

## Subtitles for the deaf and hard-of-hearing: Comparing legislation and official orientation for SDH in Brazil and in other countries

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### *Abstract*

This paper presents a comparison of legislation and creation of Subtitles for the Deaf and Hard-of-Hearing (SDH) in Brazil, United Kingdom, United States of America and Canada. The main goal of this paper is to show how each country uses their legislation to create accessibility through the SDH. By defining Translation and Audiovisual Translation, alongside Subtitling and Subtitles for the Deaf and Hard-of-Hearing, we understand how the subtitles are created and thus create accessibility. In the comparison, the laws of each country are described, how the creation of its subtitles happens and policies taken by each country to increase accessibility.

### *Key Words*

Subtitles for the Deaf and Hard-of-Hearing; Legislation; Brazil; United Kingdom; United States of America; Canada.



### *Introduction*

Accessibility, as defined in a broader way by the United Nations is about giving equal access to everyone, by breaking obstacles and barriers between people with disabilities and their goal, while also giving their civil, political, economical, social and cultural rights.

With technological advances, several accessible technologies are being designed to fit the needs of people with disabilities. And the idea of audiovisual accessibility, especially in the digital space, is to allow any user access to all

information available, despite their disabilities, without damage on the content of the information.

For this aim, Accessible Audiovisual Translation (AAT) is a way to assure this accessibility to people with disabilities. Among the different modalities of AAT, Audiodescription (aimed for visually impaired people) and the Subtitles for the Deaf and Hard-of-hearing are the most commonly used, the latter being the focus of this research.

In Brazil and the other countries selected for this research, - United Kingdom, United States of America and Canada - there are laws against discrimination, therefore, promoting accessibility to assure equal access and effective communication for people who are deaf or hard-of-hearing is guaranteed by law.

With that in mind, the aim of this research is to compare the creation of the Subtitles for Deaf and Hard-of-Hearing, in Brazil and in the selected countries, and contribute to other researches in the area of SDH by highlighting the importance of this topic. This research is divided into three main parts: The first part defines Audiovisual Translation and its several modalities, being SDH one of them. The second part defines in more depth subtitling and Subtitles for the Deaf and Hard-of-Hearing. The third part describes accessibility, in a global setting, defining the different laws from Brazil and other countries, how they regulate the creation of the subtitles and its accessibility, and later compares and analyze the Portuguese and English subtitles, relating them with their corresponding countries and its laws.

### *Translation and Audiovisual Translation*

When defining translation, Snell-Hornby (1988: 39) uses the Encyclopedia Britannica to give a more general idea: "translation, the act or process of rendering what is expressed in one language or set of symbols by means of another language or set of symbols". However, she reminds us that language is not an isolated phenomenon; it is an integral part of culture, that way we should always consider its context and not only the language itself. More recently, according to her, translation is being defined as a complex linguistic-cultural act of communication, recontextualizing a message within another situation, sometimes for another function. In this research, we consider translation not only as transposing the text into a different language, but also as

including the conditions needed to allow accessibility to people with hearing disabilities. Translation, then, involves the creation and transformation of a text (language) and its meaning (culture), not simply a transposition from one language to another.

Nowadays, the concept of translation is being revisited from times when it only involved the change from a source to a target language to become a more inclusive and flexible idea, adjusting to new technologies and new researches. Inside the field of Translation Studies, and therefore considered nowadays a subfield, there is the Audiovisual Translation (AVT – or Tradução Audiovisual, TAV, in Portuguese).

According to Jakobson (1959) translation can be divided into three types: interlingual (when source language and target language are different); intralingual (when source and target language are the same); and intersemiotic translation (when source and target texts are from different semiotic codes). These definitions are especially pertinent when talking about AVT. All three are relevant to this study, both the interlingual and intralingual for general subtitles, and the intersemiotic for specific SDH features.

With the changes in the translation field, in the 70s, the film industry improved some already existing techniques for dubbing and subtitling. That, according to Baker and Saldanha (1997), caused a big proliferation of intralingual subtitles, mainly being addressed to minority audiences, like immigrants or viewers that needed support in order to fully understand the audiovisual texts. Therefore, increasing initiatives that are accessibility-friendly and evolving the intralingual subtitles into the SDH.

