

Template for comments and secretariat observations

ANEC comments (ANEC-DFA-2015-G-036)

Date: 2015-05-04	Document <b>M/473 del 1.2: Part 1</b>
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1	2	(3)	4	5	(6)	(7)
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AN EC			gen	<p>The document clearly shows that TG2 have carried out a great deal of work to research and compile it. However we have a number of detailed comments and some major concerns. The first concern regards the exclusion of barriers in certain areas and the second the lack of cost/benefit analysis and the impact of increased accessibility on industry, as requested by M/473. Thirdly, as the activity aims to cut across other areas/standards and ensure that they consider accessibility, it is essential to have an effective mechanism for this.</p> <p>The document also feels slightly 'out of date' in terms of technology as recent technology developments are not reflected in the report. The following items are missing:</p> <ul style="list-style-type: none"> <li>- mobile or tablet devices, either as an entity or as a means by which consumers access the various technologies discussed.</li> <li>- epayments, mpayments, NFC/RFID (new ways of paying such as Apple pay/ Samsung Pay and Paypal)</li> <li>- Internet of things; connected homes; smart objects</li> <li>- Wearable devices and new interfaces</li> <li>- Mhealth / ehealth applications</li> </ul>		

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				Our concerns are elaborated in the detailed comments below. Also a number of typographical errors are corrected at the end of these comments. Finally, an Executive Summary would be useful as it is a long and detailed report.		
AN EC	Title page	title	ed	The title does not reflect the review work included in the document.	Analysis of main areas of Standardisation <b>to review</b> & Prioritisation of work in ....	
AN EC	Contents	P2	ed	A number of sections are not listed on the Contents page and we suggest changes to 3 of the section headings. Since section 2 covers objectives, section 3 should not cover the purpose of the document.	3 <b>Status</b> of this document 7.2.1 <b>Questionnaire Design</b> 7.2.10 <b>Responses</b> to the questionnaire 8 Findings ... 23 8.1 Consultation process findings ... 23 8.2 Findings from the research literature review ... 35 8.2.1.1 The relationship between Accessibility and Safety ... 35 8.2.1.2 The multifaceted-complicated area of mobility ... 36 8.2.1.3 The importance of attitudinal barriers ... 36	

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					8.4 Status of standardisation areas and requests (Mandates) ... 48 9.3 Alignment with standardization areas and mandates ... 53	
AN EC	Key Terms and abbreviations	P4 Mandate entry, para 1	te	From 2015 standardisation mandates are to be called standardisation requests.	... European policies and legislation. <b>The term 'mandate' is to be called a 'request'.</b>	
AN EC	1 Background	Paras 4 & 5	ed	These paragraphs explain the objectives of the report. We suggest they are transferred to <b>2 Scope and objectives</b> , as paragraphs 2 and 3	<b>2 Scope and objectives</b> The objective of Mandate M/473 .... <b>The Mandate defines Deliverable D1.2 as ....</b> <b>This deliverable shall be dedicated to ....</b> Design for All is design for human diversity ....	
AN EC	1 Background	Para 5 of the presented version, p5 and repeated at +3 Purpose	te	The report undertakes to prioritise the standardisation areas that will be the most beneficial to concentrate on, considering cost/benefit aspects, impact on industry, consumers and other issues. The focus of the report is on consumers and their experience of barriers. However the cost/benefit aspects of increasing	Further research would require new text at least in sections 7.3, 8.2, 9.4 and 10.	

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		of this report, para 3, p7		accessibility and its impact on industry do not appear to have been addressed in any detail in the report. (Impact is dealt with generally in section 8.3.1). Further research would be required to address these issues.		
AN EC	2 Scope and objectives	Para 3 in the presented version, p5	te	People with the most severe disabilities eg the inability to move all parts of their body or extensive cognitive impairments are unlikely to be able to live independently nor to participate fully in all aspects of life.	Accessibility enables <b>almost all</b> people with disabilities ....	
AN EC	2 Scope and objectives	Para 4 in the presented version, p6	te	The majority of standards cover mainstream products, goods and services as opposed to standards covering assistive systems. It is important that standards developers and manufacturers and providers of these systems recognise that their output is addressed by this mandate and that it does not apply only to assistive systems designed specifically for people with disabilities and older people.	The intention is to create <b>mainstream</b> products, goods and services that can ....	
AN EC	2 Scope and objectives	Para 5 in the presented version, bullet point (1)	te	As above	(1) The design of <b>mainstream</b> products, goods and services that are readily ....	

