

**EDF RESPONSE TO THE PUBLIC CONSULTATION
ON CONTENT ONLINE IN THE SINGLE MARKET
11 OCTOBER 2006**



The European Disability Forum (EDF) is an umbrella organization representing the interests of over 50 million disabled Europeans. Among other issues, EDF works on accessibility of modern technologies to persons with disabilities. Accessibility of creative content and services is an essential part of participation in cultural and educational life of the modern society. In today's context, however, the majority of the features of the digital content remain largely inaccessible to people with certain types of disability. In this respect, EDF notes that the work on accessibility of online content should be made the priority of both regulators and manufacturers, whereby the disabled users must be systematically and thoroughly consulted.

The following are EDF responses to selected questions which are of importance to the persons with disabilities in Europe. All further queries should be addressed to the EDF Secretariat: the contact policy officer is Janina Arsenjeva, who can be contacted on janina.arsenjeva@edf-feph.org, or +32 2 282 4602.

Consumption, creation and diversity of online content

3. Do you think the present environment (legal, technical, business, etc.) is conducive to developing trust in and take-up of new creative content services online? If not, what are your concerns: Insufficient reliability / security of the network? Insufficient speed of the networks? Fears for your privacy? Fears of a violation of protected content? Unreliable payment systems? Complicated price systems? Lack of interoperability between devices? Insufficient harmonisation in the Single Market? Etc.

From the perspective of disabled users, there are a number of barriers preventing them from using the creative digital content on the same footing with non-disabled users.

There are three levels of accessibility that must be ensured, in accordance with WAI guidelines, to provide access to digital content to users with disabilities. First is accessible content equipped with accessibility features, such as subtitles or audio-description ensured by the service provider. Second, accessible user agents, such as browser or a media player used to navigate the content. Third level is ensured by compatibility of user agents with assistive devices, such as screen readers.

Until all three levels of accessibility are achieved, users with disabilities will continue to be limited in the enjoyment of creative content online.

4. Do you think that adequate protection of public interests (privacy, access to information, etc) is ensured in the online environment? How are user rights taken into account in the country you live / operate in?

On one hand, content online can provide citizens with access to more information and new opportunities to participate in the society. On the other hand, if it is not accessible, content online will exclude some people, including people with disabilities. Users with disabilities are still often not perceived as consumers by a lot of providers of digital content. Neither is access to information perceived as part of the right to participate in social and cultural life of the community.

5. How important for you is the possibility to access and use all online content on several, different devices? What are the advantages and / or risks of such interoperability between content and devices in the online environment? What is your opinion on the current legal framework in that respect?

From the disability perspective, Design for All (DfA) should be used as much as possible. User interfaces and all technology must be interoperable, documented and accessible to all. Whenever this is not possible, an alternative accessible version of content should always be provided. In particular, PDF documents should never be placed online without a suitable accessible alternative. It is important not to create technical barriers!

New business models and transition of traditional ones into the digital world

8. Where do you see opportunities for new online content creation and distribution in the area of your activity, within your country/ies (This could include streaming, Pay Per View, subscription, Video On Demand, Peer2Peer, special offers for groups or communities for instance schools, digital libraries, online communities) and the delivery platforms used. Do you intend to offer these new services only at national level, or in whole Europe or beyond? If not, which are the obstacles?

Variety of channels of distribution of digital content is important to persons with sensory disabilities. EDF members have signaled that currently the selection of new publications in digital libraries is rather limited due to the copyright process. People with disabilities have therefore to wait longer to gain access to publications than those who have the option of obtaining of a hard copy of the publication.

In this respect, an interesting alternative would be to offer other channels of distribution, such as downloadable audio-books.

9. Please supply medium term forecasts on the evolution of demand for online content in your field of activity, if available.

10. *Are there any technological barriers (e.g. download and upload capacity, availability of software and other technological conditions such as interoperability, equipment, skills, other) to a more efficient online content creation and distribution? If so, please identify them.*

What role for equipment and software manufacturers?

31. *How could European equipment and software manufacturers take full advantage of the creation and distribution of creative content and services online (devices, DRMs, etc.)?*

From the disability perspective, manufacturers of equipment should take leadership to integrate accessibility features into their products from the beginning. Digital equipment with accessibility features should not be

What role for public authorities?

32. *What could be the role of national governments / regional entities to foster new business models in the online environment (broadband deployment, inclusion, etc.)?*

Public authorities must take leadership to, firstly, show good example, by providing accessible digital content to citizens (including, digital libraries, online publishing, cultural information, etc) and, secondly, by encouraging private providers to follow the suit.

33. *What actions (policy, support measures, research projects) could be taken at EU level to address the specific issues you raised? Do you have concrete proposals in this respect?*

EDF would encourage the development of technical standards relating to content online, starting with the content which is aimed at providing public information to individuals.

EDF has contributed to the ongoing revision of the Directive on Audiovisual Media Services (TV without Frontiers), proposing to include the obligation to gradually make all audiovisual media services accessible for persons with disabilities. EDF has also proposed a reporting system, whereby a Member State would be accountable to the European Commission for non-implementation of accessibility requirements. EDF position paper is available on EDF website or from the Secretariat.

EDF is also in the process of preparing its response to the Commission Communication on the review of the regulatory framework for electronic communications, focusing, among other things, on the need for an integrated approach to electronic communications services and electronic communications terminals. EDF will also raise its concerns regarding the proposal to separate access and provision of services. EDF position paper will be available on EDF website or from the Secretariat in late October 2006.