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| 300 | **Clause 3** | | | | | | | |
| 327 | EC 2 | 3.1 (and clause 10.0) |  |  | “Embedded” definition is not coherent with the use of the term in 10.0. This is important, because, as we see, it can undermine the use of Annex A.  In 3.1 Definitions: embedded: directly included in the content that is downloaded to the user agent and its extension, and is intended to be used in rendering the web page.  NOTE: Something that is downloaded using a mechanism on the web page but is not used in rendering the page is not "embedded" in the page.  In 10.0: Requirements in clause 10 apply to documents: …  • that are embedded in web pages but are not used in the rendering and are not intended to be rendered together with the web page in which they are embedded (i.e. downloadable documents). |  | Accepted  The word “embedded” is only ever used in the conventional dictionary sense of the word e.g. “fixed firmly and deeply in a surrounding mass; implanted” and hence no definition is required in clause 3.1.  The definition will be removed. |

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| 400 | **Clause 4** | | | | | | |
| 426 | EC 1 | 4.1 and 4.2 |  |  | “User needs” and “functional performance statements” are not used in a coherent way. The link between the term “user needs” and „functional performance statements” and the references to these terms should be clear.  E.g.: 4.1 refers to 4.2 the following way: The requirements in clauses 5 to 13 provide specific testable criteria for accessible ICT, corresponding to the user needs reflected in clause 4.2.  And NOTE 1: The relationship between the requirements from clauses 5 to 13 and the functional performance statements is set out in Annex B.  Meanwhile 4.2 does not use the term “user needs”.  (Same issue in Annex B.2.) |  | Partly accepted  Every functional performance statement (FPS) in clause 4.2 includes the words “users” and “need” within it – so every functional performance statement clearly **reflects** a “user need” (as stated in the last line of 4.1). The **title** of each FPS describes the user need that is addressed. There appears to be no inconsistency in the wording used in clause 4.  However, it is misleading to simply use the term “user need” and “functional performance statement” interchangeably as occurs in Annex B and Annex E.  Suggest the following changes:   * Last line of B.2.0 to read “The table indicates which functional performance statements, and corresponding user needs, are covered by each requirement.” * E.2.0 should begin “**Chapter 4** covers ‘functional performance statements’ which are directly related to end user needs”. * E 3.0 – second sentence should begin “The user needs **behind each functional performance statement** are ...” * E.3 paragraph 3, line 1, “types of user needs” should be replaced by “functional performance statements” * E.4.2 replace “user needs” with “functional performance statements” throughout. |

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| 1000 | **Clause 10** | | | | | | |
| 1025 | EC 3 | 10.3.2.3 |  |  | Question: would it make sense to consider 10.3.2.3, because of long/complex/interactive PDF documents? (10.4.1.3 [Status messages] used to be “Void” before, but is brought back into the new text.) |  | Not accepted  The W3C WCAG2ICT Task Force interpretation of how to apply Success Criterion 3.2.3 to documents related to navigation within sets of documents and not within a document itself. Their Note 2 said “Although not required by this success criterion, ensuring that navigation elements have consistent order when repeated ***within*** non-web documents or software programs directly addresses user needs identified in the Intent section for this Success Criterion, and is generally considered best practice.” During the initial creation of EN 301 549 it was felt that because 3.2.3 would not address navigation within a document, it would not be of much use. This was recently reassessed in discussions within STF 536 and reconfirmed. |
| 1026 | EC 4 | Clauses 10 and 11 |  |  | Suggestion: Please, consider using the WCAG conformance requirements in Clause 10 and 11. |  | Noted  When the W3C WCAG2ICT Task Force worked out how to apply WCAG 2.0 to documents and software it considered whether to consider the conformance requirements and decided against it. Two reasons discussed and mentioned in their Working Group Note were “The choice of what level to use for a given criteria (A vs. AA vs. AAA) was further influenced by a number of factors **specific to the web domain**” and “it wasn't possible to unambiguously carve up software into discrete pieces, and so the unit of evaluation for non-web software is the whole software program. As with any software testing this can be a very large unit of evaluation, and methods like standard software testing might be used.”  During the original work on EN 301 549 in Phase 2 of Mandate 376 it was decided not to extend the application of WCAG to documents and software beyond what the WCAG2ICT Task Force considered advisable – and hence the conformance requirements have never been included in clauses 10 and 11. |

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| 1100 | **Clause 11** | | | | | | |
| 1139 | EC 5 | 11.8 |  |  | Suggestion: Please, consider extending the requirements for Authoring tools (11.8) to authoring tools that are websites (Clause 9). (E.g. WordPress website.) |  | Accepted  11.8 certainly should apply to authoring tools that are websites. However, the inclusion of 11.8 in Table A.1 and the lack of any restrictions on the type of authoring tool in 11.8 means that the existing wording already covers this situation. |

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| A00 | **Annex A** | | | | | | |
| A48 | EC 6 | Note 3 and Annex E |  |  | Annex A Note 3 and Annex E use the term “European Web Accessibility Directive”, meanwhile the rest of the text refers to the Directive as Directive 2016/2102 [i.28]. | We suggest keeping the latter reference in Annex A. | Accepted |

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| E00 | **Annex E** | | | | | | |
| E37 | EC 7 | E.5 |  |  | the Note describes the scope of the Directive in a way that suggests that it refers only to bodies governed by public law. | Please, consider revising the text to reflect the full scope. E.g.: “The definition of public sector body is referring to state, regional or local authorities and furthermore to the Procurement Directive (Directive 2014/24/EU) article 2(1) point 4 “bodies governed by public law”. Latter means bodies that have all of the following characteristics…” | Accepted |