

Regulatory statement: superimposed text

Annex A – BCAP guidance, *Use of superimposed text in television advertising*



Use of superimposed text in television advertising

Advertising Guidance (broadcast)

Foreword

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 advertisements.

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

Advertising Guidance is intended to guide advertisers, agencies and media owners on 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 TV advertisements, please contact [Clearcast](#).

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

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Background and principles

1. Purpose

- 1.1. This guidance concerns the use of superimposed text – often referred to using the term “supers” – in TV advertising. Supers provide viewers with additional information usually because it is required for legal or regulatory purposes.
- 1.2. Section 319 of the Communications Act 2003 requires “(h) that the inclusion of advertising which may be misleading, harmful or offensive in television and radio services is prevented”. This function is contracted out to BCAP and the ASA by Ofcom. Alongside the primary focus on preventing misleading advertising detailed below, the guidance may also be relevant to supers included for the purposes of preventing harm (e.g. product safety warnings).
- 1.3. The guidance assists advertisers and practitioners in ensuring that advertisements using superimposed text are compliant with BCAP Code rules on misleading advertising. In particular, rule 3.11 requires that “qualifications must be presented clearly”; it also directs Code users to this guidance.

Practitioners should prepare ads responsibly ensuring that viewers can read all the information presented.

- 1.4. Compliance with rule 3.11 and other relevant misleading advertising provisions depends on both the content of the supers and their presentation in the context of the wider advertisement. This guidance focuses primarily on the technical aspects of presenting supers providing a set of technical guidelines that BCAP considers sufficient to ensure that viewers have a reasonable opportunity to read the information contained.
- 1.5. Ultimately, it is for the ASA, as the body that enforces the BCAP Code, to decide whether an ad complies with the BCAP Code based on relevant information – including this guidance – and an assessment of the advertisement’s likely impact on viewers. As such, compliance with the guidelines set out below alone does not ensure compliance with the misleading advertising provisions of the Code.

The General Principles section below outlines BCAP’s view on how, in general, practitioners should approach the use of supers with appropriate diligence. Subsequent sections deal with different technical issues involved.

2. Scope

2.1. Where is the guidance relevant?

This guidance applies to advertisements appearing in Ofcom-licensed TV services, including live television and time-shifted channels. The guidance does not apply to:

- interactive text services;
- videotext services; or
- other TV-like services, such as video-on-demand, which are not regulated under the BCAP Code.

With the exception of the provisions of section 11 below, subtitling access services are also outside scope. Technical standards on the provision of access services are regulated by Ofcom.

2.2. Types of text appearing on-screen

TV advertising includes or is broadcast with various types of text; the guidance does not apply to all text appearing on screen during an ad.

The main types are:

- a) text superimposed onto an advertisement (usually, at the bottom of the creative);
- b) text or graphics containing text within the creative of an advertisement itself; and
- c) subtitling added to the broadcast content as part of an access service.

This guidance applies to (a); where supers are added for the purposes of complying with the misleading advertising provisions of the BCAP Code.

See section 2.4 below for details of where parts of the guidance apply or are relevant to text included for other purposes.

2.3. Relevance of other text appearing in TV ads

Text or graphics containing text that are included in the main creative of an advertisement are not subject to these guidelines. However, such text is relevant in relation to certain provisions, such as those on calculation of the duration of hold for the supers themselves (see section 8 below). They must also comply more generally with the BCAP Code's rules on misleading advertising.

2.4. Superimposed text required by other bodies

Statements or other information that the law, statutory regulators and other bodies require in TV ads are not controlled by BCAP rules on misleading advertising. The guidance does not apply to supers added, for example, to make statements about copyright or information included as part of voluntary responsible messaging schemes.

Relevant parts of the guidance – mainly, the technical sections 5-10 that seek to ensure legibility of supers – do apply to supers included for the purposes of satisfying the requirements of other statutory frameworks.

For example:

- financial services advertising is regulated under BCAP Code section 14, which includes several mandatory information requirements mirroring provisions of financial services legislation controlled by the Financial Conduct Authority; and
- medicines advertising is regulated under BCAP Code section 12, which includes mandatory information requirements mirroring medicines legislation controlled by the Medicines and Healthcare product Regulatory Agency.

