

Advertising Guidance Note no. 1

Broadcast Committee of Advertising Practice (BCAP)

On-screen text and subtitling in television advertisements



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BCAP Advertising Standards Code rule 3.11
1. Applicability of Guidelines



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- a. The principal target of these Guidelines is 'supers'. This is a term of art strictly applying to text superimposed onto advertisements to provide additional information, usually because it is required to be there for legal or regulatory purposes (the 'small print'). Typically the prominence of such text is minimised because it forms no part of what the advertiser wants most to say.
- b. These Guidelines apply to all text on screen which states significant limitations, qualifications or other information that is likely to affect a viewer's transactional decision. For the purposes of these Guidelines, text includes numbers.
- c. These Guidelines do not apply to text or videotext services or, with the exception of Article 10, to subtitling.
- d. These Guidelines do not apply to statements about copyright or other statements included to assert intellectual property rights.

2. General principles

- a. The principal offer and any important qualifications to it should not normally appear only in the form of superimposed text.

Note: *This does not preclude the use of text as the only or the primary vehicle for the selling message. However, where for creative reasons an advertiser chooses to use text in this way it must comply with the minimum standards contained in these Guidelines.*

Superimposed text may be used to expand or clarify an offer or to make minor qualifications. It may also be used to resolve minor ambiguities. Superimposed text that flatly contradicts a claim made elsewhere in the advertisement is not acceptable.

- c. Rule 3.11 of the advertising Code requires that qualifying information 'must be presented clearly' and refers television broadcasters to this note to help them to ensure the superimposed text complies with the rule. The aim is to achieve a standard of legibility that will enable an interested viewer, who makes some positive effort, to read all text messages. Sections 4 to 8 below indicate the minimum standards with which relevant text must comply.

3. Amount and communicability of text

- a. In the interests of clarity of communication to viewers, text in conventional television advertising should be kept to a minimum. Where messages are long, complicated or obscurely expressed it will be unrealistic to expect viewers to be able to absorb them, even if the text does otherwise meet the technical requirements in these guidelines. In such cases the ASA may still conclude that the advertisement, taken as a whole, does not comply with the Code.
- b. Broadcasters should accordingly use their judgement to identify and challenge any proposed text that appears excessively long, obscure or complex. They should seek appropriate

improvements e.g. modification of basic copy to reduce the need for qualifications in text, breaking messages down to shorter, more reader-friendly chunks, and the elimination of language that is not simple and direct or material which serves no essential purpose but might detract from more important text. For additional guidance on complexity of text, see Guideline 9 II below.

4. Size of text

Text size is the vertical height of the text measured in terms of the number of television lines it occupies. There is at present no generally accepted standard for measuring character size on character generators and where monitoring is necessary the TV lines must therefore be physically counted. (See Appendix 2).

Note: Regulatory judgements on text size will be made as far as possible on the advertisement as transmitted and thus as seen by the viewer. In checking text size pre-transmission, allowance must therefore be made for any picture compression effects arising from wide screen formats. In practice this means that, where transmission is likely to be in the 'letterbox' format, tapes of commercials where text height is to be measured should be pre-letterboxed.

a. Text must be in lower-case with upper-case used only where normal for punctuation and in words or abbreviations commonly capitalised

Note: 4a does not apply where text is required to be in some other specified form. These circumstances are likely to be limited to either a legal requirement (eg by reason of a statutory regulation) or to comply with the rules of a self-regulatory body (eg a financial services regulator).

b. The preferred minimum heights of on-screen text in TV advertisements made in different formats are given in the table.

	4:3 aspect ratio	16:9 aspect ratio	
	Standard Definition Television (SDTV) format	SDTV format	1080-line High Definition Television (HDTV) format ¹
Preferred minimum text height	14 lines	16 lines	30 lines
Minimum text height (when placed on an opaque single-coloured block with a clear margin all around the text)	12 lines	14 lines	26 lines

1 30 HDTV lines are proportionally equivalent to 16 SDTV lines, based on the calculation $(16 \div 576) \times 1080 = 30$. 26 HDTV lines are proportionally equivalent to 14 SDTV lines, based on the calculation $(14 \div 576) \times 1080 = 26.25$, rounded down to 26. Those calculations are based on viewing an HDTV set with 1080 horizontal lines; regardless of the HDTV format in which an advertisement is made, character heights should reflect the heights quoted in the table when the picture is scaled to 1080 lines.

BCAP will consider reducing the preferred text height for advertisements made in widescreen format by 2 SDTV lines, or 4 HDTV lines, when evidence suggests that pre-transmission picture height (measured in TV lines) equates to post-transmission picture height for the overwhelming majority of viewers.