According to Chaume (2012: 107), "audiovisual translation is a mode of translation characterised by the transfer of audiovisual texts either interlingually or intralingually". He considers that all information in audiovisual texts is created by two channels of communication (acoustic and visual channels) while using different sign systems.

Also, audiovisual is considered by Gambier (2003), a multi-semiotic program, because it uses different means within the same audiovisual text, for example written and oral language together, to reach a certain result. For him, movies, television, videos and even radio are groups used to classify the AVTs, having its types divided in those groups.

Díaz-Cintas and Remael (2007) explain that AVT and translation, as stated before, were forced to change its concepts in order to fit the growth of

audiovisual products, to allow accessibility especially for people with vision and hearing impairment. At first, the term was used to include the translation process that happened only from a source language to a target language in an audiovisual media.

It was then that the SDH and the Audio Description (AD) gain space within the AVT. Although they were not accepted at first as a type of translation because of its use of different semiotic codes (image, sounds, etc.). The authors also state that the concept of accessibility had to undergo thorough changes to create a "bridge" between the ideas of AVT, and SDH and AD.

Chaume (2012: 107) states that the translator when working with Audiovisual Translation has to produce dialogs that recreate the spontaneity of the speech. A speech that has both the acoustic and visual channel, and also what he calls "other non-verbal codes of meaning". These other non-verbal codes of meaning are related with signs tied in a cultural community, that combined with its context, the acoustic and visual channels create more complex messages. By using the term audiovisual text, it is understood that both channels are in synchrony with the non-verbal messages. With these two channels, Chaume (2012) affirms that the audiovisual text is either revoiced (based on recording and inserting a new soundtrack and subsequent sound synchronization) or subtitled modes (based on a written translated or transcribed text inserted on or next to the screen where the original text is shown).

The two types of audiovisual texts relevant to this study are Subtitling and Subtitles for the Deaf and Hard-of-hearing, both will be defined in more depth in the next and second part of this paper.

### *Subtitles for Deaf and Hard-Of-Hearing*

The introduction of accessibility in the 70s and 80s in the United States and Europe also brought the introduction of the SDH into filmmaking and the distribution of films. But, according to Romero-Fresco (2013: 3), any service of accessibility was dismissed, being considered "costly and catering to the needs of a very reduced and specific population". Still, these countries, the US and Europe (especially the UK), alongside with Canada and Australia are the leading countries in the development and distribution of both SDH and Audio

Description, as well as leading the world in raising awareness and creating accessibility.

As stated before, at first the SDH was not considered a type of translation until a change in the concepts of audiovisual texts. In this section I will describe the differences between hearing subtitles and the particularities of the SDH, as Assis and Araújo (2016: 5) state: "Subtitles for the Deaf and Hard-of-Hearing is a mode of Audiovisual Translation (AVT) aimed for hearing impaired people, allowing access, via SDH, to any information conveyed through speech, also including in the subtitles all paralinguistic information, such as fictional sounds. SDH can be either intralinguistic, with target and source text in the same language, or interlinguistic, target and source text in different languages. Considering that the translation of sound effects (music and noise) is present in the SDH, one could say that it works as a type of intersemiotic translation, due to the fact that the sounds effects are translated into words, thus involving two semiotic modes, acoustic and verbal"<sup>1</sup>.

As seen above the SDH, then, can be created using the three types of translation: intralinguistic, interlinguistic and intersemiotic being the first one the most used. The types of translation can happen separately or all in the same audiovisual text. For example, in a film the SDH is created in Portuguese and the dialogue is also in Portuguese (intralinguistic), but there is a moment that the dialogue is in Italian so translation happens to occur from one language to another (interlinguistic) and also in another moment there is the sound of a car engine starting (intersemiotic), that is described in the SDH as well.

