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| No | Organisation | Line number/ Clause/Sub Clause/  Annex  (e.g. 3.1) | Paragraph/ Figure/ Table/ Note (e.g. Table 1) | Type  of comment[[1]](#footnote-1) | Comment | Commenter’s Proposed Change  (with justification, if not included  with the comment) | Observations Of The Secretariat |
| 000 | Schedule. Proposals for new areas for requirements | | | | | | |
| 017 | ANEC 6 | Additional Annex |  | Ge | There is currently relevant research ongoing on the field of accessibility for people with cognitive impairment. A brief additional annex would be useful to explain the relevance of this ongoing work. | Useful information will be available to designers and specifiers of ICT products and systems.  Please include the following recent and ongoing work in this area in a new Annex/Bibliography:  • ETSI EG 203 350 V1.1.1 (2016-11) ETSI GUIDE Human Factors (HF); Guidelines for the design of mobile ICT devices and their related applications for people with cognitive disabilities.  • The Cognitive and Learning Disabilities Accessibility Task Force (Cognitive A11Y TF) of the APA WG and WCAG WG. | Partially accepted  Reference to these sources will be included for information to help those trying to go beyond the minimum requirements of the EN. These and other sources of guidance will be referenced in Annex D – which has been renamed “Going beyond EN 301 549 requirements; WCAG AAA and other resources (Informative).” |
| 018 | DS |  |  | T | The relation between ISO14289-1 “Document management applications -- Electronic document file format enhancement for accessibility -- Part 1: Use of ISO 32000-1 (PDF/UA-1)” and EN 301 549. | We propose to develop guidance where the relation between ISO14289-1 “Document management applications -- Electronic document file format enhancement for accessibility -- Part 1: Use of ISO 32000-1 (PDF/UA-1)” and EN 301 549 is described. Many tools for accessibility testing and remediation of pdf document utilize the ISO 14289-1 standard, and such guidance would be a valuable asset to users applying the EN 301 549 while using such software. | Noted |
| 019 | DS |  |  | T | Chatbots and similar solutions giving answers to questions from users could possibly be seen as a kind of special user interface, changing depending on the input from the user, and the input into AI or machine learning if these techs are used.  Eg. at present the user interface for SIRI, Alexa, Google Assistant, Cortana etc. demands for a Dane very clear pronunciation of words in English - a foreign language (First part of user interface). If the answers given by the “assistants” were based on a living experience in Shanghai, China, they would not be of much use (second part of user interface). | Look into whether chatbots and similar solutions giving answers to questions from the user (written or verbal) constitute a form of user interface. And whether answers provided by such user interfaces should be based on some kind of diversity including the statements in Functional performance where relevant. This could include the input for AI and machine learning while “learning”. | Noted  It is reasonable to consider chatbots as a form of user interface. There is insufficient reliable data about what impact diversity and machine learning issues have on accessibility.  The current requirements ensure access to text communication. But beyond that this would be a good topic for research, but outside the scope of M554. |
| 020 | SIS |  |  | G | According to the outlined time plan in the document N 341, there is no possibility for the JWG to take part in solving the comments from this 3.5 draft. It is important to get the different stakeholder group’s point of view not only in written comments. | Arrange a Zoom meeting with the JWG before the next draft. The collated comments from this 3.5 draft should be on the agenda in order to make it possible for the JWG to take part in solving the comments. | Not accepted  According to the agreed procedures the STF are responsible for resolving comments and the JWG are responsible for approving the document before it is submitted for national ballot. |

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| 100 | GENERAL comments. Foreword. Introduction. Scope. References. | | | | | | |
| 104 | Clas Thorén Consulting | Scope | Second paragraph | ed | Many standards include in the introduction or scope a statement on which users and/or contexts the standard is intended for. (Example: ISO 9241-11.)  Clause 1, Scope, of this standard mentions two contexts: public procurement and the web accessibiity directive. Version 1 of EN 301549 addressed, in general, public buyers and private sellers. In version 2 and 3, a new user is introduced: public bodies in their role as service providers.  Different parts of the EN are relevant for different user groups. For example: clause 9 and Annex A are relevant for a public sector body providing a service by means of a website, while clause 8.3 is not relevant. All of the clauses 5-13 may be relevant for a manufacturer of information kiosks.  .  A non-exhaustive list of intended user groups will clarify the intended contexts of use without wrongly encouraging users to disregard parts of the standard. | After the second paragraph of clause 1 Scope, add:  “This standard is intended for use by suppliers and acquirers of ICT including   1. Public sector bodies as providers of web sites and mobile applications; 2. Designers and developers of websites and mobile applications, contracted by public bodies; 3. Suppliers of ready-made systems with web-based user interface (e.g. payroll, time registration, booking of meeting rooms), wishing to sell to the public sector; 4. Suppliers of ICT other than websystems and mobile applications, wishing to sell to the public sector; 5. Public procurers of design and development of websites and mobile applications; 6. Public procurers of ready-made systems with web-based user interface (e.g. payroll, time registration, booking of meeting rooms). It should be noted that EU Member States may have implemented the web accessibility directive differently with respect to such applications; 7. Public procurers of ICT other than websites and mobile applications.” | Partially accepted  Replace the second sentence of the scope with a new paragraph:  ”This standard is intended to be used with Web based technologies, non-web technologies and hybrids that use both. It covers both software and hardware as well as services. It is intended for use by both providers and procurers, but it is expected that it will also be of use to many others as well.” |
| 105 | DS |  |  | T | Is the new version of the standard thought to have a clause considering mobile applications or will mobile applications be covered in chapters 9 and 11 respectively? |  | Noted  Mobile applications **are** covered by requirements in clauses 9 and 11 in particular (and the other requirements listed in Table A.2). |
| 106 | DS |  |  | T | The standard would benefit from a distinction between webapps, hybrid apps and native apps. | Webapps would range under clause 9 while native apps should be described in chapter 11 | Noted  It should be unnecessary to the successful use of the EN to attempt to make any clear and unambiguous distinctions. Where an app meets the pre-conditions of clause 9 or clause 11 requirements the appropriate requirements should be used (in practice not very different apart from closed functionality situations). |
| 107 | DIN | Introduction | end | ed | For new readers, a recommendation should be provided to first read Annex E. | Add the following note at the end of the introduction:  “NOTE 2: Annex E provides an overview over the purpose and structure of this document. Readers who are unfamiliar with this standard are recommended to read Annex E first.” | Accepted |
| 108 | SIS | Introduction and Annex E |  | TE | One of the challenges with the standard is that there are very few evidence on its usage. It is probable that the document is hard to understand. One approach showing why the standard is important and to make it easier to understand is to use the introduction as a guide in to the standard. The introduction could give an informative and understandable picture about the standard. If the introduction gives this picture, the need for Annex E decreases. It is probably better if different guiding materials evolves from different stakeholder groups. One other problem with the introduction is that it references the TR: s from Mandate 376, which partly refers to non-valid information, for instance old legislation. The history of the different mandates is better placed in the foreword. | Rewrite the introduction so it gives a picture of the standard, why it is important, what purpose it has and what It covers.  Delete Annex E. | Partially accepted  (See response to 104) |
| 109 | ITS, PTS | Scope | Second paragraph | T | It is common in standards to describe the intended target group/users in the scope or introduction. In this draft, these descriptions are in the annexes. For someone who is not already a user of the standard, it would not be clearer if they understand that they are the intended users, after reading the introduction and scope. | Include more details about possible users of the standard, e.g. public sector bodies, public procurers, suppliers of ict technologies. | Partially accepted  (See response to 104) |
| 110 | vonniman consulting #1 | Scope | Second paragraph | T, E | It is good ETSI practice to state the purpose of the document and its intended users in the Introduction – even more so after the considerable change in the scoping of the EN.  This is only partly mentioned and first in the Annexes. | Please include an Introduction section, stating the intended users of the standard. It should cover the developers and suppliers of ICT technologies, public sector bodies, public procurers, regulators, service providers and other possible stakeholders. | Partially accepted  (See response to 104) |

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| 200 | **Clause 2** | | | | | | |
| 211 | NSAI- | 2.2 |  | Te | Revision could reflect relevant guidance in relation to consistent terminology and information related to user accessibility needs (as associated with WHO-ICF) found in ISO/IEC Guide 71:2014 guide for addressing accessibility in standards (AKA CEN Guide 6:2014) | Insert  [i. 36] ISO/IEC Guide 71:2014 “Guide for addressing accessibility in standards” | Accepted |

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| 300 | **Clause 3** | | | | | | | |
| 316 | IBM | Section 3.1 definitions | Definition of context of use | E | Since there is one note, it does not need to be numbered – to be consistent with other definitions. The note also has its left margin even with terms rather than indented like other notes. | Should read “Note” instead of “Note 1”. Also, indent the note as in other definitions. | Accepted |
| 317 | IBM | Section 3.1 definitions | Definition of document | E | The definition of “document” on the next line is appended the Note for “context of use”. | Need to put the definition of “document” on the next line. | Accepted |
| 318 | IBM | Section 3.1 definitions | Definition of embedded | E | The left margin for the note is even with the terms but should be indented like the other notes on other definitions. | Indent the “NOTE”. | Accepted |
| 319 | NSAI | 3.1 |  | Te | Definition for “Assistive Technology” appears out-of-date or limited in its use in this document. Where the term “technologies” is a plural it often better associates more with alternate terms found, such as “Assistive Product” or “Device”. | Definition for “Assistive Technology” should be reviewed to ensure source reference is current and that use of, or crafted, NOTES are optimised in reference to relevant sources, such as; ISO/IEC Guide 71:2014 and ISO 9999:2016. | Accepted  The Guide 71 definition of assistive technology will be used. With an additional note:  ”assistive technology equipment, product system, hardware, software or service that is used to increase, maintain or improve capabilities of individuals ( from Guide 71 [i.36]) NOTE 1 to entry: Assistive technology is an umbrella term that is broader than assistive products. NOTE 2 to entry: Assistive technology can include assistive services, and professional services needed for assessment, recommendation and provision. NOTE 3: Where ICT does not support directly connected assistive technology, but which can be operated by a system connected over a network or other remote connection, such a separate system (with any included assistive technology) can also be considered assistive technology. (additional note not included in Guide 71 [i.36]) |
| 320 | DS | 3.1 |  | T | The standard lacks a definition of “hardware”. The standard needs to have a clear definition of what hardware includes, as it is an essential part of the standard. |  | Not accepted  There are standard dictionary definitions that cover this term. |
| 321 | DS | 3.1 |  | T | The standard lacks a definition of “software”. The standard needs to have a clear definition of what software includes, as it is an essential part of the standard. |  | Not accepted  There are standard dictionary definitions that cover this term. |
| 322 | DS | 3.1 |  | T | The standard lacks a definition of “mobile application”. The standard needs to have a clear definition of what a mobile application includes, as it is an essential part of the standard. |  | Not accepted  It is Directive (EU) 2016/2102 that introduces the term mobile application, as a scoping term, **without defining it**. It is not for EN 301 549 to define what the Directive means by this term.  Suppliers and procurers have to decide whether they are supplying / acquiring a mobile application within the terms of the Directive. If they are then the requirements in Table A.2 will apply. |
| 323 | UNINFO | 3.1 |  | E | Due AT abbreviation is defined in glossary, as for ICT, is best to put the abbreviation near the definition term. | Replace: assistive technology:  with: assistive technology (AT): | Accepted |
| 324 | ITS, PTS | 3.1 | Single user connection | T | Depending on user needs and preferences, users expect a connection to be possible in any single mode of video, sound or RTT or any combination of those modes. | Change the definition to “connection established by a single user action consisting of sound, real-time text or video or a combination of two or three of those media”.  Consider changing the note or adding more notes to reflect the changes in the definition. | Accepted  The words “voice and associated RTT may travel over different channels” to “the different media may travel over separate channels” |