Note: *The minimum height of 14 lines for advertisements made in SDTV widescreen format, 12 lines for advertisements made in 4:3 SDTV format and 26 lines in HDTV format stipulated in 4b does not apply to text excluded under 5e below.*

c. Where the typeface, letter spacing, line spacing, background or other element of presentation, including interaction with the background, renders the text blurred or otherwise indistinct, it must be placed on an opaque single-coloured block with a clear margin all round the text, or otherwise amended. (See also Article 9Ib)

Notes: *i) To achieve the 'clear margin' referred to in 4b&c it is unlikely that anything less than 6 lines above and below the text will be adequate. A sensible approximation of 6 vertical lines must be shown horizontally at the ends of the block. ii) Shading or edging of individual letters or words is not an acceptable alternative to the use of blocks. (See also Article 9Ih).*

d. Line height of upper or lower case letters is measured where possible using flat-topped letters such as 'v', 'w' or 'x'. In letters with risers or descenders (eg lower case 'd' or 'p') the risers and descenders do not count for the purposes of measuring line height. Letters curved at top and bottom (eg 'c', 'e' or 'o') should not be used as the measure of line height.

e. In measuring line height only the full strength lines are counted.

Note: *For the purposes of 4e, note that some text is for aesthetic reasons given what may be described as a 'bevelled' edge where the individual letters tail off rather than have a sharply defined edge. There is also a technical device applied to some material that seeks to minimise the flicker that is a feature of the television system (known as 'anti-aliasing'). Round-topped letters such as 'o' can often give a similar effect. In all these cases the effect is to produce television lines at the top and/or bottom of letters that are noticeably weaker and less distinct than the rest of the letter (they are shown at 'lower amplitude'). For the purposes of calculating line height these lower amplitude lines are disregarded.*

General Note:

The above standard is also predicated on the use of European text where word recognition is to a significant extent influenced by the recognition of exterior word and letter shapes. BCAP is aware that in pictographic and ideographic languages some information is contained within the individual characters. This suggests that for such languages text size should probably be greater. However, in the absence of any knowledge of research in this area no firm guidance on the amount by which size should be increased can be offered. A rule of thumb judgement, based on looking at dual language texts in print, suggests that an increase of two SDTV lines (for a standard of 16 lines and a minimum of 14 for 4:3 SDTV format and a standard of 18 lines and a minimum of 16 lines for 16:9 SDTV format) and an increase of four HDTV lines (for a standard of 34 lines and a minimum of 30 lines) would suffice.

5. Duration of hold

- a. Text must be held for a duration calculated at the rate of 5 words per second, (i.e. 0.2 seconds per word) plus:
- b. Where the text concerned contains 10 words or more, an additional 'recognition period' of 3 seconds must be added, or 2 seconds if the text contains 9 words or less. See Appendix 1 for a table of hold durations. (But see also Guideline 9IIdi below)
- c. Except as specified in 5e below, for the purposes of calculating the duration of hold all text on screen at any one time will be counted, regardless of where on screen it appears and whether or not it is repeated in audio.
- d. To calculate the appropriate duration for text which rolls or scrolls across the screen, first determine the total number of seconds the caption would need to be held if it was a static caption. The moving caption should take this amount of time to move across the screen, at a steady and even rate.
- e. The following text need not be included in the calculation of duration of hold:
 - i) a company name, brand name or logo; ii) text that is included for reasons of a purely technical legal nature unrelated to consumer protection or the offer (in practice this will almost always apply only to film and video trailer credits and to copyright disclaimers or the like); iii) text that is purely incidental to the advertisement and of such a kind that viewers will be unlikely to believe contains information (e.g. text on packaging where this is not being used to convey any part of the claim or offer).

6. Treatment of numbers

- a. Long numbers should usually be presented on screen according to relevant conventions, eg telephone numbers (xxx-xxxx; xxx-xxx-xxxx) or other long numbers in groups of three (10,000; 100,000).
- b. For the purposes of calculating the duration of hold, numbers should be treated as though they were pronounced as words. Where an obvious and generally recognised short form of vocalising numbers exists, this may be used for the purposes of calculation. It will not usually be necessary to count 'thousand/s', 'hundred/s', or the conjunction 'and' as separate words in a number string.

Example: '1,255' in colloquial speech can be vocalised as 'twelve [hundred and] fifty-five' and a word count of three would be acceptable.

7. Signs and abbreviations

- a. Abstract signs such as '£' or '%' or decimal point, in numbers or prices, need not be counted.
- b. Email, internet and web addresses, and common abbreviations such as 'APR', 'RRP', 'FSA' or 'PO Box' etc, will usually count as one word.
- c. Postcodes in addresses may be counted as one word per group of letters and numbers only where an otherwise full address is given.

