Position Paper

Adoption of EN 301 549 as an international Standard by ISO

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Background

In 2005, the European Commission had launched a "Standardization mandate to CEN, CENELEC and ETSI in support of European accessibility requirements for public procurement of products and services in the ICT domain". The main result of Mandate 376 is the standard EN 301 549 "Accessibility requirements suitable for public procurement of ICT products and services in Europe"[1], published by CEN, CENELEC and ETSI in February 2014. It specifies harmonized functional accessibility requirements for ICT products and services, which are intended to be used by procurers for assessing accessibility in the context of the new European Public Procurement Directive 2014/24/EC, which came into force on April 17, 2014. The EU member states have to adopt it in the form of national legislation by April 2016.

BITKOM kindly asks the EU Commission to take the following comments into account with regard to the application of EN 301 549 in the context of public procurement:

EN 301 549 should be adopted by ISO

ICT companies, operating in Europe or worldwide, as well as ICT users with disabilities and manufacturers of assistive technology would benefit from an internationally harmonized accessibility approach.

BITKOM asks the European Commission as the issuing authority of Mandate 376

- to actively support the adoption of EN 301 549 as an international ISO standard and

- to ask the contracted European Standardization Organizations to work towards a word-by-word identical publication of EN 301 549 as an ISO standard.

The international adoption of a European Standard will demonstrate the European leadership in accessibility and is a unique opportunity to strengthen the position of European ICT companies on international markets. It would help to prevent competing

Federal Association
for Information Technology,
Telecommunications and
New Media

Christian Herzog
Bereichsleiter Technische Regulierung
& IT-Infrastruktur
P +49 30 27576-270
c.herzog@bitkom.org

Albrechtstraße 10
10117 Berlin
Germany

President
Thorsten Dirks

CEO
Dr. Bernhard Rohleder

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[1] http://www.etsi.org/deliver/etsi_en/301500_301599/301549/01.01.01_60/en_301549v010101p.pdf

or incompatible accessibility standards in non-European countries and, therefore, would help to prevent a fragmentation of accessibility requirements worldwide.

For companies active on European as well as international markets, a harmonization of the US Access Board's accessibility guidelines with European standard EN 301 549 is, therefore, of high importance. The US Access Board has announced updates to their accessibility guidelines to become effective in 2017. Fortunately, the European standard covers the requirements of the new US accessibility guidelines to a large extent. For that reason, Bitkom does not expect major conflicts between the European and the new US requirements. This fortunate situation supports our request to adopt EN 301 549 as an ISO standard as there would be no major conflicts from that perspective as well.

About Bitkom

Bitkom represents more than 2,300 companies in the digital sector, including 1,500 direct members. With more than 700,000 employees, our members generate a domestic turnover of 140 billion Euros a year, exporting high-tech goods and services worth another 50 billion Euros. Comprising 1,000 small and medium-sized businesses as well as 300 start-ups and nearly all global players, Bitkom's members offer a wide range of software technologies, IT-services, and telecommunications or internet services. They produce hardware and consumer electronics or operate in the sectors of digital media and the network industry. 78 percent of the companies' head-quarters are located in Germany with an additional 9 percent in other countries of the EU and 9 percent in the USA as well as 4 percent in other regions. Bitkom supports an innovative economic policy with a special focus on the modernization of the education sector and a future-oriented network policy.