

Docket: ATBCB-2015-0002  
ICT NPRM  
May 12, 2015

Susan Molloy, M.A., Rehab Assistance for Environmental Illness/Intolerance  
Mary Lamielle, Director, National Center for Environmental Health Strategies

Re: Proposed Rule, Updated Accessibility Requirements  
Information and Communication Technology in the Federal Sector as per Section  
508 of the Rehabilitation Act and Section 255 of the Communications Act

To the Access Board:

Thank you for this opportunity to offer comments on the Proposed Rule.

“Defined Terms” sections in the document do not say that “Accessible Technology” is to be limited to only certain individuals with only certain access requirements.

In the spirit of full inclusion of all people with all disabilities, please consider these recommendations and determine how to integrate them into the Final Rule.

Many reasonable efforts that could enable some people with environmental intolerances to use federal and federally-funded facilities and programs cost nothing because essentially they retain existing technologies or employ only the most straightforward modifications.

As examples:

Retain landline phones as an accommodation in certain select public phone booths, and federal facilities such as medical facilities, libraries, schools.

Install wired buzzers and intercoms at one or more accessible entrances to federal and federally-funded facilities, with signage and a directory in all formats, to summon a person to come outside to meet us such as our doctor, a Post Office clerk, case worker, law enforcement personnel, our child.

Do not install flashing lights and fluorescents on all ticket vending machines.

Retain incandescent lights or daylight in designated areas and paths of travel.

Designate some areas of facilities as “wifi free” zones.

Specify, possibly in the "Support Services" described in 602.4, 603, and 603.3:

We are to be granted outdoor appointments if requested, in as confidential a setting as attainable, as an accommodation when a facility is inaccessible to us; during inclement weather or bad outdoor air conditions we might be able to conduct business, for example, in our vehicle in the parking lot of a hospital, Post Office, school, voting facility, or other federal or federally-funded facility;

We are to be permitted to retain landlines for our homes and in public places to use telephones and computers – do not convert vitally essential equipment we must use, and have the right to use, over to the “smart” grid, wifi, and routers.

We need readily available electromagnetic field and radiofrequency emission data and labeling from manufacturers, retailers, and procurement offices to purchase or use electronic information and communication equipment.

We need a clear policy statement by the Access Board (an MOU?) that exempts us from mandatory "smart" features in appliances, lights, meters, routers, security systems, etc. purchased or subsidized by federal funding.

We cannot suggest particular language congruent with the Board's format. However we have every confidence that appropriate language can be readily developed by the Access Board for inclusion in the Final Rule.

Provisions including these will provide at least a minimum of access, to federal and federally-funded facilities and programs, to people who are legally entitled to access.

Stating as much in the final ICT update document will provide a measure of protection for us while more fully accessible equipment, with adequate shielding and better electronics, are being developed and made available to everyone.

Thank you for your consideration.

For additional information contact:

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