As with text appearing in the main ad creative, these forms of text are counted for the purposes of duration of hold calculations described in section 8 below.

3. Legal framework and ASA decision-making

- 3.1. The ASA's interpretation of the misleading advertising section of the BCAP Code takes into account the Consumer Protection from Unfair Trading Regulations 2008 (the CPRs).

The CPRs require that advertising must not contain misleading claims, or omit material information, to the extent that the advertisements are likely to affect consumers' transactional decisions about products or services adversely.

The effect on consumers is considered from the point of view of the average consumer. The average consumer is assumed to be reasonably well-informed, reasonably observant and circumspect. If an advertisement is targeted at a particular group of people, it is considered from the point of view of the average member of that group.

- 3.2. The ASA will have regard to this Advertising Guidance in cases involving superimposed text when considering whether a TV advertisement is likely to breach BCAP's misleading advertising rules.
- 3.3. Practitioners are cautioned that the guidance is only one consideration in the ASA's decision-making on relevant cases. The ASA will consider both the content of supers and their visual presentation within the context of the wider advertisement.

This guidance focuses primarily on the technical aspects of presentation such as text size and duration of hold. It provides a set of guidelines that BCAP considers sufficient to ensure that viewers have a reasonable opportunity to read the information presented. However, it does not cover the substance of what information must be included to satisfy the requirements of the BCAP Code. As such, presentation of supers in line with this guidance might still breach the Code, if their content is likely to mislead, either of itself or in the context of its presentation as part of the ad as a whole.

- 3.4. The guidance may be revised as a result of ASA rulings and changes in the industry.
- 3.5. This Advertising Guidance recommends an approach to presenting information through superimposed text that BCAP considers likely to be acceptable. For the avoidance of doubt, it does not proscribe other approaches, nor is it intended to stifle innovation.

If complaints are received about a TV ad in which advertiser has chosen to depart from the approach recommended, the ASA will expect the advertiser to justify why an advertisement does not mislead as a result.

4. General principles

- 4.1. BCAP Code rule 3.11 requires that qualifying information "must be presented clearly" and refers TV broadcasters to this guidance to assist them in ensuring that superimposed text complies with the Code.

The aim is to achieve a level of legibility that will enable an interested viewer, who makes some positive effort, to read all the information contained in the supers. The general principles in this section are intended to complement the more specific, technical guidance in the sections that follow in order to achieve this aim.

- 4.2. TV advertising is inherently limited by time and space. Viewers can only reasonably be expected to absorb information, if it is conveyed clearly. The use of superimposed text should therefore be kept to a minimum.
- 4.3. Long or otherwise complex superimposed text – even if it follows many of the guidelines laid out in the sections below – is likely to be more difficult for viewers to understand, heightening the risk of them being unable to read it. In such cases, the ASA may conclude that the advertisement, taken as a whole, does not comply with the Code.
- 4.4. Where appropriate, superimposed text may be used to:
 - expand or clarify a claim;
 - make qualifications;
 - resolve minor ambiguities; or
 - state necessary terms and conditions.

Examples of these uses include:

- clarifications (e.g. “car model X with feature Y shown”);
- qualifications of a product characteristic or depiction (e.g. “sequence shortened”);
- promotional terms (e.g. “closing date 31 August”); or
- conditions of an offer (e.g. “excludes NI stores”).

Where a qualification is particularly significant – because it is very important to viewers’ understanding of a claim in the main creative – other measures should be taken to place emphasis on it. For instance, by:

- amending the main claim to make it easier to understand;
- including the relevant qualifier in the main ad creative;
- using the voice-over to further draw viewers’ attention to it; and/or
- using a longer recognition period when calculating the duration of hold.

BCAP acknowledges that there are a variety of different approaches to achieving this and that these will vary dependent on the information being conveyed and the wider context of the ad. Practitioners should nevertheless expect that, at a minimum, the ASA is likely to expect them to demonstrate that they have taken steps, such as those listed immediately above, to bring particularly significant qualifying information to viewers’ attention.

Qualifications that go so far as to contradict a claim made elsewhere in a way that is likely to mislead are not acceptable.

