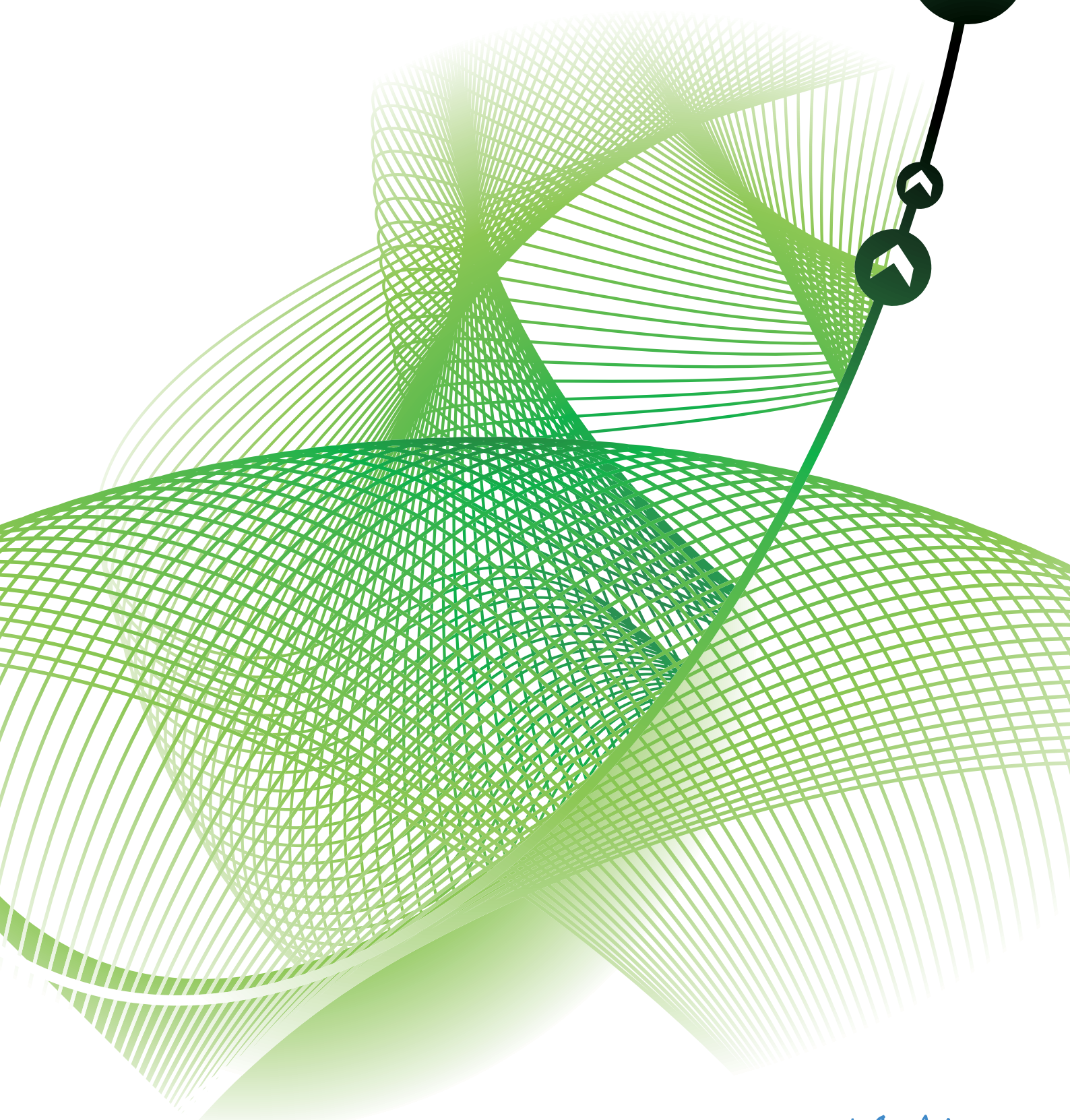


EICTA position paper on eInclusion

Brussels, 5 November 2008





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1. Introduction

The integration of digital technology into the personal and professional lives of individuals has helped to create growth, increase productivity and improve quality of life, bringing with it tremendous economic and social advances to the citizens of Europe.

