



Comment from Dick, Wayne

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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Due May 28 2015, at 11:59 PM ET

Comment

NOT THE SAME AS MY COMMENTS OF 03/30/2015

Dear Access Board Members,
Thank you for taking our comments. This document differs from my needs document of 03/30/2015 (ID: ATBCB-2015-0002-0011). That document identified rules this identifies solutions. My files are attached in a word document or you can find them at <http://www.nosetothepage.org/508/Techniques.html>.

I have been criticized for slowing down the 508 Refresh process. Here is why I am doing it. Since 2008, when people started conforming to WCAG 2.0 instead of the 508 web rules, access for visual reading with low vision has degraded significantly. There is no real way to write a reset style sheet followed with a specification of the user needs that works. With new HTML / JavaScript sites the style specifications are simply too idiosyncratic to admit a programmatic approach. The sandbox model that is so important for web security prevents practical intervention with procedural languages. In 1934, talking books were established in the United States and people with low vision were excluded. That was not corrected until 1974, 40 years later and sixteen years before the technology became obsolete. The Access Board is poised to repeat this kind of exclusionary action with the 508 Refresh in its current form. By the time the Access Board returns to the problem, if it still exists given the political climate, inclusion of rules to support low vision to the 508 Refresh will probably be obsolete.

I am proposing three new rules that identify content failures of accessibility. These rules should apply to all data formats, not just HTML, CSS and Java Script. EPUB, MOBI, PDF, Flash and any proprietary publication formats for ICT reading material are included. If the PDF standards contradict these fail cases then these rules should override the PDF standard. The rules are meant to provide access to reading all electronic publications, not just web publications. These include but are not limited to: professional journals, news publications in ICT format, BLOG publications, electronic books, electronic instructional materials, and high stakes assessment instruments used for schools and employment.

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The ultimate goal of the new rules is this. (1) Content must make sense and can be read and used when the author's visual presentation is removed. (2) Content is linear and in proper reading order when the author's visual presentation is removed. (3) The author's visual presentation can be replaced by a visual presentation format that matches the visual requirements of the reader. Specifically, the reader of content can have the color (background and foreground), font-family, font-size, letter spacing, line spacing and line length needed to support effective visual reading. No reader should be subjected to horizontal scrolling when reading at any font size so long as the line length fits at least one word per line on a view port.

These rules are consistent with Guideline 1.3, even if the WCAG WG did not recognize this at the time of adoption. At that time, 2008, fully sighted people could not perceive the problem. The Mobile Web changed that. Fully sighted users now know what it means to read and be forced to use horizontal scrolling. Most people, even fully sighted readers, now realize that if the author's visual presentation prevents effective perception, operation or comprehension of content, and the visual presentation cannot be replaced programmatically by one that supports the user's visual needs then there is no access to the content. This visual inflexibility is the current state of affairs for people with low vision. It will remain so if the 508 Refresh is adopted unchanged.

Are there user agent changes that also need to be made to support these content changes? Yes, but that does not mean content rules are not needed. The best possible user agent cannot fix bad content.

Sincerely, Wayne Dick
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Attachments (1)



Techniques

View Attachment:



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Agency Notes:

Second set of comments.