4.5. Broadcasters and Clearcast, which acts on their behalf to pre-clear TV advertising, should seek to identify and challenge any proposed superimposed text that appears excessively long or complex. They should seek appropriate improvements, for instance:

- modification of the headline claim to reduce the need for qualification through superimposed text;
- removal or modification of words or phrases that are not simple and direct;
- breaking messages down into shorter, more viewer-friendly phrases or sentences; and
- removal of words, phrases or sentences that serve no essential purpose but might detract from more important information in the superimposed text or ad creative more generally.

Additional guidelines on viewer understanding and the complexity of text are included in section 7 below.

Technical guidance

5. Size of text

5.1. Principle

Superimposed text should be of sufficient size to be legible to viewers.

5.2. Measurement

The size of supers is the vertical height of the text measured in terms of the number of television lines it occupies. In checking text size pre-transmission, allowance must therefore be made for any picture compression effects.

Appendix 2 below provides a detailed outline of the method.

5.3. Treatment of upper and lower-case letters

Line height of upper or lower-case letters is measured where possible using flat-topped letters (e.g. 'v', 'w' or 'x'). In letters with risers (e.g. a lower case 'd') or descenders (e.g. a lower case 'p') the risers and descenders do not count for the purposes of measuring line height. Letters curved at top and bottom (e.g. 'c', 'e' or 'o') should not be used when measuring line height.

5.4. Full-strength lines

In measuring line height, only full-strength lines are counted. For aesthetic reasons, some text is given what may be described as 'beveled' edges where the individual letters tail off rather than have a sharply defined edge. There is also a technical device applied to some material that seeks to minimise the flicker that is a feature of the television system (known as 'anti-aliasing'). Round-topped letters such as 'o' can often give a similar effect.

In all these cases the effect is to produce television lines at the top and/or bottom of letters that are noticeably weaker and less distinct than the rest of the letter. These lower amplitude lines are disregarded for the purposes of calculating line height.

5.5. Minimum line heights

The preferred minimum heights for supers are given in the following table¹.

16:9 aspect ratio	SDTV	HDTV
Preferred minimum text height	16 Lines	30 Lines
Minimum text height (when placed on a single-coloured opaque block)	14 Lines	26 Lines

5.6. SD to HD conversion

30 HDTV lines are proportionally equivalent to 16 SDTV lines, based on the calculation $(16 \div 576) \times 1080 = 30$. 26 HDTV lines are proportionally equivalent to 14 SDTV lines, based on the calculation $(14 \div 576) \times 1080 = 26.25$, rounded down to 26.

Those calculations are based on viewing an HDTV set with 1080 horizontal lines; regardless of the HDTV format in which an advertisement is made, character heights should reflect the heights quoted in the table when the picture is scaled to 1080 lines.

5.7. Non-European scripts

The standard set out in this section is predicated on the use of European script where word recognition is to a significant extent influenced by the recognition of exterior word and letter shapes. Some foreign language channels may use pictographic and ideographic scripts. These often contain more information within the individual characters. In BCAP's view the size of text for such languages should be greater. However, in the absence of research in this area, no firm guidance on the amount by which size should be increased can be offered.

¹ The 16:9 aspect ratio is now the standard for broadcast services in the UK. However, some services or programming may still use legacy aspect ratios, principally, 4:3. Broadcasters are urged to exercise their best judgement when dealing with supers in ad content not in the 16:9 aspect ratio. For instance, for SDTV a preferred minimum text height of 14 lines is advised.

A rule of thumb judgement, based on looking at dual language texts in print, suggests that an increase of two SDTV lines (for a standard of 18 lines and a minimum of 16 lines) and an increase of four HDTV lines (for a standard of 34 lines and a minimum of 30 lines) is likely to suffice.

5.8. **Commercial breaks appearing in split screens**

Broadcasters can ‘split’ the screen to include a commercial break alongside programming content. For example, some sports programming includes updates on live events that appear around the commercials and thereby reduce the size of the screen. In such instances, broadcasters should use their judgement when scheduling advertising to avoid instances where significant use of supers that would otherwise comply with this guidance and the Code might cause problems for viewers.

6. Format and legibility of text

6.1. **Principle**

The text used in supers should be legible to viewers both in terms of how it is presented and how it interacts with the visual content of the main ad creative.