Most facets of society now depend upon Information and Communications Technology (ICT) in some way. ICT use is increasingly being used to facilitate interaction between individuals and to provide access to public information and other services. Industry partners must continue to work collaboratively with vested stakeholders to ensure that the advantages of the digital economy reach all segments of society. In short, a committed, multi-prong strategy for promoting e-inclusion in Europe is needed.

A vision of eInclusion for Europe contains several key elements: increasing access and making services more widely available or easier to use, assisting people to use ICT to make their lives richer and facilitating individuals' use of ICT be able to fully engage in society at all levels – irrespective of disability, age, education, gender, ethnicity, social factors or geographical difficulties.

One essential component of eInclusion is eAccessibility: enabling people with disabilities and elderly people to use ICT on an equal basis with other people. E-Accessibility will continue to gain importance as public awareness of accessibility issues is strengthened and Europe's ageing demographic rises. EICTA remains committed to further exploring the range of accessible and easy-to-use products and technologies its member companies could offer the public in the future.

2. Recommendations

- Accessibility and age related needs should be addressed by mainstream products with specific features which the user can choose to turn on or off as required.
- Any required legislation should specify functional requirements based on globally harmonised standards whilst allowing the market to continue to develop innovative ways of providing technical solutions.
- Legislation and standards should enable a single design to be shipped to the largest possible market in order to encourage accessible features to be included in mainstream products at affordable prices.
- Standards must be globally harmonised, industry-led, open and transparent.
- Particular effort should be made to achieve harmonisation between Europe and the USA on technical requirements in the light of the co-timing of the EU Mandate 376 work and the US Section 508 revision.
- Version 2 of the W3C Web Content Accessibility Guidelines (WCAG2) is due to be published in December 2008, and should be adopted without modification as soon as possible.
- Public procurement should include eAccessibility criteria where this would help provide a constructive early impetus to help grow the market for such products.
- Voluntary self-declaration should remain an acceptable method for demonstrating conformity with accessibility standards.
- Voluntary self-commitment should be used where appropriate to encourage the rapid provision of eAccessibility features.
- Clear statements in sales and users documentation generally provide a more flexible and thorough method of conveying compliance information than simple labels.
- In order to keep the mainstream product affordable, a careful balance should be made in deciding which eAccessibility features should be included directly and which are better addressed via a standardised interface to a specialist external unit.
- General awareness of the importance of eAccessibility should be increased by including it as an integral component of the education curriculum.
- Increased efforts should be made to increase elderly and disabled people's familiarity with ICT devices and enhance their competence in using computer technology.
- Dialogue among policymakers, industry actors and civil society organizations should be encouraged to promote public awareness of e-inclusion issues and to find mutually acceptable solutions. In particular, broadcasters and other content providers should be encouraged to help provide digital TV programming which includes a services such as Audio Description.

3. Broad EICTA position/statements

a. eAccessibility and Age related issues

EICTA Position:

Accessibility and age related needs should be addressed by mainstream products with specific features which the user can choose to turn on or off as required

Recognizing the merits of an inclusive information society, EICTA members are committed to making their products and services accessible to all. Europe's aging demographic structure, skill shortages and the predicted increase in retirement age act in concert with existing social norms and regulatory parameters to encourage companies to develop fully accessible products.

EICTA is sensitive to the needs of all individuals with a range of different disabilities and special needs.

The two major groups requiring design accommodations are the elderly and the disabled. Many of the difficulties reported by elderly users are the same as those reported by disabled users. A diversity of needs and conditions exists within each of these classifications; for example the visually impaired include people who have difficulty in reading small text as well as people who are completely blind. Furthermore, it is important to note that younger disabled users also experience the same difficulties, such as loss of hearing, reported by elderly users.