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| 400 | **Clause 4** | | | | | | |
| 412 | IBM | 4.2.7 Usage with limited manipulation or strength  4.2.8 Usage with limited reach | Paragraph 1 & short name | T | Would be great if the FPS was split the same as the Revised 508 standards, making it easier to compare. However, I understand the implications of this change get into the mapping tables later in the standard as well. |  | Noted  This is too complex a change to make at this stage of the development of the EN. |
| 413 | NSAI | 4.1 |  | Te | Whereas the document should address the accessibility needs of people, the changes have diminished the importance of the user (usage) as a key part of ensuring the interaction intended with the requirements listed at 5-13. Elsewhere in the document, the “Functional performance statement” are expressed as more than “general objectives”.  Guidelines such as Section 508 and WCAG both have a similar structure – high level statements (principles or criteria) followed by detailed requirements.  The current edit:   1. removes connection of “functional performance statements” with “(user accessibility needs)”; 2. diminishes the value of Annex B; 3. reduces alignment with related text at E.3 and E.4; 4. contradicts with text at E5.2; 5. potentially creates inconsistencies with related procurement Toolkit.   It is important for procurement that procurers have the possibility to refer to the Functional Performance Statements in their tender specifications as a means of showing conformity with the EN. This is most desirable in cases where the subject matter of the procurement is not a commercial off the shelf product. | Return both paragraphs to the prior version.  Do no introduce the term ‘general objectives.’  Ensure this paragraph is retained a normative and not changed to informative.  Retain text in NOTES that refer to variations on, “user accessibility needs”. | Partially accepted  The “Informative” in brackets after the clause 4 heading will be removed.  There was a mistaken belief that, as it included no requirements, it had to be marked as informative (this only applies to annexes).  The first paragraph will be reinstated with edits:  “The statements set out in clause 4.2 are intended to describe the functional performance of ICT enabling people to locate, identify, and operate ICT functions, and to access the information provided, regardless of physical, cognitive or sensory abilities. Any **differences in ability** may be permanent, temporary or situational. **The requirements in clauses 5 to 13 provide specific testable criteria for making ICT more accessible.”** |
| 414 | ANEC 1 | 4.2.10 | Usage with limited cognition | Ge | The text is currently:  4.2.10 Usage with limited cognition  Some users will need the ICT to provide features and/or presentation that makes it simpler and easier to understand and use.  NOTE 1: This clause is intended to include the needs of persons with limited cognitive, language and learning abilities.  NOTE 2: Adjustable timings, error indication and suggestion, and a logical focus order are examples of design features that may contribute towards meeting this clause. | The text at the moment is very limited. By using information from ETSI EG 203 350 V1.1.1 (2016-11) ETSI GUIDE Human Factors (HF); Guidelines for the design of mobile ICT devices and their related applications for people with cognitive disabilities, the text can be expanded to be more useful as follows:  Some users will need the ICT to provide features and/or presentation that makes it simpler and easier to understand and use.  The interface needs to be designed in the following ways:  Presentation of information – The language use to present information to the user should be simple and direct. Consideration is needed with respect to the language and terminology used and in also ensuring the information is directed towards the end user. Some users will require the use of pictures to support text (such as in easy read).  Control of operation – The operation of the device should be straightforward, meet the end users’ expectations, be tolerant of errors on part of the end user and be compatible in operation and use with other systems.  Support for individualization and for skills development by the end user – Some users with a cognitive impairment will require an interface to be personalised both for ease of use and to remove elements with negative meanings for the end user. Some users with cognitive impairments will also benefit from a system whose interface is flexible and enables them to access greater functionality as their skills develop | Not accepted  Clause 4 is all about the objectives and not requirements so this does not seem to be the place for talking about going beyond requirements.  we will do this in Annex E.  (see comment 017). |
| 415 | Clas Thorén Consulting | Clause 4.1 | whole | te | The purpose of clause 4 and its relation to clauses 5-13 are not sufficiently clear.  Currently the following are stated:   * 4.1:The statements in 4.2 are general objectives * 4.1: 5-13 provide criteria for making ICT more accessible * Annex E5.2: Suppliers may make ICT more accessible by considering 4.2   Hence, 4.1 and E5.2 are (will be interpreted as) contradictory. | Replace the first paragraph of 4.1 with  “Clause 4.2 provides general objectives for accessible ICT, in the form of functional performance statements. They provide understanding of what functionality is needed to enable users to locate, identify and operate ICT functions and to access the information provided, regardless of physical, cognitive or sensory abilities.  The requirements in clauses 5 to 13 provide specific testable criteria for accessible ICT corresponding to the user needs reflected in clause 4.2.  Applicable specified requirements needed for determination of conformance with this standard will be found in clauses 5-13. See further clause 14 Conformance.  Suppliers may provide further evidence showing how their ICT addresses the user needs represented by the functional performance statements in addition to meeting the testable requirements contained in clauses 5 to 13.” | Partially accepted  (see comment 413) |
| 416 | DS | 4.2 |  | T | With the recent technological developments voice control has become a more widely used of operations for ICT. Examples are voice assistants, voice searches, dictation software for mobile phones and computers, as well as for vending machines etc. Operating voice controlled ICTs can be challenging for the average user as it requires a clear pronunciation from the user and a relatively low level of ambient noise. One of the main motivations for the use of voice control is its efficiency as an alternative to inputs through keyboard or pointing devices such as mouse and touch screen. Voice control has proven to be an especially efficient alternative for users who struggle to operate more traditional methods of input. However, some of these users may have limited vocal capabilities and therefore have difficulties precisely operating ICTs via voice control. We recommend considering adding requirements that will ensure that ICT that provide voice control as a means of operation include as many users as possible by ensuring a high level of acceptance for incorrect pronunciation or other vocal differences, and that it can be operated in as many environments as possible by allowing a certain level of background noise. This will not only benefit people with disabilities, but people who do not fluently speak a language or people on the go who may experience ambient noise. | Incorporate a paragraph on usage with limited vocal capability to accommodate users with limited vocal capability. | Partially accepted  As users with limited vocal capability are likely to have similar problems as those with no vocal capability, the title of the existing clause 4.2.6 will be changed to:  4.2.6 Usage with no or limited vocal capability |
| 417 | DIN | 4.2.12 |  | te | The “Usage without visual depth perception” is a special case of “Usage with limited vision”, it does not required a separate clause. | Delete clause 4.2.12 and move content to 4.2.2. | Accepted  4.2.12 will be deleted. This was added as a result of a previous comment, but the note 2 on 4.2.2 **always** covered depth perception as one potential limitation. |
| 418 | DIN | 4.2.13 |  | te | Respective considerations on binaural hearing is missing. | Add a new clause 4.2.13 with the following text:  Where ICT provides audio modes of operation, some users will need the ICT to provide a mode of operation that does not require spatial hearing (i.e. dies not require binaural audio perception of the room).  Note: Joint monaural option can help persons with different levels of hearing impairments on each ear including persons using one or two hearing aids.  Or add this text to clause 4.2.5, in alignment to clause 4.2.12.  Note 1 in 4.2.5 is already partially dealing with this issue. | Not accepted  As you point out, Note 1 to 4.2.5 on Usage with limited hearing already partially addresses binaural hearing.  Further expanding the note to cover the detail that you have included would exceed what is done for all other disabilities. |
| 419 | SIS | 4.0 |  | T | EN 17161 “Design for All – Accessibility following a Design for All approach in products, goods and services – Extending the range of users”, is going to be published soon. It has a process perspective and is consistent with organisational planning and process management. It refers to standards such as EN 301549. One important issue is to understand the context of the organisation both when it comes to external and internal factors and to understand the needs of those who are not using products or services. | Add the following NOTE 5  “Functional performance has a purpose for organisations who have adopted a process perspective in understanding the context of the organisation according to EN 17161:2019 Design for All – Accessibility following a Design for All approach in products, goods and services – Extending the range of users.”  Add the EN 17161 to the informative references | Not accepted  It does not provide any new information of importance for the use of the EN. |
| 420 | ITS, PTS, vonniman consulting #2 | Clause 4.1 | whole | T | The purpose of clause 4 is not clear. Neither is the relation between clause 4 and clauses 5-13.  The objective of clause 4 seems to be to inform about the general objectives of the EN, provided by the specific requirements in clauses 5-13. However, in Annex it is stated that suppliers can make their ICT more accessible by considering clause 4.2. This does not make sense. | Rewrite clause 4.1 to be consistent with the description of the intended use of clause 4.2 as described in annex E. Alternatively, reconsider the purpose of clause 4.2 and make sure that is reflected in clauses 4.1 and Annex E. | See response to comment 415. |

