

Recommendation of the Federal Communications Commission
Disability Advisory Committee
Audio Description Quality Working Group
Adopted: October 14, 2020

WHEREAS, audio description is a tool to provide access to visual information by means of a verbal representation of visual elements in a video program for audience members who are blind or have a visual impairment, and;

WHEREAS, the Disability Advisory Committee, content creators, and description producers recognize the benefits of involving audio description consumers who are blind or have a visual impairment in the audio description process as consultants on the development of descriptive language, as voice talents, and as audio editors, and;

WHEREAS, the Commission has rules requiring audio description (referred to as video description in the Commission's rules), and;

WHEREAS, the Disability Advisory Committee supports continued improvement of audio descriptions, such as ongoing training, industry education, technology innovation, and efforts to respond to consumer feedback, and

WHEREAS, in its proceeding re-instating the audio description rules, the Commission acknowledged both the potential benefits and the challenges in composing and enforcing audio description quality rules, and;

WHEREAS, concerns have been raised regarding whether audio description quality standards are consistent with the First Amendment to the US Constitution, as the FCC inquired in the March 2011 NPRM, "Does the Commission have authority to adopt such standards and could we do so consistent with the First Amendment?" (*Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Docket No. 11-43*), and;

WHEREAS, the Commission has tasked the DAC with developing guidance on best practices regarding the universal tenets of the composition of audio description.

NOW, THEREFORE, IT IS RECOMMENDED that the FCC make available upon request, and place on the audio description page of its web site, the document attached hereto as Appendix A, which provides a summary of the various considerations taken into account in the development of high-quality audio description.

APPENDIX A

**Resources and Guidance Regarding
the Composition of Audio Description
Created by the Disability Advisory Committee**

Audio description is a tool to provide access to visual information by means of a verbal representation of visual elements in a video program for audience members who are blind or have a visual impairment. Audio description often cannot convey all of the visual information included in each scene of a video program; therefore, content creators and audio describers necessarily make choices to prioritize the information ultimately included in the description. Those choices seek to convey the intent of the program's creator with the goal of providing audiences description that illustrates the visual elements of a story in a manner that provides a comparable experience to that of sighted viewers.

Background

Audio description is well-established and there are many existing excellent resources and guidelines that have been developed with input from content creators, individuals with vision loss and others around the world. Many content creators and audio describers reference these existing resources to produce quality descriptions.

Experienced providers of audio description have an understanding of how to convey visual information with language and how to prioritize which information is most critical for the intended audience. Content creators and program distributors often benefit from the knowledge that audio description professionals possess about the information access needs of the audience for audio description. However, content creators have the discretion and final authority over the content of audio description just as they retain control over all other aspects of their creative work, consistent with the First Amendment.

This document is intended to serve as a resource and provide an understanding of the decisions and strategies that are commonly employed in audio description to convey access to visual information. This document is not intended by the DAC to serve as the basis for any rules, directives or requirements on industry for the composition of audio description. The intent is to provide a deeper understanding of factors that may be taken into consideration in the creation of audio description. It is important to note that not all of the practices discussed below will be followed in every use case, and some may be technically infeasible in certain circumstances. Content that appears in one format on one distribution platform may not be capable of incorporating all of the same features or factors when that content is available on a different distribution platform (for instance, a program can appear on television via broadcast or cable and also online via an online streaming service).

The DAC acknowledges the following existing sources referenced in the development of this document:

- a. [The Accessible Content Best Practices for Digital Environments, Media Access Canada](#)

- b. Description Key for Educational Media, Described and Captioned Media Program with support from the American Foundation for the Blind
- c. *The Visual Made Verbal: A Comprehensive Training Manual and Guide to the History and Applications of Audio Description*, published by the American Council of the Blind, available at:
PDF: <https://acb.org/adp/docs/The-Visual-Made-Verbal.pdf>
Word: [https://acb.org/adp/docs/The-Visual-Made-Verbal\(3\).doc](https://acb.org/adp/docs/The-Visual-Made-Verbal(3).doc)
- d. OFCOM Code on Access Services, United Kingdom

The development of audio description for media generally involves three areas of production: writing, voicing, and audio editing. This document is organized according to these production stages and includes various considerations for audio description creators. This resource is intended to provide a general understanding of the factors that are taken into consideration rather than convey complete guidance on the process for creating audio description.

