

**United States of America**  
**before the**  
**Architectural and Transportation Barriers Compliance Board**

**Notice of Proposed Rulemaking—** )  
**Proposed Information and Communication** ) **Docket No. ATBCB-2015-0002**  
**Technology (ICT) Standards and Guidelines** )

**Comments of Word Wizards Inc.**  
**Concerning**  
**Media Alternative (Pre-recorded) Transcripts as an Alternative for Audio Description**  
**in Certain Instances**

Word Wizards Inc.<sup>1</sup> (hereafter WW) submits the following comments to the Architectural and Transportation Barriers Compliance Board (Access Board) for consideration in this Proposed Rulemaking proceeding concerning Information and Communication Technology (ICT) Standards and Guidelines under Section 508 of the Rehabilitation Act of 1973 (2015 Refresh). WW applauds the Access Board in its desire to require compliance with the WCAG 2.0 standards suggested by W3C. The Access Board has stated that one of the “primary purposes” of the 2015 Refresh is as follows:

*“...to **replace the current product-based approach with requirements based on functionality**, and, thereby, ensure that accessibility for people with disabilities keeps pace with advances in electronic and information technology.” (Emphasis added.)*

In the spirit of increasing functionality with new technology, we offer a description of our recent experience using a potential alternative to Audio Description (AD) for audio-video content with complex visual information. WCAG 2.0 Section 1.2.3 mentions “Media Alternative (Pre-recorded)” (MAP) as a valid accessibility standard. WW has developed a

<sup>1</sup>Word Wizards Inc. is on the GSA Supply Schedule, Advertising and Marketing Solutions (AIMS), Contract # GS-07F-0641X. WW provides remediation services for digital media including captioning, PDF, and Microsoft Office documents. WW also performs these services via our GPO SPA 960 contract.

process to provide MAP transcripts that yield fully compliant access to visual content in mixed media material. Our method produces a transcript that includes descriptions of visual content, fully remediated in PDF format. We have already utilized these MAP transcripts for clients seeking accessibility for Government ICT, where project limitations prevented AD from being used effectively. As the Board is aware, the use of PDF/UA (Universal Accessibility) is being encouraged as a means to increase access to ICT for people with disabilities. PDF/UA is the informal name for ISO 14289, the International Standard for PDF accessibility. What WW is proposing to do is create PDF/UAs of transcripts which will make them readable by screen readers.

### **Case History No. 1**

In early 2014, a client asked us for AD and a Section 508 compliant transcript for a short video, with a rapid turnaround deadline and a low budget. The client had only two days and a minuscule budget to produce both a video with full AD, and a compliant PDF of the video transcript. We suggested a MAP transcript as an alternative to achieve compliance on time and within the budget. The end product was a fully compliant PDF document, with all non-verbal elements described in the body of the transcript. By including all visual material in the document, we were able to satisfy the requirement of WCAG 2.0 - Section 1.2.3 to convey all visual information. The document was produced for half the cost of standard AD, because there was no need for a media specialist to record and mix audio content into the source video. In this case, budget and speed were the client's priorities - and a MAP transcript did the job twice as fast, at half of the cost.

WW recognizes that cost alone should never determine the type of accessibility afforded to persons with disabilities. However, Section 508 Subpart (a) General § 1194.1 (Purpose)

introduces the concept that the expense of providing accessibility should not cause an “undue burden” on the agency. Sometimes this notion causes confusion or limits innovation, so budget-strapped agencies may be inclined to do nothing to further the goals of increased accessibility. They could conceivably prioritize content and search for less costly, yet fully functional alternatives to commonly practiced procedures. The Proposed Rule preserves the concept of undue burden, but includes an increased requirement for agencies to document, in writing, the basis for determining whether conformance to 508 standards constitutes as an undue burden on the agency. Furthermore, regarding alternative methods to achieve the general purposes of the Act, Section 508 (a) § 1194.5 Equivalent Facilitation states:

“Nothing in this part is intended to prevent the use of designs or technologies as alternatives to those prescribed in this part provided they result in *substantially equivalent or greater access* to and use of a product for people with disabilities.” (Emphasis added.)