EICTA believes that mainstream ICT products and services should be designed with a range of accessibility features which the user can choose to turn on or off as desired. This approach would optimize industry's capacity to respond to accessibility needs of the concerned groups; specialized goods and services for each distinct group would be an inefficient and ineffective strategy.

b. Standards

EICTA Position:

Standards must be globally harmonised, industry-led, open and transparent

Standards are at the foundation of the global technological economy, helping to create value and aggregate markets. International standardisation can facilitate technology diffusion, promoting production efficiency, product compatibility, interoperability and competition. From a consumer perspective, globally harmonised standards can help drive down costs and increase product choice.

The products manufactured by EICTA members are developed for the global market. If different accessibility guidelines or standards were adopted in various countries, multiple variants of products would need to be created. This would inevitably result in an increase in development time and cost for the industry, together with an increase in production cost due to the reduction in economies of scale. The consumer would see a delay in features being released on the market, together with increased cost. To avoid this undesirable situation, EICTA supports the development of a coherent global market for accessible and inclusive products and services based on the development and adoption of international (rather than national or regional) standards.

The ISO/IEC JTC 1 Inventory of User Needs produced by the Special Working Group on Accessibility (SWG-A) serves as an excellent example of existing best practices. The document has been used as the basis of work performed both under Mandate 376 in Europe and in Section 508 in the USA. Such efforts to achieve harmonisation between the USA and Europe are particularly helpful and should be encouraged.

Conflicting and non-harmonised standards can force the developer to choose one standard over another or cause significant extra work and time to attempt to meet both standards. The end result is not necessarily to the benefit of the user and invariably involves significant delays.

EICTA members participate in the development of those global accessibility standards that accommodate new technologies. Regulations and policies that adopt such standards enhance the market for accessible products and services rather than creating barriers or disincentives.

c. Regulations

EICTA Position:

Voluntary self-commitment encourages the rapid provision of e-Accessibility features; legislation, if any, should specify functional requirements based on globally harmonised standards

EICTA supports the principle of voluntary self-commitment to encourage the rapid implementation of practical accessibility features in the market. EICTA believes that further steps for enhancing accessibility can best be accomplished through constructive cooperation and discussion between manufacturing industry, service providers and user groups, ensuring that the right balance is made between implementation cost and the benefits for disabled or elderly people.

EICTA supports existing legislation which lays down general principles against discrimination and which promotes equal opportunities for people with disabilities and the elderly. If any further regulations are to be developed, they should be based on international standards that specify functional requirements for accessibility. In particular, national governments should ensure that their regulations are compatible with those in other countries and that their policies do not inadvertently lead to a fragmented market for accessibility solutions; market fragmentation is ultimately detrimental to the cost, choice and quality of accessibility solutions.

Care should be taken to ensure that any legislation is not prescriptive on specific technical implementation details beyond the interface level. The risk of outdated regulation is greatest if regulation requires specific technical standards or specifications rather than the fulfilment of functional requirements. It is preferable to allow the market to continue to develop innovative ways of solving the functional requirements rather than mandating a specific technical solution.

d. Conformity and Labelling

EICTA Position:

Manufacturers should be responsible for making a voluntary declaration of conformity; clear statements in the user documentation are generally more useful than simple labelling

The principle of the manufacturer being responsible for making a declaration of conformity has been applied successfully within Europe and elsewhere for many years, e.g. for electrical safety requirements. This declaration is called a Supplier's Declaration of Conformity (SDOC) in ISO/IEC terminology. The self-declaration approach ensures that manufacturers themselves are directly responsible for ensuring the compliance of their products; the risk of negative publicity is a powerful deterrent against any false claims. Some manufacturers may choose to perform their own assessment of conformity, whilst others may make their declaration based on assessments performed on their behalf by third parties.

For eAccessibility features, it is only possible to partially determine compliance by simple pass/fail tests; the remainder of the assessment is dependent on interactions with other devices or subjective judgment. The declaration of conformance therefore requires an additional explanatory section, such as the Voluntary Product Accessibility Template (VPAT) being introduced to demonstrate compliance with the US Section 508 requirements.