Díaz-Cintas and Anderman (2009) describe that the SDH can be presented of up to three and sometimes four lines. Sometimes, it changes color to show the person talking or even to show emphasis on a specific word or part of the dialogue. With the dialogue, the identification of the speaker can happen in three different ways. With change in color, with the name of the person

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1 My translation. Original: "A Legendagem para Surdos e Ensurdidos (SDH) é uma modalidade de Tradução Audiovisual (TAV) destinada ao público surdo, permitindo o acesso, via LSE, à informação veiculada pela fala, devendo também ser contemplada na legenda todas as características paralinguísticas, tais como os sons ficcionais. A LSE pode ser tanto intralinguística, ou seja, texto alvo e texto fonte na mesma língua, quanto interlinguística, texto alvo e texto fonte em línguas diferentes. Considerando o fato de a tradução de efeitos sonoros (música e ruídos) estar presente na LSE, poderia se dizer, ainda, que a mesma se configura como um tipo de tradução intersemiótica, dado o fato de os efeitos sonoros serem traduzidos em palavras, perpassando, assim, dois meios semióticos, o acústico e o verbal."

between brackets or, like shown in Figure 1, with the dialogue on the side of the speaker.

Figure 1: Example of dialogue



Source: Movie Manchester By The Sea (2016)

Now the biggest difference between the SDH and the subtitles for hearers is that alongside with the dialogue, there is all paralinguistic information, such as sound effects, soundtrack noises and other acoustic signs that are not visible but audible to a hearing audience. This information is usually shown between brackets. Naves et al. (2016) explain that only the sounds that are relevant to the audiovisual product or influence the history should be in the subtitles. That includes music, when the lyrics are relevant, they should be in italics to distinguish between the dialogue and the music.

According to Díaz-Cintas and Anderman (2009: 20), the paralinguistic information "contributes to the development of the plot or the creation of atmosphere, which a deaf person cannot access from the soundtrack". In the case of a deaf person, they aren't able to receive the acoustic channel, so an adaptation is needed. As shown in Figure 2, 3 and 4:

Figure 2: Example of paralinguistic information



Source: Movie Manchester By The Sea (2016)

Figure 3: Example of paralinguistic information



Source: Movie The Longest Ride (2015)

Figure 4: Example of paralinguistic information



Source: Movie Wonder Woman (2017)

The paralinguistic information can be described in different ways. In Figure 1, the paralinguistic information is that a cell phone is ringing, while in Figure 2 there is a band performing having the lyrics shown on screen. Or like in Figure 3 where not only the sound is described but also the name of the character.

The authors, Díaz-Cintas and Anderman (2009), point out the importance of the paralinguistic information and their synchrony. The subtitles should reflect the pace of the dialogue allowing the viewer to have the full experience of an audiovisual product, such as irony, surprise, suspense, among other traits from the spoken language, and receive the information as they are happening.

Also to reach this synchrony, the translator must make linguistic changes, as well as follow the required specific guidelines of the client. Naves et al. (2016) state that these changes are related with manipulating the audiovisual text, like explaining sounds (paralinguistic information), reduction of the text and fragmentation of speech in specific semantic blocks.

This manipulation of the text is related with the on-air time of the subtitles. They consider that there are three different velocity measures linked with subtitles: "1) the reading speed of the viewers, 2) talking speed of the audiovisual program's speech, [...] there isn't a pattern, since every speaker has

its own talking speed, 3) and the speed of the subtitles."<sup>2</sup> (NAVES et al., 2016: 50).

Taking that into account, the creation of the subtitles need to focus on the velocity of the reader, especially when the viewer is deaf or hard-of-hearing they usually considers the oral language their second language, needing more on-air time for to read them. Then, the translator must manipulate the text to fit into the on-air time of 145, 160 or 180 wpm depending on the target audience.

Sometimes the manipulation means a shortening of the subtitles and other times, an explanation. Naves et al. (2016) considers the explanation a consequence of any translated text, it makes the final audiovisual product easier, simpler and more detailed. They quote Silva (2014) to state that the SDH has this "facilitator function", making the SDH more detailed and explanatory than the subtitles for hearers.

#### *Accessibility, Laws and Comparison*

Related with deafness, Díaz-Cintas and Anderman (2009: 169) explain the medical difference between a person who is deaf and one that is hard-of-hearing: "Medically and clinically speaking, one is considered to be 'deaf' whenever hearing loss is so severe that one is unable to process linguistic information through hearing alone. On the other hand, one is considered to be 'hard-of-hearing' when there is a hearing loss, whether permanent or fluctuating, which adversely affects an individual's ability to detect and decipher some sounds. In other words, despite the hearing loss, there is still some residual hearing."