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| 500 | **Clause 5** |
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| 600 | **Clause 6** | | | | | | |
| 656 | IBM | 6.2.1.2 Concurrent voice and text | NOTE 4 | T | As this is worded, I’m not sure what NOTE 4 is trying to scope in, as it’s talking about “systems” which I consider hardware. There’s server hardware, server software, local hardware, local software involved with making connections, and running software. I don’t think you can scope in server hardware, as this could come from any vendor and doesn’t directly have any bearing on RTT functionality. Are you really trying to scope in if the software has to components – server-side software and local software that work together to provide voice communication. | Please clarify. | Accepted  The wording of this note is not sufficiently clear. Your last sentence exactly covers what is behind this note.  This will be reworded to read:  NOTE 4: where both server-side software and local hardware and software are required to provide voice communication, where neither part can support voice communication without the other, and are sold as a unit for the voice communication function, the local and server-side components are considered a single product. |
| 657 | IBM | 6.2.2.2 Programmatically determinable send and receive direction | Paragraph 1 | T | Regarding the phrase, “unless the RTT has closed functionality,” how can RTT have closed functionality? Do you mean “unless the RTT is provided on ICT with closed functionality”? | Please clarify. | Accepted  “RTT has closed functionality” will be changed to read “RTT is implemented as closed functionality” |
| 658 | IBM | 6.2.3 | NOTE 1 | E | Punctuation issue – extra “.” | Remove extra period at end of sentence. | Accepted |
| 659 | IBM | 6.5.5 | Notes 1 & 2 | E | “Note” should be in all caps to be consistent with the rest of the spec | “Note” changed to “NOTE” | Accepted |
| 660 | IBM | 6.5.6 | Note | E | “Note” should be in all caps to be consistent with the rest of the spec | “Note” changed to “NOTE” | Accepted |
| 661 | IBM | 6.5.6 | Paragraph 1 | E | Misspelling of ‘identification’ | Change ‘identiifaction” to “identification” | Accepted |
| 662 | IBM | 6.5.6 | Paragraph 1 | E | Fix language to make the first phrase of the sentence read better. | Change ‘Where ICT that provides RTT functionality provides speaker identification…’ to ‘Where ICT provides RTT functionality and speaker identification…”. | Partially accepted  See comment 672. |
| 663 | IBM | 6.5.6 | Paragraph 1 | T | I’m not exactly understanding this as it is mixing RTT with Video (Sign) identification of users. How would the Video (signing) person be identified in this situation and associated with the correct user? The signer won’t necessarily be logged in on the same ID as the person who is deaf that they are signing for. Or it could potentially be the person signing for themselves, but how would that information be known/transmitted through RTT? Or do you mean this would need to be made available through the transcriber. I can, however understand that when different people are using RTT, then there should be a way of identifying who is typing the RTT messages. | Please clarify. | Accepted  We have removed RTT as it is covers in 6.2.2.3. The current wording at the end of the requirement is wrong.  **See Comment 672 for proposed revised wording.** |
| 664 | ANEC 2 | Clause 6 |  | G | Requirement for user expertise when discussing RTT. | Please note ANEC are very willing to be involved in any discussions. | Noted  Some participants in the RTT Workshops already held had direct and indirect experience or RTT from the user perspective. No similar discussions are currently planned. |
| 665 | UNINFO | 6.2.2.3 |  | T | For speaker identification, like for the visual indicator audio, there is need of a note, that could be like note 2 of 6.2.2.4. | Add: Note: Without this indication a person who lack the ability to hear does not know who is talking. | Partially accepted  The word Note: Without this, both voice and RTT participants do not know who is communicating in RTT. |
| 666 | UNINFO | 6.5.5 |  | E | Miss the full sto after note 2. | Add full stop at end of note 2. | Accepted |
| 667 | SIS | 6 |  | G | The changes of RTT is substantial. There are few evidence shown how this would affect the user experience. | Make sure that the changes of the RTT-provisions are in line with the user perspective. | Noted  (See comment 664) |
| 668 | ITS, PTS | 6.2.1.2 | Note 1 | T | Turn taking for RTT and for voice users should be handled in the same way | Add the following sentence as the last sentence of the note: “Turn taking for voice users and RTT users should be handled in the same way, so that voice and RTT users are in the same queue.”. | Partially accepted  We cannot put a SHOULD in a note and this is a good idea in and of itself. so we will add a new note 2 instead that reads  NOTE 2: Best practice is for hand-raising for voice users and RTT users to be handled in the same way, so that voice and RTT users are in the same queue. |
| 669 | ITS, PTS, vonniman consulting #5 | 6.2.3 | Note 1 | T | It is worth mentioning that not only are new standards developed and used, but others become obsolete. | Add ”while others become obsolete”. | Not Accepted.  This note is about the process for introducing and using new standards. Removing them is a different process – and is more complicated. We don’t want to spend the bandwidth to go into the process for removing standards. |
| 670 | ITS, PTS | 6.4 |  | T | This requirement can be clarified. It is not evident whether the information that is provided is only the information of the user interface or also user generated information such as a recorded voicemail. | Clarify whether ‘information’ includes not only the user interface part of the ICT but also the information included e.g. the content of the voicemail. | Accepted  We will add a note:  NOTE 1: Tasks that involve both operating the interface and perceiving the information would require that both the interface and information be accessible without use of speech or hearing. |
| 671 | ITS, PTS | 6.5.6 |  | E | Typos. | Change “identifiication” to “identification” and “Video” to “video”. | Accepted |
| 672 | ITS, PTS | 6.5.6 |  | T | It is not clear what the last word in parentheses means: “(Sign)”.  ’voice users’ and ‘video’ is not consistently referred to. | If ‘(Sign)’ means sign language and other forms of signs, please clarify that. In this context, it is not clear whether that is the intended meaning of the word.  Consider rewriting the requirement to (changes in **bold**): “Where ICT that provides RTT functionality provides speaker identification for the voice users, it shall provide speaker identification for the **signing users (using video to communicate).**” | Partially accepted  It will be redrafted to read:  6.5.6 Speaker identification of sign language users  “Where ICT provides speaker identification of voice users, it shall provide speaker identification of **sign language users.**” |
| 673 | ITS, PTS, vonniman consulting #7 | 6.5.6 |  | T | Is this requirement met by video conferencing software that is on the market? Does the requirement mean that automatic detection of sign language shall be used or is it ok to have a system where the signing part needs to click a button or in any other way indicate that he or she starts to sign? | Clarify whether the requirement means that automatic detection of sign language needs to be supported. If so, consider whether that is a requirement that is supported by any existing product or service on the market. | Accepted  Add the words “where the start of signing has been indicated”.  Clicking of a button or automatic detection would ensure that the software knows when a signing user is speaking. |
| 674 | ITS, PTS, vonniman consulting #8 | 6. ICT with two-way voice com and 6.1 Audio bandwidth for speech | New 6.1 | T | Clause 6.1 addresses only the audio bandwidth topic for speech. This covers only a subset of the relevant issues, not addressing necessary QoS requirements, in order to be able to guarantee best possible access, service levels and priorities. | Kindly introduce a new section addressing QoS aspects of connection (and possibly, service) provisioning.  Providing QoS requirements, in order to be able to guarantee the best possible access, service levels and priorities with regard to the available options at hand. | Not accepted  Although your point is understood, we do not have access to widely agreed standards for the issues that you cite.  Issues of carrier connectivity and QoS are beyond the control of the devices and software seeking conformance to this standard. |
| 675 | ITS, PTS, vonniman consulting #9 | 6. ICT with two-way voice com | New section | T | There are legal, as well as a service provisioning-focused requirement about providing location information for emergency calls and services.  In cases when an emergency call is made using RTT (or even a relay service), the location of the emergency call-originating terminal (user) must be provided – not anything else. | Please add a requirement to provide location information for the emergency call-origination user and terminal (instead of e.g. the translator’s location, or the server’s), also when RTT, and/ or a relay service is used. | Not accepted  This standard is not the place to address such detailed service specific issues. This would be more appropriate in standards for relay services and emergency services. |
| 676 | ITS, PTS, vonniman consulting #10 | 6.5 Video communication | New requirement | T | Video provisioning shall be provided on a level corresponding to the provision of text communication (also due to reasons of equality). | Where ICT is in a mode that provides a means for two-way voice communication, the ICT shall provide a means for two-way video communication.  NOTE: Changeable network environments, or temporarily less favourable network attributes may require prioritization between offered modalities, in order to maintain minimum service levels. | Not accepted  The **universal** provision of two-way video would potentially be seen as an undue burden at this point in communications technology development.  Also, there are situations where the addition of video to a voice call would be unsafe/illegal, such as when a caller is driving a vehicle or operating machinery. |
| 677 | vonniman consulting #3 | 6.2.1.2 | Note 1, or in Definitions | T, E | “Turn taking” is used in Note 1 but neither defined, nor explained. | Please define or explain “turn-taking” – and update the spelling. | Accepted  Although it was believed to be a well understood concept, there is no harm in adding a definition and inserting the hyphen.  “turn-taking: a type of organization in conversation and discourse where participants speak one at a time in alternating turns.”  (from Wikipedia) |
| 678 | vonniman consulting #4 | 6.2.1.2 | Note 1 | T, E | Turn-taking for RTT and for voice users should be handled in the same way. | Add the following sentence as the last sentence of the Note:  *“Turn-taking for voice users and RTT users shall be handled equally, so that voice and RTT users are assigned positions in the same queue system.”* | Partially accepted  (see 668) |
| 679 | vonniman consulting #6 | 6.5.6 | First para | T, E | It is not clear what the last word between brackets means: *“(Sign)”.* | If ‘(Sign)’ means sign language and other forms of signs, please clarify that.  Furthermore, please consider rewriting the requirement to:  “*Where ICT providing RTT functionality supports speaker identification for voice users, it shall provide speaker identification for signing users, using video to communicate.”* | Partially accepted  (see 672) |
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| 700 | **Clause 7** | | | | | | |
| 711 | IBM | 7.1.2 | Paraph 1 | E | I had to read this requirement a few times to understand what exactly is required in the two cases. This is quite a long sentence, so perhaps breaking it down to smaller pieces, such as a bulleted list, would make it easier to read. However, I don’t know if it is allowed in your standards writing style.  When I did break this down, I’m not sure how the live captions portion of this requirement can be tested. How would one know the time duration of the availability of the caption to the player? | Suggest rephrasing as follows:  “Where ICT displays captions, the mechanism to display captions shall preserve synchronization between the audio and the corresponding captions as follows:   * Captions in recorded material: within a tenth of a second of the time stamp of the caption * Live captions: within the availability of the caption to the player. | Partly accepted  The idea of breaking it down is good, but I believe it has been broken down incorrectly.  The requirement will be re-written as:  “Where ICT displays captions, the mechanism to display captions shall preserve synchronization between the audio and the corresponding captions as follows:   * Captions in recorded material: within 100 ms of the time stamp of the caption * Live captions: within 100 ms of the availability of the caption to the player. |
| 712 | IBM | 7.1.4 | Paragraph 1 | E | Remove the word “the” to the first phrase to be consistent with other criteria (e.g. 7.1.5). | Change ‘Where the ICT displays…” to “Where ICT displays…” | Accepted |
| 713 | IBM | 7.1.4 | Paragraph 1 | T | This requirement says “should” and not “shall”. Is that intentional?  Are there specific characteristics that are most helpful or desirable to be customizable? For those who aren’t as familiar with the technology behind the captions or the user needs, it would be helpful to get that information. E.g. being able to add an opaque background with good contrast, placement of captions (top, bottom), fonts – size, font type. | If “should” is correct, suggest marking it as “(informative)”. “(optional)” or a “(best practice)” on the heading for 7.1.4 to make it clear it isn’t really required.  Please clarify by listing some helpful characteristics to be able to personalize. | Not accepted  “Should” is correct.  The distinction between requirements and recommendations in standards is always made in the wording – by the use of the “verbal forms” “shall” and “should”. There is no need to add anything to the heading.  The Note already includes some example characteristics. |
| 714 | IBM | 7.1.5 | Paragraph 1 | T | Is it intentional that this is “should” and not “shall”? If so, same comment as 7.1.4 – make this clear in the requirement heading. | If “should” is correct, suggest marking it as “(informative)”. “(optional)” or a “(best practice)” on the heading for 7.1.4 to make it clear it isn’t really required. | Not accepted  (see comment 713 for explanation) |
| 715 | UNINFO | 7.1.4 |  | T | Note seems to be an example of possible conformance but don’t refer to other possibilities like to increase dimension of fonts, change font colours, etc. | Add another note or example:  Note 2: Defining background and foreground colour for subtitles and possibility to personalize font type and size can contribute to meet this requirement. | Partially accept  There is really no need for two notes, these good examples will be added to the existing note as follows:  “NOTE: Defining the background and foreground colour of subtitles, font type, size opacity of the background box of subtitles, and the contour or border of the fonts can contribute to meeting this requirement.” |
| 716 | UNINFO | 7.1.5 |  | T | In this case, could be important to put a note about possibility to personalize audio output regulation. For example, a user must be able to increase audio of this output without modification of the global audio settings. At same time, user shall be able to recognize audio of captions over background sounds, like last point of requirements of WCAG 2.1 1.4.7. | Add following notes:  Note 1: User must be able to manage speech output range for spoken subtitles independently from general ICT speech configuration.  Note 2: The background sounds should be at least 20 decibels lower than the spoken subtitles, with the exception of occasional sounds that last for only one or two seconds. | Partially accept  The proposed notes are unsuitable as they contain detailed recommendations.  The following, similar to the Note on 7.1.4, will be added:  NOTE: Being able to manage speech output range for spoken subtitles independently from general ICT speech configuration and having background sounds at least 20 decibels lower than the spoken subtitles, with the exception of occasional sounds that last for only one or two seconds, can contribute to meeting this requirement. |
| 717 | ITS, PTS | 7.1.2 |  | T | Language is not consistent with how time is referred to in other parts of the standard. | Replace “within a tenth of a second” with “100 ms”. | Accepted  (see comment 711 for specific solution) |

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| 800 | **Clause 8** | | | | | | |
| 842 | ES | 8.3 |  | T | ISO 21542 and prEN 17210 provide requirements on the accessibility of the built environment relevant to ICT. Due to this, the previous editions of EN 301 549 Clause 8.3 contained no requirements. However, this draft v2.4 of prEN 301 549 v.3.1.1 has turned the recommendations given in 8.3 into requirements. 8.3 should be kept informative, to avoid inconsistencies with ISO 21542 and with prEN 17210. | Keep 8.3 informative.  All the requirements given in 8.3 in this new draft of prEN 301 549 v.3.1.1 should be turned again into recommendations. | Not accepted  Clause 13 of prEN 17210 “User interface, controls and switches” says “ICT is subject to the accessibility standard EN 301 549  developed under EU Mandate 376” and “Public ITC information screens shall be accessible according to EN 301 549”. If clause 8.3 is made informative it would make these statements meaningless as a “shall” in prEN 17210 would be pointing to “should”s in EN 301 549. |
| 843 | UNINFO | 8.3.1 |  | T | Note 2 regards a national non-EU law, Section 508, that also is not referenced in any other part. | Remove note 2.  Rename note 3 as note 2. | Not accepted  The reference to Section 508 in a note is valuable information to those trying to conform to the standard (who may already meet Section 508) and helps to explain why there are a set of required dimensions and also some recommended dimensions.  A reference will be added (it can replace i.25 to the ADA which is not actually referred to in the EN). |
| 844 | DIN | 8.3 |  | ge/te | The clause “Clear floor and ground space “ (old 8.3.2) including subclauses (8.3.2.2., 8.3.2.3, 8.3.2.3.1, 8.3.2.3.2 and 8.3.2.3.3) has been deleted therefore no values are available for the vertical change of level and slopes. The forward approach and the parallel approach are clauses that are essential for fixed mounted devices like self service terminals, ATMs, Multifunction printers and check-in/access terminal. | Please include again the lost information. | Partly accepted  Despite what prEN 17210 might seem to suggest, EN 301 549 has **never** been about defining dimensions of the built environment, only the dimensions of stationary ICT that can be placed in a built environment.  However, when there are floors and circulation spaces that are “an integral part of the ICT” they are within scope (typically kiosks and cabins). Previously this concept caused a lot of confusion and opposition to clause 8.3.  Clause 8.3 from EN 301 549 V2.1.2 will be reintroduced (with all “should”s changed to “shall”s) with the following changes (the numbers will be updated for the new structure).  8.3.2.1 starts “Where stationary ICT has a floor within it, then any change of floor level within it or entering it shall be ramped with ...  8.3.2.2 starts “Where stationary ICT has an operating area within it, ..  8.3.2.3.1 starts “Where stationary ICT has an access space inside it, ...  8.3.2.3.2 and 8.3.2.3.3 start “Where the operating area is inside an alcove within the stationary ICT, ... |
| 845 | SIS, ITS, PTS, vonniman consulting #11 | 8.3 |  | TE | The clause is directly derived from the US Section 508.  In addition, it would of course be much easier for manufacturers if the same dimensions were required in the US as in Europe. However, according to measures and concepts there is a grey zone between ICT to put in the built environment and what is required of the built environment. The level of accessibility is depending on both. In Europe, Mandate 420 is delivering prEN 17210 with functional requirements and an upcoming TR with complementing information on measures. The upcoming EN is based on ISO 21542, which contain several measures and solutions, which differ from clause 8.3. Since it is about reach etc. many regard ISO 21542 to give a better user experience. The prEN 17210 was recently out for comments. The draft contained a clause, which is overlapping 8.3. Thus, there is a high risk for conflict.  There are other general problems with the clause. The way to express measurement is not according to the way of expressing requirements elsewhere in the standard. The important thing is that user could use it. Furthermore, since there is a grey zone between what is built environment and what is ICT, the accessibility is often beyond control for the manufacturer. | Ensure that there are no conflicts between (pr)EN 17210 and EN 301549 v3.1.  The burden of proof is on the STF. If there are probable conflicts 8.3 has to be removed. | Accepted  Conflicts between EN 301 549 and prEN 17210 are impossible as clause 13 “User interface, controls and switches” of prEN says “ICT is subject to the accessibility standard EN 301 549  developed under EU Mandate 376” and “Public ITC information screens shall be accessible according to EN 301 549” |