At one time it was common for compliance with technical requirements to be indicated by a label. However, as products became more complex and were expected to meet more requirements, the number of labels proliferated and consumers became confused over what the labels actually denoted and manufacturers often found it difficult to find space on the product to attach the requisite labels. EICTA believes that harmonised requirements and the SDOC concept have made labels non-essential. Sales and users documentation provide a more flexible and thorough method of conveying compliance information.

e. Affordability

EICTA Position:

Mainstream mass market products are the most affordable; public procurement policies may provide an early impetus to grow the market

Product pricing is invariably affected by manufacturing volume. EICTA believes that legislation and standards which enable products to be developed using a universal set of requirements would enable an optimal number of accessible products to be manufactured and available for consumers at lower production cost and sale price. Conversely, in cases where individual countries adopt unique technical requirements or unique means of declaring conformity, these national specificities will inevitably result in increased production and higher prices.

In determining the affordability of a proposed design, a carefully balanced analysis needs to be conducted in determining which eAccessibility features should be included directly in the mainstream products and which are better addressed via a standardised interface to a specialist external unit. For example in the case of digital TV, a feature such as subtitling should be included directly in mainstream products since it provides accessibility benefits to a large number of users at relatively low implementation cost. On the other hand, a complex feature such as text to speech generation may be better provided via a standardised interface to an external unit, to avoid excessively reducing the affordability of the mainstream product.

In some situations, the market for products with eAccessibility features may require an initial impetus to make it mainstream. In this case, EICTA would support the use of public procurement policies which include eAccessibility criteria.

f. Education

EICTA Position:

General awareness of the importance of eAccessibility should be increased by including it as an integral component of the education curriculum

Despite current efforts to improve eAccessibility education including discussions about a European Master's Degree in "Design for All", EICTA is concerned that a graduate program alone may not produce the desired outcome. More specifically, whilst a Master's Degree program will produce subject matter experts, a greater awareness of eInclusion and eAccessibility issues would fail to be promoted in other disciplines. In order for Design for All concepts to be diffused, it is essential to raise awareness of eAccessibility and eInclusion issues at multiple levels and in multiple educational fora.

EICTA strongly supports the introduction of eInclusion issues in non-specialist education. EICTA supports the introduction of “awareness modules” during secondary education and more detailed “technical modules” during under-graduate education. In addition, EICTA members acknowledge the need to work with professional bodies in developing educational material for Continuing Professional Educational purposes targeting those already active in the specification and design of products and services.

g. Digital literacy and eSkills

EICTA Position:

Digital literacy and eSkills should be promoted to improve quality of life and facilitate access to employment

EICTA members are committed to working with other stakeholders in supporting a number of events and initiatives aimed at improving the level of digital literacy for people with disabilities or with age-related difficulties. Improving a person’s familiarity with ICT devices and enhancing their competence in using a computer not only enhances their quality of life but also improves their ability to more fully engage in society at all levels. In some cases this may include gaining access to employment opportunities that were previously unattainable.

EICTA supports a flexible approach to learning, bridging the different interests of civil society, industry and government in order to achieve a common goal of digital literacy for all. EICTA is working in collaboration with the Commission, Member States and other stakeholders to explain the rapid evolution of technologies, share best practices, identify gaps and feed the policy discussion at EU level. The eInclusion Awards programme launched by the Commission provides a useful incentive to identify and reward good practices, which EICTA hopes will be continued.

A consistent strategy is needed to ensure that formal and informal education in the EU equips Europeans with the necessary eSkills to prevent digital illiteracy across all demographics in both the short and long-term. When considering eSkills required for the future, it is important to ensure that any definition is forward-looking, entrepreneurial, and flexible enough to follow the innovation trends in the industry.

A particular area that EICTA would like to highlight is the need to match workers to skills in order to facilitate a rapid transition from dependency to employment and entrepreneurship. EICTA members are actively cooperating with other stakeholders in a number of initiatives, including the European Alliance on Skills, which illustrates possible ways to achieve this ambitious goal.



4. Detailed information on key activities

a. Digital TV

Background

EICTA believes that convenient accessibility to digital TV receiver products is of major importance, both for disabled and non-disabled users. Accessibility and ease of use therefore have special attention in the product design phase and are among the key features of a digital TV receiver. EICTA members are in discussion with user groups representing people with special needs to further enhance accessibility for disabled people and the elderly. The user groups involved include EDF (European Disability Forum), AGE (European Older People’s Platform), RNIB (Royal National Institute of Blind People - in the UK) and ONCE (Organización Nacional de Ciegos Españoles - the National Organisation of the Blind in Spain). These groups provide valuable input to the industry through their insight on the accessibility needs of the people that they represent.

