

Comments on Report “CEN BT WG 185 pt on Conformity Assessment”

22. July 2008

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The German Association for Information Technology, Telecommunications and New Media (BITKOM) represents more than 1,200 companies. Its 900 direct members generate a sales volume of 135 billion euros annually and employ 700,000 people. They include providers of software, IT and telecommunication services, manufacturers of hardware and consumer electronics as well as digital media businesses. BITKOM is working, in particular, to improve the regulatory framework in Germany, for modernization of the education system and for an economic policy which encourages innovation.

Summary

BITKOM is pleased to submit its comments on the above mentioned report to the attention of the project team. We kindly ask for careful consideration and feedback on the further processing.

We would be glad to assist in case questions or concerns will arise during the evaluation of our comments.

Best regards,

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Suggestion for a modified chapter of the report:

1.1.1 BITV-Test

Organisation: BIK (Barrierefrei Informieren und Kommunizieren).

Country: Germany.

Reference: <http://www.bitvtest.de> (in German)

<http://www.bik-online.info> (in German)

Object of assessment: websites, software, information CDs.

Description: The BIK project is carried out by 3 Partners, on SME and two NGOs (German associations of visually impaired and blind persons). The project is funded by the German Federal Ministry of Labour and social affairs.

The BIK test has been developed to support the implementation of the Amendment BITV of the German equal opportunities act (based on WCAG 1.0) which covers Web sites, software and information material on CDs.

The test has been developed in close collaboration with organisations of people with disabilities, web providers and accessibility experts.

The test contains 52 test steps, basically covering the requirements of Priority 1 of BITV (corresponding to AA of WCAG). The test requirements are published completely and explained in detail (<http://www.bitvtest.de/index.php?a=dl&t=s>). The test was already performed more than 600 times (until mid 2008)

The assessment of the requirements is done predominant manual by expert evaluation. To ensure the reliability of the assessments, results of independently performed tests are compared and variations are discussed.

The resulting test report explains the assessment of the 52 test items in detail. Certified websites are "well accessible" or "very well accessible" and are listed on <http://www.90plus.de>.

A successful BIK test is also basis for admission to the 95plus list (www.plus95.de), a list of providers, who have demonstrated their ability to develop accessible web services.

Web providers and developers can perform the test also by them self. An adequate toolkit for assessment of own web services and a form for self declaration of conformity are available for free.

Details:

Selection	
Requirements	Amendment of german equal opportunities act (BITV, based on WCAG 1.0)
Scalability	Yes
Determination	
Method of determination	mixed
External	No

Type of party	Non applicable
Review and Attestation	
Type of party	Accredited Third (type A) optional SDOC
Detail of attestation	Detailed human
Publicity	Public
Surveillance	
Existence	No
Complaint system	No
Other	
Mandatory	No

Please find further comments in the following table.

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BITKOM	All		ge	BITKOM supports the work being performed under the EU Mandate 376 and expects that accessibility as a criterion in European public procurement of ICT products and services is beneficial for all stake holders. Harmonised technical requirements and harmonised means of demonstrating conformance with those requirements prevent market fragmentation and will help to come over proprietary member state regulation in the field of accessibility.		
BITKOM	All		ge	Although accessibility is a very important specification parameter for ICT products and services, it is just one of many. Therefore the development of unique conformance schemes for accessibility aspects have to be avoided		
BITKOM	All		ge	Supplier's Declarations of Conformity have been widely and successfully used for many parameters and their application is being broadened; this would be an entirely appropriate and proportionate mechanism for demonstrating conformance with accessibility specifications.		
BITKOM	All		ge	The timing of the EU mandate 376 work and the US Section 508 revision provide a unique opportunity to achieve EU-US-harmonisation of the technical requirements and the means of demonstrating compliance with those requirements. Because most ICT companies are active in both markets and the accessibility requirements of end users are the same around the world, it is strongly recommended to use this opportunity to create and realise synergy which will be beneficial for all stake holders.		
BITKOM	All		ge	When including accessibility as a criterion in European public procurement of ICT products and services it is absolutely crucial to do it in a very economic, efficient, easy to understand and practical way, permitting and encouraging innovation, supporting competition and bringing more benefit to the end users. The harmonised technical requirements and harmonised means of demonstrating conformance with those requirements should help procurers and manufacturers in their daily business to apply them effectively and efficiently. Therefore these factors must be analysed in detail in phase II of the mandate. Especially the question, if a highly labour- and cost-intensive certification process for accessibility can increase accessibility significantly, has to be analysed very carefully.		

