BITKOM

Position Paper

Draft EN (Deliverable 4.1) for Mandate 473
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BITKOM represents more than 2,200 companies in the digital sector, including 1,400 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 more than 250 start-ups and nearly all global players, BITKOM' 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. 76 percent of the companies' headquarters are located in Germany with an additional amount of 10 percent in other countries of the EU and 9 percent in the USA as well as 5 percent in other regions. BITKOM supports an innovative economic policy by focussing the modernization of the education sector and a future-oriented network policy.

Background

Currently, the Technical Committee CEN-CENELEC JWG 5 "Design for All" prepares a draft European Standard "Accessibility following a Design for All approach in products, goods and services — Extending the Range of Users" as one of several deliverables under mandate M/473 (2010) "Standardization Mandate to CEN, CENELEC and ETSI to include 'Design for All' in relevant standardization initiatives".

BITKOM would like to submit the following general strategic position on the draft EN (Deliverable 4.1) for Mandate 473:

A standard represents the state-of-the-art and provides clear requirements. Standards can be categorized in Management-System-Standards, generic standards and product standards. Each of them follows a different concept and this implies a different way of setting requirements.

Management system standards do not provide detailed requirements or even recommendations. They describe the process model. Very prominent management system standards are ISO 9001 and ISO 14001. Both standards are 10 or 14 pages "pure and real" standard with almost only requirements (shall). The explanation is placed in the annex like in ISO 14001 or in other documents. Both standards set the requirements for quality management or environmental management. They focus on the process and not on product or service requirements.

The structure of major parts of draft EN for Mandate 473 follows ISO's high level structure for management system standards. We interpret the alignment with the common structure of management system standards as the intent to support

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quality management. In fact, accessibility can be seen as a quality aspect. However, it would be more appropriate if the draft EN contained an annex like ISO 14001 providing guidance on how to implement accessibility in the management system standard. Furthermore, a second annex showing the mapping of the most prominent management system standards ISO 9001, ISO 14001 and OSHA 18001 would be very helpful for companies expanding their quality activities with accessibility.

The current draft is already too long with 22 pages and still has clauses without normative content. The annex has about 40 pages and is rather a text book than a standard. Instead of repeating what has been already defined at other sources, the draft EN should make more reference to existing normative documents e.g. CEN/CLC Guide 6, ISO/TR 22411, ISO/IEC 29138-1.

The draft EN focuses on user involvement but does not consider other methods like personas or testing tools. User involvement is only one method among others in the design and test process.

In our view, the current draft does not present the necessary structure and quality of content in order to be successfully used by product designers or auditors.