Successful cooperation and Self Commitment

EICTA supports the e-Accessibility efforts of its member companies which include initiatives such as self commitment. The cooperation between CE manufacturers and the user groups is progressing very well.

One tangible result of this is the successful cooperation platform established since the beginning of 2007. A voluntary industry Self Commitment has been signed by some EICTA members. It sets requirements and guidelines for TV accessibility for disabled and elderly people and provides a solid basis for the development of further accessibility features. The Self Commitment covers topics such as user documentation, unpacking and installation, user interface issues, remote controls and support for Subtitling and Audio Description. Other key CE manufacturers have also promised to start manufacturing equipment which implements accessible features in digital TV receivers.

Further discussions are taking place to determine how to subsequently enhance accessibility for disabled and elderly people. The potential enhancements include extending the support for Audio Description as well as adding support for new features such as Clean Audio, to improve audio intelligibility for people with hearing impairments, and Text-to-Speech functionality, to help visually impaired people to more easily use and operate TV receiver equipment.

Television Ecosystem

Successful TV receiver accessibility requires coordinated efforts in the whole content production and consumption chain. CE manufacturers are only one part of an ecosystem alongside other stakeholders such as TV programme makers and broadcasters. For example, Audio Description and Clean Audio need to be taken into account in the initial content production process and subsequently become part of the transmission schedules of broadcasters. Only when the whole content production and television ecosystem is working together on providing accessibility features can they become a success.¹

b. Total conversation

Background

Total Conversation (TC) is a concept for integrated services that would offer real-time multimedia (voice, text and video) services using broadband Internet Protocol (IP). The groups representing people with disabilities advocate the extension of Total Conversation to provide access to comparable services that support text, sign language and lip-reading communication.

¹Examples of best practices can be found in the EICTA Paper: Moving towards a fully inclusive digital Europe, European Digital Technology Industry and eAccessibility, June 2007.

There are already specific text telephones with access to relay services in some countries, but the specifications are national and they do not provide for international communications via text. Many users, particularly the younger generation, have moved to using SMS, Instant Message and email services, which enable people with hearing and speech impairment to communicate with virtually everyone without resorting to a translation service. However, some argue these are not truly “real-time services” because they do not transmit character by character like the old text telephones.

The video communications aspect of the TC concept is important to people whose native language may be sign language and who may not be fluent in written languages. Video communications services are already available commercially on fixed broadband networks and mobile 3G platforms, although the performance of mobile services will be limited until the transition from circuit switched technologies to high speed IP networks is completed.

Policy considerations

The current EU regulatory framework for telecommunications has voluntary provisions for disabled users, but only a few Member States have implemented specific provisions. This is unfortunate, since EICTA considers that Member States play a key role in the procurement of services for disabled users.

EICTA produced a contribution to the EU policy formulation on Total Conversation in August 2007². The main points of that paper were:

- 1) Mainstream services and terminal equipment should be accessible so that disabled users can enjoy affordable and inclusive services and devices. Mainstream products should be interoperable with assistive technologies and add-on software.
- 2) The Total Conversation platform should be based on international standards and be interoperable at least within Europe. A single set of standards would facilitate interoperability.
- 3) Meanwhile, technologies supporting Total Conversation service are available in the fixed environment and will likely become available in the mobile environment in 5 to 10 years. Real Time Text applications continue to be developed and help define and advance this service on 3G mobile phones and could pave the way for a large scale roll-out. However, it is not possible to predict when and to what extent users will adopt a character by character Real Time Text service or whether it can be implemented as a low cost option.
- 4) Member States should support the access of Total Conversation services to emergency, relay services and other public services.

²EICTA recommendations on Total Conversation – from Vision to Implementation Brussels, August 21, 2007.

