COMMENTS

JAPAN BUSINESS MACHINE AND INFORMATION SYSTEM INDUSTRIES ASSOCIATION (JBMIA)

We at Japan Business Machine and Information System Industries Association (JBMIA) would like to submit our comments as below from our viewpoint as manufacturers of copiers, multifunction office machines, and so on.
JBMIA is the industries association of multifunction office machines that copy, scan, fax and print established in 1960.
http://www.jbmia.or.jp/english/index.php

Based on the concept of current Section 508, we have worked toward drafting and establishing Japanese Industrial Standard: JIS X 8341-5: 2006 (Guidelines for older persons and persons with disabilities- Information and communications equipment, software and services- Part 5: Office equipment), and ISO/IEC 10779 was established on the basis of the said guidelines. It was designed for consideration of older persons and persons with disabilities adopting practical idea and perspective from each manufacturer's representative.

These comments have been studied and made by Accessibility Project of JBMIA Standardization Center which consists of Brother Industries, Ltd., Canon Inc., Fuji Xerox Co., Ltd., Konica Minolta Inc., KYOCERA Document Solutions Inc., Ricoh Company Ltd., Seiko Epson Corporation, Sharp Corporation, and Toshiba Tec Corporation

These comments refer to Information and Communication Technology (ICT) Standards and Guidelines: Notice of Proposed Rulemaking February 2015

Clause	Comment
Appendix A E201.1 Scope.	Recently, as the MFPs' printing speed is becoming faster, the boundary between the MFP and printing machines is getting unclear. The MFP is said to be a type of 'ICT' of the Section 508 since the last renewal of the Standards. However, it is not clear for the high-volume printers. Assuming the professional printer which requires its operator to be trained to operate, it

	can be considered that the 'back office exemption' is to be applied. How should we judge whether the product (and its tasks) is objectives of the Standards?
Appendix A E202.4 Functions Located in Maintenance or Monitoring Spaces	The operations of multifunction office machines and printers in offices can be categorized as follows: ●User maintenance operations (Hardware) ・Installation (When users of the corresponding products install) ・Change the paper size of a paper tray ・Clear a paper jam ・Replace a consumable (Replace a toner cartridge etc.) ●Regular operations ・Power/Power saving/Authentication ・Set an original ・Select a function (Copy/Fax/Scan/Print) ・Take out a print ・Add paper in a paper tray (Add the paper of the same size as a paper tray) ・Add paper in a bypass tray and change the paper size It is technically very difficult to enable users who are blind and users who have a disability with their hand to perform the above user maintenance operations (hardware) safely, and it is necessary to raise product prices significantly even if possible. Also, EN 301 549 excludes the following: ・when the product is in a failure, repair or maintenance state where the ordinary set of input or output functions are not available On the other hand, US Sec. 508 NPRM includes maintenance operations for ICT operations in a space that is not a

	maintenance space, and it is different from EN 301 549. We propose not to apply US Sec. 508 to user maintenance operations (hardware) for ensuring the security of users who are blind and users who have a disability with their hand, maintaining reasonable product prices, and harmonizing with EN 301 549.
Appendix A E203 Access to Functionality	E203 reads "Agencies shall ensure that all functionality of ICT is accessible .. .. .. , either directly or by supporting the use of assistive technology.....". Is "directly or by supporting the use of assistive technology" applicable to the requirements of 302.1, 302.2 and 407.12 ?
Appendix A E203 Access to Functionality	What is the idea for the minimal required abilities of operating specific functions of a certain product ? For example, unlike the ordinary office-use MFP, which is to be used by everyone who wants to print his or her own jobs, the job of the operator of production printers is the printing. They are not only required to operate the printer itself, but also need to see and judge the print quality to calibrate the printing engine to get the final prints. It would be very difficult (almost impossible) tasks if the operator is blind, does the US workplace require blind persons to be able to perform such jobs ?? We request to define in the Standards that, if the operation of a product is fundamentally impossible substantial operation for the persons with specific disabilities, the product is out of scope for those disabilities.
Appendix C 302.2 With Limited Vision	Things can be seen differently depending on people with limited vision. Uniformed thresholds for magnification, reduction or contrast may cause invisibility for some of them. Therefore, making the thresholds is not desirable. Instead of the uniformity, leeway should be given to our manufactures.

	It would lead to Innovative real useful functions for the people.
Appendix C 302.5 With Limited Hearing.	302.5 With Limited Hearing. It requires modes of operation which improves clarity, reduces background noise, and allows user control of volume. 'A mode of operation which reduces background noise' is ambiguous. If examples or explanations are added, it would help.
Appendix C 402.2.2 Braille Instructions.	402.2.2 Braille Instructions. It requires braille instructions for initiating a speech mode. We request to accept other tactile indications other than brailles. Simple easily discernable tactile mark is often preferable, for it does not depend on languages and recognizable to persons who do not use brailles, too. For global manufactures, it is often difficult to use brailles on their machines as brailles differ for each language. (Besides, the European Accessibility Standards, EN301549, requires tactile indications to activate speech mode.)
Appendix C 402.3.2 Non-private Listening.	402.3.2 Non-private Listening. - It requires a volume gain of at least 20 dB above the ambient level, when the ambient noise level is above 45 dB. We request to clarify the upper limit for the volume gain. Otherwise, the manufactures should design for unlimitedly loud voice guidance with efficient quality, which causes corresponding expense. - Please define 'use' in the last sentence: '.. after every use'. When does 'use' start and when does it end? Does that mean every time the power is switched (including the power saving mode), each time the users log in the machine, or every use of its voice mode??
Appendix C 407.3 Tactilely Discernible. 407.3.1 Identification.	Protruding hard keys from the surrounding surface is one measure, but there are other measures to enable blind users to recognize hard keys by touch. Making the material of the

