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16 November 2011

Mr. John Traversy,
Secretary General,
CRTC
Ottawa, ON
K1A 0N2

Re: MAC and the Broadcasting Accessibility Fund.

Dear Mr. Traversy;

I have been heavily involved in ICT accessibility over the last decade. I am currently the chair of the Standards Council of Canada's Canadian Advisory Committee on Accessibility and of the ISO/IEC (JTC1/SC35/WG6) working group on User Interface Accessibility. I am also an author of a number of international standards in the field of ICT accessibility, including:

Project leader / co-leader for:

ISO/IEC 13066-1:2011 Information Technology - Interoperability with Assistive Technology (AT) - Part 1: Requirements and recommendations for interoperability
ISO 9241-129:2010 Ergonomics of human-system interaction — Guidance on Individualization

ISO/IEC 24756:2009 Framework for specifying a common access profile (CAP) of needs and capabilities of users, systems, and their environments

ISO/IEC 29138-1:2009, Information Technology — Accessibility Considerations for People with Disabilities — Part 1: User Needs Summary

ISO/IEC 29138-2:2009 Information Technology – Accessibility Considerations for People with Disabilities – Part 2: Standards inventory

ISO/IEC 29138-3:2009 Information Technology – Accessibility Considerations for People with Disabilities – Part 3: Guidance on User Needs Mapping

ISO 9241-20:2008 Ergonomics of human system interaction - Part 20: Accessibility guideline for information communication equipment and services – General Guidelines

ISO/IEC TR 19766:2007 Guidelines for the design of icons and symbols to be accessible to all users - Including the elderly and persons with disabilities

Contributing author for:

ISO/IEC 24786:2009 Information technology — User interfaces — Accessible user interface for accessibility settings on information devices

ISO 9241-171:2008 Guidance on software accessibility

I am also involved in the development of a number of additional accessibility standards not yet finalized.

I have been teaching a senior/graduate level class in Accessible Computing (CMPT 480/840) on a regular basis at the University of Saskatchewan since January 2007. This class has yielded a number of accessibility research projects and has resulted in students pursuing accessibility as the focus of masters and doctoral research projects.

I am writing to you in my capacity as a university professor actively involved in research in the area of accessibility, and not in my capacity as chair or member of any of the accessibility committees in which I participate. I am very aware of the difficulties in obtaining private sector funding to support accessibility research and standardization. This is especially difficult for those of us not located in central Canada close to the headquarters of the majority of major corporations.

The Broadcasting Accessibility Fund (BAF) represents the possibility of matching dollars for project partners who otherwise would not be able to participate in research. The hardest funds to secure are those actual dollars from the private sector to meet larger project funding criteria.

All academic institutions face this challenge and this is why it is critical that the administrator of the BAF and its board remain independent of any one academic enterprise. Otherwise, it is probable the fund could be biased in favour of just one area of research and could stifle innovation, thereby inserting a barrier to accessibility.

This is why I support Media Access Canada's proposal in response to BNOC 2011-523. MAC is independent, its mandate is very closely aligned with the Commission, its project funding is conditional on the Principles of Universal Design and publication of funded work is open source.

Allowing MAC to administer the fund will ensure academic institutions from across the country have the same opportunity to design, develop and research projects to remove barriers for accessible content in a rapidly changing content distribution environment.

I, therefore, ask that you support MAC and the Accessibility Community which includes all academics from across Canada studying and researching in this area.

Yours truly



Jim Carter
Professor and Director of USERLab
Department of Computer Science
University of Saskatchewan