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AN EC	2 Scope and objectives	Para 6 in the presented version, line 3	te	This point applies to both mainstream and assistive systems	whole design and development cycle of <b>all</b> products, goods and services.	
AN EC	2 Scope and objectives	Para 7 in the presented version, line 1	te	Dealing with barriers is one of the ways of improving accessibility so the term 'overall goal' is not appropriate here.	<b>To achieve accessibility it is necessary</b> to identify, prevent and remove barriers ....	
AN EC	3 Purpose of this document	heading	te	Objectives have already been addressed in Scope and objectives so it is not appropriate to have the heading Purpose of this document.	3 <b>Status</b> of this document	
AN EC	3 Purpose of this document as presented	Para 1	ed	The first paragraph repeats the information already provided under 1 Background and is unnecessary here.	Delete para 1	
AN EC	3 Purpose of this document	Paras 2 & 3	ed	The content of the text is clearer if the deliverable numbers are included in this section. It is also clearer to point out that the current document is the first of two deliverables.	Para 2 to start: <b>D1.2 This report is the first</b> of two deliverables ... <b>D2.1</b> Work plan. This deliverable ....	
AN	3 Purpose	Para 2	te	See our concern voiced above, under 1	Further research would require new	

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EC	of this document			Background, that cost/benefit and impact on industry have not been sufficiently addressed in this report.	text at least in sections 7.3, 8.2, 9.4 and 10.	
AN EC	3 Purpose of this document	Para 4	te	It would be helpful to have a more detailed overview of the annexes here and their value to the report	Include more information on the annexes.	
AN EC	5 Constraints 6 Limitations	Entire content	ed	The points covered in these two short sections are covered in 7.1 and 7.2.8, since they are methodology points.	Delete sections 5 and 6.	
AN EC	7.1 Overview	Entire content	te	Section 7.1 is difficult to follow with its cycles, strategies, activities etc. It would be helpful her to also present the information diagrammatically. This would also help to clarify later sections of the report eg 7.3.4.	Include diagrammatic presentations of the information included.	
AN EC	7.2.1 Preparation of & Questionnaire Design	heading	ed	Questionnaire Design is a sufficient title for this section.	<b>7.2.1 Questionnaire Design</b>	
AN EC	7.2.1 Preparation of & Questionnaire Design	Paras 1 and 4	gen	Since the questionnaire was completed by both people with disabilities and organisations representing people with disabilities, the statements should cover both types of respondent.	Para 1: The questionnaire asked respondents to describe the areas where <b>people experience</b> barriers. Para 4: It was decided at the outset that <b>the</b> main outcome would be the	

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					collection of qualitative data about the barriers experienced by <b>people with disabilities</b> .	
AN EC	7.2.2 Format	Para 1, line 4	ed	Since the questionnaire was completed by both people with disabilities and organisations representing people with disabilities, the statements should cover both types of respondent.	... (free form) regarding <b>the barriers experienced</b> . The questionnaire ...	
AN EC	7.2.8 Analysing the responses	Para 3	te	<p>We question these exclusions and require a fuller explanation and justification. M/473 requires the ESOs to include accessibility following a Design for All approach in relevant standardisation initiatives. We understand this to be in <b>all</b> standardisation initiatives. M/473 has become necessary since earlier mandates in the accessibility field have not achieved widespread accessibility in standardisation.</p> <p>We are pleased that barriers in on-line services are covered in this report, despite the existence of M/376, and that packaging barriers are covered in this report despite the existence of ISO 17480:2015. However we question the lack of consistency in this report's approach to excluded barriers.</p>	Ideally cover the barriers until now excluded from this report, or justify their exclusion.	
AN	7.2.8	Para 3,	te	Where the report lists 'Recreation', Annex C	Please explain why recreation barriers	

