

**W3C WCAG 2.0 working draft comments**

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**Title**                    **Draft comments on aspects of consumer interest on the WCAG 2.0 working draft**

**Source**                 **ANEC**

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**To**                        W3C WAI- WCAG drafting group

**1. Introduction and scope**

The below comments are provided by ANEC, [www.anec.org](http://www.anec.org), representing the interests and requirements of European consumers in standardization.

As a general standpoint, ANEC considers Web accessibility to be of very high importance and appreciates the availability of these guidelines, including their ongoing update.

Our comments are provided in a positive spirit and intended to further improve version 2.0. They are more on the generic than specific level and reflect issues of relevance to consumers. They have been discussed and agreed in ANEC.

## **2. Specific comments**

ANEC believes that:

### **1. “1- Top layer- Overview of Design Principles, Guidelines, Success Criteria”**

The simplification of the approach in the current version, reducing the top layer to only 4 major principles and 13 guidelines make WCAG 2.0 easier to use and more technology-agnostic. In the mean time, the requirements on the understandability and availability of the technology-specific checklist documents are increased.

### **2. “Conformance”**

ANEC is worried for the risk taken by the present approach relating to the strong dependence on support in implementations for the User Agent. We hope “pressing hard” will give results and rely on the availability of “repair techniques”, unless adjustments can be made to this, somewhat risky, approach.

### **3. “Success criteria for every guideline should be categorized into three levels:”**

The notion of target “Users” should be better defined and segmented from the functional perspective, with assigned key attributes, certainly if testing of all success criteria should be possible. Usability is about developing proper solutions to well-defined users- one size never fits all!

### **4. “Level 1-3 success criteria” and “Conformance Requirements”**

It is difficult to understand the proposed success criteria and conformance marking, even if we appreciate the more positive tone compared to the previous version 1.0. Unless further simplified, we believe it will make the development and use of any conformance/certification/quality scheme, to be used in various circumstances (e.g. marking of sites to public procurement requirements) unnecessarily complex. Further simplification would be welcome!

### **5. “Overview of design principles”**

In addition, interface elements should preferably be efficient and the interaction enjoyable!

### **6. “User Needs”**

We would recommend to, if possible, improve the User Needs chapter, as it seems insufficient on the present format. In addition, cognitive, physical and age-related impairments should be included into the scenarios to avoid the risk of being 100% disability-focused!

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### **3. Generic comments**

#### **7. Generic comment #1**

European cultural diversity could be addressed better, and possibly included in the conformance criteria, e.g. the availability of several language versions to be considered.

#### **8. Generic comment #2**

There is an overall need to improve the use of terminology relating to “people with disabilities”. A more inclusive term with a higher degree of coverage is needed. Possible non-exhaustive options include “people with impairments” or “users with disabilities”, “very young and elderly users, handicapped users, users with special needs”- as also referred to in most European activities (e.g. see the CEN/CENELEC Guide 6 or various ETSI deliverables developed with EC e-Europe support, see [1]- [4]).

#### **9. Generic comment #3**

The guidelines would be further improved if they could carry a short reasoning or reference (answer the “why”). In addition, the document would be made even more useful if it could provide some advice on best practices and recommendations for accessibility testing methodologies with users, relating to the conformance criteria.

#### **10. Generic comment #4**

Mobile Web Accessibility Guidelines, covering the specifics of mobile Web interaction, should be developed sooner than later. As known, the penetration of mobile phones is considerably higher than the penetration of PCs (certainly in Europe). In addition, the recent launch of 3G services enables and provides a more instant and continuous access to information and communication services and is considered a top priority for the successful creation of an accessible and connected e-Europe. We wonder what your plans are and possible relations to and shared responsibilities with the recently launched Mobile Web Initiative?

#### **11. Generic comment #5**

There is a need to not only help designers and those implementing Web sites do a better job but also to educate users and consumers in how to use the benefits and options provided, simply user and consumer education for a more efficient use of the Web!

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### **5. References**

CEN/CENELEC Guide 6: "Guidelines for standards developers to address the needs of older persons and persons with disabilities".

NOTE: This is the same document as ISO Guide 71.

ANEC Policy Statement on Design for All (ANEC2003/DFA/027)

ANEC report on Consumers Requirements regarding ICT, January 2005, (ANEC2003/ICT/008rev1)