6.2. **Typeface**

Supers should be presented in a way that is easily familiar to viewers.

- Supers should use a plain typeface.
- Text that has a compressed or vertically ‘stretched’ appearance making it difficult for viewers to read should be avoided.
- Ornate, heavily serifed, italic typefaces and the like should be avoided.
- Text should be in lower-case with upper-case used only where normal for punctuation and in words or abbreviations that are commonly capitalised.
- Unconventional use of upper-case text is acceptable in circumstances, for instance, where it is specifically required by legislation or to comply with other requirements of regulatory bodies like the financial services regulator.

6.3. Spacing

The visible space between words should be greater than the visible space between letters and the visible space between lines should be greater than the visible space between words. Fully justified and proportional text should be avoided.

6.4. Background contrast

The visual interaction of supers with the main ad creative can cause them to become unclear. Broadcasters should ensure that appropriate steps are taken to avoid this:

- The contrast between supers and the background, whether in terms of colour contrast or relative brightness, must be sufficient to permit the text to be clearly legible.
- Certain colour combinations are unlikely to produce readable text and should be avoided. Appendix 3 includes lists of combinations likely to be acceptable and those that should be avoided.
- As a general rule of thumb, ‘light-on-light’ combinations (e.g. whites and greys) are unlikely to be acceptable.
- Where the background ad creative distorts the text or might otherwise be distracting for viewers (for example, when it is moving or cuts from one view to another or where it results in more than one colour contrast between the supers and the background) creative approaches should be adopted to create an appropriate level of contrast, for example:
 - using bold text in the supers; and/or
 - changing the contrast of the part of the ad creative behind the supers.
- If an effective creative approach-based solution cannot be found, the supers should be placed on an opaque single-coloured block or band at the bottom of the screen (the lower portion of a letterbox).
- Supers presented in a block or band should have a clear margin in relation to the main ad creative (all around a block or above a band at the bottom of the screen). Anything less than 6 lines above and below the super is unlikely to be adequate. A sensible approximation of 6 vertical lines must be used horizontally at the ends of the block.

6.5. Edging and shadowing

Individual letters are sometimes ‘edged’ to make them stand out from the background. However, applying edging to small text can have the opposite effect to improving legibility because it results in blurring, a significant barrier to legibility. A similar problem can occur when applying shadow effects.

In improving the contrast between supers and their background in the main ad creative, practitioners are cautioned that these effects should be used sparingly and with care; edging or shadowing effects are not acceptable as substitutes for background blocks or bands as described under 6.4 above.

6.6. Fading

Fading supers in and out of vision should be avoided. Such text will inherently be at less than optimum visibility for a part of its time on screen. If it is used, only the time when it is at optimum visibility will be counted for the purposes of duration of hold calculations.

6.7. Position and orientation

The optimal position for supers is centered at the bottom of the creative. Viewers are less likely to anticipate supers appearing in other parts of the screen making them harder to read.

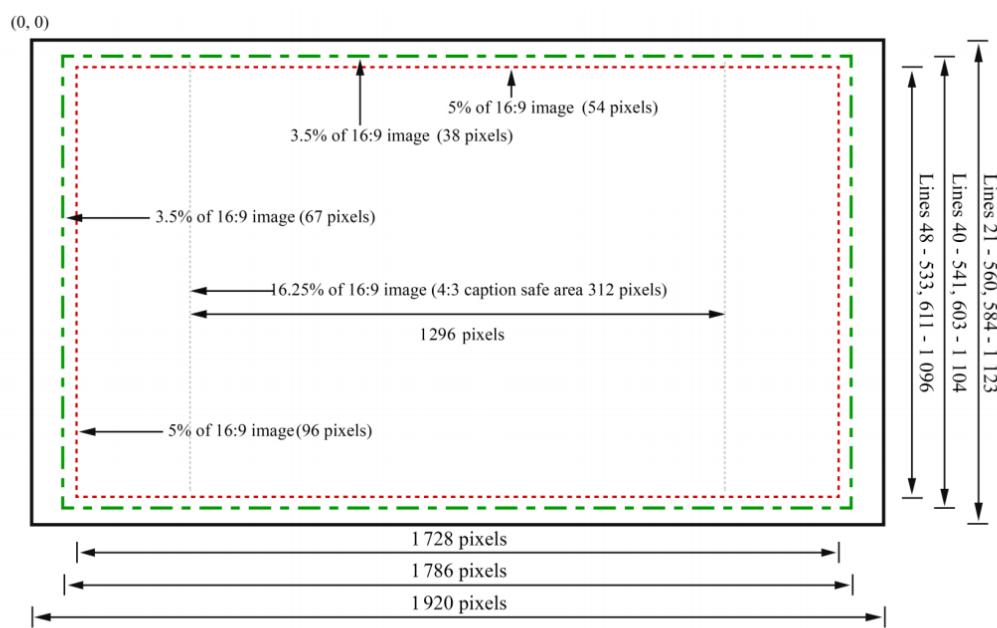
Text shown sideways, at an angle or distorted in any way, such as by being wrapped round a real or virtual object in the commercial, should be avoided.

