



## Comment from Nakayama, Andy

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

To whom it may concern,

We are writing on behalf of Ricoh Company Ltd.

#### 1. Regarding E203 - Access to Functionality

E203 reads "Agencies shall ensure that all functionality of ICT is accessible ... .. , either directly or by supporting the use of assistive technology.....".

Is "directly or by supporting the use of assistive technology" applicable to the requirements of 302.1, 302.2, 407.12 and also Chapter 5 ?

#### 2.Regarding 302.3 - Without Perception of Color

1194.25(g) reads color does not as the only means of conveying information".

On the other hand, 302.3 reads ICT does not require user perception of color.

Does the sentence of 302.3 mean that ICT should give the alternative recognition of color such as change shapes or font of letters or "underline color words?

#### 3.Regarding 402.2 - Speech-Output Enabled

We believe visually handicapped people are satisfied with the two functions which are magnifieswritten in 302.2 andby supporting the use of assistive technologywritten in E203.

Screen reader is a defacto standard tool and it is very familiar for visually handicapped people.

Therefore, speech-output enabled is not necessarily needed.

We recommend to add when product provides auditory output on 402.2.

Sincerely yours,

Michiko Momose & Andy Nakayama

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