Activities

The Commission has launched a pilot project on Total Conversation service particularly focusing on access to emergency services. This project is part of the ICT Policy Support Programme (ICT PSP) under the Competition and Innovation Programme (CIP).³

The active participation of emergency centres is a key enabler for this pilot project. Some EICTA members have indicated that they are willing to provide real-time text components and technical support. The project is expected to start in early 2009 and will run for three years. The project aims to validate interoperability between Total Conversation applications and with emergency centres, thus paving the way for a pan-European roll-out of Total Conversation services. This pilot project includes a platform for the interoperability testing of mobile real-time text applications.

c. IT accessibility

The Web is unique in not recognising international borders or barriers. Global harmonization of requirements is therefore essential and policy makers must avoid the introduction of unique national or regional requirements, or variants of requirements. Where suitable guidelines or standards exist they should be adopted without change. Where suitable standards do not exist the interested parties should support their development at a global level.

EICTA believes that web sites should be accessible and supports the use of public procurement and contractual requirements to promote this objective. In particular, version 2 of the W3C Web Content Accessibility Guidelines (WCAG2) should be adopted without modification as soon as it is finalised. EICTA is pleased to note CEN's proposal to introduce an EN which will enable WCAG2 to be recognised in public procurement.

³The project states: The objective is the implementation of a pilot service focusing on the validation of Total Conversation access to emergency services (making the 112 number accessible for all across Europe), encouraging replication as well as ensuring interoperability and assessing cost effectiveness and user acceptance.



5. About EICTA

EICTA, founded in 1999 is the voice of the European digital technology industry, which includes large and small companies in the Information and Communications Technology and Consumer Electronics Industry sectors. It is composed of 61 major multinational companies and 41 national associations from 29 European countries. In all, EICTA represents more than 10,000 companies all over Europe with more than 2 million employees and over EUR 1,000 billion in revenues.

The membership of EICTA:

Company Members:

Adobe, Agilent, Alcatel-Lucent, AMD, Apple, Bang & Olufsen, Bose, Brother, Canon, Cisco, Corning, Dell, EADS, Elcoteq, Epson, Ericsson, Fujitsu, Hitachi, HP, IBM, Infineon, Ingram Micro, Intel, JVC, Kenwood, Kodak, Konica Minolta, Lexmark, LG Electronics, Loewe, Micronas, Microsoft, Motorola, NEC, Nokia, Nokia Siemens Networks, Nortel, NXP, Océ, Oki, Oracle, Panasonic, Philips, Pioneer, Qualcomm, Research In Motion, Samsung, Sanyo, SAP, Sharp, Siemens, Sony, Sony Ericsson, STMicroelectronics, Sun Microsystems, Texas Instruments, Thales, Thomson, Toshiba, UMC, Xerox.

National Trade Associations:

Austria: FEEL; **Belarus:** INFOPARK; **Belgium:** AGORIA; **Bulgaria:** BAIT; **Cyprus:** CITEA; **Czech Republic:** ASE, SPIS; **Denmark:** DI ITEK, IT-Branchen; **Estonia:** ITL; **Finland:** FFTI; **France:** ALLIANCE TICS, SIMAVELEC; **Germany:** BITKOM, ZVEI; **Greece:** SEPE; **Hungary:** IVSZ; **Ireland:** ICT Ireland; **Italy:** ANIE, AITech-ASSINFORM; **Malta:** ITTS; **Netherlands:** ICTffOffice, FIAR; **Norway:** ABELIA, IKT Norge; **Poland:** KIGEIT, PIIT; **Portugal:** AGEFE; **Romania:** APDETIC; **Slovakia:** ITAS; **Slovenia:** GZS; **Spain:** AETIC, ASIMELEC; **Sweden:** IT&Telekomföretagen; **Switzerland:** SWICO, SWISSMEM; **Turkey:** ECID, TESID, TÜBISAD; **Ukraine:** IT Ukraine; **United Kingdom:** INTELLECT.

EICTA

20 Rue Joseph II
B-1000 Brussels
Belgium
Tel: +32 2 609 53 14
Fax: +32 2 609 53 39
Email: info@eicta.org