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| 900 | **Clause 9** | | | | | | |
| 913 | IBM | 9.0 | Bullet 3 | E | New phrasing is hard to understand. Could be made a little simpler by applying WCAG2ICT verbiage. | Suggest text is changed to read:  Requirements for non-web documents and non-web software are given in clauses 10 and 11 respectively. | Accepted. |
| 914 | UNINFO | 9.0 |  | T | First list point refers to WCAG 2.0. In WCAG 2.0 there wasn’t Success Criteria 2.1.4, so 9.2.1.4 cannot be referenced. | Remove “9.2.1.4,” from first point in unordered list in paragraph 1. | Accepted |
| 915 | UNINFO | 9.0 |  | E | Referring to 9.5 in some part of this clause is set as “9.5 of the present document” and in other parts as “clause 9.5”. Need to decide what solution is best. For us, is best to remove “of the present document” due is redundant. | Remove “of the present document” from first and second point in unordered list in paragraph 1. | Not accepted  Referring to “the present document” is a way of making it unambiguously clear that this is an **internal reference** (there is no possibility to choose not to do this). The “of the present document” is meant to apply to all of the clauses listed in a sentence. |
| 916 | Clas Thorén Consulting | 9, 10, 11, Annex A | whole | te | The procurement directive 2014/24 EU, Article 42, paragraph 3(b) stipulates that each reference to a standard in the technical specification (=mandatory requirements) shall be accompanied by the words ”or equivalent”. This means that a call for tender for a web application will contain ”the website shall conform to EN 301 549, or equivalent”. A tenderer referring to an alternative specification, e.g. WCAG 2.1, has to prove that the alternative is equivalent.  Many web based application software are developed for compliance with WCAG 2.1. They will exist in the market even after EN 301 549 is implemented. In the context of public procurement, procurers and suppliers of such software will be faced with the question whether WCAG 2.1 and EN 301 549 are equivalent. Clearly, they are not identical, since table A in the EN has unconditional requirements beyond WCAG 2.1.  It can not be presumed that suppliers, and in particular procurers, are sufficiently familiar with EN 301 549 and WCAG 2.1 and its differences.Guidance is needed to avoid different interpretations.  In the worst case, the situation may occur where a winning bidder claims in his tender that WCAG 2.1 is equivalent to EN 301 549, while another bidder challenges thats claim, after which the issue ends up in court. We should avoid as much as possible that the equivalence question is decided by lawyers. | JWG should initiate a procedure for clarifying whether WCAG 2.1 and EN 301 549 are equivalent, in the sense of directive 2014/24 EU, or not. | Not accepted  Clearly, as you state, EN 301 549 and WCAG 2.1 are not completely equivalent as Annex A asks for more than WCAG 2.1. Only clause 9 and WCAG 2.1 are equivalent – this is already stated in clause 9.0. Although parts of clauses 10 and 11 are based on WCAG 2.1, there is no overall equivalence there either.  We do not believe that we need a statement on equivalence when clause 9.0 and the tables in Annex A make it unambiguously clear that they are not. |
| 917 | DIN | 9,10 and 11 |  | ge | The level A and AA success criteria of WCAG 2.1 fulfil the essential requirements set out in EU Directive 2016/2102.  But some Member States like Germany may require some level AAA success criteria under certain conditions to be compliant with their existing national accessibility legislation for Web pages and mobile applications.  Including Level AAA criteria in clause 9 and respectively in clauses 10 and 11 as "conditional" would help them to deal with ONE consistent framework of criteria. Respective checks should be added in Annex C.  The resolution of the comments of 901 and 903 in N334 are not acceptable because  The Annex D does not provide the full information  There are many other requirements in the document also not applicable to WAD  this standard will be probably will be used by experts who will not be confused by mandatory and not mandatory requirements | Add level AAA criteria in clause 9 (replacing void clauses) and respectively in clauses 10 and 11. Provide respective checks in Annex C. Don´t include Level AAA in tables A1 and A2. Delete Annex D. | Not accepted  The current arrangement does not prevent Member States from requiring some level AAA success criteria under certain conditions to be compliant with their existing national accessibility legislation for Web pages and mobile applications?  It is not clear what is meant by “Annex D does not provide the full information – what of importance is missing.  It is still a major concern that readers of the EN have to be relied upon to carefully check the modal verb in order to correctly understand the appropriate significance of the various requirements. I have personally made errors in WCAG 2.1 by failing to notice that a requirement is AAA and not actually required.  As the W3C WCAG2ICT Task Force never considered the applicability of AAA Success Criteria as requirements for software and documents, there is no evidence about the appropriateness of doing so.  From https://www.w3.org/TR/UNDERSTANDING-WCAG20/conformance.html#uc-conformance-requirements-head  “Note 2: It is not recommended that Level AAA conformance be required as a general policy for entire sites because it is not possible to satisfy all Level AAA Success Criteria for some content.” |
| 918 | DIN | 9.1.2.4 |  | ed | Add a note at the end of the subsection, stating that this requirement is excluded by the Web Accessibility Directive (EU) 2016/2102. | “NOTE: This requirement has been excluded by the Web Accessibility Directive (EU) 2016/2102. It is nevertheless an important requirement for making live streaming media accessible.” | Partially Accept  Putting this here might actually weaken the provisions by noting their exclusion. However - we will add a note in Annex A (where we map the provisions against the Web directive) that says:  NOTE: Because the Web Accessibility Directive (EU) 2016/2102 “does not apply to live time-based media”, the following requirements are not listed in the table above. They are however, important requirements for making live streaming media accessible.  • 9.1.2.4 Captions (live)  o Where ICT is a web page, it shall satisfy WCAG 2.1 Success Criterion 1.2.4 Captions (Live).  • 10.1.2.4 Captions (live)  o Where ICT is a non-web document, it shall satisfy the WCAG 2.1 Success Criterion 1.2.4 Captions (Live).  • 11.1.2.4 Captions (live)  o Where ICT is non-web software that provides a user interface, it shall satisfy the WCAG 2.1 Success Criterion 1.2.4 Captions (Live). |
| 919 | Gregg | 9.0 |  |  | I brought this up before and I thought we repaired this.  We can say what conformance to our document is,  but we cannot say what constitutes conformance to another standard. They are the only ones that can say that. | REMOVE Last two bullets in second group   * Web Pages conforming to clauses 9.1.1.1 to 9.1.3.3, 9.1.4.1 to 9.1.4.5, 9.2.1.1, 9.2.1.2, 9.2.2.1 to 9.2.4.7, 9.3.1.1 to 9.4.1.2, and the conformance requirements of clause 9.5, also conform to WCAG 2.0 Level AA.   Web Pages that conform to all of clauses 9.1 to 9.4, and the conformance requirements of clause 9.5, conform to WCAG 2.1 Level AA. | Accepted  Going beyond this, we will delete the sentence after NOTE 1 and the four bullets. The first two references to WCAG will be an expanded version of the name (similar to the sentence below Note 1). |

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| 1000 | **Clause 10** | | | | | | |
| 1003 | IBM | 10.4.1.3 | Paragraph 1 | T | I suspect that not all document markup languages support this requirement. When I look at Wikipedia, there’s over 30 different document markup languages. Perhaps there should be a caveat, “Where document markup languages support providing messages” to this requirement. | Suggest text is changed to read:  Where ICT is a non-web document and the document markup language supports marking up messages, it shall satisfy [WCAG 2.1 Success Criterion 4.1.3 Status Messages](https://www.w3.org/TR/WCAG21/#status-messages). | Not accepted  All of the major markup languages support this. We don’t see a need to create an exception for the possibility that a language may fail to meet this requirement. |
| 1004 | DIN | 10 |  | te | There are certain requirements for PDF documents in the standard PDF/UA which go beyond WCAG. For example a PDF/UA identifier (xmp format) is required, symbols of lists (in CSS named as list-style-type) must appear in the tags tree, scope attribute is obligatory in simple tables. Requirements like that are missing. | Add certain PDF/UA requirements to clause 10 in the same way as WCAG success criterions are referenced. | Not accepted  Early in the development it was decided not to include technology-specific requirements (e.g. requirements that only apply to PDF documents). |
| 1005 | DIN | 10.1.2.4 |  | ed | Add a note at the end of the subsection, stating that this requirement is excluded by the Web Accessibility Directive (EU) 2016/2102. | “NOTE: This requirement has been excluded by the Web Accessibility Directive (EU) 2016/2102. It is nevertheless an important requirement for making live streaming media accessible.” | Partially accepted  (see comment 918) |
| 1006 | DIN | 10.2.4.1 |  | ed | Insert a note, explaining why this requirement is void. | NOTE: The web page related requirement “Bypass blocks” does not apply to documents. | Partially accepted  The following note will be added.  “NOTE: The web page related requirement “Bypass blocks” does not apply to single documents, but to a specific definition of “sets of documents” that are very rare.”  See <https://www.w3.org/TR/wcag2ict/#wcag2ict-def_set-of-documents> |
| 1007 | DIN | 10.2.4.5 |  | ed | Insert a note, explaining why this requirement is void. | NOTE: The web page related requirement “Multiple ways” does not apply to documents. | Partially Accepted.  (see 1006). |
| 1008 | DIN | 10.3.2.3 |  | ed | Insert a note, explaining why this requirement is void. | NOTE: The web page related requirement “Consistent navigation” does not apply to documents. | Partially Accepted.  (See 1006) |
| 1009 | DIN | 10.3.2.4 |  | ed | Insert a note, explaining why this requirement is void. | NOTE: The web page related requirement “Consistent identification” does not apply to documents. | Partially Accepted.  (See 1006) |
| 1010 | SIS, ITS, PTS | 10 | Heading | TE | Since tables A.1 refer to clause 10 for downloadable documents, it is necessary to change the heading of clause 10 in order to mirror that change. In version 2.1.2 of EN 301549, downloadable documents are covered by clause 9, since they are web pages. In published versions of the standard, clause 9 is applicable to web content including downloadable documents, whereas clause 10 is applicable to documents that are provided by other means than as web pages. | Change the heading of clause 10 to “Documents”. | Not accepted  Downloadable documents are not web pages according to the definition in clause 3.1 (and in WCAG 2.1). They appear in Table A.1 because the Directive says that it should also apply to documents downloaded from a website. |
| 1011 | SIS, ITS, PTS | 10.0 | Paragraph 2 | TE | Since clause 10 are requirements for downloadable documents and forms (they are listed in tables A.1), paragraph 2 has to be rewritten. | Make sure that the text in paragraph 2 informs that downloadable documents are covered by clause 10, since tables A.1 refer to clause 10 as conditional requirements for downloadable documents. | Accepted  Although the third bullet covers downloadable documents, this could be emphasised by adding “(i.e. downloadable documents)” at the end. |
| 1012 | SIS | 10 | 10.2.4.1; 10.2.4.5.; 10.3.2.3; 10.3.2.4; 10.4.1.3 | TE | Some requirements on WCAG 2.1 AA-level are left out of Clause 10. As it is now (v2.1.2), downloadable documents are covered by clause 9. The referring to clause 10 for documents shall not mean that the level of requirements is lowered. The void requirements in clause 10 may be valid for documents that are in web-pages. | Check the void requirements of AA reinsert and rewrite them to suit documents with the purpose to maintain the level of requirements. | Partially accepted  The following note will be added.  “NOTE: The web page related requirement “Bypass blocks” does not apply to single documents, but to a specific definition of “sets of software programs” that are very rare.”  See <https://www.w3.org/TR/wcag2ict/#wcag2ict-def_software> |
| 1013 | ITS, PTS | 10 | 10.2.4.1; 10.2.4.5.; 10.3.2.3; 10.3.2.4; 10.4.1.3 | T | Since the definition of web page includes any web content technology that is retrieved from a URI using http, all types of document retrieved in such a manner are web pages. Such documents include “office file formats” as described in the Web Accessibility Directive (WAD) and this is backed by the WCAG definition of ‘technology (web content)’.  In this draft of the EN, downloadable documents and forms are covered by clause 10 (referred to in table A.1). However, there is no definition of “downloadable” or “downloadable documents and forms”. Thereby, it is not clear when documents such as pdf’s and MS Office files are covered by clause 10 and when they are covered by clause 9.  An illustrating example: when surfing a website, the user can click a link to open a pdf file. In most web browsers, the file is opened in a new tab or window, i.e. in the user agent. In the user’s perspective, it is not downloaded, unless any web content is considered downloaded when retrieved and rendered in the web browser.  If the requirements of clauses 9 and 10 were identical, except for the wording referring to ‘documents’ and ‘web page’ respectively, this would not be a problem. However, there are clauses that refer to WCAG in clause 9 but are void in clause 10. | Some requirements on WCAG 2.1 AA-level are left out of Clause 10. As it is now (v2.1.2), downloadable documents are covered by clause 9. Make sure that referring to clause 10 does not mean that the level of requirements are lowered for documents. The void requirements may be valid for documents that are in web-pages.  Also, consider defining ‘downloadable’ or ‘downloadable documents and forms’. | Not accepted  (See comment 1012) |
| 1014 | ITS, PTS | 10.0 | Second paragraph | T | The current second paragraph describes the scope of clause 9. | Make sure the description in 10.0 about the scope of clause 9 is also described in the introduction to clause 9. | Not accepted  This is not necessary as the description in clause 10 is to remind people looking at documents about the definition of what a web page is (and hence what types of documents might be classed as web pages). The first line of clause 9 refers the reader to the definition of what a web page is. |
| 1015 | ITS, PTS | 10.0 | Third bullet point in the first paragraph | T | This bullet point is incomprehensible. Please clarify by giving an example of document that are “embedded in web pages but are not used in the rendering and that are not intended to be rendered together with the web page in which they are embedded”. | Clarify or provide a clarifying example of what this bullet point means. | Accepted  (see response to comment 1011) |

