C Comment from Warner, Michael

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

Section 508 is being updated to match W3C WCAG 2.0. The problem with this is that W3C is intended for all websites, which includes entertainment sites that use various proprietary software, while Section 508 is intended for a much smaller part of the Internet that is far more essential for many people (government, education, etceteras). W3C WCAG 2.0 is technology neutral, which is great for rapid development of new technologies for things such as entertainment, but we need to be careful to ensure that government and education websites are as accessible (disabilities and economical) to as wide a range of people as possible. Many people have old and/or slow computers that either have some commonly available software missing, out of date, or operates in an unreliable manner. Adobe Flash is a prime example of such user problems.

The Section 508 Update being based on W3C WCAG 2.0 needs the following additions:
1.   All information should be available in plain HTML or plain text. Plain HTML is not a well-established term; what I mean is HTML that works regardless of styles or scripts. Users of special needs may be using their own style sheets to view webpages, which can fix artsy webpage problems of poor contrast, font sizes, fonts that use serifs, etceteras. And, people might have scripts and plug-ins disabled for security or performance reasons.
2.   Tables should never be used for layout in HTML. CSS can easily do whatever layout tables can do. Surprisingly, W3C WCAG 2.0 doesnt have this mandate. This may seem to conflict my previous rule, but actually doesn't. Styles can be used in addition to plain HTML, but not in place of plain HTML for conveying semantics. And plain HTML should not be used for appearance instead of semantics. Tables should only be used for semantic organization of tabular data.
3.   Information that is redundant (including alternative representations) can be presented in a different form that might be less accessible but provides unique functionality. One example of this is having an interactive mass transit system map in addition to lists of bus/train routes and timetables.
4.   HTML5 should be used when possible instead of Adobe Flash.
5.   Until HTML5 can do so, documents intended for printing out or

have legal requirements for stringent layout should be made available in Portable Document Format (PDF) instead of Microsoft Word or other word-processor formats.

Attachments (1)

ICT Refresh

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