



Comment from Malamud, Carl

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

Dear Mr. Baquis -

We submitted our comment today, Im hoping it goes live tomorrow on regulations.gov. As part of that comment, we included a reformatting of the text of the proposed rule with some accessibility features that were missing on the federalregister.gov version of the rule and I believe also missing on the web page published on the Access Board site (though I must say, I found the advisory notes and diagrams that you published on your site very helpful!).

You can see the reformatted proposed rule here:

<https://law.resource.org/pub/us/cfr/ibr/006/36.cfr.1194.html>

I just wanted to write and say that wed be happy to talk with your tech staff about some of the features we used under the hood, such as deeper levels of hierarchy, aria- tags to provide descriptions to hrefs, region labels in html5 for <main> and <nav> with an IE8 compatibility fix, etc. I also wrote to the Archivist of the US and the Acting Director of OFR and suggested that some of these changes could probably be incorporated wholesale into the transformation code used to create the online Federal Register and then the CFR. And, of course, youre totally welcome to use any of the stuff we did.

Best regards,

Carl

P.S. I understand you probably need to publish this email as well as our previous exchange about the reasonable availability of the ISO document as they are both pertaining to the open comment period for the ATBCB-2015-0002 rulemaking. Feel free to consider this a formal comment if your lawyers think thats the right thing.

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