

Sound levels in advertising

Advertising Guidance (broadcast)

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Foreword

The Committee of Advertising Practice (CAP) offers guidance on the interpretation of the UK Code of Advertising (the CAP Code) in relation to non-broadcast marketing communications.

The Broadcast Committee of Advertising Practice (BCAP) offers guidance on the interpretation of the UK Code of Broadcast Advertising (the BCAP Code) in relation to broadcast marketing communications.

Advertising Guidance is intended to guide advertisers, agencies and media owners how to interpret the Codes but is not a substitute for those Codes. Advertising Guidance reflects CAP's and/or BCAP's intended effect of the Codes but neither constitutes new rules nor binds the ASA Councils in the event of a complaint about an advertisement that follows it.

For pre-publication advice on specific non-broadcast advertisements, consult the CAP Copy Advice team by telephone on 020 7492 2100, by fax on 020 7404 3404 or you can log a written enquiry via our [online request form](#).

For advice on specific radio advertisements, consult the [Radio Centre](#), and for TV advertisements, [Clearcast](#).

For the full list of Advertising Guidance, please [visit our website](#).

Background

Overview

This Advertising Guidance helps broadcasters to comply with BCAP Code rule 4.7 concerning sound levels in advertising. The guidance is split into two parts:

- the rule and its interpretation; and
- relevant technical standards

The basic principle of BCAP's rule is that viewers should not be presented with advertising in commercial breaks where the sound level is significantly higher, as a whole or for individual commercials, than the sound level of the surrounding programming.

Ensuring the sound levels of broadcast content are compliant is a complex and highly technical process dependent on a variety of factors. Different broadcasters may follow different approaches and individual broadcasters may approach certain types of content in different ways. This guidance does not therefore prescribe a particular approach to compliance. Instead, it sets out key points on the interpretation of the rule and best practice in terms of the necessary technical standards.

In understanding the rule and this guidance, broadcasters are urged to seek advice and input from broadcast audio specialists.

The Rule and Its Interpretation

BCAP Code rule 4.7

The rule states:

Television only – Advertisements must not be excessively noisy or strident. The maximum subjective loudness of advertisements must be consistent and in line with the maximum subjective loudness of programmes and junction material.

Broadcasters must endeavour to minimise the annoyance that perceived imbalances could cause, with the aim that the audience need not adjust the volume of their television sets during programme breaks. However, BCAP recognises that commercial breaks sometimes occur during especially quiet parts of a programme, with the result that advertisements at normally acceptable levels seem loud in comparison.

Measurement and balancing of loudness levels should preferably be carried out using a means of subjective loudness measurement conforming to standards derived from relevant ITU recommendations.

BCAP considers that subjective loudness-based measurement techniques represent best practice. However, if broadcasters use a peak programme meter (PPM) instead, the maximum level of the advertisements must be at least 6dB less than the maximum level of the programmes to take account of the limited dynamic range exhibited by most advertisements.

Broadcasters are urged to refer to BCAP's guidance on sound levels in advertising for more information on the technical aspects of the rule and information about its application (available [here](#)).

The present sound levels rule was developed to address concerns over the use of audio techniques, such as dynamic range compression, which resulted in advertising content that was perceived by viewers as being excessively loud or strident whilst remaining compliant with the previous rule.

The new approach is based on the concept of subjective loudness, using an algorithm that is designed to reflect human perceptions of loudness. The focus of the rule is to mitigate as far as possible perceived imbalances in sound levels between the programming and advertising content. This type of transition between content is a potential cause of annoyance to viewers.

Scope

The rule applies to all TV broadcast content covered by the BCAP Code:

- Spot advertising – Covered by Rule 4.7 and regulated by the ASA.
- Sponsorship credits – Covered by Rule 4.7 and regulated by Ofcom in conjunction with their responsibilities for regulating broadcast programming.
- Teleshopping – In practice, only teleshopping that appears around programming is covered by the rule 4.7. Long form teleshopping (including participation TV), such as that on dedicated teleshopping channels, does not appear around programming and is therefore not within the scope of the rule.

It should be noted that “programming” encompasses junction material, such as programme promotions and idents.

