

Date: May 21, 2015

To: Architectural and Transportation Barriers Compliance Board

From: Anthony Fadale  
State ADA Coordinator  
State of Kansas

RE: Comments on Draft ICT Standards and Guidelines  
Regulatory Identification Number 3014-AA37  
Docket ID ATBCB-2015-0002

The state of Kansas is strongly committed to improving access to information and communications technology. As part of our efforts, we have adopted in long-standing state policy both Section 508 Electronic and Information Technology Accessibility Standards for Web-Based Intranet and Internet Information and Applications and the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA. This policy is also incorporated into our state procurement standards. As such, Kansas has great interest in the future direction of the federal Information and Communication Technology (ICT) Standards and Guidelines.

We greatly appreciate the consideration that has been given to our comments in the past,<sup>1</sup> as well as the opportunity to comment on this draft. Our remarks herein are drawn from individual examination of the Notice of Proposed Rulemaking draft, and were reviewed by the membership of the Kansas Partnership for Accessible Technology, an advisory group that aims to ensure equitable and inclusive access to ICT in the state of Kansas.

Our primary comment is to emphasize our interest in seeing the proposed rule put into effect as soon as possible, particularly the harmonization with WCAG 2.0 Level AA. In addition to obviously making affected ICT more accessible, the consistency this will bring will greatly benefit us in dealings with constituents, vendors, and other business partners.

More specifically, one area we believe would benefit from greater clarification is the application of ISO 14289-1 (PDF/UA-1). Where it appears, the stated requirements to be met are conformance to all Level A and Level AA Success Criteria and all Conformance Requirements in WCAG 2.0, or, where applicable, ISO 14289-1 (PDF/UA-1). While we are supportive of the inclusion of PDF/UA-1, and recognize the fact that, for PDF documents, both WCAG 2.0 and PDF/UA-1 can be applied, we believe that clarification of intent regarding the use of the word “or” would be helpful. Despite the predominant agreement and overlap between WCAG 2.0 as applied to PDF documents and PDF/UA-1, there are some differences—as noted, for example, by the Association for Information and Image Management<sup>2</sup> and the PDF Association<sup>3</sup>. Is it the Board’s contention that complete conformance with either standard represents a

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<sup>1</sup> Comment on the 2010 draft proposed rule: ID [ATBCB-2010-0001-0068](#)  
Comment on the 2011 draft proposed rule: ID [ATBCB-2011-0007-0042](#)

<sup>2</sup> *Achieving WCAG 2.0 with PDF/UA*, <http://www.aiim.org/Research-and-Publications/standards/committees/PDFUA/WCAG20-Mapping>

<sup>3</sup> *Infographics: PDF/UA and WCAG 2.0*, <http://www.pdfa.org/2015/04/infographics-pdfua-and-wcag-2-0/>

sufficient level of accessibility to satisfy the rule? Or, alternatively, might there be cases in which one or the other must be the standard applied? If the latter, how would it be determined that one standard in particular must be used, and which one? Our current interpretation is that the former position is what is intended (i.e., that satisfaction of either standard is sufficient, and there is to be no requirement of one over the other), but, as stated, clarification of whether this interpretation is correct would be appreciated.

Thank you again. We hope these comments are helpful in your deliberation process. Please let us know if you have any questions.