8. Position of text on the screen

Text positioned so that it is likely to be wholly or partially obscured or distorted at any edge of the picture area of any domestic television set is unacceptable. Text must therefore be positioned within the 'safe text area' of the screen. Particular care must be taken with widescreen formats. (See Note ii) below)

Note: i) A definition of 'safe text area' is currently being reviewed by broadcasters but is generally accepted to be a slightly smaller central screen area than the 'safe picture area'. ii) During the long-term transition from the existing 4:3 (ie 12:9) television ratio to the 'widescreen' 16:9 ratio, material for transmission is being produced by framing the picture on an intermediate 14:9 standard in order to minimise the black edge effects when widescreen material is displayed on 4:3 domestic television sets, and vice versa. The effect is to move the outer edges of the safe text area slightly towards the centre of the screen. Text must be placed with this intermediate 14:9 aspect ratio in mind. iii) Further guidance on aspect ratios and the transition to 16:9 is available from the Ofcom Television Licensing and Planning Group.

9. Additional factors

The following points are also important for achieving clearly legible and comprehensible text. Departure from these principles will not automatically make an advertisement unacceptable but may be taken into account if there is doubt about the standard achieved.

I: Legibility

- a. The contrast between text and its background, whether in terms of colour contrast or relative

brightness, must be sufficient to permit the text to be clearly legible.

b. Where the background to text may be distracting (eg when it is moving or cuts from one view to another) it will normally be necessary to place the text on an opaque single-coloured block.

c. Certain colour combinations are unlikely to produce readable text and should be avoided. (See Appendix 3). Note also that the PAL television system tends to give coloured text a 'fuzzy' edge and that the use of coloured text, particularly against certain other coloured backgrounds, needs to be treated with care.

d. Ornate, heavily serified, italic typefaces and the like should be avoided.

e. The visible space between words should be greater than the visible space between letters and the visible space between lines should be greater than the visible space between words. For this reason fully justified and proportional text should not be used.

f. Fading text in and out of vision should be used sparingly. The text will by definition be at less than optimum visibility and brightness or contrast for a part of its time on screen and in marginal cases only the time when it is at optimum will be counted.

g. Text shown sideways, at an angle or distorted in any way, such as by being wrapped round a real or virtual object in the commercial, should be avoided.

h. Individual letters are sometimes 'edged' to make them stand out from the background. However, applying edging to small type can sometimes have the opposite effect and result in blurring. A similar problem can occur when applying shadow effects to type. These effects should be used sparingly and with care. Edging or shadow effects are not acceptable as substitutes for background blocks as required under 4c above.

II: Comprehension

Complexity is a significant bar to the understanding of on-screen text.

There are two kinds of complexity, that of the offer itself and the way the offer is presented. The two elements are closely related but these guidelines are targeted primarily at the second, the communication of the message.

The following guidance indicates the kinds of things Ofcom licensees should consider when assessing text in advertisements submitted for approval.

a. Licensees should not accept without further question any advertiser's assertion that specific text is legally required. In BCAP's experience this is by no means always the case and advertisers' legal advisors may sometimes be excessively cautious.

b. Where the background to text may be distracting (eg when it is moving or cuts from one view to another) it will normally be necessary to place the text on an opaque single-coloured block.

c. Certain colour combinations are unlikely to produce readable text and should be avoided. (See Appendix 3). Note also that the PAL television system tends to give coloured text a 'fuzzy' edge and that the use of coloured text, particularly against certain other coloured backgrounds,

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a. Licensees should not accept without further question any advertiser's assertion that specific text is legally required. In BCAP's experience this is by no means always the case and advertisers' legal advisors may sometimes be excessively cautious.

b. Some **types of word to be avoided** as far as possible because they are not quickly recognisable and are therefore processed slowly are:

unfamiliar words;
jargon words;
'legal' words;
long words;
abbreviations;
proper nouns.

c. **Sentence structure** is another key element. Sentences should be:

short: contained on one line.
simple containing one key idea;
no subordinate phrases or clauses;
no jargon or legalistic phrases.

d. **Length of text** is the third key element.

i) Large blocks of text are likely to deter a viewer from even attempting to read the contents. As a rule of thumb any text that takes up more than three full-length lines is likely to require higher than the minimum standards for both size and duration of hold. In such cases the ASA and BCAP may require a minimum size of at least 16 lines and a hold duration of at least 4 words per second in addition to the recognition period. Placing the text on a mono-coloured block might be an alternative or additional remedy in cases where the type of background did not already indicate this.

ii) In reducing the amount of text whole sections should be considered for removal before individual words. The removal of individual words can often make text difficult to read because it becomes fragmented. Thus a longer text that is a proper sentence with all the words in place can sometimes communicate better and more quickly than a shorter text with words removed.

e. The **layout of text** is a fourth key element. Where large amounts of text are unavoidable, the way it is presented on screen can help viewers to read it.

i) Within blocks of text, line endings should coincide with the ends of sentences or phrases.

ii) Separate captions should be placed as close as practicable to that part of the advertisement to which they refer.