Loudness or PPM

With developments in digital audio technology, subjective loudness measurement is now the best practice approach to minimising potentially problematic sound level issues. However, BCAP acknowledges that some broadcasters might still use peak programme meter (PPM) measurements. Although subjective loudness based approaches are encouraged, rule 4.7 provides for both approaches.

Key loudness test

Rule 4.7 requires the maximum subjective loudness of advertisements and sponsorship credits to be “consistent and in line” with that of the surrounding programming. The key point of comparison is between the maximum level of subjective loudness for the preceding programming and that for individual advertisements and sponsorship credits. If the maximum loudness of any of the advertisements and sponsorship credits exceed that of programming content preceding the commercial break, the broadcaster is likely to have breached rule 4.7.

Application

BCAP acknowledges that it is virtually impossible to match the sound levels of all types of content exactly. Some programming and advertising is inherently quieter or louder and it is also common to find programming with significant ranges of sound levels. Matching loudness is not required on a programme-part by programme-part basis. Commercial breaks will occur during quiet parts of programming creating a greater perception of an imbalance in sound levels. Broadcasters may also choose to adopt different approaches for creative effect or to better suit the sound profiles of different types of programming.

BCAP therefore accepts that an element of discretion is necessary when assessing content under the test outlined in section 5 above both to ensure appropriate levels of protection for viewers and a proportionate approach to identifying breaches. Each case should be assessed in context as well as on the basis of the assessment of sound levels.

Relevant Technical Standards

Measuring subjective loudness

The relevant International Telecommunication Union (ITU) recommendations are ITU-R BS1770, Algorithms to measure audio programme loudness and true-peak audio level, and ITU-R BS1771, Requirements for loudness and true-peak indicating meters. The standards in these recommendations should form the technical basis of approaches to complying with rule 4.7 when using subjective loudness metering.

EBU Recommendation R128 on Audio Loudness

The European Broadcast Union (EBU) Recommendation R128 on Audio Loudness is a technical recommendation for loudness normalization based on the ITU-R BS1770 technical standard. Its constituent documents EBU Tech.3341 (a technical specification detailing the characteristics of meters for measuring subjective loudness) and Tech.3344 (a detailed guide on the distribution aspects of loudness normalization) EBU Tech 3343 provides practical production guidelines on how to implement R128.

BCAP acknowledges that R128 provides a model of best practice for mitigating potential annoyance to viewers by normalising loudness to a standardised level. However, broadcasters should note that the user of EBU R128 is not mandated by rule 4.7. BCAP further acknowledges that, for various reasons, broadcasters might be unable or choose not to apply EBU R128 to certain pieces of programming or advertising content. For instance, for legacy programming not remixed to EBU R128 standards or in instances where an advertisement is intentionally quiet for creative reasons.

Digital Production Partnership

The Digital Production Partnership (DPP), founded by ITV, BBC and Channel 4, has already introduced common technical delivery standards for long-form programme content to all major UK broadcasters, including the BBC, ITV, Channel 4, Channel 5, Sky and BT Sport. They have also published a specification for commercial and sponsorship delivery.

Broadcasters may be interested to note that the DPP Technical Specification for Delivery of HD Commercial and Sponsorship material to UK Broadcasters provides guidance on producing content to comply with the EBU R128, which the DPP have mandated within their specification.

PPM

For those broadcasters still using PPM technology, meters should be a PPM Type IIa as specified in BS6840: Part 10, Programme Level Meters. Normal convention for analogue audio is that the peak sound level of programmes is set to be no higher than +8dBm, which corresponds to 6 on a peak programme meter. The peak sound level of advertisements should therefore be limited to +2dBm or 4.5 on a peak programme meter. Note: +8dBm corresponds to a digital audio level of -10dB relative to digital clipping level. ITU-R BS.645 and EBU recommendation R68-2000 describe how analogue audio levels should be translated into digital levels.

Committee of Advertising Practice

Mid City Place, 71 High Holborn

London WC1V 6QT

Telephone 020 7492 2200

Textphone 020 7242 8159

Email: enquiries@cap.org.uk

 @CAP_UK

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