



May 28, 2015

Timothy Creagan
U.S. Access Board
Office of Technical and Information Services
1331 F Street NW., Suite 1000
Washington, DC 20004

Re: ATBCB-2015-002 (ICT Standards and Guidelines Notice of Proposed Rulemaking)

Mr. Creagan:

The Coalition for Government Procurement (“the Coalition”) appreciates the opportunity to provide comments on the proposed revisions to the Section 508 standards for information and communication technology (ICT).

The Coalition is a non-profit association of firms selling commercial services and products to the Federal Government. Our members collectively account for approximately 70% of the sales generated through the GSA Multiple Award Schedules (MAS) program and about half of the commercial item solutions purchased annually by the Federal Government, including ICT products and services. Coalition members include small, medium and large business concerns. The Coalition is proud to have worked with Government officials over the past 35 years towards the mutual goal of common sense acquisition.

The Coalition commends the U.S. Access Board for the progress made through the Section 508 refresh to address new ICT products and technological advances in assistive technology, harmonization with international standards, ambiguities in the current language regarding the application of the 508 standards to some ICT, and how to use the standards to test for accessibility.

Scope

The Coalition for Government Procurement's comments on the Section 508 standards are made by our Imaging Equipment Committee. Members of this committee are original equipment manufacturers (OEMs) that provide ICT hardware products such as printers and multifunction devices available for purchase by Federal agencies through GSA's Multiple Award Schedules program and other government contracts.

Statements of Conformance

The Coalition supports use of the Voluntary Product Accessibility Template® (VPAT) as the most efficient and effective means of demonstrating a product's conformance to the Section 508 standards. Since the VPAT was developed jointly by GSA and the Information Technology Industry Council (ITIC) more than a decade ago, OEMs have invested in internal testing of ICT to determine how these products meet the Section 508 standards. How a particular product conforms to the 508 standards is then communicated to Federal agencies through the industry standard VPAT as part of the solicitation process.

There are some customer agencies that prefer that contractors complete a Government Product Accessibility Template (GPAT) in which the government identifies the applicable standards for the ICT they intend to procure. These instances are limited within the broad scope of ICT purchases by the government, and not all purchasing agencies have the internal resources or expertise to go through this additional process. For this reason, we support continued use of the VPAT as the standard documentation necessary to demonstrate product conformance with the Section 508 standards as part of the Federal acquisition process. The Coalition requests that the U.S. Access Board and GSA support use of the VPAT for this purpose, as it does not require a duplicative effort on the behalf of Federal agencies to republish already existing documentation or retest ICT products for 508 conformance.

Functional Performance Criteria

In the Section 508 refresh, the Functional Performance criteria are proposed to apply when there are gaps in the technical requirements or when evaluating equivalent facilitation. As an example, hardware and software *features* not addressed in Chapters 4 and 5 would need to be evaluated using the Functional Performance Criteria. However, it is unclear how one should determine whether the technical requirements address individual products *at the feature level* or

not. Clarification on this point would be extremely beneficial in consistently applying the Functional Performance Criteria under the next version of the Section 508 standards.

Access to Functionality

E203 allows for the use of assistive technology in ensuring that all ICT functionality is accessible and usable by individuals with disabilities. However, other verbiage in the proposed 508 standard appears to not allow for this approach. For example, Part 1194 402.1 states that with the exception of personal headsets and audio couplers, “closed functionality of ICT shall be operable without requiring the user to attach or install assistive technology.” If Appendix A is to set the framework for the overall approach to achieving accessibility in the technical standards, we suggest that the following criteria also allow for the use of assistive technology:

- Chapter 3: Functional Performance Criteria
 - 302.1 Without Vision
 - 302.2 With Limited Vision
- Chapter 4: Hardware
 - 407.12 Reach Height
- Chapter 5: Software

We also ask that the U.S. Access Board provide some clarification regarding “all ICT functionality.” There are some functions that by their nature, assume certain abilities. For example, an operator or other user of a production color printer may need to check or fine tune the print quality. Per E203, should OEMs assume that this product functionality also be executable by users who are blind, or is some flexibility permitted in assuming that for some functions certain abilities would be required in order to execute them? In this example, one might assume that some level of “limited vision” may be necessary.

Applicability of WCAG 2.0

The proposed Section 508 standards incorporate WCAG 2.0 by reference and apply it to both web and non-web ICT. We ask that additional clarification and guidance be provided as to how the WCAG 2.0 criteria should be applied to ICT hardware products. Further, there appears to be an inconsistency in the applicability of certain WCAG 2.0 criteria for closed products that are compatible with assistive technology. Specifically, Section 502 Interoperability with Assistive Technology has an exception that states that “platforms and applications that have closed

functionality and that conform to 402 shall not be required to conform to 502.” However, pg 42 of the NPRM states that 14 of the success criteria may apply to firmware. These 14 criteria largely relate to Sections 402 and 502, so clarification is needed as to the U.S. Access Board’s intent. We suggest that it would be most efficient to require either 402 *or* 502 as suggested by the 502 exception.

Braille Instructions

Section 402.2.2 proposes that Braille instructions be required when speech output is used to instruct users concerning the method for activating the speech mode of operation. More clarification would be appreciated for this section. It is not clear where the Braille instructions should be located and how they should be placed. Further, many OEMs manufacture products for a global market. Given that Braille varies worldwide, we ask that the instructions in Braille not be required to be embedded in the device itself to accommodate the broad scope of international users.

Without Perception of Color

In the current version of Section 508, 1194.25(g) states that, “color coding shall not be used as the only means of conveying information.” In the proposed refresh, this language is updated at 302.3 Without Perception of Color to require “at least one mode of operation that does not require user perception of color.” Examples of permissible alternatives would be helpful such as different shapes, fonts, or underlining.

Tactilely Discernible

The Section 508 refresh also addresses the accessibility of touchscreens in Section 407.3 Tactilely Discernible and proposes compatibility with prosthetic devices as well as an exception for personal use ICT devices. First, the Coalition asks for more clarification as to whether the Access Board is proposing that touchscreens be capable of recognizing non-skin touch or prosthetics in particular. Second, it may be more effective to propose an exception for devices that offer “input controls that (a) are audibly discernible without activation, and (b) operable by touch” rather than specifically referring to whether the product is for “personal use.”

Lastly, 407.3.1 Identification requires that “key surfaces outside active areas of the display screen shall be *raised* above surrounding surfaces.” The Coalition recommends that tactile features other than raised keys be acceptable in meeting this requirement – for example, through the use of different materials or surface texture.

The Coalition appreciates the opportunity to provide input on the proposed revisions to the Section 508 standards for ICT. If there are any questions, please contact me at (202) 331-0975 or rwaldron@thecgp.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'RWaldron', with a long horizontal flourish extending to the right.

Roger Waldron
President