Where a qualifying text is divorced from the claim it qualifies (eg where the super is at the beginning and the claim at the end of the advertisement) the ASA may consider this as a material factor in determining the acceptability of the advertising.

10. Subtitles

The following additional points should be borne in mind when advertisements are to be subtitled in the form of text for the hard of hearing accessed through page 888 on the public teletext service.

a. When positioning subtitling on the screen care must be taken to avoid obscuring any visual, including other forms of text, that is material to the offer.

b. Care should be taken in paraphrasing the audio for text transmission that no essential consumer protection or information material is lost or any misleading impression given relating to the offer.

Note: Further guidance on the use of subtitling is available from the Ofcom Television Licensing and Planning Group.

Appendix 1: Duration of hold

See paragraphs 5a & b of the Guidelines.

'Short' (9 words or fewer) captions:

0.2 seconds per word plus 2 seconds recognition time.

Number of words/Duration in seconds, inclusive of recognition time.

1 / 2.2	6 / 3.2
2 / 2.4	7 / 3.4
3 / 2.6	8 / 3.6
4 / 2.8	9 / 3.8
5 / 3.0	

'Long' (10 words or more) captions:

0.2 seconds per word plus 3 seconds recognition time.

Number of words/Duration in seconds, inclusive of recognition time.

10 / 5.0	21 / 7.2
11 / 5.2	22 / 7.4
12 / 5.4	23 / 7.6
13 / 5.6	24 / 7.8
14 / 5.8	25 / 8.0
15 / 6.0	26 / 8.2
16 / 6.2	27 / 8.4
17 / 6.4	28 / 8.6
18 / 6.6	29 / 8.8
19 / 6.8	30 / 9.0
20 / 7.0	etc

Appendix 2: Method of determining line height (See Section 4 of the Guidelines)

It is expected that agencies and production companies will, as these size requirements become widely known and adopted, calibrate their equipment to produce the required height automatically. However, licensees or their representatives will need to have the means to measure text themselves. There will be more than one way of doing this but the following has been found to work well in practice using standard PC equipment in conjunction with facilities common to many edit suites.

First capture the text to be measured in a frame store.

Second convert that image to an uncompressed graphics file.

Third use 'paint' software to zoom in on the image to the point where individual pixels can be clearly seen. Note that the image should not be re-sampled or re-sized as this will result in errors.

Finally simply count the number of TV lines displayed. For example, for a white caption on a dark background, count the number of vertical lines of full brightness pixels.

Above is an example of a text image captured using the above method. Note that the original was white text on a black background and this has been reversed. In this configuration, those segments of the letters containing the darkest pixels represent the lines at maximum brightness. Each horizontal line of pixels represents a television line. To calculate the line height, simply count the number of vertical lines containing the darkest pixels, using where possible flat-topped letters (eg 'i', 'x'). Although when printed there are variations in the density of individual pixels even within the main body of the letters it is a fairly simple matter to identify the upper and lower horizontal boundaries. Where no flat-topped letters are available, ignore any risers (eg 'h' and 't') and descenders (eg 'g') and the top and bottom lines of rounded letters (eg 'g', 'h', 'e'). (See the Note to Article 4). Note how this example demonstrates that the tops and bottoms of rounded letters fall outside the maximum brightness vertical height of flat-topped letters. The example is of text 14 lines high; however the same method can be used to check that on-screen text complies with the 16-line standard (for 16:9 SDTV format) and 30-line standard (for 1080-line HDTV format).

Note that if the pattern of pixels making up the letters is not easily identifiable against the background this probably indicates that the relative contrast between text and background is insufficient. The text probably needs to be placed on a block.

Appendix 3: Text/background legibility effects

See paragraph 9c of the Guidelines.

(i) Certain colour combinations have been found to make text difficult to read and so should be **avoided**.

Character colour	Backgrounds
White	Yellow
Yellow	White, Cyan
Cyan	Green, Yellow
Green	Cyan, Blue
Magenta	Red
Red	Magenta (green)
Blue	Black

(ii) Other combinations have been found to be **acceptable**.

Character colour	Backgrounds
White	Magenta, Red, Green, Blue, Black
Yellow	Blue
Cyan	Blue
Green	Yellow, White
Magenta	Blue, White
Red	White, Yellow, Cyan (green)
Blue	White

Note: *Black on white is a combination hitherto used quite successfully in television advertising although the current research indicates that it is not an ideal combination.*

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