Again, the Proposed Rule preserves the “Equivalent Facilitation” Standard of Sec. 508 (a) § 1194.5 by stating (at § E101.2) that the use of alternative design that results in “substantially equivalent or greater accessibility” is permitted. In fact, the Proposed Rule actually combines the undue burden concept with equivalent facilitation. This combination works to encourage new technologies that are able to relieve undue burdens on the agencies. Decreasing undue burden by alternative means is included in Section E202.5.3 of the Proposed Rule, which states:

“Where conformance to one or more requirements in the 508 Standards imposes an undue burden or a fundamental alteration in the nature of the ICT, the agency *shall provide* individuals with disabilities access to and use of information and data by an *alternative means* that meets identified needs.” (Emphasis added.)

The WCAG 2.0 success criteria for Understanding SC 1.2.3 state in the footnotes that audio description and full text alternatives (such as MAP transcripts) are acceptable interchangeably at different success levels. Footnote #2 quoted in its entirety may be found in Appendix A of this document.

### **Case History No. 2**

In instances of highly complex video content, MAP transcripts provide a level of visual description otherwise impossible with conventional AD. In the summer of 2014, WW used a MAP transcript to assist a client who was working on a high-profile Federal investigation. During this sensitive inquiry, a video presentation was created to summarize the findings of the agency's investigation. The video was long and visually elaborate, consisting of different camera feeds spliced together, views with multiple screens simultaneously, and an uninterrupted audio track blended from several sources. In this case, while the videos were complex, they were completely understandable to sighted people. Given the intricacies of the mixed media, conventional AD was not feasible. At the final stages of this investigation, a concerned family member, who was blind, insisted on an accessible version of the video in order to fully understand what had happened in the case. We suggested a MAP transcript to provide complete accessibility, because of the complicated visual content, and because the audio track did not leave any space for traditional AD. Even extended AD would not work.

WW has focused on Sections 1.2.3 and 1.2.8. of WCAG 2.0 which states the following regarding Media Alternative (Pre-recorded), which we are calling MAP documents:

#### *Understanding Success Criterion 1.2.3,*

“This approach involves providing all of the information in the synchronized media (both visual and auditory) in text form. An

alternative for time-based media provides a running description of all that is going on in the synchronized media content. The alternative for time-based media reads [in JAWS as] something like a book. Unlike audio description, the description of the video portion is not constrained to just the pauses in the existing dialogue. Full descriptions of all visual information are provided, including visual context, actions and expressions of actors, and any other visual material. In addition, non-speech sounds (laughter, off-screen voices, etc.) are described, and transcripts of all dialogue are included.”

### **Conclusion**

As the Access Board prepares to refresh the standards by which Section 508 compliance will be evaluated, we encourage inclusion of MAP transcripts as a viable option in appropriate circumstances. When budgets are constrained, rapid turnaround is required, and/or visual information is highly complex, MAP transcripts fulfill real and significant needs while conforming to the practical Section 508 compliance standards. WW recognizes the need to reduce undue burden on the agencies and permit the use of alternative means which are as good as, or better, than conventional means at achieving accessibility to people with disabilities. These comments are being submitted in order to bring our actual experience to the attention of the accessibility community. It is our hope that MAP transcripts will be included on the list of acceptable compliance solutions, and we offer our expertise in advancing these new technologies further.

Respectfully Submitted,  
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## Appendix A – WCAG 2.0 Success Criteria Footnote # 2 to Understanding SC 1.2.3

**Note 2:** 1.2.3, 1.2.5, and 1.2.8 overlap somewhat with each other. This is to give the author some choice at the minimum conformance level, and to provide additional requirements at higher levels. At Level A in Success Criterion 1.2.3, ***authors do have the choice of providing either an audio description or a full text alternative.*** (Emphasis added.) If they wish to conform at Level AA, under Success Criterion 1.2.5 authors must provide an audio description - a requirement already met if they chose that alternative for 1.2.3, otherwise an additional requirement. ***At Level AAA under Success Criterion 1.2.8 they must provide an extended text description.*** (Emphasis added.) This is an additional requirement if both 1.2.3 and 1.2.5 were met by providing an audio description only. If 1.2.3 was met, however, by providing a text description, and the 1.2.5 requirement for an audio description was met, then 1.2.8 does not add new requirements.