31 May 2003
World Wide Web Consortium
Comments on WSIS Draft Declaration of Principles and Draft Action Plan

In order to more clearly and specifically address issues regarding accessibility for people with disabilities and support for internationalization in information and communications technologies, the World Wide Web Consortium (W3C) makes the following suggestions for edits to the WSIS Principles and Action Plan drafts dated 21 March 2003. Thank you for your consideration of our comments.

Additional information on the World Wide Web Consortium is available at http://www.w3.org/.

Comments on Draft Declaration of Principles (version 21 March 2003)

1. [Section I.B.10.first paragraph] Given that it is important not only for information sources to be accessible, but also for the technologies used to deliver and access this information to be accessible, following "...and to unhindered access by individuals to communication media and information sources..." add "...and technologies."

2. [Section I.C.1.14.second bullet] "...including...the disabled" change to "...including...people with disabilities..."

3. [Section I.C.1.18] Given that "easily-accessed" is often interpreted as referring to the general availability of technology, rather than to the accessibility of that technology to people with disabilities, change the sentence "A well-developed and easily-accessed and affordable information and communication network infrastructure is essential..." to "A well-developed, easily-accessed, affordable, and accessible information and communication network infrastructure is essential..."

4. [Section I.C.1.19] Given that community ICT centres are currently often built in locations inaccessible to people with disabilities, and filled with technologies unusable by people with disabilities, change the sentence "Public access from community centres such as post offices, libraries, and schools, provides an effective means for promoting universal access..." to "Public access from community centres such as post offices, libraries, and schools, when such facilities and the technologies within them are accessible for all including people with disabilities, provides an effective means for promoting universal access..."

5. [Section I.C.2.25] Given that the specific problems of technologies inaccessible to people with disabilities are not widely understood, add additional clarification at the end of the sentence which begins with "Barriers to equitable access result from..." to also explain "...and from the inaccessibility of some mainstream ICT's to people with disabilities, and the lack of interoperability of some mainstream technologies with assistive technologies used by some people with disabilities."

Comments on Draft Action Plan (version 21 March 2003)

6. [Section I.A.2.13] "Information in the public domain should be of high quality, easily accessible for all, including the disabled" change to "Information in the public domain, and the technologies used to access this information, should be of high quality and easily accessible for all, including people with disabilities."

7. [Section I.A.4.22.second bulleted item] Given the importance of capacity building in ICT literacy and skills for people with disabilities, whose involvement in ICT development and deployment is beneficial to ensuring the accessibility of ICT as well as enhanced usability for non-disabled individuals, in the sentence "Women should be given equal opportunities for obtaining training in the ICT field" insert "....and people with disabilities" after "Women."

8. [Section I.A.6.30] To avoid the possibility of misunderstanding due to ambiguity of the word "accessible" in some contexts, in the phrase "based on platforms of internationally interoperable technical standards, accessible for all,..." insert "including people with disabilities" following "accessible for all."

9. [Section I.A.8.42.after third bulleted item] To ensure not only that the content development but that the underlying technologies support effective localization and internationalization, following the third bulleted item, add a new bulleted item "Ensure adoption and implementation of standards and technologies which provide optimum support for a wide range of local languages."

10. [Section I.A.8.42.last bulleted item] To ensure optimum preservation of non-written languages, multimedia recording is more effective than audio recording alone, and can be accomplished with the ICT's promoted in this action plan. Change the sentence "Non-written languages should be preserved by using audio support" to "...by using multimedia support."

11. [Section I.A.8.42.after last bulleted item] To ensure that ICT standards and technologies support the requirements of the world's diverse languages, early involvement of organizations representing diverse languages in standards

discussions is important. Add a new bulleted item, "Ensure early involvement of organizations representing diverse language communities in the development of ICT standards and technologies, to ensure that these technologies meet the requirements of all the world's language communities."