6.8. Screen parameters

Superimposed text positioned so that it is likely to be wholly or partially obscured or distorted at any edge of the picture area is unacceptable.

There is now only one caption safe area defined for 16:9 commercial material for UK transmission (see [EBU R95-1](#) for further details). All essential action should take place inside the 16:9 action safe area and all graphics and text should be framed within the 16:9 caption safe area.

The graphic below is an illustration of the action safe area and caption safe area in the HD environment.



* The total number of lines is 1125 (active lines from 21 to 560 and 584 to 1123 inclusive = 1080 lines).

** The complete digital line comprises 2200 pixels. Of these, the "digital active line" comprises 1920 pixels (numbered from 0 - 1919 inclusive). All active pixels are included in the image active line.

7. Viewer understanding

7.1. Principle

Complexity is a significant bar to understanding superimposed text. Advertisers and practitioners, along with broadcasters and Clearcast when clearing ads for broadcast, should take all steps to ensure that supers are kept to a minimum and are as straight-forward and simple as possible.

7.2. Unnecessary text

Broadcasters and Clearcast should not accept an advertiser's assertion that specific text is required for legal or other reasons. In BCAP's experience, this is not always the case; advertisers' legal advisors may sometimes be excessively cautious.

Broadcasters and Clearcast should use their judgement to identify circumstances where advertisers should be asked to provide an appropriate justification of the inclusion of a piece of text in supers.

7.3. Types of word to avoid

Certain types of word to be avoided as far as possible because they are not quickly recognisable and are therefore processed slowly by viewers. For example:

- unfamiliar words;
- jargon words;
- legalistic words;
- long words;
- less common abbreviations; and
- proper nouns.

7.4. Sentence structure

Sentences should be:

- short, contained on one line; and
- simple, containing one key idea, with no subordinate phrases or clauses.

7.5. Length of text

As a general principle, the longer supers are, the greater the burden on viewers in reading them. This is likely to increase the risk of supers either being in breach or contributing to a breach of the misleading advertising rules of the BCAP Code.

The following points should be considered:

- Practitioners should take all reasonable steps to ensure the length of text is kept to a minimum.
- Large blocks of text are likely to deter a viewer from even attempting to read the contents.
- Supers that take up a full line length tend to be harder to read for viewers than the same information presented in two shorter lines.
- Supers that take up more than two full length lines are likely to necessitate higher requirements for both size of text and duration of hold:
 - a minimum size of at least 16 lines; and
 - a hold duration of at least 4 words per second in addition to the recognition period.
- In reducing the amount of text, whole phrases or sentences should be considered for removal before individual words. The removal of individual words can often make supers more difficult to read because they become fragmented. A longer text that is a proper sentence with all the words in place can sometimes communicate better and more quickly than a shorter one with words removed.

7.6. Layout of text

Supers should be arranged so as to maximise the opportunity for viewers to understand the information contained in them.

Where qualifying information is divorced from the claim it qualifies (e.g. where the super is at the beginning and the claim qualified at the end of an advertisement), the ASA may consider it material factor in determining the acceptability of the advertising.

