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June 21, 2010

Tim Creagan
Office of Technical and Informational Services
Architectural and Transportation Barriers Compliance Board
1331 F Street NW, Suite 1000
Washington, DC 20004

Subject: Docket Number 2010-1/RIN Number 3014-AA37

Dear Mr. Creagan:

The Coalition for Government Procurement appreciates the opportunity to comment on the Advance Notice of Proposed Rulemaking on the draft Information and Communication Technology (ICT) Standards and Guidelines for accessibility in accordance with Section 508 of the Rehabilitation Act and Section 255 of the Telecommunications Act.

The Coalition for Government Procurement is a non-profit association of 330 companies offering commercial services and products to Federal, and increasingly State, agencies through GSA schedule and other contracts. Our members account for approximately 70% of the business conducted through Multiple Award Schedule contracts and about half of the commercial solutions purchased annually by the Federal Government. The Coalition is proud to have worked with officials in Government for over 30 years to promote common sense acquisition solutions.

Coalition member companies offer products to the Federal Government that cover the full scope of Section 508 including software, multimedia equipment, telecommunications products, office equipment and computers. Since the Section 508 standards went into effect in 2001, information communication technology (ICT) companies have responded with the development of advanced accessible solutions to serve Federal agencies, their employees, and the public. In addition to developing new technologies, these companies have also invested in providing Government customers with information about accessibility product features and Section 508 conformance that is critical to making informed procurement decisions.

Given the advances in ICT over the past decade, the Coalition supports the U.S. Access Board's current update of the Section 508 and Section 255 standards. In response to the Draft Information and Communication Technology Standards and Guidelines, we offer the following comments from imaging equipment member companies.

Chapter 3: Common Functionality

302.1 General. ICT that has closed functionality shall conform to 302.

Comment: "Closed functionality" is undefined (either here or in E111.5). There are examples provided in the advisory, but no clear definition.

Suggestion: Access Board to provide a definition for closed functionality in E111.5 or other suitable location.

307.2 Clear Floor Space. A clear floor or ground space conforming to 36 CFR Part 1191 Appendix D, Section 305 shall be provided for ICT with operable parts.

Comment: This requirement is installation-specific and difficult to evaluate.

Suggestion: Vendor should only need to show that product can be installed in such a way to meet 36 CFR Part 1191 Appendix D, Section 308.

307.3 Height. ICT with operable parts shall be placed so that the operable parts are within one or more of the reach ranges conforming to 36 CFR Part 1191 Appendix D, Section 308.

Comment: Requirement seems to differ in meaning from what is implied by the advisory statement. 307.3 requires that operable parts meet "one or more" of the reach ranges in 36 CFR 1191 Appendix D, Section 308, whereas the advisory states that the provision "applies reach ranges" applicable to both.

Also see 702.1, which requires "conformance to 36 CFR 1191 Appendix D, Section 308" (not one or more).

Suggestion: Change to "307.3 Height. ICT with operable parts shall be placed so that the operable parts are within either front or side reach ranges conforming to 36 CFR Part 1191 Appendix D, Section 308." Or make consistent with 702.1

307.5 Touch-operated Controls. ICT with controls that are designed to be operated by touch using the fingers, including but not limited to keys, buttons, switches, and touch pads, shall conform to 307.5 through 307.5.3.

Comment: Standards would be easier to interpret if there were clear definitions for how "touch-operated controls" differ from "operable parts" and "non mechanical controls." Are "touch-operated controls" simply "operable parts" designed to be operated with the fingers?

Suggestion: Access Board to clarify differences between types of "operable parts" discussed in section 307.

307.5.3 Key Repeat. When key repeat is supported by a keyboard interface, the delay before key repeat shall be adjustable to at least two seconds.

Comment: The intent of 307.5.3 Key Repeat and 307.5.3.1 Adjustability are not entirely clear. Are we to assume at least two seconds before the first "repeat" instance (307.5.3), followed by additional repeats at two second intervals (307.5.3.1)?

Suggestions:

307.5.3 Key Repeat. ICT that supports key repeat through a keyboard interface shall conform to 307.5.3.1 and 307.5.3.2.

307.5.3.1 The delay before key repeat shall be adjustable to at least two seconds.

307.5.3.2 The delay between repeating characters shall be adjustable to two seconds.

307.6 Non-mechanical controls. ICT that utilize non-mechanical controls shall provide an alternate mode of operation by touch, voice control or gesture input that conforms to 307.6.1 or 307.6.2, as applicable.

Comment: "Non-mechanical controls" needs to be defined. What is the difference between "touch-operated controls" (307.5) and "non-mechanical controls that are operated by touch (307.6.1). In both cases, touch pads are used as examples. Is there a need for two different sections?

Suggestion: Clarify differences between types of controls with definitions, wherever possible. Consider reorganizing section 307 to eliminate any redundancies.

Chapter 7: Hardware Aspects of ICT

702.1 General (Reach Ranges for Installed or Free-standing ICT). Reach ranges for controls and keys on installed or free-standing non-portable ICT intended to be used in one location shall conform to 36 CFR Part 1191 Appendix D, Section 308.

Comment: Can this be combined with 307 such that the requirements apply to both "installed or free standing non-portable" (702.1) and portable ICT that "shall be placed so that the operable parts are within" 307.3 the designated reach ranges?

Suggestion: 307.3 Height. Reach ranges for operable parts on installed ICT shall conform within one or more of the reach ranges conforming to 36 CFR Part 1191 Appendix D, Section 308.

703.1 General (Standard Connections). When connection points are provided, at least one of each type of connection shall conform to industry standard non-proprietary formats. Exception: This provision does not apply to products with closed functionality.

Comment: What exactly is meant by "connection points" needs to be defined, as does "each type of connection." A list of examples is not sufficient to understand the intent of the standards. Interpreted broadly, this standard seems to go beyond the stated goal of ensuring "compatibility with assistive technologies by requiring the use of standard connections on products".

Suggestion: Access Board to clarify meaning of "connection points" and "each type of connection".

704.3.1 Text Attributes. Characters in images of text shall be in a sans serif font. Characters shall be 3/16 (4.8 mm) high minimum, based on the uppercase letter "I".

Comment: The provision as written presumes both a viewing distance (unstated) and a visual acuity objective. The resulting requirement provides little flexibility in the design of user operator panels and controls which may have a negative impact on the usability of the equipment regardless of whether the user has a disability.

Suggestion: ITI recommends changing the provision to align with the TEITAC recommendation of 20/70 for visual acuity and allow appropriate flexibility in the size of characters in images of text. As an example, a user operator panel designed to be used at a 20 inch distance would have a minimum text size of 3 mm.

704.3.2 Contrast Ratio for Images of Text. Images of text shall have a contrast ratio of at least 3:1.