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

NOTE

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BITKOM	All		ge	When including accessibility as a criterion in European public procurement of ICT products and services it is absolutely crucial to do it in a easy to handle way so it is feasible for SMEs.		
BITKOM	All		ed	The published MS word document doesn't provide a clear structure for the headlines (format issue). That makes it not easy to identify headlines by a screen reader e.g. find clause 4.2.5.2.		
BITKOM	All		ed	In the published MS word document only 4 links to Internet site are marked as links, e.g. last sentence of introduction with reference to ETSI. Please do so for all other given Internet references and mail addresses.		
BITKOM	1		ed	» <i>The reader is referred to the mandate text ...</i> « Please provide the link to the official website of the mandate.		
BITKOM	4.2(ff)		ge	Please make clearer the point in the clauses, when leaving the explanation of the general concepts and when applying them to accessibility.		
BITKOM	4.2		ge	» <i>It is also assumed that Member States may implement conformity assessment standards in different ways.</i> « Market fragmentation can be caused by disparate conformance requirements and technical requirements. Replace with: It is recognised that Member States may implement conformity assessment standards in different ways but this will introduce market fragmentation. All stake holders benefit from both harmonised technical requirements and harmonised means of demonstrating conformance with those requirements.		
BITKOM	4.2.1: 4th paragraph		ed	» <i>For instance, an example of a conformity assessment system would be third party attestation (certification), whereas its application to web</i>		

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				<p><i>content, based on the web content accessibility guidelines, would be a conformity assessment scheme. «</i></p> <p>There are other conformity assessments besides third party. Replace with: For instance, an example of a conformity assessment system would be third party attestation (certification), whereas its application to web content, based on the web content accessibility guidelines, would be one of the available conformity assessment schemes.</p>		
BITKOM	4.2.2: 5th paragraph		ge	<p>» ... before taking the important decision as to whether or not the object of conformity assessment has been reliably demonstrated to fulfil the specified requirements. «</p> <p>Please explain "decision": what is the base for the decision and is it a yes/no-decision or a qualitative statement e.g. 73,568% accessible?</p>		
BITKOM	4.2.2: 6th paragraph		ge	<p>» <i>The needs of users drive such activities. «</i></p> <p>May be in the field of accessibility but not in general.</p>		
BITKOM	4.2.4		ge	<p>The manufacturer or service provider remains responsible for conformance with requirements, even if a third party is involved with the assessment. Add appropriate text to the end of clause 4.2.4.</p>		
BITKOM	4.2.4.1		ge	<p>» <i>A first party assessment is a done by a supplier or manufacturer to assess the fulfilment of specific requirements. The assessment is made by the supplier or manufacturer. «</i></p> <p>Clarify the basis on which the assessment can be made. Give information on the incremental assessment during the product</p>		

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				development phase. Correct wording. Replace text with: A first party assessment is done by a supplier or manufacturer to assess the fulfilment of specific requirements. The assessment is made by the supplier or manufacturer, based on first or third party services. If the assessment is made by the manufacturer, it is preferably performed not at the stage when the product is ready but incrementally during the complete development of the product, providing the unique option, to perform necessary modifications cost effectively and efficiently at the earliest possible stage without losing time.		
BITKOM	4.2.4.3		ge	Clarify that third party assessment is sometimes used to support a first party declaration. Add a new final sentence: Third party assessment is sometimes used by a manufacturer or supplier to support a first party declaration.		
BITKOM	4.2.5.1 and 4.2.5.2		ge	First party attestation is SDOC. Merge clauses 4.2.5.1 and 4.2.5.2 or explain the differences.		
BITKOM	4.2.5.1		ge	Clarify the basis on which an SDOC can be made. Add a new final sentence: An SDOC may be based on First or Third party assessments.		
BITKOM	5.1: Scalability, note 2		ge	» <i>Another example of scalability is when products are assessed against a small set of predefined assistive technology.</i> « Better wording. Replace with: another example of scalability is when products are assessed against a		

