



November 27, 2007

Commissioner Viviane Reding
Commissioner for Information Society and Media

Dear Commissioner Reding,

The European American Business Council (EABC), representing 75 US and European-based global companies united in promoting Trans-Atlantic investment, innovation and integration, is pleased to have reviewed the Commission sponsored report, *Assessment of the Status of eAccessibility in Europe*. We see this thoughtful analysis as a useful contribution to the eInclusion policy dialogue currently ongoing both within Europe and globally. EABC's members are committed to creating a worldwide digital society that is inclusive of people with disabilities, ageing technology users and anyone who wants to adjust their technology experience to meet their individual needs. For that reason, we would like to offer some observations on the report. These observations have been provided by those companies which are making eInclusion possible through their new and innovating technologies and products.

We are pleased that the report comprehensively describes the current eAccessibility challenge that we face. That description accurately points to several key issues, including the ever-increasing and diverse range of technologies available and the broad scope of those affected. The report's benchmarking approach and the posing of three basic questions can serve as a simple way to frame a complex discussion and could help lead toward broader eInclusion.

The fact that the report declares that "policy can work" and shows a strong positive link between overall eAccessibility policy and accessibility status in certain countries (e.g. the United States, Canada, and Australia) is important and we agree with this assessment. We have worked with policy makers and consumers in each of those countries to develop and implement effective policies. In addition, EABC members have been actively engaged in the policy and standards development process at both the European and Member State level for many years.

However, we maintain that the detailed substance of policy and the process for developing and implementing it are more important than the simple correlation between the existence of policy and eInclusion. Unfortunately, while this report does refer to good policy in a generic way, there is very little discussion of what constitutes good policy and effective policy development and implementation. We believe that there are exceptional best practices and lessons to be

learned in the benchmark countries highlighted in the study, particularly around procurement guidelines and conformance systems.

For example, while the report discusses the merits of a certification scheme, the inference is that only a third party scheme has been considered; there is no discussion of the relative merits of a Supplier's Declaration of Conformity (SDoC). SDoC is widely used around the World as a means of demonstrating conformance with requirements, whether these are for safety or procurement. "Manufacturers" (in the broadest sense) know their products best and can determine whether to base their declaration on first party testing or third party testing. The European "New Approach Directive" is one of many demonstrations of the effectiveness of the use of the SDoC.

It must be remembered that requirements for the demonstration of conformance can harmonize or fragment a market, they can drive or impede innovation and competition, and they can affect the cost and availability of a product or service. These factors all have a significant impact on consumers. For more analysis on this important topic, we would like to direct your attention to a new IDC report entitled *Using Appropriate Conformity Assessment Tools to Ensure Effective Consumer Protections*.

Today, our industry is delivering excellent solutions for people with a broad range of impairments and disabilities, but we believe we now have the opportunity to build on that success and provide even better solutions for more consumers in the future.

I would like to conclude by reaffirming our members' commitment to partnering with governments and NGOs and to playing a leading role in achieving our shared vision of digital inclusion. More specifically, we would be happy to co-sponsor an occasion with you to discuss this Empirica study along with lessons learned from other benchmark countries and the recent IDC analysis.

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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