



European-American
Business Council

US-EU eAccessibility Standardization

EABC Policy Paper

October 2011

The EABC asks the Trans-Atlantic Economic Council (TEC) to continue to support the adoption of globally harmonized standards for eAccessibility – beginning with harmonized Trans-Atlantic standards. Harmonization of eAccessibility standards should be a key action item on the November TEC Agenda.

The need for accessible information and communication technology is acute across the globe. With an aging population and the need for life-long learning and contributing, a growing number of people can benefit from accessible technology to utilize ICT. By making digital products, web pages, and web-based tools accessible to the aged and individuals with disabilities, companies are able to improve the quality of life of millions of people and significantly enhance the productivity of the workforce. Harmonization will also allow small and medium-sized enterprises to compete globally by creating a single Trans-Atlantic market for their products and services. SMEs do not have the staff, R&D or marketing budgets to create separate offerings for both the US and EU markets.

Beyond this singular issue, interoperable standards generally are a critical factor of the 21st Century economy. A coordinated global approach to accessibility standardization not only benefits citizens who need accessible ICT, but also increases the competitiveness of companies by widening their talent and customer bases. Globalized, harmonized, market-led, voluntary accessibility standards will reduce product and services costs through economies of scale, while increasing investments in ICT product innovation.

In 2009 EU Commissioner Reding recognised the importance and benefits of eAccessibility when she stated "...15% of our population is disabled and yet our rules on accessibility are still fragmented... What should we do? We should encourage the European-wide adoption of a global web accessibility standard, the new Web Content Accessibility Guidelines. We should do it together and in step (with America) so that the online services industry can reap economies of scale and the users get a decent and reliable framework."

To meet the needs of citizens with disabilities or age-related limitations, some governments are now developing unique, national, ICT accessibility policies. Some of these may present divergent and conflicting accessibility guidelines for public procurement as well as commercial products. In December 2005 the EU Commission issued standards mandate 376 (M376) to harmonize and facilitate the public procurement of accessible ICT products and services and to enable public procurers to make use of these harmonized requirements in the procurement process. The intention of M376 is to

provide a similar technical framework in Europe to that which Section 508 of the Rehabilitation Act (S508) provides in the United States.

In fact, US Section 508 is being revised at present, and there is a desire among citizens and companies that it be revised in alignment with similar standards now being developed in Europe. However, industry is concerned that there is insufficient coordination between the US S508 revision and EU M376 development. This could needlessly lead to incompatible US and EU accessibility standards – a true “lose-lose” result. Indeed, this is the very type of disconnect that the TEC has been created to avoid.

The US and EU technical teams need to be able to collaborate closely but this has not been possible so far. The M376 and S508 teams are working without frequent technical exchanges and to different schedules at a time when close cooperation is vital for success. The problems are exemplified by the delay in the publication of the latest US Advanced Notice of Proposed Rulemaking (ANPRM) version of S508 that was announced by the US Access Board in early October 2011. Because of the lack of exchange of information this delay has caused a problem for the EU M376 team that could lead to a harmonisation failure.

The EABC therefore urges the TEC to take the following actions:

1. The TEC should publically re-state their support for harmonised US-EU eAccessibility standards for the aged and disabled.
2. The TEC should encourage the M376 and S508 standards teams to exchange information on a regular basis to coordinate work within the proper guidelines of US and EU laws to insure robust and successful cooperation.
3. The TEC should request that the schedules of the US and EU projects be synchronised, or that the schedule of the EU project be modified to allow for further revision once the US S508 revisions have been completed.
4. The TEC should emphasize they support the leadership of the European Commission with the member states and that those states should not take policy steps that could jeopardize harmonization.

We welcome every opportunity to work with the Trans-Atlantic Economic Council to bring real policy results in this vital area for the citizens of the United States and Europe in the months ahead.

For more information, contact:

Justine Korwek, Brussels Director: 32 2 791 7515 or Justine@eabc.org

Alex Propes, Policy Manager: 202-828-9107 or Alex.Propes@eabc.org