




Comment from Wehrman, Lynn

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 IN REGARDS TO: RELATIONSHIP BETWEEN FUNCTIONAL PERFORMANCE CRITERIA AND TECHNICAL PROVISIONS

As someone who works closely with people living with a wide variety of disabilities as they test websites, software products and mobile applications for accessibility in conjunction with WCAG 2.0/Section 508/ADA criteria, it was a relief to know that the new rules would include functional performance criteria.

Most of our clients use software to verify accessibility while they are developing, and submit the finished product to us to determine accessibility from a functionality position. Quite often we run into instances where our clients believe they are sending us a totally accessible product, simply because the software deemed the product to be "accessible." But when it is submitted to our testers, their analysis can find these products inaccessible because they cannot complete tasks that are aligned with product use.

In the words of Michael Reardon at the US Dept. of Labor: "A service can be 508 compliant, but barely usable. Usability is a much more important standard for us than accessibility."

Thank you for recognizing the high importance of functional performance criteria in measuring true usability for real people living with disabilities. After all, we are developing websites, software and other applications for people to actually use, not for software programs to "pass."

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Submitter Information

Submitter Name:

Lynn Wehrman

City:

Minneapolis

Country:

United States

State or Province:

MN

Category:

Organization