

Template for comments and secretariat observations

ANEC-DFA-2014-G-018

Date: 15 May 2014	Document: draft ETSI Guide 202 952 "Guidelines to identify and address "Design for All" aspects in ETSI deliverables	Project:
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MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
ANEC C 1				ge	<p>ANEC welcomes any efforts aimed at mainstreaming accessibility into the standardisation process. However we have to express our concerns at the present version of the guide as it is rather limited and it is going to be very difficult for the draft guide to be used on its own, without reference to the different documents listed in section 2.2.</p> <p>While it is common practice for standards documents to refer to other documents, we believe that the aim of this guide should be to provide in a comprehensive and easy-to-understand way information about accessibility users' needs to Technical Committees officials who are not experts in Design for All issues.</p> <p>Moreover, we express our concerns about the copyrights issues linked to the use and reference to of ISO/IEC TR 29138-1 "Information technology -- Accessibility considerations for</p>	Revise present version of Guide.	

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² Type of comment: ge = general te = technical ed = editorial

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					people with disabilities -- Part 1: User needs summary".		
AN EC 2		5.2.7		ge	As the preamble to clause 5.2 only talks about the list of six checklist topics, sub-clause 5.2.7 should be a separate clause and should be part of the following clause 5.3.	Change sub-clause 5.2.7 and integrate it in clause 5.3.	
AN EC 3		5.3		ge	The order of the user needs, the checklist and the Annexes is very confused as mixed-up. We suggest that the users' needs should come first, then the checklist subjects in relation to the user needs, and in turn link them to the relevant Annexes.	Change order of clause 5.2, 5.3 and Annex D.	
AN EC 4		6.1		ge	Sub-clause 6.1 is rather weak as it seems just to ask the TC s Chairman to raise awareness and bear in mind that TC/HF can give a presentation, which is already possible now, without the guide. We think that this should be a collective responsibility of the TC	Add as follows: "The Technical Committee should report to the General Assembly/Board about the use of this Guide and how accessibility has been addressed in their work (eg: whether a presentation from HF	

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					<p>about which the TC should report.</p> <p>We suggest that accessibility training should be offered/organised by the ETSI Secretariat to TCs officers to provide them with the information and knowledge on how to take into account accessibility in their work.</p>	<p>took place, etc).</p> <p>Accessibility training should be offered to TCs officers to provide them with the information and knowledge on how to take into account accessibility in their work."</p>	
AN EC 5		New clause 6.4		ge	<p>Technical Committees should ensure that all stages of the standards development process are accessible. This includes documentation and any information produced by the standards development committee, the means of access to these resources as well as the physical or remote access (e.g. through teleconferencing or web-conferencing tools) to the standards development committee meetings.</p> <p>Standards bodies should encourage and facilitate the participation of relevant stakeholders in the standards development process.</p>	<p>Insert new clause 6.4 as follows: "Technical Committees and Working Groups should make sure that all stages of the standards development process are accessible. This includes access to documentation and any information produced by the standards development committee, the means of access to these resources as well as the physical or remote access to the standards development committee meetings."</p>	

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		Annex D		ge	See ANEC 3	See ANEC 3	

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