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				carefully selected set of assistive technology, known to cover most use cases.		
BITKOM	5.1: Method of determination		ed	» <i>Some types of determination activities defined in EN ISO/IEC 17000:2004 are ...</i> « Make the following text easier to read e.g. by a bullet list for the four determination activities.		
BITKOM	5.2: Type of party		ed	» <i>... their independence will be measured using the types of inspection bodies identified in EN ISO/IEC 17020: ...</i> « Make the following text easier to read e.g. by a bullet list for the three types. Please apply bullet lists to all description of dimensions in clause 5.		
BITKOM	.2: Type of party, note 1		ge	An organisation may (and frequently does) have an internal assessment function that is independent of the development function.		
BITKOM	5.2: Type of party, note 3		ge	Incomplete: It states that the type of party should typically be "third party". And since it asserts in Note 2 that this field is only valid if External = "yes", it's promoting external third party certification.		
BITKOM	5.4: Existence, note 1		ge	» <i>For instance, in web accessibility all the conformity assessment schemes should include surveillance, due to the high rate of changes of websites.</i> « Conformity assessment should be an organic part of the edition of websites. Delete the sentence or reword: For instance, in web accessibility the conformity assessment schemes		

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				may consider surveillance, due to the high rate of changes of websites.		
BITKOM	6.1.1 and 6.1.2		ge	First party attestation is SDOC. Merge clauses 6.1.1 and 6.1.2 (see comment on 4.2.5.1 and 4.2.5.2).		
BITKOM	6.1.1: table		ge	The scalability part could be yes, depending on the products.		
BITKOM	6.1.1: table 5th row, 2nd column		ge	Use the same content as the method of determination from SDOC (clause 6.1.2) except the inspection part.		
BITKOM	6.1.1: table 10th row, 2nd column		ge	Detailed human and detailed machine		
BITKOM	6.1.1: table 14th row, 2nd column		ge	Directly through company, other		
BITKOM	6.1.2: table		ge	The table indicates that requirements are not specified, but the definition of an SDOC requires them. See also comments on 6.1.1.		
BITKOM	6.1.4: table		ge	The table states that the attestation is third party. This does not have to be true because a third party determination could be based on first or second party attestation.		
BITKOM	6.2.6:		ge	» <i>Country: USA</i> « VPATs are also used in other countries to demonstrate accessibility issues to customers. Replace by: Country of origin: USA		

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BITKOM	6.2.6		ge	<p>» <i>The ... VPAT was developed by the industry in USA to deal with Section 508.</i> «</p> <p>The VPAT was developed in conjunction with the US government. Give a reference to the VPAT website. Change: ... was developed by the US industry and government to show conformance to Section 508.</p>		
BITKOM	6.2.6:		ge	<p>» <i>A VPAT does not provide a clear yes/no answer for each requirement and for product accessibility.</i> «</p> <p>Explain why a VPAT does not give a Yes/No answer. Replace with: A VPAT does not provide a clear yes/no answer for each requirement and for product accessibility because many aspects of accessibility are subjective and depend on system-level interactions.</p>		
BITKOM	6.2.6: table 14th row, 2nd column		ge	<p>» <i>No (yes, we need clarification)</i> «</p> <p>Replace with: Directly through company.</p>		
BITKOM	6.3.2		ge	<p>» <i>The CE mark is not a third party certification mark.</i> «</p> <p>The CE mark is in some cases third party (see module A). Example: Gas oven.</p>		
BITKOM	7		ge	<p>Please improve this clause by more explanations. Please provide a summary and conclusions for this clause. Please clarify what belongs to the procurement phase and what is subject to the resulting contract.</p>		