Writing

The writer of audio description (“the describer”) is a highly trained professional who specializes in translating visual information into a descriptive text. The describer analyzes the visual content, prioritizes the important visual elements, and describes those elements that will provide an experience that is comparable to that of the sighted viewer. The describer must do all of these things while taking into account the preferences of, and direction from, the content creator. The final script for the audio description will be a product of this process.

Some of the factors that the describer may weigh during the creation of the script include how to adhere to the content creator’s intent, how the visual elements of a program intersect with dialogue and the sound score, and how to identify key visual elements in the program.

When identifying key visual elements for the script, the describer aims to cull from all the visual content with the goal of selecting the elements that will provide a compelling description of the scene while also providing a comparable experience to that of a sighted viewer. Some examples of visual elements that a script may describe include:

- facial expressions
- body language and gestures, including nudity
- visual comedy and sight gags
- dance or other movements
- visual actions, including sexual acts, violence, etc.
- clothing
- multi-media effects and lighting
- settings and scene changes
- individual characteristics as relevant to the content (e.g., skin color, height, age, disability, etc.)
- text or on-screen graphics including titles, credits, captioned and/or subtitled translations of a foreign language
- time of day, period of history or location

Note: The above list is not intended to be exhaustive, nor does it imply that all of these elements must be described in each and every circumstance.

Describers strive to be clear, concise, conversational and use familiar terms in a manner that is consistent with the content and vocabulary of the program. A describer also may provide a technical term if relevant to the context of the program, or consider the appropriateness of using slang or jargon.

Describers also consider the proper structure to use in describing a program, such as present tense or past tense, or active voice or passive voice. In the same vein, the describer may choose to describe material in the third person to convey neutrality and noninterference, if doing so is appropriate.

Voicing

Generally, voicers are selected with the goal to voice audio descriptions in a manner that is consistent with the nature and tone of the material being described. Voicers are expected to speak clearly and at a rate that can be understood. Some of the artistic choices the voicer makes in order to reflect the nature and tone of the material include the pace and tempo of the description, inflection, pauses, phrasing, energy and volume. In addition, voicers also seek to convey accurate pronunciation. The program producer may include an audio file or transliterations to help the voicer know how to pronounce unusual names or multi-syllabic words.

Audio Editing

The following material illustrates some of the technical factors that are considered in providing audio description that are appropriate for the needs of the intended audience and that matches, insofar as possible, the audio quality of the accompanying video program.

An important resource for detail on broadcast television technical capabilities and description can be found in Sections III and IV (pp. 8-21) of the final report of the FCC's Video Programming Access Advisory Committee (dated April 9, 2012), available at <https://docs.fcc.gov/public/attachments/DOC-329400A1.pdf>.

Generally, the audio specifications of the audio description track follow the specs of the network and/or distributor. The goal of audio editors is to achieve audibility, to the extent reasonable and consistent with the judgment of the audio description author and content producer, that does not substantively interfere with dialogue or other critical program audio. Some of the factors that audio editors may take into account include:

- Media product to be described (*e.g.*, mixed versus unmixed) and delivery method.
- Software Capability: Editing software typically allows for both video and audio playback of the show being described, while recording the audio description in sync with the show.

- **Audio Levels:** Audio editors strive to record clean audio. The volume of the description audio should reasonably match that of the show whenever possible, especially its spoken dialogue, or other critical sound elements. The goal is that the description audio not seem to be too loud or soft as compared to the show soundtrack.
- **Timing:** Audio description authors and editors seek to produce audio description that is appropriately timed with the visual elements of the programming to be described.

Delivery

There are many factors that contribute to the successful delivery of quality audio description. In order to reach the consumer, the description must pass through several layers along the broadcast chain, each of which can contribute to the proper delivery of audio descriptions. These layers may include but are not limited to the national network feed, the local station affiliate, and the local video provider head-end. Resolving audio description issues requires identification of the issue at the relevant point in the distribution chain, bringing awareness to the correct layer in the chain and implementation of any necessary corrections.