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| 1100 | **Clause 11** | | | | | | |
| 1109 | IBM | 11.0 | NOTE 1, first sentence | T | Would prefer the UAAG definition of user agent was used here, with a little tweaking, to explain what a user agent is in the context of software (both web and non-web).  UAAG’s definition of “user agent” is as follows:  Any software that retrieves, renders and facilitates end user interaction with web content.  So when extended beyond web, a user agent facilitates end user interaction with “authored content” – web content, non-web documentation, etc.  In addition, I think the first two sentences could be tweaked further to indicate that user agents must actually be developed in a way that renders accessible content to the user. | Suggest the first two sentences be edited to read as follows:  User agents are examples of software programs that retrieve, render and facilitate end user interaction with authored content ~~provide a user interface~~. User agents play an ~~They are also~~ important role in the accessibility of authored ~~for presenting~~ content rendered in the user interface ~~in accessible ways~~. | Partially accepted  It is proposed that the first sentence remains the same. Then second sentence would then follow your proposal and become:  “They retrieve, render and facilitate end user interaction with authored content. User agents play an important role in the accessibility of authored content rendered in the user interface.” |
| 1110 | IBM | 11.0 | NOTE 1, third sentence | E | Should there be a reference identifier to UAAG here? If so, add it – it’s currently reference [i.34]. This is the first and, as it seems, only reference to UAAG in the standard. | Instead of ‘UAAG 2.0’, change it to ‘UAAG 2.0 [i.34] | Accepted |
| 1111 | IBM | 11.0 | NOTE 1, third sentence | E | Need to correct the grammatical error in the phrase “for those who creating user agents”. Also, isn’t “other’s content” really “authored content”? I think a little editing of this sentence could help a lot. See suggested edits. | UAAG 2.0 provides additional advice for those who are creating user agents and want to ~~go beyond just making their software accessible and want to~~ increase ~~its~~ the functionality ~~in~~ when rendering authored ~~presenting other's~~ content in an accessible way. | Accepted |
| 1112 | IBM | 11.1.1.1.2 Non-text content (closed functionality) | Section title and Paragraph 1 | T | It is confusing to have a requirement that simply points to another requirement. Then vendors (and the developers of reporting tools such as the VPAT 2.0) don’t know which provision to respond to the requirement. Do you respond for clause 11.1.1.1.2, or 5.1.3.6, or both?  Suggest that this be made a void clause, since the real requirement is stated in 5.1.3.6. You can add a note that says for closed products there is a different requirement - 5.1.3.6. This will completely avoid the reporting confusion – conformance would only be documented on 5.1.3.6. | 11.1.1.1.2 Void ~~Non-text content~~ (closed functionality)  NOTE: For products with closed functionality, see clause 5.1.3.6 (Speech output for non-text content).  …and delete the rest of the existing clause. | Not accepted  We examined this and concluded that It was preferable to have overlapping solutions rather than complex cross-referencing in a Note. |
| 1113 | IBM | 11.1.2.1.2.1 | Section title and Paragraph 1 | T | Similar issue to 11.1.1.1.2 in the previous row, but this requirement points to 5.1.5 (Visual output for auditory information).  Similar suggestion for revision to the provision. | 11.1.2.1.2.1 Void ~~Pre-recorded audio-only~~ (closed functionality) NOTE: For products with closed functionality, see clause 5.1.5 (Visual output for auditory information).  …and delete the rest of the existing clause. | Not accepted  (see comment 1112) |
| 1114 | IBM | 11.1.2.1.2.2 | Section title and Paragraph 1 | T | Similar issue to 11.1.1.1.2, but this requirement points to 5.1.3.7 (Speech output for video information).  Similar suggestion for revision to the provision. | 11.1.2.1.2.2 Void ~~Pre-recorded video-only~~ (closed functionality) NOTE: For products with closed functionality, see clause 5.1.3.7 (Speech output for video information). …and delete the rest of the existing clause. | Not accepted  (see comment 1112) |
| 1115 | IBM | 11.1.2.3.2 | Section title and paragraph 1 | T | Similar issue to 11.1.1.1.2, but this requirement points to 5.1.3.7 (Speech output for video information).  Similar suggestion for revision to the provision. | 11.1.2.1.3.2 Void ~~Audio description or media alternative~~ (closed functionality)NOTE: For products with closed functionality, see clause 5.1.3.7 (Speech output for video information).…and delete the rest of the existing clause. | Not accepted  (see comment 1112) |
| 1116 | IBM | 11.1.3.1.2 and 11.1.3.2.2 | Entire requirement | T | There is already another requirement in the closed product section 5.1.3.3 Auditory Output Correlation that contain or mean the same thing as these requirements. Suggest voiding these requirements and referencing 5.1.3.3 in a NOTE for both of them. | 11.1.3.1.2 Void ~~Info and relationships~~ (closed functionality) NOTE: For products with closed functionality, see clause 5.1.3.3 (Auditory output correlation).  …and delete the rest of the existing clause  11.1.3.2.2 Void ~~Meaningful Sequence~~ (closed functionality)  NOTE: For products with closed functionality, see clause 5.1.3.3 (Auditory output correlation). …and delete the rest of the existing clause | Not accepted  (see comment 1112) |
| 1117 | IBM, Level Access 2 (see separate Excel sheet) | 11.1.3.5 Input purpose | Section title and paragraph 1 | T | This WCAG success criterion does not make sense to be applied to closed product software, as the SC clearly states that the input purpose is “programmatically determined”. This is so that assistive technology can provide additional information or an alternate display of labeling content based on the programmatic markup. A closed product, by definition, cannot have AT attached or installed.  Therefore, this SC should be “void” for closed product software. To fix, there will need to be a split of regular software from closed product software - with an 11.1.3.5.1 the points to the WCAG criteria and an 11.1.3.5.2 for products with closed functionality that voids the requirement. | 11.1.3.5.1 Input purpose (open functionality) Where ICT is non-web software that provides a user interface, it shall satisfy the [WCAG 2.1 Success Criterion 1.3.5 Identify Input Purpose](https://www.w3.org/TR/WCAG21/" \l "identify-input-purpose). 11.1.3.5.2 Void (closed functionality) | Accepted  In addition, "and that supports access to assistive technologies" will be added into the requirement after “user interface”. |
| 1118 | IBM | 11.1.4.3 Contrast (minimum) | Paragraph 1 | T | For closed products, many displays are 2-tone LCD where the closed product software has no ability to modify any setting to change/improve the contrast to meet this requirement – it’s a limitation of the hardware. It’s up to the closed product hardware to provide the appropriate contrast. But there is no hardware requirement in the EN 301 549 for this case.  This is why the Revised 508 standards has the requirement 402.4 Characters on Display Screens, where the text of the provision includes a basic contrast requirement:  Characters shall contrast with their background with either light characters on a dark background or dark characters on a light background. | Potentially add a closed product hardware requirement that the display supports a certain contrast. Then for 11.1.4.3 there would have to be a Note like “For products with closed functionality, and the hardware has the capability of displaying multiple colors and intensities”, then this software criteria would apply. | Not accepted  This applies to both open and closed functionality. This requirement is not based upon the behaviour of AT.  If a closed product cannot support a given colour contrast then it cannot be accessible. |
| 1119 | IBM | 11.1.4.4.2 | Section title and paragraph 1 | T | Similar issue to 11.1.1.1.2, but this requirement points to 5.1.4 (Functionality closed to text enlargement).  Similar suggestion for revision to the provision. | 11.1.4.4.2 Void ~~Resize text~~ (closed functionality) NOTE: For products with closed functionality, see clause 5.1.4 (Functionality closed to text enlargement). …and delete the rest of the existing clause. | Not accepted  (see comment 1112) |
| 1120 | IBM | 11.1.4.5.2 | Heading and paragraph 1 | T | Since the text of this requirement states that closed product software does not need to meet this requirement, suggest it is more easily determined without having to closely scrutinize the text of the “requirement”. This is most easily accomplished by making the heading a “Void” and giving the reasoning in a NOTE. | 11.1.4.10.2 Void ~~Images of text~~ (closed functionality) NOTE: ~~Where ICT is non-web software that provides a user interface which is closed to assistive technologies for screen reading, it does not need to meet the [WCAG 2.1 Success Criterion 1.4.5 Images of Text](https://www.w3.org/TR/WCAG21/" \l "images-of-text) because t~~There is no need to impose a requirement on all closed functionality that text displayed on the screen actually be represented internally as text (as defined by WCAG 2.1), given that there is no interoperability with assistive technology. | Not accepted  Thank you for identifying the error, however the correct solution is to point to the correct closed functionality requirement (in this case 5.1.3.6)  The text for 11.1.4.5.2 will be changed to:  Where ICT is non-web software that provides a user interface which is closed to assistive technologies for screen reading, it shall meet requirement 5.1.3.6 (Speech output for non-text content). |
| 1121 | IBM | 11.1.4.10.2 | Paragraph 1 | T | It is confusing to have a requirement that simply points to another requirement. Then vendors (and the developers of reporting tools such as the VPAT 2.0) don’t know which provision to respond to the requirement. Do you respond on 11.4.1.2, or 5.1.4, or both?  Suggest that this be made a void clause, since the real requirement is stated in 5.1.4. You can add a note that says for closed products there is a different requirement - 5.1.4. This will completely avoid the reporting confusion – conformance would only be documented on 5.1.4. | 11.1.4.10.2 Void ~~Reflow~~ (closed functionality) NOTE: For products with closed functionality, see clause 5.1.4 (Functionality closed to text enlargement).  …and delete the rest of the existing clause. | Not accepted  (see comment 1112) |
| 1122 | IBM | 11.1.4.11 Non-text contrast | Paragraph 1 | T | Similar to the issue 11.1.4.3 Contrast (minimum) above for closed product software. If the hardware doesn’t support multiple levels of contrast, colors, or intensity then the software cannot fix that for non-text contrast. | Similar solution as 11.1.4.3. | Not accepted  (see comment 1118) |
| 1123 | IBM | 11.2.1.1.2 | Heading and paragraph 1 | T | Similar issue to 11.1.1.1.2, but this requirement points to 5.1.6.1 (Operation without keyboard interface: Closed functionality).  Similar suggestion for revision to the provision. | 11.2.1.1.2 Void ~~Keyboard~~ (closed functionality) NOTE: For products with closed functionality, see clause 5.1.6.1 (Operation without keyboard interface: Closed functionality). …and delete the rest of the existing clause | Not accepted  (see comment 1112) |
| 1124 | IBM | 11.2.1.4.2 | Paragraph 1 | T | Similar issue to 11.1.1.1.2, but this requirement points to 5.1.6.1 (Operation without keyboard interface: Closed functionality).  Similar suggestion for revision to the provision. | 11.2.1.4.2 Void ~~Character Key Shortcuts~~ (closed functionality) NOTE: For products with closed functionality, see clause 5.1.6.1 (Operation without keyboard interface: Closed functionality). …and delete the rest of the existing clause | Not accepted  (see comment 1112) |
| 1125 | IBM | 11.2.5.3 | Paragraph 1 | T | This requirement is problematic to apply to closed product software. In WCAG, the “name” is the programmatic name that must contain the visible label. There could be a very similar requirement for closed products (in the closed product section) which states that the spoken label contains the visual label, but that is not what the WCAG SC requires. It requires the programmatic label to include the visual label – meant for announcement by AT.  Closed products, by definition, cannot have AT installed.  Suggest you void this WCAG criterion for closed product software, and reference 5.1.3.3 Auditory Output Correlation. If desired, add a note to the existing 5.1.3.3 Auditory Output Correlation requirement in the closed functionality section to add the case that auditory announcement of visual labels would contain the text that appears on the screen. | 11.2.5.3.1 Label in Name (open functionality) …requirement text as it normally appears 11.2.5.3.2 Void ~~Label in Name~~ (closed functionality)NOTE: For products with closed functionality, see clause 5.1.3.3 (Auditory Output Correlation). | Partially accepted  Agreed to splitting into open and closed.  The closed functionality part will be worded:  Where ICT is non-web software that provides a user interface which is closed to assistive technologies for screen reading, it shall meet requirement 5.1.3.3 (Auditory output correlation). |
| 1126 | IBM | 11.3.1.1.2 | Heading and paragraph 1 | T | Similar issue to 11.1.1.1.2, but this requirement points to 5.1.3.14 (Spoken Languages).  Similar suggestion for revision to the provision. | 11.3.1.1.2 Void ~~Language of software~~ (closed functionality) NOTE: For products with closed functionality, see clause 5.1.3.14 (Spoken languages). …and delete the rest of the existing clause | Not accepted  (see comment 1112) |
| 1127 | IBM | 11.3.3.1.2 | Heading and paragraph 1 | T | Similar issue to 11.1.1.1.2, but this requirement points to 5.1.3.15 (Non-visual error identification).  Similar suggestion for revision to the provision. | 11.3.1.1.2 Void ~~Error Identification~~ (closed functionality) NOTE: For products with closed functionality, see clause 5.1.3.15 (Non-visual error identification). …and delete the rest of the existing clause | Not accepted  (see comment 1112) |
| 1128 | IBM | 11.4.1.1.2 | Heading and paragraph 1 | T | Since the text of this requirement states that closed product software does not need to meet this requirement, suggest it is more easily determined without having to closely scrutinize the text of the “requirement”. This is most easily accomplished by making the heading a “Void” and giving the reasoning in a NOTE. | 11.4.1.1.2 Void ~~Parsing~~ (closed functionality) ~~Where ICT is non-web software that provides a user interface which is closed to all assistive technology it shall not have to meet the "Parsing" success criterion in Table 11.10 because the intent of this success criterion is to provide consistency so that different user agents or assistive technologies will yield the same result.~~ NOTE: There is no need to impose the WCAG parsing requirement on all closed functionality software, given that there is no interoperability with assistive technology or user agent parsing of the software for content that appears in the user interface. | Partially accepted  The existing heading will be retained. But the following text will be used:  Not applicable.  NOTE: (the existing text of 11.4.1.1.2) |
| 1129 | IBM | 11.4.1.2.2 | Heading and paragraph 1 | T | Since the text of this requirement states that closed product software does not need to meet this requirement, suggest it is more easily determined without having to closely scrutinize the text of the “requirement”. This is most easily accomplished by making the heading a “Void” and giving the reasoning in a NOTE. | 11.4.1.1.2 Void ~~Name, Role Value~~ (closed functionality) ~~Where ICT is non-web software that provides a user interface which is closed to all assistive technology it shall not have to meet the "Name, role, value" success criterion in Table 11.11 because this success criterion requires information in a programmatically determinable form.~~  NOTE: There is no need to impose a requirement on all closed functionality that the name, role and value be made programmatically determinable (as defined by WCAG 2.1), given that there is no interoperability with assistive technology. | Partially accepted  The existing heading will be retained. But the following text will be used:  Not applicable.  NOTE: (the existing text of 11.4.1.2.2) |
| 1130 | ANEC 3 | 11.7 | User preferences | Te | The text is currently:  11.7 User preferences  Where software is not designed to be isolated from its platform, and provides a user interface, that user interface shall follow the values of the user preferences for platform settings for: units of measurement, colour, contrast, font type, font size, and focus cursor except where they are overridden by the user.  Where the user interface is pre-designed, it should be designed to meet the needs of all users including the requirements for users with cognitive impairments for a simple interface. | Being able to personalise the interface could be particularly useful for people with cognitive impairments but only if the interface can be easily personalised and personalised to meet their requirements. Consider designing the pre-designed interface to meet the needs of all users including the requirements for users with cognitive impairments for a simple interface. | Noted  It is worth noting that any personalisation of user interfaces can complicate things like customer support, since the assisting engineer may be seeing a different UI to the customer. Also, users often make mistakes with such settings, which increases support costs. |
| 1131 | DIN | 11.1.2.4 |  | ed | Add a note at the end of the subsection, stating that this requirement is excluded by the Web Accessibility Directive (EU) 2016/2102. | “NOTE 2: This requirement has been excluded by the Web Accessibility Directive (EU) 2016/2102. It is nevertheless an important requirement for making live streaming media accessible.” | Partially accepted  (see comment 918) |
| 1132 | DIN | 11.2.4.1 |  | te | Clause 11.2.4.1 is marked as Void which might be wrong. In WCAG 2.4.1 is named as Bypass Blocks. In software applications there are also blocks like the menu, a toolbar, a search tab the main content and the status bar and if software is accessible you can bypass them by F6 key in Windows, for example. | Replace the void clauses 11.2.4.1 by references to WCAG 2.4.1. Modify annexes A.2 and C.11.2.4.1 respectively. | Not accepted  The W3C WCAG2ICT Task Force attempted to do this over several months but failed to come up with words that really related to the equivalent accessibility issues in software.  They only related to a “set of software programs”, the equivalent to “set of web pages”), which are almost non-existent in today’s software. This is why the EN has never considered 2.4.1 (and all the other “set of web pages” success criteria in WCAG). |
| 1133 | DIN | 11.2.4.2 |  | ed | WCAG criterion 2.4.2 is also applicable to software e.g. titles of screens, windows, tabs (graphical control element), etc.  See WCAG2ICT.  The resolution in N334 for comment 1106 is not acceptable because WCAG2 to ICT clearly applies recommendation 2.4.2 also to titles of screen, windows, tables etc. The requirement has to be reworded respectively. The recommendation also applies to title of software which consist of many subcomponents (e.g. MS Office 365). | Replace the void clauses 11.2.4.2 by references to WCAG 2.4.2. Title of 11.2.4.2: Window/screen titled. Modify annexes A.2 and C.11.2.4.2 respectively. | Not accepted  (see comment 1132) |
| 1134 | ITS, PTS | 11.6.2, Annex A table A.1 and A.2 |  | T | It is not clear how requirement 11.6.2 is applicable in the context of the Web Accessibility Directive.  This requirement is incomprehensible for web pages - does platform mean the user agent or the CMS/server/similar? If it means that web pages shall not block accessibility functionality of user agents, the requirement would probably not be feasible, unless the requirement shall be applied only for certain standardized accessibility features. If it applies to CMS’s or servers, it is not certain that it is in line with the WAD, since the WAD covers web content.  It needs clarification in order for public authorities to be able to comply with it when they provide web and for consistent implementation of the WAD in EU member states. For mobile applications (table A.2), this requirement seems to be applicable and relevant. | Please clarify, e.g. by providing a note or example giving guidance on how the requirement shall be interpreted for software provided as a web page or embedded in a web page. Use corresponding wording as in note 2 of clause 11.7.  This could be done by adding the following note: “Note: For software provided as a web page or embedded in a web page the platform is the user agent.”. But, this may mean huge problems for public bodies to conform to every user agent’s specific accessibility features. | Partially accept  For web content, the browser is the platform. As a result this requirement does make sense. However, we can see how people think of the OS as the platform as it is for software.  Any software (even web pages using javascript) can disrupt documented accessibility features. And so 11.6.2 applies and is relevant in the context of the WAD.  One example of accessibility feature could be a “read aloud” function in a right-click menu. Some developers use javascript to replace the standard user-agent menu with a new menu… and that would block access to the “read aloud” accessibility feature.  We are therefore adding a note:  NOTE: For web content, the platform consists of the browser and the technologies used to create the content. |

