ANEC Comments on the EC Green Paper "Preparing for a Fully Converged Audiovisual World: Growth, Creation and Values"

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ANEC Position Paper

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Introduction

ANEC is pleased to be able to submit our comments to the European Commission public consultation on "Preparing for a Fully Converged Audiovisual World: Growth, Creation and Values".[1]

Our comments are focused only on the questions in the EC Green Paper that we consider as relevant to our activities. Accessibility, along with interoperability, is a key issue for consumers. Hence, in this paper we respond to the questions asked in Chapter **3.5 Accessibility for persons with disabilities.**

As a membership based association, our views reflect the feedback we have received from our members following their consultation.

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[1] https://ec.europa.eu/digital-agenda/sites/digital agenda/files/convergence_green_paper_en_0.pdf

General Comments

There is a need for manufacturers to ensure that needs of disabled people have been taken into account from the earliest stages of design and development. There is also a lack of interoperability between content providers, between platforms and across borders when it comes to access services such as audio description and subtitling. In addition, there is a market failure in ensuring that connectivity features in products are suitable for use with external accessibility solutions and a failure to provide third party assistive technology developers access to these interfaces.

3.5. Accessibility for persons with disabilities

(26) Do you think that additional standardisation efforts are needed in this field?

All consumers should be able to participate in the Information Society and reap its benefits. ANEC believes that standards can be successfully used to make products and services accessible to as many consumers as possible, irrespective of their age or abilities. European Standards, if based on the principles of Design for all and used, can play an essential role in making Europe accessible. Due to the enormous impact of the Information Society on a consumer's everyday life, it is vital for Electronic Communications to be accessible by all. Design for All means designing products and services for as many consumers as possible as a very large number of people have requirements which can be easily addressed by relative small changes in product design and service provision. ANEC believes that accessibility, and namely the Design for All principle, should be taken into account in a systematic matter in the standardisation system[2]. This is in line with Mandate 473 objectives, "to include a Design for all perspective in mainstream standards"[3].

We welcomed the proposal by the European Commission for mandatory provisions on web-accessibility of public sector bodies' websites as it took into account many of our suggestions about the use of standards and monitoring of implementation.[4] Binding legislation and standards should be seen as complementary instruments with legislation should set accessibility requirements and standards setting specific technical requirements. Web-accessibility standards should continue to be developed.

In our opinion, standardisation of audio description is needed: this is important to provide access to TV and digital cinema content when they are initially produced, but importantly there is a need to ensure that any audio described content is compatible

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[2]   ANEC position on European Commission standardisation mandate 473 to CEN, CENELEC and ETSI to include "Design for All" in relevant standardisation initiatives, Feb 2011 (ANEC-DFA-2011-G-003final)
[3]   Mandate 473, Standardisation Mandate to CEN, CENELEC and ETSI to include "Design for All" in Relevant Standardisation Initiatives, Ref.Ares(2010)578264 – 10/09/2010
[4]   ANEC position on standardisation and other aspects of the European Commission Proposal for a Directive on Accessibilityof Public Sector Bodies' Websites, March 2013 (ANEC-DFA-2013-G-001final)

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and therefore accessible in 'on demand' format going forward. It is often the case that initially audio described programmes are no longer so when broadcast on demand over the Internet at a later date[5]. With regard to connectivity and APIs there is a clear need for standardisation in order to ensure that specialised accessibility solutions can be developed using these connectivity provisions (and to ensure that the protocols cover the required set of functions that such accessibility solutions must be able to access). However, the technical means to deliver audiovisual access services (e.g. audio description, subtitling) and the standards needed for implementation already exist. The problem therefore is not so much one of gaps in standardisation, but one of fragmentation and lack of focus in terms of the technologies used.

With regard to products, interoperability is another important issue linked to accessibility. From a consumer point of view, as different devices follow different operating philosophies, it is difficult to adapt and to learn how to use the different products/services. Not to mention that for a specific category of consumers, visually impaired persons, interfaces, especially if web-based, need to be designed in an accessible manner, according to recognised web accessibility standards.

The challenges of ICT informal standardisation are that it poses a problem in terms of consumers' participation and transparency of the systems. For consumers it is vital that European ICT standardisation is open, transparent and a consensus-driven process, which allows all stakeholders to participate and to safeguard their interests. It could also help to provide further training and develop relevant tools for societal stakeholders' in general so that they can better understand how to get involved in standardisation. CEN and CENELEC are currently looking into developing through their Societal Stakeholders' Group Task Forces 1 and 2, of which ANEC is a member, a "Toolbox" and an "eLearning tool". These could be promoted largely, and synergies could be foreseen so as to encourage their use.

(27) What incentives could be offered to encourage investment in innovative services for people with disabilities?

•   Harmonisation of legislation would act as an incentive as it would create a level playing field and bring economic and social benefits for Europe. With respect of public procurement, the legal requirements coupled with functional accessibility requirements (in accordance with Mandate 376) could provide businesses with an incentive to develop accessible goods and services and stimulate innovation given the market importance of public procurement.

•   The market potential of Design for All could be emphasised. Disabled and older consumers often have to obtain 'special' accessible goods which usually cost more,

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[5] More information is available at EBU Response to Public Consultation on the Access to Interoperability Information of Digital Products and Services, June 2012, http://www.euroblind.org/media/position-papers/EBU-response-consultation-on-digital-interoperability-final.doc

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yet often such accessible goods, if marketed for all, would be more usable by many people who would not consider themselves to be a disabled person. Similarly, many multiple-use devices can be personalized with new software and applications to increase their accessibility and consumers' demand.

- The introduction of accessibility in engineering and technical training curricula (architects, designers, ICT professionals, etc.) could be used as an important measure to help build on growing interest in the development of accessible goods and services.

- The use of instruments in support of the European Accessibility Act, e.g. EU research policy, could encourage innovation in accessible products and services.

About ANEC

ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and conformity assessment, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 33 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.

Raising standards for consumers

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