Where large amounts of text are mandated (for instance, because of statutory requirements), the way it is presented can help viewers to read it, for example:

- Within blocks of text, line endings should coincide with the ends of sentences or phrases.
- Separate supers should be placed as close as practicable to that part of the advertisement to which they refer.

7.7. Competition with other ad messages

In many instances, viewers are less likely to be able to read and understand information contained within supers when it is competing with other information – in particular, other text – presented in the main ad creative. This is likely to be mitigated by the information presented in the super being closely related to the messages of the main ad creative. Practitioners should ensure as far as possible that supers relate closely to the information and messages of the main creative to maximise viewers' opportunity to read and understand them.

7.8. Use of numbers and calculation

Large amounts of numerical information can frustrate viewer understanding. Practitioners should avoid supers with multiple pieces of complex numerical information (e.g. information on a monthly price, contract length, delivery charges and activation fees for a service). Spreading such information over a number of supers is more likely to be acceptable.

Ordinarily, supers that require viewers to make additional calculations are unlikely to be acceptable. This is unlikely to apply to commonly understood information (e.g. price indications) such as stating only the monthly price of a 12-month contract.

8. Duration of hold

- 8.1.** Viewers must be given an appropriate length of time to read superimposed text. This part of the guidance outlines a method for establishing the duration of hold in the context of a particular ad.
- 8.2.** In general, supers should be held for a duration calculated at the rate of 5 words per second (i.e. 0.2 seconds per word or 300 words per minute).
- 8.3.** An additional 'recognition period' should be added to the duration of hold calculated. Where the supers concerned contain:
 - 9 words or fewer, the recognition period is 2 seconds; and
 - 10 words or more, the recognition period is 3 seconds.

Additionally, in conjunction with section 4.4 above, where qualifying information in a super is particularly significant practitioners should use a longer recognition period than those above (at least an additional 2 seconds) to create a greater window for viewers to absorb the information presented.

See Appendix 1 below for a table of hold durations.

- 8.4. For the purposes of calculating the duration of hold of a super, all forms of text appearing on screen at any one point in time should be counted. This includes both superimposed text and, subject to the exemptions in section 8.5 below, any text content in the main ad creative regardless of where on screen it appears and whether or not it is repeated in audio.
- 8.5. The following types of text are excluded from the calculation of duration of hold:
 - a company name, brand name or logo;
 - text that is included for reasons of a purely technical legal nature unrelated to consumer protection or the offer (in practice this will almost always apply only to film and video trailer credits and to copyright disclaimers or the like);
 - text that is purely incidental to the advertisement and of such a kind that viewers will be unlikely to believe contains information (e.g. text on packaging where this is not being used to convey any part of the claim or offer); and
 - abstract signs such as ‘£’ or ‘%’ or decimal point, in numbers or prices.

- 8.6. Numbers should be treated as they are commonly pronounced as words.

Where an obvious and generally recognised short form of vocalising numbers exists, this may be used for the purposes of calculation. It will not usually be necessary to count ‘thousand/s’, ‘hundred/s’, or the conjunction ‘and’ as separate words in a number string. For example, ‘1,255’ can be vocalised as “twelve [hundred and] fifty-five” and a word count of three would be acceptable.

Long numbers should usually be presented on screen according to relevant conventions, e.g. telephone numbers (0207 922 2200; 01234 567 890) or other long numbers in groups of three (10,000; 100,000).

- 8.7. The following miscellaneous expressions should usually be counted as one word:

- e-mail addresses;
- internet URLs; and
- common abbreviations, such as, ‘APR’, ‘RRP’ or ‘PO Box’.

Postcodes in addresses may be counted as one word per group of letters and numbers only where an otherwise full address is given.

- 8.8. To calculate the appropriate duration for text which rolls or scrolls across the screen, first determine the total number of seconds the caption would need to be held if it was a static caption. The moving caption should take this amount of time to move across the screen, at a steady and even rate.

9. Combined effects

- 9.1. The factors influencing readability of supers outlined in section 4-8 above can work in combination to frustrate viewers' attempts to read and understand them. Practitioners are cautioned that the ASA will consider the factors individually and cumulatively when investigating complaints. One action that BCAP recommends to mitigate this risk is to ensure that supers are presented with appropriate contrast from the background creative as per section 6 above.

