User Control

The FCC embraced the Video Programming Accessibility Advisory Committee’s (VPAAC) suggested presentation format for closed captioning, requiring the following end-user controls:^{xii}

- ▶ Font size
- ▶ Font style
- ▶ Character color
- ▶ Opacity
- ▶ Edge attributes
- ▶ Caption background
- ▶ Language selection
- ▶ Preview/setting retention

Caption Formats

The SMPTE-TT (Society of Motion Picture and Television Engineers Timed Text) caption format is a “safe harbor interchange and delivery format.”^{xiii} The FCC adopted this format as the preferred IP-delivery caption format in order to minimize the need to produce multiple formats and potentially re-caption content.

SMPTE-TT is not required, but recommended by the FCC. Devices that support SMPTE-TT are in compliance in regard to functionality.

Conclusion

The laws governing Internet video accessibility have arrived. Video owners and distributors are now required to provide an equivalent experience for the millions of people who are deaf or hard-of-hearing, much like TV broadcasters had to do in the 1980s.

The CVAA has been phased in over time to allow video producers and distributors time to implement these accommodations. It's up to the FCC to enforce closed captioning regulations for broadcast-turned-digital video.

Endnotes

ⁱ "Captioning of Internet Video Programming," Federal Communications Commission, accessed November 12, 2013, <http://www.fcc.gov/guides/captioning-internet-video-programming>

ⁱⁱ "FCC Sets Deadlines for Internet Captioning," *ClosedCaptioning.net Blog*, April 3, 2012, <http://www.closedcaptioning.net/webcasting/deadlines-for-ip>

ⁱⁱⁱ <http://www.pewresearch.org/fact-tank/2017/09/13/about-6-in-10-young-adults-in-u-s-primarily-use-online-streaming-to-watch-tv/>

^{iv} Lerman Senter, "FCC Adopts Closed Captioning Rules for Video Programming Delivered Via Internet Protocol," *Martindale Legal Library*, February 29, 2012, http://www.martindale.com/internet-e-commerce/article_Lerman-Senter-PLLC_1459200.htm

^v "Captioning of Internet Programming," *Federal Communications Commission*, October 3, 2017, <https://www.fcc.gov/consumers/guides/captioning-internet-video-programming>

^{vi} "Closed Captioning of Internet Protocol-Delivered Video Programming," Federal Communication Commission, accessed November 12, 2013, <http://www.fcc.gov/document/closed-captioning-internet-protocol-delivered-video-programming>

^{vii} <http://www.3playmedia.com/2016/05/25/rethinking-how-we-use-closed-captioning-in-education/>

^{viii} <https://dcmp.org/caai/nadh219.pdf>

^{ix} Karen Peltz Strauss, "How the FCC is Implementing the CVAA," *Hearing Loss Association of America*, June 22, 2012, http://www.hearingloss.org/sites/default/files/docs/KStrauss_friday.pdf

^x <http://www.3playmedia.com/2016/02/19/fcc-implicates-video-programmers-in-new-captioning-rules/>

^{xi} <http://www.3playmedia.com/2014/04/03/fccs-new-quality-standards-closed-captioning-video-programming/>

^{xii} Maria T. Browne, Brendan Holland, and Ronald G. London, "FCC Adopts Closed Captioning Rules for Online Video Programming," *Davis, Wright, Tremaine LLP Blog*, January 17, 2012, <http://www.dwt.com/FCC-Adopts-Closed-Captioning-Rules-for-Online-Video-Programming-01-17-2012/>

^{xiii} "SMPTE Standard: Timed Text Format," SMPTE.org, accessed November 12, <https://www.smpte.org/sites/default/files/st2052-1-2010.pdf>

About 3Play Media

3Play Media provides closed captioning, transcription, and audio description to more than 2,300 customers in higher education, enterprise, entertainment, and government. 3Play Media simplifies the process of making videos accessible through flexible APIs, integrations with video players and platforms, simple plugins, and a user-friendly online account system. 3Play Media is based in Boston, MA and has been operating since 2007.

