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**Subtitles as a measure of ensuring the accessibility of digital media content**

Over the past few years, the number of platforms and programs available to deaf and hard of hearing people has increased. However, a number of factors can be identified that impede the correct implementation and full use of the subtitling system. Measures to imrove the situation are considered (and will be presented) in the report.

Keywords: media, subtitles, media content, accessibility, digital media.

In September 2020, the Government of the Russian Federation approved the Regulations on Licensing Television Broadcasting and Radio Broadcasting [1], according to which the licensee-broadcaster of a TV channel is obliged to ensure the availability of media products for "hearing-impaired" "in the amount of at least 5% of the broadcast volume per week (excluding live television programs)" [2].

This provision can theoretically be attributed to measures to ensure access to information for deaf and hard of hearing people; however, there are currently a number of problems in Russia that prevent deaf and hard of hearing Russians from receiving complete and up-to-date information from the media. Thus, many important media reports on the topic of coronavirus were not accompanied neither by translation into Russian sign language nor subtitles [3], even though some messages on this topic (including addresses from top officials) can be classified as emergency. For example, the President’s first video address in connection with the spread of the coronavirus infection (which was shown on television on March 25, 2020) was not accompanied by a translation into Russian sign language. The translation was made by volunteers, a video with the translation of the President's address into Russian Sign Language was published on the website of the All-Russian Society of the Deaf on April 02, 2020.

On the one hand, over the past few years, the number of platforms and programs available to deaf and hard of hearing people has increased. On the other hand, a number of factors can be identified that impede the correct implementation and full use of the subtitling system:

1) analysis of the practice of arbitration courts shows that the violation under Art. 31 of the Mass Media Law [3], committed for the first time, in most cases considered as insignificant, and the court does not find there a threat to public interests; thus, the courts classify these offenses as minor, applying a sanction in the form of a warning (broadcasting is not stopped);

2) the rules on mandatory subtitling are not applicable to online platforms; in this regard, online platforms do not bear legal responsibility for the lack of adapted content;

3) the broadcaster decides which television programs to adapt. This is disputable practice since in this situation the interests of deaf and hard of hearing viewers may not be taken into account;

4) the process of implementing and configuring the operation of subtitles has its own specifics (today there are a large number of standards and delivery technologies, devices may or may not support certain technologies), existing regulatory legal acts do not cover all issues related to the compatibility of various standards, technologies and devices; probably, the use of international standards by TV channels can partially improve the situation.

It should not be forgotten that an alternative way to adapt television content could be translation into Russian Sign Language, which is the official language used by deaf and hard of hearing Russians [4]. Despite this, the proportion of content adapted using Russian sign language on Russian TV channels is still negligible.

So, the analysis of various situations allows us to draw the following conclusions:

− not all broadcasters are interested in adapting television content for deaf and hard of hearing people;

− legal mechanisms, that would regulate the introduction of subtitling by online platforms, have not yet been developed;

− the interests of deaf and hard of hearing viewers in relation to the choice of programs for subtitling are practically not taken into account.

It seems to us that one of the measures to improve the current situation could be state support for those TV channels and online platforms that are actively introducing a system of subtitling and/or translation of content into Russian sign language.

References:

1. Decree of the Government of the Russian Federation of September 23, 2020 No. 1529 “On licensing television broadcasting and radio broadcasting” (together with the “Regulation on licensing television broadcasting and radio broadcasting”) // ConsultantPlus. Published on September 28, 2020 on the official Internet portal of legal information. URL: <http://www.pravo.gov.ru>.

2. In accordance with subparagraph l) of paragraph 4 of this Resolution.

3. Law of the Russian Federation of December 27, 1991 No 2124-1 (as amended on July 1, 2021) “On the Mass Media” (as amended and supplemented, effective from August 1, 2021).

4. Changes have been made to the law on the social protection of the disabled. URL: <http://kremlin.ru/events/president/news/17244> (date of access: 10/30/2021).