Also, Corradi (2007) states that deafness, in any level and despite the physical aspect, can be considered a cultural construct. The relation between a person that has some level of deafness and a hearing person happens through communication, Sign Language (oral and written) and, in this case, the Portuguese language (oral and written).

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2 My translation. Original: 1) a velocidade de leitura dos espectadores, 2) a velocidade das falas dos programas audiovisuais, [...] não há um padrão, pois cada falante tem uma velocidade de fala espontânea, 3) e a velocidade das legendas.

The author then presents the idea of bilingualism, she uses the definition by Quadros (2005) that says that bilingualism can be the use of different languages in different social contexts. Then, bilingualism related with deafness is defined by Sign Language being the first language and, in this case, Portuguese is used as second language as a social and cognitive intermediation. Having its learning process similar to a foreign language.

Regarding this learning process and the SDH, Caimi (2006: 3) focus on its importance for a deaf person, especially the development of a deaf child. According to her, there is a visible educational element "when we consider the function that subtitled multimedia products have in our societies. Subtitles are one of the most powerful learning tools for a deaf child, just as a hearing child would learn from things heard."

Regarding accessibility, Greco (2016) mentions the importance of the UN Convention on the Rights of Persons with Disabilities (CRPD) signed in 2007, with fifty articles talking about civil, political, economical, social and cultural rights of this group of people and considering that the absence of accessibility is discrimination.

The CRPD describes disability as, not only being related with the person, but also with the hurdles and the interaction of these people with the environment that they live in. And that disability is a direct result from this interaction and the environment that prevent their active role in society and from having the same rights as other people.

Also the CRPD (2007: 12), in article 21, ensures that persons with disabilities can exercise the right to freedom of expression and opinion, "including the freedom to seek, receive and impart information and ideas on an equal basis with others".

As well as in article 30, promotes the right to culture and the participation of people with disabilities in the cultural life, having access to cultural objects, programs and cultural activities in general, being that those need to be in accessible formats

Regarding accessibility in the digital space, Torres et al. (2002) defines it as to allow any user access to all information available, despite their body characteristics, without damage on the content of the information. They highlight that accessibility involves both physical spaces as well as digital ones, but caused by technology and specially the SDH, the latter brings distinct ways

of interaction between the information and people, respecting their limitations and preferences.

In the translation field and, particularly in relation with the SDH, accessibility has a more detailed definition. According to Díaz-Cintas and Ramael (2007: 12) accessibility is: "[...] making an audiovisual program available to people that otherwise could not have access to it, always bearing in mind a degree of impairment on the part of the receiver." So for the translator to allow accessibility, they have to consider not only the translation itself and the environment that the receiver lives in but also their impairment. This way, we can consider the job of the translator as one that creates accessibility, not only for people with disabilities, but also for those that don't have any kind of impairment.

As said by the authors: "Whether the hurdle is a language or a sensorial barrier, the aim of the translation process is the same: to facilitate access to an otherwise hermetic source of information and entertainment. In this way, accessibility becomes a common denominator that underpins these practices".

Díaz-Cintas and Anderman (2009: 168) quote Nord (2000) to explain the work that the translator has to do. In their point of view, specifically with this type of translation related with subtitling, there is "a need to 'adapt' a product to a target audience [...] which, according to Nord, is: 'not a real person but a concept'". This "concept" comes from previous communicative experiences that we, as receivers, have. In the case of the SDH, the environment that a person with hearing disabilities lives in and how they communicate.

A big step for accessibility, in the digital space, was the creation of the Web Content Accessibility Guidelines (WCAG) by the World Wide Web Consortium (WC3) Web Accessibility initiative. The Guidelines have several instructions to creating content online that it is accessible. Its second version has four universal concepts that must be followed: presentation of the information; how operable are all components; how the information is understood; and the robust of the content so it can be easily interpreted.

