



Comment from Leiserson, Anna Belle

This is a Comment on the **Architectural and Transportation Barriers Compliance Board (ATBCB) Proposed Rule: Information and Communication Technology Standards and Guidelines**

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Due May 28 2015, at 11:59 PM ET

Comment

While WCAG overall is an excellent standard, the success criteria for low vision do not help the population -- and even remove access that was available under 508. Specifically all items in Guideline 1.4 regarding are phrased in ways that do harm. 1.4.3 and 1.4.6 (contrast) harm readers with light sensitivity; 1.4.4 and 1.4.7 use a paper standard for enlargement, permit horizontal scrolling, and substantially weaken the access given in the current 508; 1.4.8 is a move in the right direction, but too little, and as a Level AAA rule will not be included in the 508 Refresh. Finally, in Guideline 1.3, text level semantics need to be considered meaning conveyed in presentation 1.3.1 and must be programmatically determined. Definitions and citations are examples. Also, text containing sequences that convey meaning must be programmatically determined 1.3.2. Program code included in <pre> elements are examples of "meaningful sequences" presented visually for which no programmatic relationship is given. With regard to 1.3.1 and 1.3.2, the Level AAA guideline 1.4, there are also two success criteria that conflict with an appropriate interpretation of 1.3.1. The level AAA 3.1.4 (abbreviations) and 3.1.6 (pronunciation) nullify treating these text level semantics as presentational objects whose meaning must be determined programmatically.

Summary: Strengthen 1.3.1 and 1.3.2 to include semantics embedded in text. Drop 1.4.3, 1.4.4 and 1.4.6, 3.1.4 and 3.1.6. Finally, reword 1.4.8 to say users have the same access to style that authors have.

Thank you so much for all the work you do to help the disabled.

Best wishes,
Anna Belle Leiserson

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