# Reviewing of WD HEN 301 549 working draft and READ ME documents - 8th December 2017

## Introduction

WD HEN\_301549v020101p\_a.1.8.docx (and WD HEN\_301549v020101p\_a.1.8\_clean.docx) is available for review and commenting. Could you also review this associated READ ME document as it contains proposals that may be implemented in future drafts.

If possible, please use the “Comment Form WD HEN 301 549 V1.8 - V 2.1.1.8.doc” to provide your comments.

All of these documents are in the folder <https://docbox.etsi.org/HF/Open/Latest_Drafts/STF536>.

## Comments and proposals

The following are the major changes from the early draft seen by the JWG (version 1.4 – in <https://docbox.etsi.org/HF/Open/Latest_Drafts/STF536/Earlier%20drafts> ). Another version (V 1.6) that was produced for approval of Milestone A of the STF is also included in the “Earlier Drafts” folder.

1. The new WCAG 2.1-related content in the draft EN has been aligned with that published in W3C’s [new public draft of WCAG 2.1](https://www.w3.org/TR/WCAG21/) which was published on 7th December. **This will be the most stable and important WCAG 2.1-related text available prior to the submission of a draft HEN for approval in January.**
2. ”The Introduction to the current draft, that shows how EN 301 549 was created in response to Phase 2 of Mandate M 376, has (at the request of Ima Placencia Porrero) been restored and edited to make clear that the EN was developed for, and retains its suitability for, its original intended purpose.
3. An initial copyright statement has been added to the IPR clause to indicate that the copyright of additions to clause 9, based on draft text for WCAG 2.1, belong to W3C. This will be revised pending further discussions between W3C and the ESOs.
4. Currently, for editorial convenience and to maximise their visibility, the new draft WCAG 2.1-based requirements are placed immediately after the existing WCAG 2.0-based requirements in clause 9. There has been a proposal from Roberto Scano to organise clause 9 with all the new and WCAG 2.0 requirements grouped beneath headings that correspond to the existing and new WCAG principles and guidelines.

It is editorially challenging to implement this proposal within the ETSI drafting rules, but it. should be possible. The proposal has the benefit of making the important principles and guidelines visible and can be done in such a way as to make a clear 1:1 correspondence between the clause number and the number of the success criterion it contains or references. This will largely avoid the confusion of the clause number of a success criterion changing if W3C add or remove some before WCAG 2.1 is published.

The following is an example of how this might appear (in an index):

9 Web

9.1 General (informative)

9.2 Web content requirements

9.2.1. Principle 1: Perceivable

9.2.1.1 Guideline 1.1 Text Alternatives

9.2.1.1.1 Non-text content (SC 1.1.1)

9.2.1.2 Guideline 1.2 Time-based Media

9.2.1.2.1 Audio-only and video-only (pre-recorded) (SC 1.2.1)

9.2.1.2.2 Captions (pre-recorded) (SC 1.2.2)

9.2.1.2.3 Audio description or media alternative (pre-recorded) (SC 1.2.3)

9.2.1.2.4 Captions (live) (SC 1.2.4)

9.2.1.2.5 Audio description (pre-recorded) (SC 1.2.5)

and so on...

**Comment on the proposal to make the above reorganisation of clause 9 (and a matching reorganisation of clauses 10 and 11) would be very welcome. The expectation is that the changes will be made and a revised draft made available unless there is significant opposition to doing so.**

1. In response to concerns that the EN makes no reference to AAA Success Criteria, a note has been added to clause 9.1. This note repeats the W3C warning “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.”.

An alternative way of addressing AAA Success Criteria would be to include them in the HEN. Although WCAG includes AAA success criteria in the same structure as the A and AA success criteria, the equivalent of adding AAA requirements in clause 9.1 poses a serious risk that those using the HEN might accidentally require the use of AAA success criteria without realising that they are doing so. An alternative would be to put all AAA requirements in a separate clause or Annex (Roberto Scano proposed a new clause 9.4).

Views are sought on the most appropriate way of dealing with AAA requirements:
	1. A note that indicates to the reader of the HEN that they exist and could be used (as at present).
	2. A separate clause (9.4 or another annex).
	3. Integrating them into the revised clause 9 structure (as suggested in point 8 above.
2. Last, but by no means least, Annex A contains two tables that are critical elements in an HEN showing how the “essential requirements” of the Directive can be met by conforming to the requirements in the HEN. **Comments on how effective these tables are for the intended purpose are sought.**