



Stockholm the 27th of May 2015

Comments from the Swedish Disability Federation to U.S. Access Board on accessibility requirements for information and communication technologies (ICT)

Docket number ATBCB-2015-0002

On behalf of the Swedish Disability Federation representing 39 national organizations for persons with disabilities, I would like to express our support to the proposed update of Section 508 and 255 Guidelines made by the U.S. Access Board in February.

ICT has an impact on the daily lives of people with disabilities in almost any situation. Over 150 states have ratified the UN Convention on the Rights of Persons with Disabilities (CRPD) and should comply with the general comment number 2, that explains the responsibilities of the states when it comes to accessibility and universal design of ICT. The US public procurement policy, section 508 and the 21st century Communication Video Accessibility Act has had a positive global impact to enhance accessibility in Information and Communication Technologies (ICT). But there is still much to do to implement the rights set up in the CRPD.

Given the fact that the U.S. is a key player on the Global ICT market the improvements proposed in this standard to ensure accessibility of the ICT procured by the U.S. government will end up benefiting persons with disabilities in the U.S. and all around the world.

The Swedish Disability Federation has been involved in the process to develop the European standard EN301549 also covering accessibility requirements of ICT products and services that was published in 2014, since the beginning in

2005. In our opinion the proposed revised U.S. standard provides improvements in many ways.

We especially welcome:

- Functional Performance Criteria requesting innovative solutions if the existing products and services do not meet the technical requirements for accessibility.
- Alignment with the W3C WCAG 2.0.
- Clearly expressed requirements to ensure interoperability to assistive technologies, solutions such as the Real-Time Text, improved wording than in the European Standard EN301549, and a clear requirement for RFC 4103 for SIP based VoIP. These requirements are essential for interoperability.
- The language and structure of the standard is important so that as many organizations as possible will be able to understand and use it, and avoid misinterpretations.

We recommend the Access Board to listen to the voice of organizations representing users with disabilities so that the standard will have requirements that are in line with the needs and the UN Convention. We welcome harmonization with other standards, such as the European EN301549. The EN or any other standard covering accessible technologies, can be revised at a later stage to meet higher levels of accessibility and clearer requirements.

We therefore give our support and look forward to a swift adoption of the improved Section 508 and 255 Guidelines hoping for the global ICT market to move further towards more inclusive technologies for persons with disabilities.