

LOUDNESS IN TELEVISION COMMERCIALS: H.R. 6209

"To require the Federal Communications Commission to prescribe a standard to preclude commercials from being broadcast at louder volumes than the program material they accompany."

A RESPONSE

Reliably measuring loudness is not strictly a mechanical process because loudness is as much perception as it is measurable "energy" or sound pressure. Relying on a VU meter needle not swinging into the red over extended periods of time does not ensure that the program or commercial will not be perceived as loud.

In broadcast television, there are two loudness situations to consider:

1. Inter-channel: the difference in loudness when switching from one channel to another.
2. Intra-channel: the difference in loudness between, for example, a program and a commercial on the same channel.

To effectively and fairly measure and 'police' either situation would be difficult at best. Inter-channel differences will be solved when all networks, O&Os and affiliates agree to and abide by the same standard. Intra-channel differences must be addressed as an internal issue by each network, O&O and affiliate. (It appears that H.R. 6209, The Calm Act, is aimed at intra-channel differences.)

The specification for digital television in the US which goes into universal effect in February 2009, includes a parameter called the Dialog Normalization Value, or DialNorm. If implemented across all distribution channels, DialNorm would essentially mitigate both inter- and intra-channel perceived loudness differences. DialNorm is a sophisticated software algorithm which identifies the average dialog level within a program or commercial. It is expressed as a number, for example "-23".

The ATSC (Advanced Television Systems Committee)* adopted Dolby Digital AC-3 as their standard for audio transmission in Digital Television. AC-3 includes the DialNorm specification. When the DialNorm value is transmitted in the program data stream, every device with an AC-3 decoder—a television set, a set top box or an audio/video receiver—can read the DialNorm value and adjust the audio output level at the end user's device.

If program producers, commercial post houses and importantly, the networks, O&Os and affiliates conform to and enforce the DialNorm standard, there would be no need for H.R. 6209, The Calm Act.

*The Advanced Television Systems Committee, Inc., is an international, non-profit organization developing voluntary standards for digital television. The ATSC member organizations represent the broadcast, broadcast equipment, motion picture, consumer electronics, computer, cable, satellite, and semiconductor industries. ATSC creates and fosters implementation of voluntary Standards and Recommended Practices to advance terrestrial digital television broadcasting, and to facilitate interoperability with other media.