




Comment from Dunphy, Dawn

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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Comment

While I'm glad that these regulations are being updated, there is a major component still missing from every section - voice recognition/speech to text/voice activation technology.

My hands ceased functioning properly halfway through my first full semester of graduate school. I suffered severe loss of strength, dexterity, & stamina in my hands & arms, the result of permanent nerve damage.

I went from typing 82 wpm & 200+ kpm (10-key) to not physically being able to type on a standard keyboard at all. While I love touch screens, my hands fatigue too quickly to use them in place of a keyboard for more than a few minutes every few hours.

Determined to complete my degree & realize my dream of serving my country as a civil servant, I turned to the one Assistive Technology that allowed me to access & utilize every aspect & feature of my computer - the voice recognition program Dragon Naturally Speaking.

Dragon enabled me to complete my degree, & Dragon is the tool I continue to utilize to complete everything from doctor office forms to paying bills online to completing work - all by voice.

This transition to having to use Assistive Technology for all computer usage led me to discover that while most commercial websites, web applications, & programs are compatible with Dragon, most federal agency websites, web applications, programs, & entire systems, are not.

The federal government is the largest employer in the country, & is currently seeking to hire greater numbers of individuals with disabilities.

At the same time, there are numerous agencies being directed & mandated to move to a 'cloud-based' computer system. Unfortunately, the requirements for accessibility are forgotten during this transition, didn't exist in the first place, or, as I've been told many, many times "it was tested with XYZ program, so we're compliant. We don't have to make it work with ALL technology." (The program usually cited as 'tested with' is a specific screen reader.). This is followed by a refusal to provide any accessible means to access or utilize the information.

I've encountered barrier after barrier, roadblock after roadblock,

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Submitter Information

Submitter Name:

Dawn Dunphy

City:

Wenonah

Country:

United States

State or Province:

NJ

Category:

Individual

when seeking equivalent access to everything from position-required databases & applications to benefits information.

I would greatly appreciate it if, throughout this regulatory document, for every mention of Braille output & screen readers, the term 'voice recognition technology' or a similar phrase was included. This inclusion would not only raise awareness & remind the federal acquisition and IT communities of the need to provide accessible content to individuals with disabilities, no matter the category of the person's disability (ie, auditory, visual, dexterity, etc), but would also provide a regulatory 'cue card' to remind agencies & vendors of the need to test & configure systems, products, programs, web applications, & web sites for compatibility with voice recognition software.

I also request that the Access Board please consider adding specific speech to text/voice recognition guidelines/requirements to these & future standards.

This would greatly assist all voice recognition users in our quest for inclusion as we seek to gain equivalent access to, & utilization of, the same information, trainings, databases, data manipulation tools, & communications that our peers & coworkers currently enjoy without limitation.

Thank you.