10. Short ads or shortened versions

- 10.1. Advertisers sometime create deliberately short commercials or shortened versions of longer commercials. These inherently limit the available time and space for supers to be displayed. Advertisers should exercise caution in such circumstances to ensure their ads still conform to the approach outlined above.

11. Subtitling

- 11.1. The following additional points should be borne in mind when advertisements are to be subtitled in the form of text for the hearing impaired.
- 11.2. When positioning subtitling on the screen care must be taken to avoid obscuring any visual, including other forms of text, that is material to the offer.
- 11.3. Care should be taken in paraphrasing the audio for text transmission that no essential consumer protection or material information material is lost or any misleading impression given relating to the offer.

Further guidance on the use of subtitling is available from the Ofcom Television Licensing and Planning Group.

Appendix 1: Duration of hold calculations

- a) 'Short' supers (containing 9 words or fewer) – 0.2 seconds per word plus 2 seconds recognition time; for example:

Number of words	Duration in seconds (including recognition time)	Number of words	Duration in seconds (including recognition time)
1	2.2	6	3.2
2	2.4	7	3.4
3	2.6	8	3.6
4	2.8	9	3.8
5	3.0		

- b) 'Long' supers (containing 10 words or more) – 0.2 seconds per word plus 3 seconds recognition time; for example:

Number of words	Duration in seconds (including recognition time)	Number of words	Duration in seconds (including recognition time)
10	5.0	21	7.2
11	5.2	22	7.4
12	5.4	23	7.6
13	5.6	24	7.8
14	5.8	25	8.0
15	6.0	26	8.2
16	6.2	27	8.4
17	6.4	28	8.6
18	6.6	29	8.8
19	6.8	30	9.0
20	7.0	(etc)	

Appendix 2: Method of measuring line height

Digital image and video editing equipment allow for a variety of means of measuring line height. This is a basic method for ensuring that practitioners' processes are in line with BCAP's intended approach outlined above.

- a) Capture a frame from the ad including the text to be measured.
- b) Convert that image to an uncompressed graphics file; the image should not be revised or re-sized in any way.
- c) Using common graphics editing software zoom in on the image to the point where individual pixels can be clearly seen.
- d) Count the number of TV lines displayed; for example, for a white caption on a dark background, count the number of vertical lines of full brightness pixels.

Each horizontal line of pixels represents a television line. To calculate the line height, simply count the number of vertical lines containing the darkest pixels, using where possible flat-topped letters (e.g. 'i', 'x').

Although when printed there are variations in the density of individual pixels even within the main body of the letters it is a fairly simple matter to identify the upper and lower horizontal boundaries. Where no flat-topped letters are available, ignore any risers (e.g. 'h' and 't') and descenders (e.g. 'g') and the top and bottom lines of rounded letters (e.g. 'g', 'h', 'e').

Note how this example demonstrates that the tops and bottoms of rounded letters fall outside the maximum brightness vertical height of flat-topped letters. If the pattern of pixels making up the letters is not easily identifiable against the background this probably indicates that the relative contrast between text and background is insufficient. The text probably needs to be placed on a block.

See section 6 above.

Appendix 3: Colour combinations

- a) Certain colour combinations have been found to make text difficult to read and so should be avoided:

Text colour	Background	Text colour	Background
White	Yellow	Magenta	Red
Yellow	White, Cyan	Red	Magenta (Green)
Cyan	Green, Yellow	Blue	Black
Green	Cyan, Blue		

- b) Other combinations have been found more likely to be acceptable:

Text colour	Background	Text colour	Background
White	Magenta, Red, Green, Blue, Black	Magenta	Blue, White
Yellow	Blue	Red	White, Yellow, Cyan (Green)
Cyan	Blue	Blue	White
Green	Yellow, White		

Note: Black on white is a combination hitherto used quite successfully in television advertising, although the research indicates that it is not an ideal combination.

See section 6 above.

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Advice on specific non-broadcast marketing communications is available from the Copy Advice team by telephone on 020 7492 2100, or you can log a specific written enquiry via the [online request form](#).

The [Advice and Training](#) section of the CAP website contains a full list of Advertising Guidance notes as well as access to the full AdviceOnline database, which links through to relevant Code rules and ASA rulings.

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