



Suppliers Declaration and ICT Accessibility

The Global Accessibility Context

The need for accessible information technology is acute across the globe. According to a 2001 United Nations report, there are approximately 600 million people with disabilities worldwide. According to the U.S. Census Bureau, people with disabilities are the largest minority in the United States, accounting for approximately one-fifth of the entire U.S. population. The global number of people with disabilities is destined to grow as the population ages. In response to this reality, governments around the world are currently exploring or have already established national ICT accessibility policies. Some of these policies are similar to Section 508 of the Rehabilitation Act in the U.S., but others represent new, divergent, and potentially conflicting accessibility guidelines for public procurement.

In Europe, the "New Approach," defined in the European Council Resolution of May 1985, introduced an innovative way of technical harmonisation by establishing a clear separation of responsibilities between legislators and the standards bodies in the legal framework allowing for the free movement of goods. It also put into place a new conformity assessment system of "Supplier's Declaration of Conformity (SDoC)," in which suppliers of designated equipment would be able to declare conformity to technological standards upon release of their products on the market.

The implementation of the SDoC system has streamlined the time and effort needed for product validation, cut costs and spread the benefits of self-declaration to many businesses. In addition, its implementation has improved the services provided by conformity assessment bodies and lowered their prices for testing and certification, benefiting companies that do not have the resources to implement their own SDoC process.

eAccessibility and SDoC

The "eAccessibility" of ICT is an area in which policy makers, industry, and advocacy groups are especially active in developing conformity assessment approaches. It is growing in importance as both a practical and policy imperative due in large part to the increasing number of older Europeans with one or more limitations, and government's increasing reliance on the Internet to provide information and services to its citizens.

SDoC is particularly well suited to eAccessibility for a variety of reasons. Rapid change is a hallmark of the ICT marketplace as manufacturers compete to provide the tools that enable people to maintain active, productive lives. SDoC helps assure that product conformance with eAccessibility requirements is documented and available for review by policy makers and regulators, while still preserving flexibility and innovation in the product lifecycle.

Benefits of Internal Accessibility Testing

Allowing manufacturers the option to self-evaluate and report on eAccessibility conformance provides a variety of other benefits desired by policy makers and consumers:

- Socializes and institutionalizes accessibility product development and design processes.
- Allows companies to continue to engage persons with disabilities within the product development process (design, testing, marketing).
- Drives core product engineers and developers to address accessibility at the early design and engineering stages.
- Uncovers technical gaps and highlights areas where standards are not met and solutions need to be developed.
- Reinforces and magnifies eAccessibility as a product feature into core business practices.
- Ownership for accessibility is kept within the company, which improves the chance of timely problem resolution rather than just being reported.
- Allows for companies to use outside resources to assist and enhance their internal testing efforts (if required).
- Encourages collaborative problem solving between hardware, software and assistive technology developers and vendors.

There are other conformance assessment approaches being applied or recommended in the marketplace, such as third party testing, mandatory certifications and the use of eAccessibility logos or marks. However, we believe that such approaches pose a number of problems for government, industry and consumers:

- Mandatory third party testing would substantially increase costs for manufacturers and the vast majority of consumers, while producing little improvement in eAccessibility. Certifications and logos or marks also add significant costs, while offering no guaranty of continuous eAccessibility.
- Mandatory third party testing will delay product introductions. The length of the delay will be proportional to the amount of new technology applied to accessibility innovation due to the likely inexperience of the testing “lab” with the technology, particularly if it is a new proprietary technology. This would further inhibit advances in eAccessibility.
- Mandatory third party testing may result in many companies developing products with minimal accessibility features in order to align with and pass limited testing criteria. This may discourage manufacturers from competing on the basis of eAccessibility by exceeding market requirements. The result would be fewer choices at higher prices for consumers.
- Since the work of Industry Consensus bodies generally takes years to complete, waiting for formalized test procedures will be an excuse for companies that are not accessibility-oriented to further delay implementation of eAccessibility features.

Conclusion

ICT Self Declaration of Conformity with eAccessibility policies and market requirements provides distinct advantages to government, industry and consumers. It reduces costs for all stakeholders, expedites the delivery of new products and technology into the marketplace, and encourages manufacturers to invest in - and compete on the basis of - accessibility.

Consistent with the European New Approach, SDoC should be included as a manufacturer option in any conformance assessment scheme that is adopted to enhance and ensure the availability of cost effective, accessible ICT.