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BITKOM	7.4.1 and 7.4.2		ge	Please improve wording to enable understanding.		
BITKOM	7.4.2: last paragraph		ge	What is the justification for "which we endorse"?		
BITKOM	7.4.5: 8th (last) paragraph		ge	» <i>A contracting authority is allowed to ask for verification by a third party as long as equivalent verifications made by bodies in other Member States are accepted.</i> « There is nowhere in the directive mentioning about this. The directive only means that "the tenderer has the option to use another method for proof, provided this party can prove to the satisfaction of the contracting authority that it yields equivalent result". Action: Delete the sentence.		
BITKOM	8		te	» <i>This section defines a model to analyse the properties of one public procurement context.</i> « Such an approach is plainly not workable in practice. Industry needs to know what kind of reporting scheme is required before bringing products to market, not at the point when someone decides whether to buy them. The determination of the appropriate reporting scheme (attestation) on a procurement by procurement basis (s. clause 9) is also not reasonable for public procurers.		
BITKOM	9		ge	In each scenario, there is first a table analysing the procurement scenario against the procurement model. Next is a table of recommended values for the dimensions of conformity assessment. The values are influenced by various dimensions of the procurement model but there is no guidance given on which procurement model dimensions		

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				should influence which conformity assessment dimensions.		
BITKOM	9		ge	All 4 scenarios come up with the same results. Please provide examples with different results to learn about the differences.		
BITKOM	9.1.2: Market		ge	The competitor's surveillance can not be known. Action: Replace with unknown.		
BITKOM	9.1.3: Determination		ge	» <i>There is low confidence on attestations and thus an external determination could raise this confidence.</i> « Mandating third party testing in this situation is disproportionate.		
BITKOM	9.1.4		ge	» <i>... with the addition of third party determination by laboratories ...</i> « Mandating third party determination by laboratories in this situation is disproportionate. If a supplier makes a false claim there is simple recourse to contract law, as with every other aspect of stated compliance with requirements. Action: Delete the text.		
BITKOM	9.3.2: table 8th row, 3rd column		ge	» <i>All products are accessible for people with disabilities using screen readers and related hardware.</i> « In reality, there is no such scenario that a product is accessible to all type of screen readers. The accessibility of a product depends on the vendor and the version of assistive technology. Normally companies receive a list of requirements in which the procurers listed the vendor of the assistive technologies and company selects the supported vendor and the version.		

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BITKOM	9.3.2: table 21st row, 3rd column		ge	» <i>There is in-house expertise on accessibility, but not on accessibility of CMS</i> « This is contradictory information. In 9.3.1 it was stated that no in-house expertise exists.		
BITKOM	9.3.2: table 25th row, 3rd column		ge	» If the system is not accessible most users will not be able to reach or input information. « We do not agree that most users will be affected. Replace with: If the system is not accessible affected users will not be able to reach or input information.		
BITKOM	9.3.3		ge	» <i>Recommended values for the dimensions of conformity assessment</i> « What is the purpose of this clause? Previously it is mentioned that the directive does not demand the usage of any mandatory schemes but in this clause the report provides the recommended values list which is followed by recommended conformity assessment in clause 9.3.4 which means certain schemes shall be used for certain scenarios. If this dimension has to be used, it would be good if there is a clarification where this recommended values dimension comes from.		
BITKOM	9.3.4: 1st paragraph		ge	» <i>Given the above values for the dimensions of conformity assessment, the recommended system is inspection of products, according to ISO/IEC 17020.</i> « This statement contradicts with the information written in clause 7.4.5 "the tenderer has the option to use another method for proof ... equivalent results" which means that as long as the supplier can show		

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				the "equivalent results" it does not matter which conformity scheme to use. As a result, it is not correct that the scheme is narrowed down to only "inspection".		
BITKOM	9.4.2: table 25th row, 3rd column		ge	» <i>If the system is not accessible most users will still be able to use the roads, albeit with less information about the traffic state.</i> « Why is the risk intermediate for end-users and high for employees?		
BITKOM	10		ge	A supplier making an SDOC does so based on the internal quality and operational management systems which will be certified to ISO900x and are independent of the specific parameter. A further management system for accessibility is not required or beneficial.		
BITKOM	10.5: 1st paragraph, 2nd bullet		ge	» ... <i>attempts to assess the accessibility knowledge and capabilities of the potential supplier.</i> « The goal of procurers is to procure the most accessible products, not to check the capacities of the suppliers, manufacturers and their possible sub-contractors. A supplier approaches the procurer only when the supplier knows the requirements of the procurer and what the procurer wants. It is unusual that a supplier approaches the procurers blindly so that the procurers have to conduct such attempt.		
BITKOM	10.5: 2nd paragraph		ge	» <i>A first goal should be to specify what capacities are required in a supplier to become an "accessible supplier".</i> « Is this the goal of the supplier? If yes, it is not clear why is the term "goal" used in this case? The title of this whole chapter is "Conclusion on ability and capacity of suppliers" and it is not clear what does conclusion have to do with "goal"?		