	surrounding surface different from the one of hard keys, for example. Protruding hard keys from the surrounding surface may be difficult for users who have a disability with their hand to push. Also, when hard keys are protruded from the surrounding surface, hands or documents may hit and push the hard keys wrongly without intention. We request US Sec. 508 to change the description of hard keys "so that users can recognize them by touch" without restricting to measures to give consideration to users who are blind and users who have a disability with their hand at the same time and prevent wrong operations.
Appendix C 407.12 Reach Height	We would like you to consider the following comment regarding "407.12 Reach Height" of "Appendix C, Part 1194 – Functional Performance Criteria and Technical Requirements". You described that "Where a side reach requires a reach over a portion of the ICT, the height of that portion of the ICT shall be 34 inches (865 mm) maximum." and "Where the operable part is located 10 inches (255 mm) or less beyond the vertical reference plane, the operable part shall be 48 inches (1220 mm) high maximum.". However we request to apply the present rule, "The 508 Standards" to multifunction Printers (i.e. the operable part shall be 54 inches (1370 mm) high maximum). The reason: multifunction printers are used by handicapped people seated in wheelchairs as well as non-handicapped people in general offices. If the reach height rules (48 inches and others) are applied to multifunction printers, non-handicapped people of the height of 180cm or more will need to down to

	approach the operable part. That is inconvenient. Also weak sighted people of the height of 180cm or more will have to get even closer the operable part. Therefore the burden of the weak sighted people's waist and back will be even larger than the burden of the non-handicapped people.
Appendix C 407.12 Reach Height Preamble P99 VI. Section-by-Section D. Functional Performance Criteria and Technical Requirements	P99 Ⅵ.Section-by-Section D. Functional Performance Criteria and Technical Requirements 407.12 Reach Height writes about freestanding products such as desk-top type multifunction printer: ---------- 1194.25(j) of the current Section 508 Standards uses the words 'freestanding, non-portable, and intended to be used in one location' to describe the products to be applied. On the NPRM draft, the word 'stationary' is used instead to exclude the products which may not always be in place, such as with a multifunction printer specifically designed for desk-top use. Manufactures cannot control the installation location, but be able to prepare the installation conditions which can meet the reach height requirements. The manufactures have flexibility to choose either a forward reach or side reach, and other conditions. ---------- We request to accept the manufactures to declare the installation conditions, especially about the height of installation table, to ensure federal agencies to meet the requirements. (A 'standard type desk' can be any height. The actual height which the product can meet the 508 requirements is the important information.)

Appendix C 407.12.2 Side Reach.	407.12.2 Side Reach. For 407.12.2 Side Reach, there are requirements of '407.12.2.1 Unobstructed high side reach' and '407.12.2.2 Obstructed side reach'. Actually, there are obstructing objects in both 407.12.2.1 and 407.12.2.2, and their distances from the vertical reference plane differ. We request to change their titles appropriate to the requirements. (Otherwise, it is confusing.)
Appendix C 407.12.3.2 Obstructed Forward Reach.	407.12.3.2 Obstructed Forward Reach. - It is not clearly recognizable whether 'vertical reference plane (407.12.1)' or 'leading edge of the maximum protrusion (407.12.3.2)' is appropriate. Eg. For a printer with paper trays which stick out to the front of the machine, is a vertical reference plane should be its operational panel (with keys and display) or to paper trays? OR, should the Obstructed Forward Reach requirement be applied, and is 'the leading edge' the end of the paper tray?? We consider paper tray is one of its 'operational part'.
Appendix C 502 Interoperability with Assistive Technology Preamble P43 V. Major Issues B. WCAG Incorporation by Reference	502 Interoperability with Assistive Technology The exception says 'Platforms and applications that have closed functionality and that conform to 402 shall not be required to conform to 502'. On the other hand, on the page 42 of the NPRM draft, it says 14 success criteria of WCAG 2.0 can be applied to firmwares. Those 14 success criteria (as picked up by European Accessibility Standards, EN 301549) are mostly included to 402 and 502, so it would be very confusing to apply both WCAG and 402/502. We recommend to require '402 or 502' alone.

Comments on questions that are described in the Notice of Proposed Rulemaking are as follows:

Clause	Comment
Question 23. Should the Board add a requirement that the viewing angle of display screens be adjustable to permit wheelchair users or persons of small stature to see the entire viewable area of such screens and minimize glare? Are there other characteristics of display screens that would make them more viewable to persons who use wheelchairs or other mobility aids?	It requires displays to be visible from the position of a user with wheel chairs. An additional requirement of the display tilting is a duplicating demand. A tilting display would be useful not only for the persons with disability, but also for the people without disability. This seems to be a subject of usability rather than accessibility. It is questionable to include a requirement of display's adjustable angle to the standards, while requiring the visibility already.
Question 25. Are there requirements in proposed Exception 3 to 409.1 sufficiently clear?	The objective equipments are not clear. If there are extra examples or explanations, that would help.
Question 35. The Board seeks comment on its proposed approach to making its revised 508 Standards effective six months after publication in the Federal Register, with the exception of federal ICT-related procurements. The Board also seeks comment on deferring to the FAR Council to establish the effective date	US Federal government states the new Standards are effective in six months after its publication. We request to defer it to one year (or more), if the change from NPRM draft to the new Standards are fairly large.

for application of the revised 508 Standards to “new” ICT contracts (i.e., contracts awarded after publication the FAR Council’s final rule), as well as existing ICT contracts.	

JBMIA thanks the Board for this opportunity to submit comments.

Respectfully submitted,

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