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EC	Analysing the responses	line 2		is referred to. It is unclear why recreation barriers are excluded after referring to Annex C.	have been excluded.	
AN EC	7.2.8 Analysing the responses	Para 3, line 4	te	Mandate M/420 provides accessibility requirements only for public procurement in the built environment. Also it provides design requirements in the built environment. However products, goods and services within all buildings are not covered in M/420 and therefore barriers arising from them should be covered in this report, since it is a deliverable of M/473.	Please include barriers arising from products, goods and services in the built environment.	
AN EC	7.2.8 Analysing the responses	NOTE	te	The bracketed information above the NOTE is not included in the questionnaire as presented in Annex A, A.1. Therefore it is unclear to what this note refers.	Please clarify the purpose of this note.	
AN EC	7.2.9	Para 1	te	The first sentence is untrue! Questionnaire recipients were restricted to members of SAGA, JWG5 and TGs within M/473 and their contacts. Section 7.2.9 should start with its current final sentence.	7.2.9 Accessibility and usability of the questionnaire  <b>The format of the questionnaire was assessed to be accessible and usable for the target population. It was also designed to be simple and short.</b>	
AN EC	7.2.10 Respondents to the	heading	ed	The content of this section is the responses received and not about the individual and	7.2.10 <b>Responses to the questionnaire</b>	

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	questionnai re			organisational respondents.		
AN EC	7.2.10 Responden ts to the questionnai re	Entire content	ed	The information in 7.2.10 is repeated in section 8.1. The content of these two sections should be combined at 8.1. The bar charts in 7.2.10 would be helpful in 8.1. Section 8.1 is a more appropriate place for this data, since 8.1 is a findings section, whereas 7.2.10 is a methodology section.	Combine the content of 7.2.10 and 8.1 at 8.1.	
AN EC						
AN EC	7.2.10 Responden ts to the questionnai re	Informati on relating to Table 7, para 2	ed	The report states that findings about barriers is in 9.1. The barriers information is in 8.1	Correct 9.1 to <b>8.1</b>	
AN EC	7.3.3 Types of literature	Para 2, 5 <sup>th</sup> bullet point	ed	'Other miscellaneous documents' should be a separate bullet point.	<b>o other miscellaneous documents</b>	
AN EC	7.3.6 Criteria for prioritizatio n			This refers to the prioritisation tool "Exclusion Calculator" to estimate the number of people affected by a particular barrier, or aspect of a barrier. How does this take account of the range of impairments people may have and the impact of a barrier on different groups? For instance, there are more people with	Explain how criteria for prioritization takes into account of the range of impairments people may have and the impact of a barrier on different groups.	

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				physical impairments than with speech difficulties so a barrier impacting on the former group would score higher than one impacting on the second group despite the possible severity of the impact of the barrier on this group.		
AN EC	8.1 Consultatio n process findings	Entire content	ed	Include the bar charts from 7.2.10 here. See our comments above re. 7.2.10, which should otherwise be deleted since it is repetitive.	Include the bar charts from 7.2.10 here.	
AN EC	8.1 Consultatio n process findings	P 24	te	Each line reporting the proportion of people reporting an impairment should include the words 'difficulty with'.	Eg 74% of the respondents reported <b>difficulties with</b> "seeing" 68% of the respondents reported <b>difficulties with</b> "language/literacy"	
AN EC	8.1.1	Bullet point 6	te	Difficulties are briefly explained in the other bullet points. What were the barriers with food, medication and electronic devices?	Briefly mention the barriers experienced with food, medication and electronic devices.	
AN EC	8.1.6	At end of bullet points	te	Include a statement about the overlap of comments re. 'Communicatuions, information and signalling' and 'Online services' and delete repetitive information eg bullet points 1, 2 and 3 in the example comments of section 8.1.6	Include a statement about overlap of comments and delete repetitive comments.	
AN	8.1.6		ed	This section is rather long, it may need to be	Consider create subsections in section	