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| 1200 | **Clause 12** | | | | | | |
| 1205 | IBM | 12.1.2 | Note 3 | T | Note 3 states: Where documentation is incorporated into the ICT, the documentation falls under the requirements for accessibility “in the present document.” What does “in the present document” mean? In the EN 301 549? I’m not sure what this requirement is trying to say. | *Please clarify. Don’t know what to suggest, as I don’t understand the intent.* | Noted  “in the present document” is the correct language to use when referring to EN 301 549 from inside EN 301 549. |
| 1206 | UNINFO | 12.2.4 |  | E | Referring to previous similar clause 12.1.2 Accessible documentation, need to integrate the revised note 3 of clause 12.1.2 in this point. | Rename: Note 3 as Note 4  Add Note 3: Where the support documentation is incorporated into the ICT, the documentation fall under the requirements for accessibility in the present document. | Accepted |
| 1207 | ITS, PTS | 12.1.1-12.1.2, 12.2.2-12.2.4 |  | T | In the context of the Web Accessibility Directive, these requirements are interesting, since there is no requirement that product documentation shall be provided. Since these are requirements on how the product documentation shall list the accessibility features and that the product documentation shall be in an accessible form, there is a risk that public agencies that need to comply with the WAD will decide that they won’t provide any product documentation. | Consider requiring that product documentation shall be provided with the web site or the mobile application. | Not accepted  It is outside the scope of the EN to have a requirement on whether an ICT has to include documentation. What the EN can do is to ask for the accessibility of such documentation if it exists.  *NOTE FOR DAVE (delete when done)*  *Commas will be added before and after  “,whether provided…ICT,* |

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| 1300 | **Clause 13** |
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| 1400 | **Clause 14** | | | | | | |
| 1401 | Clas Thorén Consulting | 14 | First paragraph | ed | Current text not mature | Replace all text before the table with  “Conformance with this standard is achieved by determination that applicable requirements in clauses 5-13 are fulfilled. The table below shows where detailed information of conformance criteria in different contexts of use, related to different user groups, are provided.  Applicable requirements are those requirements where the pre-conditions are true for the ICT in question.  Determination of fulfilment of individual requirements is addressed in Annex C.” | Not accepted  The content of clause 14 will be replaced by the content of clause C.1, with the word “shall” removed from the line preceding the bulleted list”, both sentences that begin with “Prioritization of those requirements ...” removed. and the word “compliance” changed to “conformance throughout the document.  In addition, the first sentence will be replaced by:  “Conformance to the present document is achieved by meeting all of the “shall” requirements in the standard.”  There may be a need for some further statements related to conformance with this standard but these belong at a national level. |
| 1402 | Clas Thorén Consulting | 14 | Table, second column, fourth row | ed | Typo | Replace “crresponding” with “corresponding”. | No longer relevant  (see comment 1401) |
| 1403 | Clas Thorén Consulting | 14 | Table, second column, fourth row | te | Current text not mature | Replace “It follows from ...that are not met” with  “Annex C, clause C.1, specifies how conformance can be declared.” | No longer relevant  (see comment 1401) |
| 1404 | ITS, PTS, vonniman consulting #13 | 14 |  | T | Clause 14 is intended to describe how conformance with the standard is met. It is confusing that compliance is dealt with in annex C and described in clause C.1. Can you describe conformance and compliance in the same clause, in order not to make the standard too confusing? Compliance and conformance may need to be defined or further described in order for the intended reader to understand the differences. | If clause 14 should be kept and further elaborated on, consider moving parts of the content of clause C.1 to clause 14.  Also, describe the difference between conformance and compliance and if they mean the same thing, use either of them consistently in all of the standard.  Gather all information about conformance and compliance in clause 14, so that it reflects all information about conformance/compliance in other parts of the standard. | Accepted  (see comment 1401) |
| 1405 | vonniman consulting #12 | 14 | Entire Conformance section | G, T, E | The Conformance section is not well aligned with the rest of the HEN by means of content and language. | Please align this early draft chapter with the other sections of the HEN, and provide and circulate it earlier than the final draft, for a review – not to unnecessarily risk delaying the approval of the HEN. | Noted  This is no longer relevant as clause 14 has been replaced by an edited version of the existing clause C.1. |

