



Voice on the Net Coalition

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

*Re: Comments of the Voice on the Net Coalition, Docket No. ATBCB-2015-0002,
RIN No. 3014-AA37*

Dear Chair Pavithran and Members of the Board:

The Voice on the Net Coalition (VON) 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). VON is the leading advocacy organization for the Internet communications industry, working with legislators, regulators, and other policymakers to develop policies that support the availability and adoption of Internet communications products and services. For more information see www.von.org.

VON supports the Access Board's objective of updating the Section 508 standards and Section 255 guidelines to ensure people with disabilities have access to ICT. However, VON is concerned that the proposed requirements relating to Real-Time Text and Digitally Encoded Speech mandate specific standards in a "one size fits all" approach that will "lock in" particular technologies for years to come, stifling innovation and denying all consumers, including people with disabilities, access to those innovations. Functional requirements serve all stakeholders better than technical mandates as they afford industry needed design flexibility and encourage the development of new accessibility solutions.

Real-Time Text

The Access Board's proposal to require all ICT that provides real-time voice communication support real-time text (RTT) is one example of the "one size fits all" approach. VON members are concerned about mandating a technology which industry has determined is not suitable for real-time web-based communications. The Internet Engineering Task Force (IETF) WebRTC Working Group determined the XMPP RTT standard (XEP-0301) is currently the most appropriate one for web-based communications, not the RFC 4103 standard proposed in the NPRM. As written, the Access Board proposal would not permit this industry consensus solution to be used. In addition, RFC 4103 is not a final standard (its

official status is “Proposed Standard” per IETF¹) and the Access Board is thus not permitted to reference it in its rule.²

A more efficient path is for the Access Board to revise provision 410.6.3.2 by adopting the language it proposed in the 2010 NPRM stating that ICT support transmission of RTT conforming to a “commonly used cross-manufacturer, non-proprietary standard”. Adopting this language will save the Board from having to update the rules when industry comes to consensus on any of the draft standards listed in the NPRM or any other standards industry deems appropriate for RTT.

A flexible approach is particularly appropriate where, as in this case, the technology is in a nascent stage. Contrary to the Board’s belief “that RTT is sufficiently mature as a technology (and has sufficiently proliferated in the current ICT marketplace)”, VON members are not aware of any commercially deployed solution in the US marketplace. While the technology is nascent and still developing, industry is best positioned to determine the appropriate technology solution and appropriate standards to ensure interoperability. As evidence of the nascent state of the technology, in the NPRM the Access Board discusses several standards currently under development for RTT. It is possible that as the technology develops, industry will determine that different technologies and different standards are needed for different real-time communications applications. Therefore, the Access Board should allow industry flexibility in implementing RTT and should not mandate a technical solution for VoIP in provision 410.6.3.2.

In NPRM Question 8, the Board asks if it should consider referencing the XEP-0301 standard when it is finalized, in addition to RFC 4103. As explained above, the Access Board cannot reference RFC 4103 in its current draft state. While industry has already come to consensus that XEP-0301 is the appropriate standard for real-time web-based communications, mandating specific solutions by referencing standards “locks in” particular technologies and would deny the use of emerging technology for years while the Board completes a rulemaking to incorporate new standards. As noted, a more appropriate approach is to enable industry flexibility to use any “commonly used cross-manufacturer, non-proprietary standard”.

As a global organization, VON is also concerned about the differences between the approaches to RTT taken by the Access Board and Europe (as specified in ETSI EN 301 549³). Harmonization of technical requirements reduces costs and encourages innovation by creating a unified global market. VON recommends that the Access Board align with the European standard and allow flexibility for RTT to be *either* built-in or added later. This approach better reflects the reality that “Employees who do not need

¹ See RFC-Editor, *RFC Search Detail: RFC 4103* (last accessed May 28, 2015), http://www.rfc-editor.org/search/rfc_search_detail.php?rfc=4103&pubstatus%5B%5D=Any&pub_date_type=any.

² See, e.g., NPRM at 25 (“The Board considered referencing RFC 4103, but elected not to do so because, at that time, it was not thought to be a referenceable standard”); NPRM at 56 (“despite its potential benefits, the Board cannot incorporate XEP-0301 until it becomes a final standard”).

³ ETSI, EN 301 549 v1.1.1 (2014-02) Accessibility requirements suitable for public procurement of ICT products and services in Europe, *available at* http://www.etsi.org/deliver/etsi_en/301500_301599/301549/01.01.01_60/en_301549v010101p.pdf.

to communicate using RTT would otherwise be able to disable or ignore this feature.”⁴ Mandating a built-in solution adds cost for a feature that would not be used by most federal employees.

Digitally Encoded Speech

In provision 410.5, the Access Board proposes that ICT transmit and receive digitally encoded speech in the format specified by ITU-T Rec. G.722. VON disagrees that G.722 is the most appropriate format for voice over IP applications. IETF rejected G.722 for web-based communications because it is inferior to newer technology. Industry instead has come to consensus on the Opus codec, a proposed IETF standard (RFC 6716), which produces dramatically better audio quality for the same bandwidth as G.722.⁵ It is available open source and is currently deployed in the Google Chrome and Mozilla Firefox browsers. By mandating use of G.722, the Access Board would deny use of the industry consensus standard for real-time web communications, force industry to degrade audio quality by using an inferior outdated technology (circa 1988), ignore recent advances in technology, and deny people with disabilities access to superior audio quality. Again, VON recommends the Access Board not reference any standard in its rule and instead harmonize with ETSI EN 301 549 clause 6.1 to allow industry freedom to innovate and provide consumers with the most current technology solutions.

Respectfully submitted,

/s/

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⁴ NPRM at 26-27.

⁵ See Opus, *Codec Landscape* (last accessed May 28, 2015), <http://www.Opus-codec.org/comparison>.