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EC				broken into smaller chunks.	8.1.6.	
AN EC	8.2.3 Most frequently cited barriers	Para 1	ed	Clarify the first sentence.	More than 200 documents were examined <b>as part of the research for this report.</b> Of these ...	
AN EC	8.2.3 Most frequently cited barriers	Para 1, 3 <sup>rd</sup> sentence	te	Clarify whether the 200 or the 60 documents were tabulated.	Either: In the first cycle <b>all the documents</b> were tabulated .... Or: In the first cycle <b>the 60 documents</b> were tabulated ....	
AN EC	8.2.4 Instructions for use and labelling	Paras 1, lines 4 & 5, & para 2, line 2	ed	Please check the references – 8.2.8 is about online services, 8.2.7 about self-service machines and 8.2.9 does not exist.	Check references	
AN EC	8.2.6 Electronic household products	Para 1, line 3	ed	Ricability changed its name back to RICA a couple of years ago.	... features. Guides from <b>RICA</b> advise on ...	
AN EC	8.3.1 impact and 9.4 Business case	8.3.1 para 1; 9.4 para 1	te	Contradictory percentages of disabled people in the EU are stated in these two sections. In 8.3.1 15% or 9% and in 9.4 more than 10%.	Correct the percentage of disabled people in the EU.	

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AN EC	8.4 Status of standardis ation areas and requests	Paras 2, 3 and 4	ed	Please check the references to annexes in Part 2 in these paragraphs, for example Annexes I and J do not exist.	Correct the references to annexes in Part 2 in this section.	
AN EC	9.1 Environme ntal factors and context of use			We welcome the highlighting of this. Most products are not used in isolation but in specific environments. Examples include lighting conditions in the environment in which the product or service is accessed. For example a self-service machine may be accessible when sited in good lighting conditions but impossible for some people to use where lighting is poor. It is important that standards address requirements for the identified possible areas of use of the product or service which is the subject of the standard.		
AN EC	9.4 Business case	Para 3	te	Please provide a full reference to the Eurobarometer flash survey and state 26% of whom.	Eurobarometer flash survey ( <b>ref</b> ) 26% <b>of ...</b>	
AN EC	10 Recommen dations	Entire content	gen	Recommendations is clearly an important part of this long report, so it is important that it is easy to read. We suggest that recommended actions are more clearly identified, for example with the addition of	Edit the section and organise with sub-headings.	

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				sub-headings.		
AN EC	10 Recommendations	After para 5	ed	Please include a list of the 6 priority areas (as bullet points) here to aid the clarity of the recommendations.	<b>The identified 6 priority areas are:</b> ....	
AN EC	10 Recommendations	Para 11	te	The references to the work of CEN/CLC TC61 and IEC TC59 WG11 require correction.	In relation to electronic household equipment ... products. <b>CEN/CLC TC 61 WG4</b> deals with safety aspects ... IEC TC59 <b>WG11</b> workplan is to define performance requirements <b>to improve the accessibility of</b> household products. In addition <b>WG11</b> has developed a new <b>Technical Specification, IEC TS 62835: Electric toasters</b> ....	
AN EC	10 Recommendations	Para 11	te	IEC TC59 WG11 was specifically set up to improve the accessibility of household product performance standards. We question whether CEN/CLC TC59X has a similar remit.	We question whether reference should be made to CEN/CLC TC59X here.	
AN EC	10 Recommendations	Para 15, 1 <sup>st</sup> bullet point	te	The reported finding that physical barriers have been mentioned by many participants in the survey again suggests that the built environment should not have been excluded by TG2.	Please research and report on barriers resulting from built environment products, goods and services.	
AN EC	M/473	content	Main	There are a number of typographical errors in	See below:	

