

BY ELECTRONIC FILING

BRUSSELS, 28 May 2015

Office of Technical and Informational Services
Access Board
1331 F Street NW, Suite 1000
Washington, DC 20004-1111

Re: Comments of DIGITALEUROPE, Docket No. ATBCB-2015-0002, RIN No. 3014-AA37

Dear Chair Pavithran and Members of the Board,

DIGITALEUROPE submits these comments on the Draft Information and Communication Technology (ICT) Standards and Guidelines proposed by the Architectural and Transportation Barriers Compliance Board (Access Board) in connection with its February 27, 2015 Notice of Proposed Rulemaking (NPRM).

DIGITALEUROPE represents the digital technology industry in Europe, including some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE ensures industry participation in the development and implementation of EU and global policies. Its members include 58 corporate members and 37 national trade associations from across Europe.

DIGITALEUROPE shares the Access Board's objective in promoting the development of accessible ICT, and the Access Board's view that this objective is best achieved through globally-recognized standards. While the overall population that benefits from accessible ICT is large, each individual group of users with disabilities (e.g., mobility, sensorial or cognitive) is best served by avoiding market fragmentation and promoting instead a global market. Policy makers can support this through the incorporation of globally-recognized accessibility standards into public procurement policies and practices.

Throughout the Access Board's supporting statements, it is made very clear that the intent was to harmonize the revised Section 508 standards with the European Accessibility Standard for Procurement, EN 301 549, and DIGITALEUROPE fully supports that goal. Nonetheless, in many cases the two standards differ, even if only by the selection of a different word to describe the same intent. This fragmentation creates unnecessary market confusion. It also requires ICT vendors to make costly investments in maintaining divergent product conformance statements to support fragmented regulations, even where the objective of the regimes are harmonized.

Accordingly, we urge the Access Board to add a statement to the revised Section 508 standards stating that a conformance statement that covers EN 301 549 is also sufficient for demonstrating conformance to the new Section 508 standards. We will also be asking regulatory bodies in the EU to take a similar step – to acknowledge that a conformance statement to the new Section 508 standards be deemed acceptable for demonstrating conformance to EN 301 549. We believe such approach will lead to fewer barriers to trade, stronger competition in accessibility technology development, lower costs for government procurement, and a higher level of accessibility for the citizens of both the United States and Europe.

Sincerely,

Ulrike Haltrich,
Chair,
DIGITALEUROPE e-Inclusion Working Group.