### *Brazil*

The Brazilian Sign Language (known as *Libras*) only became official sign language for the deaf community with the law 10.436 of 2002. Then in 2005 with the Law 5.626, Libras became a curricular subject and in 2010, Libras

Translator/Interpreter became a regulated profession with the Law 12.319. The law decree the use of Brazilian Sign Language in all government services and education.

Festa et al. (2013) declare that until the law passed, many political movements happened to assure that the Brazilian deaf community had their space towards society. Araujo et al. (2013) explain that Brazil considers the SDH, and also the audio description, a transcription of dialogs and others sounds as seen in the law 01/2006, ordinance 310 of June of 2006, and not a type of translation.

Regarding the laws that regulate how the subtitles are created, because Brazil considers that the SDH is not a type of translation but a transcript, the hearing subtitles and the SDH are created differently.

The Complement Norm of Portaria 310 of 2006 defines SDH as a transcript in Portuguese of dialogs, sounds effects and other information that couldn't be perceived or understood by people with hearing impairment. Having them being created differently.

In Brazil, the *Guia para Produções Audiovisuais Acessíveis* (2016, Guide for Accessible Audiovisual Products) highlights the laws 10.048/00 and 10.098/00 that define accessibility in the country. They state that accessibility is a requirement to use, safely and autonomy, any space, urban equipments from buildings, transportation services and devices, systems, forms of communication and information, by people with disabilities or limited mobility. It also considers a hurdle any obstacle or barrier that limits or prevents access to free movement and possibility of communication or access to information.

The country also follows the UN Convention on the Rights of Persons with Disabilities (CRPD) of 2007, becoming part of the Brazilian Constitution with the Legislative Decree 186 of 2008 and Executive Decree 6.949 of 2009.

One of its highlights is the Article 21, where the CRPD ensure the freedom of expression and opinion, and access to information. This article focus on the idea that all media should not only be able to provide the information to people with disabilities, but also allow it in accessible formats with the appropriate technology. As well as facilitating and promoting the use of sign languages, Braille and alternative communication and encouraging all media outlets to provide their information in accessible formats.

Another important Brazilian law is the 13.146 of 2015, which is the Brazilian Law of Inclusion of the Person with Disabilities (Lei Brasileira de Inclusão da Pessoa com Deficiência). That, as well as stated in the CRPD, states to assure

and promote, in conditions of equality, the fundamental rights and liberties of the person with disability, aiming their social inclusion and citizenship.

The Guide explains that Brazil does have a wide legal landmark with many specific claims regarding accessibility in audiovisual products. But it is essential that the public authorities and the society are mobilized and committed with these instances to ensure equal access in all products, especially audiovisual ones, for all people.

Assis and Araújo (2016) also comment on the Brazilian law 01/2006 of Ministry of Communications of 27 of June of 2006. This law mentions that every broadcasting has the date deadline of 11 years to provide Audiodescription and the SDH in their programs, this means that by 2017 the time will be up and the TV channels, cinemas and other entertainment vehicles will have to offer AD and SDH options.

As for the conclusion of this research in December of 2017, it was possible to confirm that many channels were not fully accessible yet, in disregard of what the regulation stated. This fact just highlights the importance of this study that aims shine light on such a relevant topic that is constantly misrepresented among both the different circles of society and also academia.

#### *Other Countries: United Kingdom*

The European Union (EU) is a State Party to the UN Convention on the Rights of Persons with Disabilities (CRPD) of 2007, with the United Kingdom (UK) agreeing to the convention.

The Equality Act (EQA) of 2010 is the main anti-discrimination law in the UK. It unites over 116 laws into one bill that protects all people, including people with disabilities. The Act also assures that all government websites in the UK have to follow the Web Content Accessibility Guidelines (WCAG), while the private ones need to be accessible, but not necessarily follow the WCAG.

UK, being an important union in the EU<sup>3</sup>, is part of the European Federation of Hard of Hearing People (EFHOH). According to its report of 2011, the EU has around 50 million Hard of Hearing citizens. The Federation exists to

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<sup>3</sup> So far, as the UK is leaving the EU after the Brexit vote in the 2016 referendum.

represent these people in the EU and its authorities. This report focuses on ensuring that institutions put in practice the actions presented on the European Disability Strategy, this strategy is an active policy instrument to implement the CRPD and create a stronger commitment from the EU.

