



November 13, 2007

Mr. Adam Bailin,
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Mr. Bailin:

The European-American Business Council represents 75 global companies who are based in the US and Europe and are united in promoting Trans-Atlantic investment, innovation and integration. We support enhanced EU-US government-to-government and industry-government collaboration. We support and are working for globally-harmonized accessibility standards and hope that the UK Cabinet Office policy on web accessibility will help further harmonization.

EABC members are encouraged that your office has circulated a draft policy on government website accessibility, "Delivering Inclusive Websites: user centred accessibility." We applaud your Office for adopting W3C guidelines rather than introducing unique national requirements (and thereby fragmenting the market) but we are concerned that you are specifying conformance to WCAG 1.0 "double A" and not discussing an early migration to WCAG 2.0 as a matter of policy.

In 1999, when WCAG 1.0 was published, HTML was the primary Web technology employed on the Internet. Browsers and assistive technologies provided little support for non-HTML technologies and, because of this, WCAG 1.0 restricted the use of these non-HTML technologies and specified a number of "until user agent ..." requirements as short-term "workarounds".

During the last eight years many of the barriers that WCAG 1.0 was designed to overcome have ceased to be issues and several new accessible technologies have been introduced. Many of the "until user agent ..." requirements in WCAG 1.0 are no longer necessary, yet they remain in the document and are therefore required for "compliance." Compliance with WCAG 1.0 "double A" will therefore either inhibit the full adoption of the new technologies (even though they are accessible) and the provision of a rich internet environment for all, or lead to the need for two levels of a website, with the attendant problems.

The W3C has recognized the limitations of WCAG 1.0 and will soon finalize WCAG 2.0, a principle-based Web accessibility guideline. Any Web technology that is enabled for accessibility can then be used to create websites which conform to WCAG 2.0.

We suggest that the UK and other countries can best protect the interests of their disabled citizens by introducing policies requiring an early migration to compliance with WCAG 2.0. This will encourage effective technological innovation, communication, and commerce on the Web to the benefit of all.

An example of such a policy was introduced in Switzerland. They acknowledge that WCAG 1.0 has disadvantages and that several checkpoints are obsolete but, rather than introducing unique national requirements, they set WCAG 1.0 as their standard. We copy below an extract from their excellent document "From Equality Law to Internet Accessibility - Implementation of the Federal Act on the Elimination of Discrimination against People with Disabilities (EPDA)." and hope you will consider including a similar policy statement in your document.

"Adaptation and update"

According to Art. 10 section 3 sentence 2 of the EPDO, the Accessibility Guidelines that have been developed should regularly be adapted to the latest developments in technology. The Web Content Accessibility Guidelines 1.0 of 5th May 1999 constituted the most recent W3C standard on accessibility throughout the period in which the Federal guidelines were developed. This is why the Federal guidelines are based only on version 1.0. If Version 2.0 of the Web Content Accessibility Guidelines that are currently being developed should be enacted officially in the next few years, the «Accessibility» working party will meet within three months to discuss and possibly implement an update to the Federal guidelines. "

If you would like to discuss this further, please do not hesitate to contact myself or EABC Europe Director, Jan Barnes (Jan.Barnes@eabc.org).

Sincerely yours,



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