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C Comment from Cuk, Vladimir

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

On behalf of the International Disability Alliance (IDA) representing 7 global and 4 regional organizations of persons with disabilities, I would like to express our support to the proposed update of Section 508 and 255 Guidelines made by the U.S. Access Board in February.
Given the positive impact that this U.S. public procurement policy had in boosting enhanced accessibility in Information and Communication Technologies (ICT), not only in the public sector but also on everyday technologies, we welcome this improved, up-to-date and realistic approach taken in the proposed technical specifications and guidelines.
We are aware that in the global ICT market the U.S. is a key player and, therefore, the improvements proposed in this standard to ensure accessibility of the ICT procured by the U.S. government will end up benefiting persons with disabilities in the U.S. and all around the world due to the economies of scale that major ICT companies tend to pursue.
We particularly welcome the new approach taken with the Functional Performance Criteria requesting manufacturers to provide accessibility with innovative solutions when their products and services do not meet the technical requirements. It is also remarkable the effort made in aligning the Section 508 standard with other global standards, in particular the W3C WCAG 2.0. We are pleased to see that the proposed rule takes into consideration the potential of WCAG, as well as its application not only for websites, but also for electronic documents and software.
In addition, we would also like to highlight and support the clear requirements to ensure interoperability to assistive technologies, as well as essential solutions such as the Real-Time Text, including improved wording over the European Standard EN301549, and a clear requirement for RFC 4103 for SIP based VoIP. This is critical for interoperability. Allowing different companies to use different standards, or just specifying that things should interoperate but giving developers no clear statement of what they will need to interoperate

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with, has never worked. Finally, we also support the requirement for wideband audio, since this is already being adopted in mainstream telephony, and the impact on people with speech or hearing impairment is significant.

We therefore recommend the Access Board to stick to their proposal, especially in relation to these crucial items. And as mentioned above, we particularly welcome the already good level of harmonization achieved with other standards, such as the European EN301549 also covering accessibility requirements of ICT products and services, and we hope that this, or any other standard covering accessible technologies, will be revised at a later stage to meet those higher levels of accessibility and clearer requirements.

The UN Convention on the Rights of Persons with Disabilities is the first international human rights treaty that addresses ICT and sets out accessibility as one of its general principles, establishing obligations to the States Parties to take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to () information and communications technologies and systems, as well as to develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public. Hence, standards with the highest level of accessibility can serve as a global model for the implementation of the UN Convention.

Universally designed products and services, including new technologies, can be a great enabler to overcome the barriers that persons with disabilities face everyday. For this reason, we support public policies on public procurement aiming at the inclusion of persons with disabilities, and those standards and guidelines, such as the ones proposed in February by the Access Board, in support of those policies.

We look forward to a swift adoption of the improved Section 508 and 255 Guidelines that can move the global ICT market towards more inclusive technologies for persons with disabilities.

IDA represents the collective global voice of persons with disabilities counting among the estimated 1 billion persons with disabilities worldwide. The aim of IDA is to promote the effective and full implementation of the UN Convention on the Rights of Persons with Disabilities (CRPD) worldwide, as well as compliance with the CRPD within the UN system, through the active and coordinated involvement of representative organizations of persons with disabilities at national, regional and international levels.