

To: [PC_QoS_Guidelines](#)
Subject: submission to the QoS BEREC Guidelines
Date: Monday, 9 December 2019 17:07:50
Importance: High

Dear Sir, Madame

I would also like to make a submission towards the proposed BEREC Guidelines despite official deadline closing on 5th December. Due to travelling out of office, I was not able to respond earlier

I am presently the head of delegation to ITU from G3ict and lead much of the standards work on accessibility to several study groups and in all sectors of the ITU. I have been participating in the ITU as an independent accessibility advisor for the inclusion of accessibility in all three sectors in standards work for persons with disabilities and those with specific needs since 1991.

<https://www.itu.int/en/ITU-T/accessibility/dcad/Pages/SAKSAndrea.aspx>

I also was the pioneer in starting the textphone in Europe for persons who are deaf and hard of hearing and organized the first deaf transatlantic call from the UK to the USA back in 1975. I would like to emphasize that standards work to include the needs and the inclusion of persons with disabilities and specific needs been going on for a long time in standardization and guidelines at the ITU. These guidelines and standards for the inclusion for persons with disabilities and those with specific needs are often already implemented. So as not to see conflicts and duplication of work with existing standards and guideline that include person with disabilities, I have included the list with links of the pertinent list of consented and approved existing accessibility standards and guidelines. It is also important to also point out that many are not just for persons with disabilities and specific needs but ordinary standards and guidelines that are inclusive for all.

The main issue is to prevent the duplication of work that often causes confusion, conflicts misunderstandings, and incompatibilities thus undermining the very reason for writing the BEREC guidelines.

So the list of ITU consented international accessibility standards with links is as follows:

[F.790: Telecommunications accessibility guidelines for older persons and persons with disabilities](#)
[F.791: Accessibility terms and definitions](#)
[F.921: Audio-based indoor and outdoor network navigation system for persons with vision impairment](#)
[F.930: Multimedia telecommunication relay services](#)

The list of ITU approved international accessibility guidelines with links are as follows:

[2019 - FSTP-ACC-RCS - Overview of remote captioning services New !](#)
[2018 - FSTP-CONF-F921 - Compliance of audio-based navigation system for persons with vision impairment](#)
[2016 - FSTP-UMAA - Use cases for assisting persons with disabilities using mobile applications](#)
[2015 - FSTP-AM - Guidelines for accessible meetings](#)
[2015 - FSTP-ACC-RemPart - Guidelines for supporting remote participation in meetings for all](#)
[2006 - FSTP-TACL - Telecommunications Accessibility Checklist](#)
[2018 - FSTP-ACC-RCS - Overview of remote captioning services](#)

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It is hoped that the above list will aid and assist in the writing of the guidelines. I am happy to be of any further assistance if needed.

Best Regards,

Factors) ITU JCA-AHF (Joint Coordinating Activity on Accessibility and Human
IGF DCAD (Dynamic Coalition on Accessibility and Disability)