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| A00 | **Annex A** | | | | | | |
| A13 | UNINFO | Annex A | Table A | T | For points regarding clause 10, the text “Where the documents and forms are downloadable from the website”, add the term “website” (that is not defined) instead “web page”. This add also the term “forms” that isn’t defined. Also “web site” can discourage the application of these topics to contents like “intranet”, etc. | Remove “and forms” from third paragraph and in any table instance in this annex.  Replace the term “website” with “web page” | Partially accepted  We will change “and forms” to “including forms”.  We are replacing Website with Web Page except where the term is used by the WAD. |
| A14 | DIN | Annex A |  | ed | At the beginning, add a note containing a short explanation of Annex A, as provided in Annex E. | NOTE: Annex A describes how the standard relates to the European Web Accessibility Directive. Apart from the minimum requirements in chapter 9, 10 an 11, some of the requirements in chapter 5, 6, 7 and 12 can also be relevant to fullfill the directive, in specific situations. The table in Annex A is showing which ones of the requirements that are important to look at. | Accepted  This (with minor editorial changes) will be added as a new NOTE 3 and the existing NOTE 3 will be renumbered to NOTE 4. |
| A15 | DIN | Annex A | 4th par (after the bulleted list) | te | It should be made clear that table A.2 applies also to documents and forms that are provided by mobile applications. | “The requirements listed in Table A.2 apply to mobile applications that provide a user interface including content (such as documents and forms) that is in the software or provided by the software.” | Accepted |
| A16 | DIN | Annex A | Table A1 and A2, criterion 5.5.1 | ed/te | Criterion 5.5.1 is not applicable to websites.  The rejection in the resolution N334 to comment A01 is not acceptable because it will forbid many assistive gestures (e.g. rotor) on smartphones when using VoiceOver or Talkback. | Delete 5.5.1 from table A1 and do not add 5.5.1 to A2. | Not accepted  This does not ban use of gestures. It just says that they should not be **the only way** to do things (or should) so that those who cannot make those gestures are not able |
| A17 | DIN | Annex A | Table A 1 and A 2 | ed/te | Please make both tables more accessible. Specially the joint column for essential requirements with many empty entries should be tagged in word and later in pdf for screen reader compliance. Moreover, we suggest marking those requirements in EN which are relevant for WAD and listed in table A1 and A2 by a graphic and textual mark in the main body of the document. | For avoiding duplications please provide 3 tables:  A.1 Common requirements  A.2 Additional requirements for Web Pages  A.3 Additional requirements for Mobile Applications | Partially accepted  Attention will certainly be given to the accessibility of the table in the final version. This cannot be done in Word, but will be done when the pdf version is produced.  The words (Directive 2016/2102) will be added after the heading text for clauses that appear in Tables A.1 or A.2.  The duplication of items in tables A.1 and A.2 does not appear to create any practical problems for those using the standard. Always having to use two tables instead of one does create a problem. |
| A18 | DIN | Annex A | Table A1 and A2 | ed/ge | WAD (42) “The European standardisation organisations have adopted European standard EN 301 549 V1.1.2 (2015-04), specifying the functional accessibility requirements for ICT products and services, including web content, which... The presumption of conformity with the accessibility requirements laid down in this Directive should be based on clauses 9.10 and 11 of European standard EN 301 549 V1.1.2 (2015-4) in relation to mobile applications.”  Please clarify why clause 10 is not relevant to the WAD. (see resolution A03 of N334) | Add clause 10 requirements in Annex A2 table. | Accepted |
| A19 | DIN | Annex A | Table A.1, title | te | In the table title, replace “Web Pages” with “Web Content” | “Table A.1: Web Content - relationship between the present document and the essential requirements of Directive 2016/2102/EU” | Accepted |
| A20 | DIN | Annex A | Table A.1, rows 4-18 | te | This does not apply to documents, so the condition should refer to “web pages” rather than “web content”. | Change the condition to “Where web pages have …”. | Accepted |
| A21 | DIN | Annex A | Table A.1, rows 26-74 | te | It should be made clear that these provisions refer to web pages rather than web content in general. For document, rows 75-120 are to be applied. | Add the following condition: “For web pages”. | Partially accepted  We will add “Where ICT is a web page” |
| A22 | DIN | Annex A | Table A.1, after row 74 | te | Clause 9.5 (WCAG conformance requirements) is missing in the table. According to WCAG those must be satisfied in order to satisfy WCAG. | Add clause 9.5 to table A1. Alternatively, add clause 9.5 to clause 14 to the user group of public sector bodies. | Accepted |
| A23 | DIN | Annex A | Table A.1, after row 120 | te | Clause 10.6 (Audiodescription timing) is missing. It is required for synchronized media with audio-description in non-web documents. | Add clause 10.6 to table A1. | Not accepted  10.6 is not a requirement, but a recommendation and therefore cannot be included. |
| A24 | DIN | Annex A | Table A.2, row 12 | te | “6.2.1 RTT provision” is a heading containing two requirements: 6.2.1.1 RTT communication & 6.2.1.2 Concurrent voice and text. | Split up row 12 into two rows:  6.2.1.1 RTT communication  6.2.1.2 Concurrent voice and text | Accepted |
| A25 | DIN | Annex A | Table A.2, row 13 | te | “6.2.2 Display of Real-time Text” is a heading containing two requirements: 6.2.2.1 Visually distinguishable display & 6.2.2.2 Programmatically determinable send and receive direction.  Also: The condition “Where ICT provides two-way voice communication” does not match the requirements wording. | Split up row 13 into two rows:  6.2.2.1 Visually distinguishable display  6.2.2.2 Programmatically determinable send and receive direction  Also: Use the following wording for “Condition”: “Where ICT has RTT send and receive capabilities” | Accepted |
| A26 | DIN | Annex A | Table A.2, row 14 | te | “6.2.3 Interoperability”: The condition “Where ICT provides two-way voice communication” does not match the requirements wording. | Use the following wording for “Condition”: “Where ICT with RTT functionality interoperates with other ICT with RTT functionality” | Accepted |
| A27 | DIN | Annex A | Table A.2, row 15 | te | “6.2.4 Real-time text responsiveness”: The condition “Where ICT provides two-way voice communication” does not match the requirements wording. | Use the following wording for “Condition”: “Where ICT utilises RTT input” | Accepted |
| A28 | DIN | Annex A | Table A.2, row 16 | te | “6.3 Caller ID”: The condition “Where ICT provides two-way voice communication” does not match the requirements wording. | Use the following wording for “Condition”: “Where ICT provides caller identification or similar telecommunications functions are provided” | Accepted |
| A29 | DIN | Annex A | Table A.2, after row 16 | te | The requirement “6.4 Alternatives to voice-based services” is missing. | Add a row for requirement “6.4 Alternatives to voice-based services”. | Accepted |
| A30 | DIN | Annex A | Table A.2, row 17 | te | “6.5.2 Resolution item a)”: The condition “Where ICT provides two-way voice communication” does not match the requirements wording. | Use the following wording for “Condition”: “Where ICT that provides two-way voice communication includes real-time video functionality” | Accepted |
| A31 | DIN | Annex A | Table A.2, row 18 | te | “6.5.3 Frame rate item a)”: The condition “Where ICT provides two-way voice communication” does not match the requirements wording. | Use the following wording for “Condition”: “Where ICT that provides two-way voice communication includes real-time video functionality” | Accepted |
| A32 | DIN | Annex A | Table A.2, after row 18 | te | Two requirements are missing:  6.5.4 Synchronization between audio and video  6.6 Alternatives to video-based services | Add two rows for the following requirements:  6.5.4 Synchronization between audio and video  6.6 Alternatives to video-based services | Partially accepted  Yes for 6.5.4 because it is a requirement.  No for 6.6 because it is a recommendation. |
| A33 | DIN | Annex A | Table A.2, after row 25 | te | The requirements from chapter 10 (documents) should be added here, as in Table A.1. Mobile applications can contain or provide documents, and these documents fall under the Web Accessibility Directive (cf. Directive (EU) 2016/2102, preamble (19): “Content of websites and mobile applications includes textual as well as non-textual information, downloadable documents and forms, and two-way interaction such as the processing of digital forms and the completion of authentication, identification and payment processes.” | Insert rows 75-120 of Table A.1 into Table A.2, after row 25. Condition: “Where the documents and forms are contained in or provided by the mobile applications” | Accepted |
| A34 | DIN | Annex A | Table A.2, rows 26-98 | te | It should be made clear that these provisions refer to the user interface aspect of mobile applications. | Add the following condition: “Where mobile applications provide a user interface”. | Partially accepted  We are adding “Where ICT is non-web software that provides a user interface”. |
| A35 | DIN | Annex A | Table A.2, row 34 | te | The “closed functionality” is missing for 11.1.3.1.2. | Add a row for 11.1.3.1.2 Info and relationships (closed functionality). | Not accepted  Clause 11.1.3.1.2 is a recommendation (“should”) and therefore does not belong in Table A.2 |
| A36 | DIN | Annex A | Table A.2, row 35 | te | The “closed functionality” is missing for 11.1.3.2.2. | Add a row for 11.1.3.2.2 Meaningful sequence (closed functionality). | Not accepted  Clause 11.1.3.2.2 is a recommendation (“should”) and therefore does not belong in Table A.2 |
| A37 | DIN | Annex A | Table A.2 | te | Make it clear in the “Conditions” column, whether the requirement refers to open or closed functionality. | In the Condition column, add either “Where mobile applications have open functionality” or “Where mobile applications have closed functionality”. | Partially accepted  Some requirements apply to either and can thus remain unconditional. Where there are alternative requirements for open and closed functionality they will be marked as conditional (C). The detailed conditions about open and closed functionality are built into the requirements and are too lengthy and complex to be added into the “Condition” column. |
| A38 | ITS, PTS | Annex A, tables A.1 and A.2 | Lines referring to clause 5 | T | It is doubtful that requirements on operable parts are applicable for the Web accessibility directive (WAD). WAD covers websites and webpages and thus covers content that is intended to be displayed to users in their user agents. For clauses 5.5.1, 5.5.2, 5.6.1, 5.6.2 and 5.9, any physical operable part is part of the user agent, and any part that is displayed on the screen and is operable by using a mouse or similar fulfils the requirements by fulfilling WCAG 2.1, i.e. clauses 9, 10 or 11. | See specific comments on references to clauses 5.5.1, 5.5.2, 5.6.1, 5.6.2 and 5.9. | Not accepted  Operable parts does not necessarily mean mechanical parts. See definition of operable part. Only 8.4 refers to MECHANICALLY OPERABLE PARTS. |
| A39 | ITS, PTS | Annex A, tables A.1 and A.2 | Lines referring to clauses 5.5.1 and 5.5.2, | T | This is one of the conditional requirements listed in both tables of Annex A. The requirements are related to e.g. WCAG 2.1 success criterion 2.5.1 Pointer gestures (clauses 9.2.5.1, 10.2.5.1 and 11.2.5.1 in EN 301549). By fulfilling the mandatory requirements of clause 9, 10 or 11, the requirements of clauses 5.5.1 and 5.5.2 are fulfilled.  Having conditional requirements that don’t add anything since they are fulfilled by complying to other (unconditional) requirements cause confusion for public bodies, and can be removed since they don’t add any accessibility quality. | Remove the lines referring to clauses 5.5.1 and 5.5.2. | Not accepted  We examined this and concluded that It was preferable to have overlapping solutions rather than relying on a broader requirement to cover a narrower one. |
| A40 | ITS, PTS | Annex A, tables A.1 and A.2 | Lines referring to 5.6.1 and 5.6.2 | T | See our comment on table A.1 and A.2 referring to clauses 5.5.1 and 5.5.2.  These requirements are most probably met by the fulfilment of requirements in clauses 9.4.1.2, 10.4.1.2 and 11.4.1.2, that are unconditional for the conformance with WAD. | Remove the lines referring to clauses 5.6.1 and 5.6.2. | Not accepted  (see comment A39) |
| A41 | ITS, PTS | Annex A, tables A.1 and A.2 | Line referring to clause 5.9 | T | See our comment on table A.1 and A.2 referring to clauses 5.5.1 and 5.5.2.  For web content, requirement 5.9 is fulfilled by the unconditional requirement in clauses 9.2.1.1, 10.2.1.1 and 11.2.1.1 which refer to WCAG success criterion 2.1.1 Keyboard: “All functionality of the content is operable through a keyboard interface **without requiring specific timings for individual keystrokes**, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints.“ | Remove the line referring to clause 5.9 as a conditional requirement. | Not accepted  (see comment A39) |
| A42 | Mike Pluke | Tables A.1 and A.2 |  |  | The use of asterisks to indicate repeated requirements across Tables A.1 and A.2 has become confusing and unhelpful as, even when the same requirement appears in the two tables they are not absolutely identical as the pre-conditions in the two tables are not always identical They have different underlying assumptions e.g. operating system versus user agent. | The use of asterisks is neither helpful nor reliable. | Accepted  The asterisks have been removed from Tables A.1 and A.2, as has Note 4 that explains what they are supposed to represent. |

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| B00 | **Annex B** | | | | | | |
| B03 | UNINFO | Annex B | B.2 | E | Alternative text of example images is not set. | Add correct alternative text or put a descriptive caption. | Accepted  Both will be done. |  |
| B04 | UNINFO | Annex B | B.2 |  | Define a heading level for “Example” and “Step X” | Set “Example” title as heading 3  Set from “Step 1” to “Step 4” title as heading 4 | Accepted |  |
| B05 | DIN | Annex B | Table B2, rows 9.2.4.3, 10.2.4.3, 11.2.4.3, Column WH (without hearing) | ed/te | There is neither a primary nor a secondary relationship between focus order and "without hearing". WCAG does not provide any information about the benefits of WH persons and focus order.  WCAG 2.1 statement on 2.4.3 is related to persons with reading difficulties and not to WH. The argumentation is at least very poor. | Delete the entry “S”. | Accepted  Since the text form of the spoken language is a second language for many who are deaf, they have difficult reading and may need reading aids. However, reading ORDER is probably ok to omit. |  |

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| C00 | **Annex C** | | | | | | |
| C03 | IBM | C6.2.3 – a, b, c, d |  | T | There is no stated way to pass 6.2.3 as a whole, only how to test each of the bulleted 6.2.3 reequirements. Since the ICT isn’t required to meet all of these tests, only the “applicable” ones, something should be said to that effect as overall test guidance for 6.2.3 before getting into testing each part. | *Add a C6.2.3 section that says to test that all of the applicable C6.2.3 (a, b, c, d) are met.* | Not accepted  This is unnecessary as each test has a pre-condition which determines which one(s) are relevant. There appears to be no need for any additional explanation. |
| C04 | IBM | C8.3.0 | Sentence | E | Delete extra punctuation | *Delete extra ‘.’ from end of sentence.* | Accepted |
| C05 | Clas Thorén Consulting | Annex C | Clause C.1, Note 1 | te | The currrent text presumes that clause 4.2 is the basis for compliance. This is no longer true | Replace the current text in Note 1 by  “In some circumstances, when the present document is used for purposes other than supporting Directive 2016/2102 [i.28], user accessibility needs might be met by a subset of those requirements which are applicable in themselves. For example, where ICT is designed to be used by a specific individual, or in a well-defined usage scenario. Annex B might be helpful to identify such a subset.” | Partially accepted  After discussions it was decided to delete Note 1. |
| C06 | UNINFO | Annex C | C.6.2.3.c | E | Missing space between word and (c). | Add a space after Interoperability. | Accepted |
| C07 | ITS, PTS | Annex C | Clause C.6 | T | There is no specified reference terminal anywhere. It is not relevant to use a reference terminal if that terminal is not thoroughly documented in a reference specification. | Change ‘reference terminal’ to ‘reference specification’. | Not accepted  Specifications cannot substitute for a reference terminal.  A reference terminal is there to prove interoperability and correct implementation of the specification. |
| C08 | ITS, PTS | Annex C | Clause C.6.5.3 | T | There is a recommendation (should) in clause 6.5.3 but there is no procedure in C.6.5.3 to verify whether that recommendation is fulfilled. | Include a test procedure for the recommendation (should) in clause 6.5.3 | Not accepted  Tests are only provided for **requirements**. There is no need for a separate test procedure to verify that the higher **recommended** frame rate has been achieve. It is the same test procedure. |
| C09 | vonniman consulting #14 | Annex C | Clause C.6 | T, E | No “reference terminal” is defined, nor described properly, with key attributes, in the HEN.  Unless thoroughly defined, specified and documented in a public reference specification, the benefit of referring to a reference terminal is highly questionable. | Please specify the “reference terminal”, or change the wording to “reference” specification. | (see C07) |
| C10 | Level Access 6 | Annex C |  |  | Inconsistencies between several requirements in clause 11 compared to those in clause C.11. Most are due to incorrect identification of whether a requirement only applies to open functionality in either the requirement or in its test. | Some of the inconsistencies are identified in the accompanying Excel sheet from Level Access, together with some proposed resolutions. | Accepted  Annex C will be reviewed and revised (see following proposed changes C11 to C19) |
| C11 | Level Access 1 | C.11.1.3.4 |  |  | Annex C inappropriately requires support for AT. The AT support requirement in Annex C is inconsistent with Chapter 11. |  | Accepted  The AT support line will be removed from C.11.1.3.4 |
| C12 | Level Access 2 | C.11.1.3.5 |  |  | Issues: - Chapter 11 does not require support for AT, whereas WCAG Success Criterion (SC) 1.3.5 requires the input purpose to be programmatically determined. - Chapter 11 is inconsistent with the AT support requirement in Annex C. | Comment: Annex C is correct. It requires support for AT. | Partially accepted  11.1.3.5 will be divided into open and closed functionality versions.  The heading of 11.1.3.5.1 will have (open functionality) added to the title, and "and that supports access to assistive technologies for screen reading" added into the requirement. In clause C.11.1.3.5, "to at least one assistive technology" will be replaced by "to assistive technologies for screen reading".  A closed functionality clause 11.1.3.5.2 will be added together with a C.11.1.3.5.2. |
| C13 | Level Access 3 | C.11.1.4.10.1 |  |  | Issues: - This clause requires support for screen reading AT, but this is not relevant to the visual reflow of enlarged text. - This clause is inconsistent with Annex C. - The scope of this clause is not complementary to the scope of clause 11.1.4.10.2. | Issues: - This clause requires support for AT, which is too broad. It should require support for enlargement. - This clause is inconsistent with Chapter 11. - The scope of this clause is not complementary to the scope of clause C.11.1.4.10.2. | Partially accepted  Clause 11.1.4.10 will be a single requirement that is not subdivided into open and closed variants as SC 1.4.10 needs to be met in all cases. |
| C14 | Level Access 4 | C.11.1.4.10.2 |  |  | Issue and comment - Comment: Chapter 11 is correctly scoped for ICT closed to enlargement. - Issue: This clause repeats the same requirement as 11.1.4.4.2, which is not the intent of WCAG SC 1.4.10 Reflow. Content authors may choose to provide text enlargement as a mechanism to satisfy clause 11.1.4.4.2, so clause 11.1.4.10.2 should state a reflow requirement that is analogous to WCAG SC 1.4.10. | Issue and comment - Comment: Annex C is correctly scoped for ICT closed to enlargement. - Issue: The test procedure and pass/fail criteria are identical to those of C.11.1.4.4.2. This issue should be addressed in a manner consistent with the issue in Chapter 11. | Partially accepted  (See comment C13)  . |
| C15 | Level Access 5 | C.11.1.4.11 |  |  | Comment: Chapter 11 is correct. Like clause 11.1.4.3 Contrast (minimum), this clause does not require support for assistive technology (AT). | Issues: - Annex C inappropriately requires support for AT. - The AT support requirement in Annex C is inconsistent with Chapter 11. | Accepted  The AT support line will be removed from C.11.1.4.11 |
| C16 | Mike Pluke | C.11.1.4.5.2 |  |  |  | Images of text. The open funtionality test in C is correct, but a test is needed for the cloded functionality C.11.1.4.5.2. Like 11.1.1.5.2, 11.1.4.5.2 points to 5.1.3.6 (Speech output for non-text content). The same test can be used. | Accepted  Exactly the same test can be used in C.11.1.4.5.2 as for C.11.1.1.1.2 |
| C17 | Mike Pluke | C.11.1.4.12 and C.11.1.4.13 |  |  |  | Neither of these rely on assistive technology. | Accepted  Precondition 2 will be removed from clauses C.11.1.4.12, C.11.1.4.13, |
| C18 | Mike Pluke | C.11.2.1.4.2 |  |  |  | There is no precondition related to what type of ICT this applies to. | Accepted  There should be an additional precondition "1. The ICT is non-web software that provides a user interface". Before the existing precondition 1 in C.11.2.1.4.2. |
| C19 | Mike Pluke | C.11.4.1.3 |  |  | 11.1.4.1.3 Status messages only applies to open functionality |  | Accepted  11.4.1.3.1 needs to be marked as open functionality only in the heading. Needs a new precondition 2. The software provides support to assistive technologies for screen reading.  There is no closed functionality equivalent. |

