



February 26, 2021

W3C (MIT/CSAIL)  
105 Broadway  
Room 7-134  
Cambridge, MA 02142

**RE: Draft W3C Accessibility Guidelines (WCAG) 3.0**

ACT | The App Association welcomes the opportunity to provide its input on the first public working draft W3C Accessibility Guidelines (WCAG) 3.0.<sup>1</sup>

The App Association represents thousands of small business software application development companies and technology firms located across the United States and the globe. Alongside the rapid adoption of mobile technologies, our members develop innovative applications and products that improve workplace productivity, accelerate academic achievement, monitor health, and support the global digital economy. Today, the app ecosystem is worth more than \$1.7 trillion, is responsible for tens of millions of jobs, and serves as a key driver of the \$8 trillion internet of things (IoT) revolution. The App Association is invested in advancing accessibility because our members provide the touchpoint to the mobile technology revolution, which continues to create new efficiencies across sectors, from consumer to finance to healthcare to manufacturing and in other contexts.

The App Association and its members share a commitment to providing all users, including those with disabilities, a software experience that is fully accessible. We assist developers in incorporating the needs of disabled end-users at large, ensuring that accessibility is considered throughout the app development process (“accessibility-by-design”), and in advancing our industry’s commitment to accessibility. Countless small business developers rely on the W3C Accessibility Guidelines (WCAG) in advancing these priorities. In light of the COVID-19 pandemic and demographic shifts all around the world, the development of WCAG 3.0 is timely and necessary to ensure continued digital and social inclusion for those with disabilities.

In our review of the January 2021 draft of WCAG 3.0, concerns arose for the App Association with respect to the prescriptive nature of the draft. We strongly urge W3C to carefully consider whether it has adequately prioritized flexibility for those who implement WCAG into technology solutions. In several instances across the testing, scoring,

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<sup>1</sup> <https://www.w3.org/TR/2021/WD-wcag-3.0-20210121/>.



guidelines, and conformance sections, the App Association finds the draft WCAG 3.0 standard positioned to be overly prescriptive.

As the standard develops, we strongly encourage WCAG 3.0 to, where possible, provide expectations for outcomes without mandating how the implementer of the standard gets to that goal. Providing such flexibility will leave room for ingenuity and would provide WCAG 3.0 implementers with the ability to prioritize making new features functional from a disability access perspective as well as being more inclusive from the start and exceeding the requirements of law and regulation, rather than focusing on bare minimum compliance with WCAG 3.0 requirements.

The App Association appreciates the ability to provide comments on the January 2021 draft of WCAG 3.0 and looks forward to working with W3C in advancing an accessible digital environment for all.

Sincerely,

/s/

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