

DIGITALEUROPE's response to the BEREC consultation on equivalent access and choice for disabled end-users

Brussels, 30 October 2015

1. Do you have details of initiatives which you consider to be best practices in promoting equivalent access and choice for disabled end-users of electronic communication services? Please describe and explain their relevance and impact on disabled end-users.

In an effort to improve the understanding of accessibility needs and further develop accessibility solutions, DIGITALEUROPE collaborated with a number of disability NGOs, associations and standardisation organisations. This regular dialogue ensures industry can understand the views and needs of all groups.

As a matter of fact, the ICT industry has a leading role in developing and implementing accessible solutions based on globally recognised standards to ensure the market delivers the highest possible level of accessibility while minimising the burden on consumers, public agencies and industry. These include the development of an International Standard for text-to-speech for Digital TV (IEC 62731) in 2013 and the on-going creation of a new IEC standard on digital TV (IEC 62944).

Among other recent joint voluntary initiatives, we would like to underline the set-up of the GARI database (<http://www.gari.info>) which consists of didactic guides to facilitate the search and selection of models of mobile phones which are suited to the special needs of persons with disabilities. In some countries, regulators have also taken up the GARI database to help inform disabled consumers on the options available for them.

These successful developments have been possible through competition and voluntary actions, which have led to the rapid provision and improvement of e-Accessibility features.

2. In your opinion, what actions or measures, if any, should be considered by NRAs, governments, public bodies, consumer associations, disability associations, equipment manufacturers, network operators, electronic communications service providers and the European Commission to improve equivalence of access and choice, for example, under the provisions of the Universal Service Directive?

Industry's aim is to ensure the market delivers the highest possible level of accessibility while minimising the burden on consumers, public agencies and industry. Competition and the above-mentioned voluntary actions have led to the rapid provision and improvement of e-Accessibility features.

In fact, in many cases accessibility of a given product depends on a wide array of other interdependent products and technologies such as web applications or broadcast content or assistive technology, in order to be accessible. This entire 'ecosystem' has to be taken into account when picturing a vision for accessibility that may be necessary to produce an accessible solution, and limit the requirements on each organisation to only those aspects under the total control of that organisation.

By the same token, legislators should refrain to develop a one-size-fits-all approach which could not cater for the products' & services' diversity existing in the accessibility space: no one product or service is suited for every user. For instance, requiring that every product has features that address all disabilities may be undesirable, impractical, and needlessly drive up the cost of every product. It is rarely possible for a product or service to be fully accessible out of the box for every user.

Against this background, the ICT industry is of the view that:

- Demand generation should be achieved by way of standardised public procurement and obligations on public services to drive market provisioning of suitable solutions and to drive adoption and demand without affecting more innovative areas that are not subject to such universal requirements.
- Referenced standards for public procurement should be globally recognised standards, specify functional requirements, cross-platform, technology neutral and proven to support further innovation and competition. They should enable a single design to be shipped to the largest possible market in order to encourage accessibility features to be included in mainstream products at affordable prices.

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ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 59 corporate members and 35 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

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