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	Deliverable 1.2 Part 1		ly ed, som e te	the report and a few references to other sections that are wrong. They follow with simple page and line references.		
AN EC		P 12, line 3	ed		... activities are described and commented <b>on</b> . Each activity ....	
AN EC		P 12, line 6	ed		... what the difficulties presented <b>were</b> and how these were overcome.	
AN EC		P 13, line 6	ed		The questionnaires were circulated together with an introduction <b>letter</b> in all 5 languages	
AN EC		P 13, line 9	ed		All members of JWG5 within Mandate <b>M/473</b>	
AN EC		P 13, line 10	ed		All members of <b>TGs</b> within Mandate <b>M/473</b>	
AN EC		P 13, line 12	ed		... relevant persons in <b>their</b> organisation and ....	
AN EC		P 14, line 11	ed		For the second cycle ... experts of TG2 and <b>then</b> ....	
AN EC		P 15, lines 1 & 2	ed		The questionnaire was made <b>available online</b> initially ...potential respondents <b>of</b> the questionnaire. ....	
AN EC		P 15, line	ed		The format of the questionnaire was	

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Document **M/473 del 1.2: Part 1**

1	2	(3)	4	5	(6)	(7)
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		6			assessed accessible <b>and usable</b> for the target ....	
AN EC		P17, 4 lines from end	ed		... highest percentage of responses received from <b>those</b> 41-60 years old	
AN EC		P 17, last line	te		... groups of people they represent are given in <b>8.1</b> .	
AN EC		P 18, 10 lines from end	ed		... information <b>regarding</b> impact were retained.	
AN EC		P 18, 8 lines from end	ed		... these being dealt with elsewhere (8.4).	
AN EC		P 18, 2 lines from end	ed		... developed countries (especially Australia, Canada, USA, New Zealand ....	
AN EC		P 19, line 11/12	ed		... as well as to cover <b>a</b> wide range.	
AN EC		P 20, line 7	ed		... where barriers are <b>faced</b> .	
AN EC		P 20, line 14	ed		... documents that fully <b>corresponded</b> to the 13 ...	
AN EC		P 23, 6	ed		... responses from 889 persons. The	

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**NOTE** Columns 1, 2, 4, 5 are compulsory.

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		lines from end			respondents ...	
AN EC		P 24, 2 lines above table at end	ed		... reported from within each of the <b>4</b> areas (physical, sensory, cognitive, allergy) by order ...	
AN EC		P 25, 3 lines below the table	te		... discussed in <b>the</b> Analysis Section (Section <b>9</b> ).	
AN EC		P 28, line 7	ed		<i>The most important <b>area</b> is detail packaging ...</i>	
AN EC		P 28, 6 lines from the end	ed		<i>... this often makes their operation <b>impossible for</b> people with vision impairment.</i>	
AN EC		P 29, line 5	ed		<i>... microwave <b>ovens</b>, cell phones etc. Accessibility <b>of</b> household appliances ...</i>	
AN EC		P 29, 10 lines from the end	ed		<i>... which means that many <b>lose</b> control over ...</i>	
AN EC		P 30, line 11	ed		<i>... electronic contact forms. "<b>Normal</b>" old people ...</i>	
AN		P 30, line	ed		<i>... There ought to be synthetic <b>speech</b></i>	

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EC		19			<i>on all ATMs.</i>	
AN EC		P 30, line 22	ed		<i>... sale devices: for <b>independent</b> and safer ...</i>	
AN EC		P 30, 8 lines from end	ed		<i>... not user friendly for people <b>with</b> vision impairments ....</i>	
AN EC		P 31, line 13	ed		<i>... payment transactions. NFC <b>should</b> be equipped with ....</i>	
AN EC		P 31, line 16	ed		<i>Online and <b>webservices</b> – this is the ....</i>	
AN EC		P 31, line 10 from the end	ed		<i>... if one cannot inspect <b>one's</b> account statement?</i>	
AN EC		P 31, line 2 from the end	ed		<i>... sighted people that public <b>websites</b> are accessible ....</i>	
AN EC		P 32, line 3	ed		<i>... no efficient and <b>continuous</b> internet coverage.</i>	
AN EC		P 32, line 14	ed		<i>Text font should be <b>enlarged</b> without needing ...</i>	
AN EC		P 33, line 12 from the end	ed		<i>... of two senses) and <b>of</b> installation ....</i>	
AN EC		P 34, line 6	ed		<i>...favourable for all people due <b>to</b></i>	