The Audiovisual Media Services Regulations of 2009 follows the European Communities Act, “in relation to information society services and measures relating to television broadcasting” (2009: 3). These regulations from part 4A (Electronic Communications Broadcasting) are related with the duties of all involved, from the authorities to the providers, to ensure that all services are accessible to people with disabilities.

In 2003, with the Communications Act, the parliament consolidated the authority of telecommunications and media to the Office of Communications (Ofcom). The Communications Act expanded requirements for UK broadcasters to provide 'television access services', like subtitling, sign language, and audio description.

Ofcom has a code of Guidance on standards for Subtitling that gives the parameters for the creation of subtitles in the UK. With its last version in 2012, the code also sets, besides the parameters, a level of accessibility for broadcasters reach after 5 and 10 years of broadcasting.

#### *Other Countries: United States of America*

The most important anti-discrimination law, in the United States of America, is the Americans with Disabilities Act (ADA) that became law in 1990. ADA is a civil rights law that prohibits discrimination against people with disabilities in all areas of public life, such as on the basis of disability in employment, State and local government, public accommodations, commercial facilities, transportation, and telecommunications.

ADA is in constant changes and adjustments, in 2008, for example, several changes in the definition of “disability” were made. An individual with a disability is defined, then, as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having such impairment.

Another Act is the Telecommunications Act of 1996, amending the Act of 1934. It requires telecommunication equipment and providers of telecommunication services to ensure that all equipment and services are accessible to people with disabilities.

More recently, in 2010, President Barack Obama signed the Twenty-First Century Communications and Video Accessibility Act (CVAA). The CVAA updates federal communication law to increase the access of people with disabilities to new technologies. The CVAA ensures that accessibility laws enacted in the 1980s and 1990s are brought up to date with 21st century technologies, including new digital, broadband, and mobile innovations.

The US has also signed the UN Convention on the Rights of Persons with Disabilities (CRPD) of 2007.

#### *Other Countries: Canada*

In Canada, an important act is the Constitution Act from 1982, the Canadian Charter of Rights and Freedoms, which ensure equal rights to all citizens without discrimination. The Charter guarantees broad equality rights and other fundamental rights such as the freedom of expression, freedom of assembly and freedom of religion.

The Canadian Broadcasting Act requires that, within the Canadian broadcasting system, accessible programming is provided as resources become available. Broadcasters thus contribute to the public interest by continually working to improve access to their programming for deaf, deafened, and hard of hearing people.

Canada, unlike the other countries, does not have a national anti-discrimination law. But, Ontario has its own, The Accessibility for Ontarians with Disabilities Act (AODA), a reference in Canada. The AODA was passed in 2005 to set an accessibility standard in which no person with a disability is prevented from fully participating in all aspects of society because of his or her disability. AODA also references the WCAG as standards.

And, more recently in 2017, Primer-Minister Justin Trudeau did a consultation process in the country to develop new federal accessibility legislation to make a more accessible Canada.

Canada has ratified the UN Convention on the Rights of Persons with Disabilities (CRPD) of 2007.

### *Comparison: Brazil's SDH*

In Brazil, Araújo et al. (2013) explain that the SDH is created using the US Closed Caption System. Closed caption, as said before, is a system that does a word by word transcription of the dialogs or sounds using a stenotype, but the subtitles for hearing people are created following the European system that uses software called Subtitle Workshop (SW).

The above authors clarify that the reason for this distinction is because Brazil considers the SDH, and also the audio description, a transcription of dialogs, sound effects and other information that may not be perceived by a hearing-impaired person, and not a type of translation, as seen in the law 01/2006, ordinance 310 of June of 2006.

While the creation of hearing subtitles happens by a translator and uses software that allows the tracking of the whole subtitling process, the SDH is created by a stenotype professional that focus mostly on what is being said rather than all the paralinguistic information necessary for a hearing-impaired person.

