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Authoring Tool Accessibility Guidelines Working Group
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To whom it may concern:

The Julia Farr Association (JFA) wishes to make comment on the 'World Wide Web Consortium Accessibility Consultation' to the Authoring Tool Accessibility Guidelines Working Group.

JFA and its predecessor organisations have been involved with the disability community for 130 years and strongly supports the values of Personal Authority, Social Inclusion and Capacity Building. JFA strongly supports web accessibility, both for the capacity of web authors and most importantly for the convenience of the end users of web content.

The Julia Farr Association offers the following feedback:

Guideline A.3.2: (For the authoring tool user interface). Minimise time limits on authors.

The Julia Farr Association supports the rationale that people who have difficulty typing, operating the mouse, or processing information can be prevented from using systems with short time limits. The Authoring Tool Accessibility Guidelines have proposed that authors are given a 20 second extended time limit to complete an action with a warning signal. JFA proposes that this time limit be further extended to ensure a person has adequate time to continue or complete a task.

Guideline A.4.2 (For the authoring tool user interface). Document the user interface including all accessibility features.

The Julia Farr Association supports the idea of providing tutorials to web authors and the provision of support documentation on accessible features for authors to read. However, we recommend that the documentation also include a comprehensive list of what accessibility means across a range of disabilities. For example; there are font/background colour considerations for a person with low vision, audio considerations for a blind person, and colour, shape and pattern considerations for a person who has photosensitive epilepsy.

Choice and inclusion for people living with disability.

Guideline B.3.1: Ensure that accessible authoring actions are given prominence.

Julia Farr Association supports the view that web content is made accessible to authors and users of the web. Many authors may not be aware of which authoring tools are accessible and for whom they are intended. Therefore JFA recommends that accessible tool options are highlighted, with an explanation of their desired outcome and audience, as a means to encourage their use.

To encourage authors to use an accessible feature over a non-accessible feature JFA suggests that when authors are provided with multiple options for an authoring task, a drop-down box is included with a symbol to let authors know what features are accessible and an explanation behind the intended accessibility feature.

Guideline B.2.4: Assist authors with managing alternative content for non-text content.

The Working Group has requested feedback on **Guideline B.2.4** on whether the guideline is clear on how it would apply to content management systems or photo repository sites.

JFA did not find the guideline clear. JFA recommends the following options for consideration:

- After the sentence provide an example the nature of alternative content, such as, *'This includes types of alternative content that may not typically be displayed on screen by user agents (Level A). For example....'*
- There was no mention of the words 'photo repository sites' in the guideline or any explanation in the glossary. A person who does not have previous knowledge of this term may not know what this means and how it would apply.
- JFA encourages the use of 'plain english' to make the Guideline and document easier to read and understand for all people.

Does the Glossary definition of “prominence” provide guidance for objective testing?

JFA suggests that the definition of 'prominence' is usefully written in that it provides examples of what prominence means and the many factors which can affect prominence.

JFA's understanding of objective testing is that the tool is without bias when using the Authoring Tool and authors have the choice about whether they use an accessible tool or a non-accessible tool.

JFA strongly supports people choosing an accessible feature over a non-accessible feature and that the benefits of this be highlighted when the choice is offered to authors.

Do the new examples of authoring tools in the Introduction sufficiently illustrate and differentiate between web and non-web functionality?

JFA felt that the Introduction did not sufficiently illustrate and differentiate between web and non-web functionality. JFA recommends the following suggestions:

- Provide an explanation of what web and non-web functionality is and list examples of this.

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- JFA encourages the use of 'plain english' to make the Guideline and document easier to read and understand.

Thank you for taking JFA's views into consideration as part of the World Wide Web Consortium Accessibility Consultation.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Robbi Williams', with a stylized flourish at the end.

Robbi Williams
Chief Executive Officer
Julia Farr Association

Choice and inclusion for people living with disability.