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					<i>increased ...</i>	
AN EC		P 34, line 9	ed		<i>... little <b>contrast</b> and often very small ...</i>	
AN EC		P 34, line 9 from the end	ed		<i>Raising awareness <b>of</b> existing accessibility ....</i>	
AN EC		P 34, line 2 from the end	ed		<i>... essential relief if it <b>was</b> decided ...</i>	
AN EC		P 35, line 12 from the end	ed		<i>Certainly at least three themes <b>re- occur</b> frequently in ....</i>	
AN EC		P 35, line 5 from the end	ed		<i>Household products, <b>packaging, instructions</b> for use and labelling ...</i>	
AN EC		P 38, line 8 from the end	ed		<i>... travel information, so that this <b>was</b> also frequently ....</i>	
AN EC		P 39, line 9 from the end	ed		<i>... applicable to many domains, <b>are</b> in the area of ...</i>	
AN EC		P 39, last line	ed		<i>... indeed they are <b>replete</b> with references ....</i>	
AN EC		P 40, line 10	ed		<i>... in other formats. Technology <b>offers</b> opportunities ....</i>	
AN		P 41, line	ed		<i>... they are selling to <b>a</b> population that</i>	

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EC		16			values ....	
AN EC		P 42, line 2	ed		... packaging problems. <b>A</b> study by Bell et ....	
AN EC		P 42, line 8	ed		... "Which? magazine" <b>in the UK</b> that carried ....	
AN EC		P 42, line 10	ed		... by complicated packaging. "The problems ....	
AN EC		P 43, line 2	ed		"The Overlooked Consumers" <b>noted</b> that ....	
AN EC		P 43, line 9 from the end	ed		...that information can be perceived in more <b>than</b> one way ....	
AN EC		P 43, 8.2.7 heading	ed		8.2.7 Self service <b>Machines</b>	
AN EC		P 44, line 4	ed		It is almost <b>impossible not</b> to interact ....	
AN EC		P 44, line 8	ed		... through the <b>airport weighing</b> and tagging ....	
AN EC		P 44, line 15	ed		...the use <b>of</b> automatic solutions ....	
AN EC		P 45, line 1	ed		Consumers with accessibility and usability <b>requirements</b> would like ...	

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AN EC		P 45, line 8	ed		... into mobile devices, <b>and there</b> are also ....	
AN EC		P 45, line 13	ed		... also present problems, <b>and</b> machines ....	
AN EC		P 47, line 5, 6	ed		... produced by the <b>Office</b> for Disability ... and Pensions, "UK Guidance on ... communication formats."[ref] <b>Also</b> the EU produced ...	
AN EC		P 47, line 12	ed		... the needs that have to be addressed. In addition, the work of the ....	
AN EC		P 48, line 12 from end	ed		... open packaging and <b>malnutrition</b> .	
AN EC		P 50, line 11 from end	ed		... only part of the <b>problem</b> . <b>There</b> will be users ...	
AN EC		P 51, line 2	ed		...Methodology Section ( Section <b>7</b> ), the two ....	
AN EC		P 52, line 11, 12	te		See Section <b>8</b> on Findings, section <b>7</b> , Table <b>6</b> ), there were comments .... was a problem <b>because</b> :	
AN EC		P52, 3, 4 from end	ed		... on the rise in Europe <b>and</b> has led ... rules in force <b>in</b> late 2014 will require ....	

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AN EC		P55, last line	ed		... <b>capability to plan</b> , to compare prices ....	
AN EC		P56, line 10	ed		... have expected to. In a <b>small</b> focus group ...	
AN EC		P56, line 6 from end	te		... to be marshalled, see Section <b>8.2.5</b> . However, still ....	
AN EC		P58, line 11	ed		... take measures for improvement according <b>to</b> Deliverable 1.1.	
AN EC		P59, line 16	ed		... spite of the number of comments about <b>inaccessibility</b> . <b>However</b> , the group ....	
AN EC		P 60, line 4	ed		... identified above will be a need to <b>complete</b> in the following areas:	

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