

February 25, 2021

Accessibility Guidelines Working Group

Via Email : public-agwg-comments@w3.org

SUBJECT: Comments on First Public Working Draft of W3C Accessibility Guidelines (WCAG) 3.0

To Whom It May Concern:

VMware is writing this letter to submit comments on W3C's Accessibility Guidelines Working Group (AG WG) First Public Working Draft of W3C Accessibility Guidelines (WCAG) 3.0. By way of background, VMware provides over 140 products and services around App Modernization, Multi-Cloud, Digital Workspace, Virtual Cloud Networking, and Intrinsic Security to customers of all sizes.

We value the leadership in digital inclusion that the W3C continues to demonstrate, and we are appreciative of being afforded the opportunity to provide feedback. Due to time constraints, our feedback, provided below, is in no particular order and focuses only on refinement opportunities, some of which might not fully align with the specific feedback questions posed. The below comments have been simplified and already loaded into your public facing GitHub instance.

- **Concern:** The terms "Silver/AG/Accessibility Guidelines" has been problematic for us in that the name "Accessibility Guidelines" alone is broader and suggestive of a scope that is beyond digital: physical accessibility, process accessibility, and more. That misconception is something that we as accessibility SMEs have to correct whenever talking about these guidelines.
 - **Ask:** We ask the formal name of "WCAG 3.0" be used moving forward in place of "Silver/AG" in marketing materials, presentations, etc. so that the name/guidelines always have an appropriate, focused context. If "Web" is considered too limiting since the guidelines do apply more broadly, perhaps consider "Digital" in place of "Web": DAG 3.0.
- **Concern:** There may not be enough coverage in some guidelines. For example, guideline 7.4 Structured Content covers the use of sections, headings, and sub-headings, but there is no mention of other content structures such as tables, lists, and landmarks. Another example is guideline 7.5 Visual Contrast of Text, but no mention of non-text contrast. Additionally, there is an emphasis on specific kinds of technology like EPUB and HTML, and not others such as native mobile applications.
 - **Ask:** We ask that the guidelines provide adequate coverage of their topics and other forms of digital technology be included in any examples provided to improve scoring, guidance for testing, and understanding documentation.
- **Concern:** Guideline 7.4 does not offer guidance around ensuring headings be unique and descriptive.
 - **Ask:** Please consider those as possible requirements here and provide examples/guidance as appropriate.
- **Concern:** There is an emphasis on testing because of scoring and certain elements are unclear, such as the scoring for the guidelines "Clear Words" and "Visual Contrast of Text". Additionally, the relationship between critical errors and scoring is not obvious and has too much emphasis

on critical errors, and the parameters for some guidelines could be problematic to obtain such as heading count, image count, and font weight for text contrast.

Does the work required to address these gaps add value?

- **Ask:** We ask that testing and scoring be clear and simplified. A couple of suggestions we have are to incorporate critical errors into outcomes to simplify scoring, and to better explain guideline scoring.
- **Concern:** It is difficult to navigate and consume the WCAG 3.0 documentation. For example, one screen reader user had difficulty using skip links, expanding content, and finding information a sighted user was pointing her to. Additionally, navigating to and locating resource pages is difficult.
 - **Ask:** We ask that WCAG 3.0 documentation provide components and navigation that are easier to use, and resource pages be easier to locate.
- **Concern:** The WCAG 3.0 documentation does not always use clear language. For example, some users found the language for testing terminology, concepts in guidelines, and pages in the conformance section to be passive and confusing.
 - **Ask:** We ask that action-oriented, plain language be used when writing WCAG 3.0 documentation.
- **Concern:** The wording for the “Clear Words” guideline places emphasis on only words and not sentences, paragraphs, and concepts. An illustration of this the exercise example used in the “Clear Words” guideline - the simplified language loses some of the meaning of the first paragraph and some users found the simplification insulting.
 - **Ask:** We ask that the “Clear Words” guideline name be changed to include words, sentences, paragraphs, and concepts, and that examples better demonstrate the guideline.
- **Concern:** W3C released separate guidance such as VR/XR, ATAG, and UAG but it is not clear how these will integrate into the WCAG 3.0 framework.
 - **Ask:** We ask that considerations be made for how other guidelines released by the W3C can be integrated into WCAG 3.0.
- **Concern:** There is lots of guidance proposed, some of which is new.
 - **Ask:** Please provide more examples/samples showing the new methods in action.
- **Concern:** Some of the methods are going to be very manually intensive and might not scale well across large organizations.
 - **Ask:** Please try to temper “the ideal” with “the feasible” as many organizations barely have budget as is to support accessibility. The depth that some of these criteria aim for, though wonderful in spirit, will likely not be possible in organizations that don’t have robust accessibility budgets.
- **Concern:** The scoring, though well intended, might have adverse, unforeseen consequences.
 - **Ask:** Please give thought to divorcing the “scoring” aspect from the document and stick with just providing technical criteria (akin to the other version of WCAG). The scoring, like the medaling, could perhaps be its own document, giving organizations and the regulatory communities more freedom here to make the decisions that they believe best work for their constituents. Some countries, for example, might which to adopt the criteria without the scoring or the medaling. Some countries might be all in. Keeping it all as one document (criteria and scoring) might adversely impact adoption.
- **Concern:** The conformance claims aspect might need more support.
 - **Ask:** Perhaps the conformance claims should be required to link to a list of the known issues?

VMware greatly appreciates your review and consideration of the comments provided herein. We look forward to the next public working draft.

Sincerely,

Cristopher Broyles,
Accessibility Compliance Head, VMware

Commented [CB1]: Sheri, feel free to add your name here. Would like to be aligned. Up to you.

Commented [CB2]: @Sheri Byrne Haber - please feel free to add your name here too if you wish.