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May 28, 2015

Tim Creagan, Esq.
Office of Technical and Information Services
U. S. Architectural and Transportation Barriers Compliance Board
1331 F Street, NW, Suite 1000
Washington, DC 20004-1111

Re: ATBCB-2015-0002

Dear Mr. Creagan,

Ricoh Americas Corporation appreciates the opportunity to submit comments in response to the Proposed Rulemaking. Attached below are our comments for your review:

1. Regarding E203 Access to Functionality

There is contradiction between E203 and other requirements. The Appendix A to Part 1194, E203.1 reads “by supporting the use of assistive technology” ,but (for example) the Appendix C to Part 1194 Chapter 4 Hardware 402.1 reads“ to be operable without requiring the user to attached or install assistive technology”. Does the Appendix A to Part 1194, E203 are upper concept of all other requirement? If so, is the E203 “by supporting the use of assistive technology” effective to the criteria as follows?

- I Chapter 3 Functional performance criteria and technical requirements
 - Ø 302.1
 - Ø 302.2
- I Chapter 4 Hardware 402 Closed Functionality
 - Ø 407.12
- I Chapter 5 Software

2. Regarding 302.3 Without Perception of Color

1194.25(g) reads “color does not as the only means of conveying information”, but 302.3 reads “ICT does not require user perception of color”. Does the wording of 302.3 “does not require user perception of color” mean to give the alternative recognition of color such as “change shapes/ font of characters” or “underline color characters” ?

3. Regarding 402.2 Speech-Output Enabled

We believe visually handicapped people are satisfied with the two functions which are “magnifies” written in 302.2 and “by supporting the use of assistive technology” written in E203. “Screen reader” is *a de facto* standard tool and very familiar for visually handicapped people. “speech-output enabled” is not necessarily needed. We recommend adding wording of “when product provides auditory output“ on 402.2.

Please let me know if you have any questions.

Sincerely,



Kousuke Ito
Director,
Environmental Sustainability and Product Compliance