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Subject: Recommendation ITU-R BS.1864

## North American Broadcasters Association (NABA)

### DRAFT REVISION TO RECOMMENDATION ITU-R BS.1864

## **Operational practices for loudness in the international exchange of digital television programmes**

The North American Broadcasters Association (NABA, [www.nabanet.com](http://www.nabanet.com)) is an association of broadcasters in Canada, Mexico, and the United States, and the NABA Technical Committee is its standing technical body. NABA is thus in a position to present the technical viewpoints of the most authoritative association of professional North American Broadcasters in television and sound programme production, post-production, and distribution for terrestrial, satellite, and cable broadcasting.

NABA is a Sector Member of ITU-R and a long-time participant in ITU-R Study Groups, Working Parties, Task Groups, Rapporteur Groups, etc. NABA numbers among its members Chairmen, Vice-Chairmen and members of the above groups. NABA also participates widely in the ITU work on radio, television and multimedia services and has a strong interest in spectrum issues, as well as operational practices including control of loudness.

NABA is concerned that Recommendation ITU-R BS.1864 can easily be misinterpreted. While the text in the “*recommends...*” specifies a “target loudness”, there is no specific language stating that the target loudness “should” be used for programmes that do not use metadata to indicate the programme loudness. This is because the target loudness specification is in an isolated “recommends” and is not directly tied to the “*recommends*” that covers exchange of programmes that do not employ metadata.

As written, the text can be interpreted as not actually requiring programmes without metadata to have a loudness equal to the target loudness; another interpretation is that programmes with or without metadata should be at the target loudness. It is important to remove the ambiguity.

NABA believes that the text in the “*recommends*” should be clarified so that the only possible interpretation is that content without metadata should be interchanged at the target loudness of -24 LKFS. Parties that, with prior arrangement, exchange content with loudness indicated by metadata, should of course be able to exchange programmes at any loudness level that is appropriate as long as the metadata properly indicates the loudness of the programme. This is consistent with ATSC A/85 that NABA members strongly support. We suggest all parties might accept a set of “*recommends*” constructed as shown below:

*recommends*

- 1 that loudness measurements should be made in conformance with Annex 1 of Recommendation ITU-R BS.1770;
  - 2 that the measurement should be made on the full programme mix (average loudness), or on the normal dialogue component (dialogue level) – whichever is deemed appropriate by the programme provider;
  - 3 that for international exchange of digital television programmes, when metadata is not employed to indicate the loudness of the programme, the target loudness should be –24 LKFS unless agreed otherwise by means of prior arrangement between the parties;
  - 4 that for international exchange of digital television programmes, when, with prior arrangement between the parties, metadata is employed to indicate the loudness of the programme, the metadata value should correspond to the measured loudness.
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