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ISO/IEC JTC 1 Special Working Group on Accessibility (SWG-A)

JTC 1 SWG-A N 342

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Document Type: Contribution to JTC 1 SWG on Directives and Ad Hoc on Annex H of the Directives

Title: **JTC 1 Special Working Group on Accessibility Comments in Response to JTC 1 N 8860 - JTC 1 Directives Annex H - JTC 1 Policy on Electronic Document Distribution Using the World Wide Web**

Source: JTC 1 SWG on Accessibility

Requested Action: For consideration by the JTC 1 SWG on Directives and Ad Hoc on Annex H of the Directives:

SWG-A 2008 Tokyo Resolution 18: SWG on Accessibility Response to JTC 1 N 8860 (JTC 1 Directives Annex H - JTC 1 Policy on Electronic Document Distribution Using the World Wide Web)

The JTC 1 Special Working Group on Accessibility instructs its Secretariat to submit SWG-A N 342 in response to JTC 1 N 8860 (JTC 1 Directives Annex H - JTC 1 Policy on Electronic Document Distribution Using the World Wide Web).

Unanimous

Comments from JTC1 SWG-A on the proposed revision of Annex H

In response to Resolution 9 of the March 2008 JTC1 SWG-D meeting the SWG-A reviewed the document at their meeting in Tokyo in June 2008 and ask that the following comments are considered by JTC1 SWG-D when the revision of the Annex H document is discussed.

1. H1 Scope
This should have an additional sentence to express the high level goal that all documents are fully accessible

"In order to make information on ISO/IEC JTC 1 and its activities available to the widest range of audiences, it is essential that documents to be distributed electronically be provided in an accessible format

2. H1 reference to the ISO e-Services Guide
The SWG-A notes that this guide (referenced from ISO/IEC procedures and JTC 1 procedures) does not cover issues of accessibility and therefore recommend that it should be
a) revised to provide a policy statement on ISO e-Services and accessibility, and
b) amended to introduce text, as appropriate, to ensure that the descriptions of processes and documentation are extended to provide guidance on how these processes and documents can support requirements for accessibility of documents, web sites etc for example
> covering the use of machine translatable technology, or
> where input documents are automatically converted to PDFs (August 2007 update) then the generation of accessible PDF should be mandatory.

note: *possibly some guidance on techniques for creating and using accessible PDF could be included*
note: *some users would find accessible HTML easier to use and ISO might need to consider support for this in the e-Services Guide*

3. H2 Medium
The statement "ftp capability may be provided as an additional distribution mechanism at the discretion of the individual Secretariats" is only considered here in the context of improving efficiency. However ftp can provide significant support to users with accessibility needs.

4. H4.1 document formats
1. ODF 1.1 should be recommended rather than 1.0
2. XHTML 1.0 has been adopted by many organizations for accessibility and JTC 1 should consider recommending this as well (since ISO/IEC 15445:2000 has reduced accessibility features)
3. The entry for PDF is confusing
> "Portable Document Format (PDFTM) version 4.0
> Note: PDF is recommended only where there is a requirement for a defined page layout presentation of the document, e.g. circulation of FDIS text, or when PDF is the only choice as a result of the document development tool being used."

because in the ISO e-Services Guide (August 2007 update) it is now stated that documents submitted will be automatically converted to PDFs

4. connectivity should not be required to access documents so formats such as .docx should not be permitted

5.   H4.2 Graphics and other Non-Textual Data

The accessibility of the different graphics specifications varies, SWG-A recommend that SVG should be added and comment that from an accessibility perspective SVG, PNG should be preferred before JPEG and GIF

6.   H.4.4.2 File Naming Conventions

Believing this is an essential requirement in providing accessibility, the SWG-A requests that these conventions

- mandate the use of meaningful short titles, in addition to document numbers, in the file names of all files that are distributed electronically
- be modified so that the constraint on file name length is compatible with the above (reference: SWG-A Resolution 27, September 2006 Plenary meeting in Brussels)

7.   H4.3 Document structure

Templates should be in an accessible form and support production of accessible content

8.   H4.4 Document Server Navigation Structure / Document Distribution

It should be specifically recommended that any NB holding Secretariat follow the guidelines and address accessibility issues

9.   Annex HE

Change HTML to XHTML or at least add an additional column as below

	XHTML
Simple Administrative Document	HR
Simple Technical ISO/IEC Standard in preparation	P
Joint ISO/IEC and ITU-T Standard/Recommendation in Preparation	NR
Document intended for Web page browsing	HR
Complex * document in revisable form	P
Complex document in non-revisable form	NR
Document needing template as defined in this document	IA

10.   Annex HF

Add XHTML with an appropriate definition

XHTML	abbreviation for Extensible Hypertext Markup Language, which is an application of XML a more restrictive subset of SGML than HTML but standard XML tools can perform automated processing on XHTML documents

11.   Annex HG (web server policy)

1. This should have a policy statement stating the need to support accessibility

2.   Any elements that are mandatory must also be accessible and this requirement should be explicit
3.   III 5. a should use WAI-ARIA - Accessible Rich Internet Applications as an appropriate acceptable format