Comments on WCAG 3 by Robert G. Martinengo

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With all due respect to the Silver working group, please just stop for a moment. I have been in the accessibility field for over twenty years and have come to understand that after a certain point, continued emphasis on accessibility as a separate topic only serves to further distance people with disability from the mainstream. The WCAG is at that point, and it's time to make a decision.

I reviewed the various posted materials on WCAG 3. The amount of time, effort, and care that went in to them is impressive, evident, and admirable. But as it stands, WCAG 3 is bound to fail to live up to the lofty goals set for it. This is not a prediction, but an observation based on experience.

The most important thing that needs to happen with WCAG is removing the words 'accessibility' and 'guidelines'. Replace them with something like 'building codes': "...sets of regulations governing the design, construction, alteration and maintenance of structures. They specify the minimum requirements to adequately safeguard the health, safety and welfare of building occupants."

<https://www.fema.gov/emergency-managers/risk-management/earthquake/seismic-building-codes>

Adopting the building code model for the web is not just a matter of semantics – it's a seismic shift in the way accessibility is conceptualized. Not to overstretch parallels with construction, but if mark-up languages, scripts, style sheets, etc are the raw materials, web building codes are the specifications for how these parts can be assembled in to web sites and applications that safeguard access for all users (authoring tools and user agents fit nicely in to this framework as well). The main levels of web building codes should be 'personal', 'commercial', and 'government'. The main point is, accessibility is woven into the codes, not as a separate topic but simply as *the way things are done*.

Here's some good news: if the W3C adopts this approach, all of the great resources and experience generated by WCAG, and the terrific research and work done on v.3 will definitely not go to waste. Instead, WCAG will become the backbone of the new web building codes, ensuring accessibility becomes fundamental to the web and second-nature to those who design, build, use, and pay for web sites and apps. There will still be specific testing criteria, just as there are for building codes, but compliance with web building codes will be more holistic than testing for accessibility alone.

On the surface, it's a classic Catch-22: the only way to achieve sustainable accessibility is to stop talking about accessibility. Yes, there will be plenty of challenges transitioning from accessibility guidelines to web building codes, but the difference is between continuing to head down a dead end road, versus merging with the mainstream freeway of web development to ensure that people with disabilities will be in the front seat.

Thanks for your time,

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