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| D00 | **Annex D** | | | | | | |
| D01 | ANEC 4 | Annex D |  | te | The text is currently:  WCAG 2.1 AAA Success Criteria  Table D.1 lists the Level AAA Success Criteria from the W3C Web Content Accessibility Guidelines (WCAG 2.1) [5]. | The listing of the triple AAA success criteria is useful but as there is no indication of where or when they should be used it is a bit odd. It is therefore suggested that the text be expanded to say:  Table D.1 lists the Level AAA Success Criteria from the W3C Web Content Accessibility Guidelines (WCAG 2.1). Conformance to level AAA can be required in specific situations to ensure accessibility. | Partially Accept  We cannot say they should be required – when they are “should”. The following text will replace the existing text:  “Table D.1 lists the Level AAA Success Criteria from the W3C Web Content Accessibility Guidelines (WCAG 2.1) [5]. Level AAA Success Criteria that, when it is possible to apply them, may provide access beyond that required in the present document.”  (See also the response to comment 917). |
| D02 | DIN | Annex D |  | ed | At the beginning, add a note containing a short explanation of Annex D, as provided in Annex E. | NOTE: Annex D lists the success criteria for web content from W3C that go beyond the minimum requirements of the Web Accessibility Directive and the Procurement Directive (Directive 2014/24/EU), called level AAA. These can be seen as further recommendations. | Partially accepted  (See comment D01) |
| D03 | Nikolaos Floratos | D.2 |  |  |  | New material pointing to sources of cognitive accessibility guidance. | Partially accepted  Added with major edits to improve suitability for inclusion in the EN. |

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| E00 | **Annex E** | | | | | | |
| E05 | ANEC 5 | Annex E |  | Ge | Annex E - This explanatory annex is meant to support users of the EN301549 standard who are new to accessibility, or new to understanding a technical standard. It aims to give readers a helping hand in how to make most use of it. | Will this annex be available to be reviewed by the 6th March version? We are particularly concerned that the final version of this annex enables the users to support people with the full range of disabilities. In particular notice needs to be made of the increasing level of knowledge in the field of accessibility for people with cognitive impairments. | Noted  A complete version of Annex E may need to be sent out for review separately to the 6th March version of the EN. |
| E06 | DIN | Annex E |  | ge | This is an excellent addition to the standard, providing new readers an entry into understanding the structure of the document. We recommend hinting at Annex E in the introduction |  | Accepted  The following will be added as a last sentence of the Introduction.  “Annex E provides an overview and simple explanation of the structure of the present document, including an explanation of how it can be used. Readers who are unfamiliar with this standard are recommended to read Annex E first.” |
| E07 | DIN | E.4 | 3rd par | ed | There are now eleven types of user needs listed in chapter 4. | Change “ten types” to “eleven types”: “In this chapter, eleven types of user needs based on variations of impairments are described, plus privacy. … This is what chapter 4 is describing for all the eleven user groups, in detail.” | Not accepted |
| E08 | DIN | E.6 | 7th par | ed | The following sentence is irritating, if not false: “The minimum requirements are chapter 9, 10 and 11 of the EN301549, covering websites, documents and apps.” It conflicts with Annex A in which additional mandatory requirements for websites and mobile apps are listed. | Clarify or remove this sentence. | Accepted  See response to E12. |
| E09 | DIN | E.7 | 1st par | ed | Replace “this table” with “the table in Annex D”. | “If you aim for a higher level of accessibility than the minimum requirements of the Web Accessibility Directive and the Procurement Directive, the table in Annex D can be used for inspiration.” | Accepted |
| E10 | ITS, PTS | Annex E |  | G | It is a very good initiative to include information about how the standard could be used. We hope you do your best to keep the language simple and understandable, bearing all possible target audiences in mind! | Please focus in keeping the language simple and allow yourselves to explain the standard in a language that is as non-technical and simple as possible! | Noted |
| E11 | ITS, PTS | Annex E |  | E | Minor typos in several places: | E.5.1 first paragraph, second sentence: change ‘statments’ to ‘statements’  E.5.2 second paragraph, second sentence: change ‘statments’ to ‘statements’  E.6 paragraph 1, last sentence: Change ‘chose’ to ‘choose’. | Accepted |
| E12 | ITS, PTS | E.3 and E.6 | E.3 para 6, E.6 para 4 | T | E.3 paragraph six says “Chapters 9, 10 and 11 are the ones that make up the minimum requirements of the European Web Accessibility Directive. They cover websites, documents and apps.” E.6 paragraph 4 st.  Considering that tables A.1 and A.2 refers to other clauses/chapters of the standard, this statement is not true, at least not for assumption of conformance. The requirements in the WAD are not specified in detail in the WAD, they are only stated as the four principles of WCAG: perceivable, operable, understandable and robust (article 4 of the WAD). | Change to (changes in **bold**) “Chapters 9, 10 and 11 are the ones that **are most relevant to** the European Web Accessibility Directive. They cover websites, documents and apps. **However, requirements from other clauses apply, as listed in the tables in annex A**.“ | Partially accepted  For consistency with the language used in Annex E, it will be worded:  “Chapters 9, 10 and 11 are the ones that are most relevant to the European Web Accessibility Directive. They cover websites, documents and apps. However, requirements from other **chapters** apply, as listed in the tables in annex A.“ |
| E13 | ITS, PTS | E.3 para 10: E7 | E3 Para 10 and entire E7 | T | It is important to mention that the WCAG AAA success criterion listed in annex D can be used as award criteria in public or private procurement.  Also, the EN 301549 is not harmonised with the procurement directive, apart from procured web sites, web services and mobile applications that are covered by the web accessibility directive. | E.3 para 10: Change the whole paragraph to “Annex D lists the success criteria for web content from W3C that go beyond the minimum requirements of the Web Accessibility Directive, called level AAA. These can be seen as further recommendations, **and can be used as award criteria in procurement**.” | Not accepted  Although it may be possible to use certain AAA requirements as award criteria for some types of content in some contexts, any possible implication that meeting more AAA Success Criteria would result in a superior solution is dangerous. The W3C group that developed the WCAG even took care to specifically say this in the guidelines. |
| E14 | ITS, PTS | E.6 | Paragraph 4 | T | See our comment on E.3 paragraph 6.  In this paragraph it is said that the minimum requirements of the Web Accessibility Directive are clauses 9, 10 and 11 of the standard. This is inconsistent with the list of requirements in tables A.1 and A.2 in Annex A, since they list requirements found in other clauses as well. All requirements listed in table A.1 and A.2 can be categorized as requirements to make websites more accessible by being perceivable, operable, understandable or robust. Some requirements in the tables are conditional, but that does not mean they are not minimum requirements, it means that they are only applicable under certain circumstances. | Rewrite the paragraph either so that the reference to chapters 9, 10 and 11 are removed, or that those chapters are emphasized without the other applicable clauses are downgraded as not being applicable for websites and mobile applications covered by the web accessibility directive. | Accepted  See E12 |
| E15 | ITS, PTS | E.6 | Paragraph 4 | G | In Sweden, some public agencies are not sure whether e-services provided in web pages are covered by the WAD. | Consider adding a sentence highlighting that e-services are covered, given that they are provided as web pages or mobile applications. | Not accepted  If e-services are provided as web pages or mobile applications they will automatically be covered. Policy application is outside the scope of a technical standard. |
| E16 | vonniman consulting #15 | Annex E | Entire Annex E | G, T, E | It is far too late to review a first complete draft of Annex E in the final draft of the EN.. | Please consider drafting this and circulation it for comments at your earliest convenience. | Accepted |
| E17 | vonniman consulting #16 | Annex E | Entire Annex E | G, T, E | Annex E is a replacement for three previous TRs and it is not yet, by any means, in parity, nor well aligned with the rest of the HEN by means of style, structure, content and language. | Please align this very early draft of the Annex with the other sections of the HEN, and provide and circulate it at your earliest convenience not to unnecessarily delay the approval of the HEN. | Accepted |
| E18 | vonniman consulting #17 | Annex E | Entire Annex E | T, E | There is a considerable volume of potentially beneficial content, also available through external references made available to the drafting team, to consider and include useful parts of into Annex E. We believe that the following should be included, at a minimum: | 1. Shall- and should- requirements; 2. Relation to W3C and the WAI (WCAG, etc.) specifications ; 3. Procurement: 4. Structure of requirements; 5. Imposition of requirements:    1. How use and refer to the HEN in public procurement;    2. Compliance;    3. Tests. 6. Development:    1. Requirements applicable to standards, technologies and product development;    2. Functional requirements in the development of new technologies and standards 7. Current and expected European policy framework for ICT accessibility (e.g. Mandates, Procurement directives, Accessibility directive, etc.) 8. Will these requirements apply for a while? Benefits for stakeholders? Expectations for Society? | Not accepted  The scope of the EN does not include educating potential readers on topics as broad as how to use standards, how to do procurement, European policies, societal benefits, etc.  The primary purpose of Annex E should be a “How to use the **document**” at a very basic level and not become a tutorial on development processes, procurement processes or policies. |
| E19 | Mike Pluke |  |  |  |  | Annex E needs to refer to the newly added D.2 on cognitive accessibility. | E.6.2 added to explain the new D.2 on cognitive accessibility. |

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| \* | | **Comment and response from the review of draft 1.3** | | | | | | |
| 406 | EDF 5 | | 4.1 |  | Te | Find below the justification of functional performance criteria.  The first sentence (ICT … is deemed to have met a level of accessibility….) is misleading because:  1) it refers to statements which are merely informative, and  2) it is entirely a subjective consideration which is not technically sound and limits the application of further accessibility requirements not included in the EN.  E.g. is the EN providing the right level of accessibility for “usage with limited cognition”? The EN provides requirements up to a certain level of accessibility. Therefore, this consideration which should not be kept in the EN, or at the very least should be redrafted to avoid the impression that by complying with the EN ICT will be absolutely accessible to all.  EDF proposes some changes according to this justification also on the notes, in which we also remove the term “impairment”, because of being too medical based.  Finally, as for Note 4, this should become a requirement as it is crucial that users are able to activate the accessibility features independently. | ICT meeting the applicable requirements of clauses 5 to 13 is consistent with clause 4.2 (Functional performance criteria.  NOTE 1: The relationship between the requirements from clauses 5 to 13 and the functional performance criteria set out in Annex B.  NOTE 2: The intent of clause 4.2 is to describe the ICT performance in enabling users to access the full functionality and documentation of the product or the service with or without the use of assistive technologies.  NOTE 3: The methods of meeting the accessibility needs of users with multiple access needs will depend on the specific combination of needs. Meeting these user accessibility needs may be addressed by considering multiple clauses in clause 4.2.  Several users' accessibility needs rely on ICT providing specific modes of operation. If a user is to activate, engage or switch to the mode that complies with his or her user accessibility needs, the method for activating, engaging or switching to that mode shall comply with the same user accessibility needs. | Partially accepted  The title of clause 4 will be marked as “informative”.  The wording of clause 4.1 will be changed to:  The functional performance statements in clause 4.2 e are given in terms of general objectives. The requirements in clauses 5 to 13 provide specific testable criteria for making ICT more accessible. The relationship between the requirements from clauses 5 to 13 and the functional performance criteria are set out in Annex B. NOTE 2: The intent of clause 4.2 is to describe the ICT performance in enabling users to access the full functionality and documentation of the product or the service with or without the use of assistive technologies. NOTE 3: The methods of meeting the accessibility needs of users with multiple access needs will depend on the specific combination of needs. Meeting these user accessibility needs may be addressed by considering multiple clauses in clause 4.2.  Several users' accessibility needs rely on ICT providing specific modes of operation. If a user is to activate, engage or switch to the mode that complies with his or her user accessibility needs, the method for activating, engaging or switching to that mode would need to comply with the same user accessibility needs. |

1. **G** for General, **T** for technical, **E** for Editorial [↑](#footnote-ref-1)