According to Araújo and Nascimento (2011), the Brazilian SDH doesn't follow the standard rules of the hearing subtitles, such as being reduced, having its divisions or complete synchrony, usually they have a delay of one or two seconds. Having an average of 16 characters per second, with sometimes three lines, the SDH only shows paralinguistic information between brackets, without the option of showing it in other ways, like in bold, change of color or onomatopoeia.

In the *Guia para Produções Audiovisuais Acessíveis* (2016, Guide for Accessible Audiovisual Products), the authors describe a "standard" SDH to the Brazilian public, proposed by translation researchers, with technical, linguistic and translation parameters. Ideally, the SDH should also follow the European system. It should have max of 37 characters per line with max of two lines,

have synchrony between the original speech and the subtitle following on-air time of 145, 160 or 180 wpm. All paralinguistic information and identification of the speaker should be shown in brackets.

*Comparison: United Kingdom's SDH*

As said before, the UK has OFCOM (Office of Communications) that regulates the standards and parameters for the creation of all subtitles. Its latest version, from 2012, involves all the previous discussed aspects of the SDH, such as adding the identification of speaker and describing sound effects.

But also has other several requirements, like indication of an off-screen voice or the use of the number sign (#) to indicate music or lyrics. And others related with the language in the subtitles as preserving the tone of original speech with proper punctuation, descriptions between brackets of speech style or bracketed text to show whisper speech.

*Comparison: United States of America's SDH*

Now, as for how the SDH is created, in the United States, the ADA (American with Disabilities Act - 1990) mandate the use of the Closed Caption system on all television programming and others videos. So in TV, the CC system is mandatory, allowing the viewer this option, while the SDH is found mainly in other types of media, such as DVD.

The SDH in the US is created using the closed caption system, with a stenotype - a chorded keyboard or typewriter -, but has the differences to target a hearing-impaired person, like showing all paralinguistic information. Then, the SDH follows the same format as translated hearing subtitles, varying on the style of the text or the placement on screen. While, the closed caption maintains a white text on a black box.

*Comparison: Canada's SDH*

According to the Canadian Association of Broadcasters, from 2008, for a long time Canada didn't have an inclusive and wide standard for captioning developed. This means that captioning styles changed from one provider to another, confusing the viewers and the providers, that don't have standards to guide them.

Then in 2012, a policy with standards for closed captioning was released. This policy follows standards for hearing subtitles and has the close caption and the SDH being created following these standards, with both paying close attention to all paralinguistic information. This policy states that the Canadian government considers the closed caption to be designed for the deaf and hard-of-hearing.

Some of its main guidelines focus on these four principles: Accuracy and Monitoring; Responsibility; Consistency; Clarity. Alongside with descriptions of specific situations such as moving captions, spelling, spacing, punctuation or others.

*Conclusion*

In conclusion, accessibility is about giving equal access to everyone, by breaking obstacles and barriers between people with disabilities and their goal, and the SDH is able to provide that.

With advances, several accessible technologies are being designed to fit the needs of people with disabilities. And the idea of audiovisual accessibility, especially in the digital space, is to allow any user access to all information available, despite their disabilities, without damage on the content of the information.

We are able to understand, by defining Audiovisual Translation and its work in general, how the idea of accessibility and translation walk together to make all audiovisual products accessible. There's a big contrast between the subtitles for hearers and the SDH and understanding how they are created and these differences is one of the main ways to improve the SDH.

Is also important to acknowledge the role that the SDH has in the life of people with hearing disabilities and how it allows the content to reach its receptor. So, that's one of the main goals of this paper to understand the needs of the users to allow better accessibility.

By explaining how some world organizations perceive accessibility and the person with disabilities, we can have an overall look at how it influences the countries and their laws. With the views of laws of each country - United Kingdom, United States of America and Canada -, we're able to understand the culture in which their SDH is created and how each country commits to their laws and to allow accessibility in different ways.

Lastly, describing and analyzing the Brazilian and other SDH's, relating them with their corresponding countries and its laws, we can understand how each country has different details regarding the creation of their subtitle. As discussed previously, especially in the Brazil's SDH comparison, is important for researchers of the area to conduct studies to create an "standard" SDH for their country, as done by *Guia para Produções Audiovisuais Acessíveis* (2016, Guide for Accessible Audiovisual Products) taking into account the target audience.

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