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BITKOM	10.5: 4th paragraph		ge	<p>» <i>This suggests that employing or having access to certified people with the required knowledge and experience to deal with accessibility issues could be a way for a supplier to show ability and capacity in accessibility.</i> «</p> <p>The clause only mentions about "the educational and professional qualifications of the person" and it does not say anything about "certified" so the word "certified" can be wrongly understood. The way suppliers to show their ability and capacity in the area of accessibility should be valued by the end product itself, not by whether the developers or testers have so called "certification".</p> <p>Action: delete the whole paragraph.</p>		
BITKOM	10.5: 7th paragraph, 1st bullet		ge	<p>» <i>User-centred requirement specification</i> «</p> <p>Unusual term. Not used e.g. in WCAG, US Section 508, etc..</p>		
BITKOM	10.5: 8th paragraph		ge	<p>» <i>The main problem with this second goal is its applicability in short term, because there is a need to completely define the required extensions to ISO 9001, ISO/IEC 15504 or other similar schemes. In addition there is a lack of knowledge on the issue of accessibility management systems so the time to develop those extensions could be relatively long.</i> «</p> <p>Please explain why this is a problem and where does the conclusion come from.</p>		
BITKOM	12.1:		ge	<p>The expressions of the views of stake holders do not include the justification, which is an essential aspect.</p>		

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				Action: Add more detail, for Industry this would come from the referenced white papers. More details for procures are required.		
BITKOM	12.1: Final paragraph		ge	The referenced EC consultation was fatally flawed because it was performed anonymously on-line with no verification that respondents were who they purported to be. Also, the questionnaire appeared to be biased towards yielding a particular result. Action: Delete this reference until such time that an independent survey organisation produces a professionally designed study.		
BITKOM	12.2.3		ge	CEN CWA15554 is an extremely poor quality document and was produced by a small interest group. The scheme proposed is totally impractical and will benefit nobody but the potential certifiers. Action: Delete whole text about CWA15554.		
BITKOM	12.2.3		ge	All stake holders need to work together in this area, not just those with one particular viewpoint or interest. Action: Delete: Further harmonisation involving stake holders like started in the WAB Cluster would however be desirable.		
BITKOM	12.2.3 and 13.4		ge	There is nothing unique about accessibility and it is important not to introduce unique processes for one topic like accessibility.		
BITKOM	13.4: 3rd paragraph		ge	» <i>Access to experts who are certified in accessibility could be an item in that specification.</i> « See comment to 10.5, 4th paragraph. Action: delete this paragraph.		

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1	2	(3)	4	5	(6)	(7)
PE ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of com- ment ²	Comment (justification for change) by PE	Proposed change by PE	Secretariat observations on each comment submitted
BITKOM	13.4: 3rd paragraph		ge	<p>» <i>The Mandate does not specify what should be done in the capacity/ability area, but such a specification could possibly be included in the toolkit.</i> «</p> <p>The accessibility of the product should be valued by the end product itself, not by whether a person is a certified expert or not. No one can develop an accessible product and test these if these persons do not have the education and qualification.</p> <p>Action: Delete this sentence.</p>		
BITKOM	13.4: 3rd paragraph		ge	<p>» <i>A more long-term task would be to develop a standard on accessibility management, by using for example ISO 14000 on environment protection or ISO 27000 on information security as models.</i> «</p> <p>It is not clear which type of "accessibility management" is meant in this case. Does "accessibility management" also mean "methods and processes" or does it mean "content management system"?</p>		

1 PE = person producing the comment

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

NOTE Columns 1, 2, 4, 5 are compulsory.