



The voice of blind and partially sighted people in Europe

To: Mr Tadashi Ezaki, TC 100 Secretary: Tadashi.Ezaki@jp.sony.com
Cc: Mr Hiroyuki Iga, Assistant Secretary: hiro2.iga@toshiba.co.jp
Cc: Mr Norimasa Minami, Assistant Secretary: minami.norimasa@jp.panasonic.com
Cc: Mr Matei Cocimarov, IEC Central Office: mco@iec.ch

16 March 2011

Re: EBU TC 100 Category D Liaison Request – TTS specification

Dear Mr Ezaki,

Now that Japan has been struck by a severe earth quake, I would like to first and foremost offer commiserations and sympathy with the people of Japan. I do hope that all those dear to you and your colleagues are well and accounted for.

I am writing to you to request Category D liaison status to TC 100 for the European Blind Union (EBU) in accordance with clause 1.17 of ISO/IEC Directives part 1. EBU is the authoritative voice for Europe's blind and partially-sighted people. Our principal objective in making this request is to contribute to the work item "Text To Speech for Television" (hereafter referred to as the "TTS spec") recently submitted to TC 100 by DIGITALEUROPE.

This TTS spec is the result of many years of collaboration and negotiation between the television industry and user groups. In requesting liaison, we are offering representation to TC 100 by the same experts who have already been deeply involved in the development of said TTS spec. For various reasons, the collaboration with DIGITALEUROPE took place until now under the banner of the European Disability Forum (EDF). As the primary audience for the functionality defined in the TTS spec are overwhelmingly blind and partially sighted people, we believe, after conferring with EDF, and with their agreement, that it is more appropriate for the TC 100 liaison to be taken up by the European Blind Union, an EDF member.

The transposition of the TTS spec submitted by DIGITALEUROPE into an IEC standard is, in our opinion, a most relevant activity for TC 100. TTS interfaces are a core component for making television accessible to many blind and partially sighted people. There is therefore a clear user need for this type of assistive technology, and this need is a global one.



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In addition, while the user need is clear and incontrovertible, TTS is at present not a function used by general consumer audiences¹. While some manufacturers are implementing TTS within television receivers, others might consider it more appropriate to connect mainstream designs to external TTS devices. Both of these models fall within the strategies covered by IEC/TR 62678 (Audio, video and multimedia systems and equipment activities and considerations related to accessibility and usability). Initial implementations of television equipment with TTS functionality are already emerging into the market. There is therefore a clear need for harmonisation through standardisation to avoid fragmentation in the market which would lead to significant interoperability problems in the future. A standardised spec for TTS functionality would also ensure that designers, engineers and other stakeholders will be able to meet the actual user need, which is highly relevant with regard to an often not well understood disability requirement.

The European Blind Union (EBU) represents millions of blind and partially sighted consumers across Europe, which is the region where the TTS spec was developed in partnership with DIGITALEUROPE, a close collaboration between industry and user representatives. EBU has its own technical committee and a proven track record in harnessing technology to improve the lives of blind and partially sighted people. It has access to deep engineering expertise from its member organisations.

We feel therefore that EBU is very much the best point of liaison for this activity. Furthermore, the personnel involved would be the same that has already provided core input to the development of this spec so far under the EDF banner. Also, the staff concerned have an industry background, extensive experience with standardisation and deep knowledge of television technologies.

In addition to being a direct representative organisation of the core users of TTS technology and its established technical competence, the European Blind Union also wishes to explicitly state its commitment to constructive and consensus-based collaboration. The people previously involved in this work, most of whom have an industry background, have demonstrated this cooperative and positive stance amply throughout the partnership with DIGITALEUROPE.

Apart from the real user need and the necessity to harmonise implementations and safeguard interoperability, a further impetus for this work stems from public policy, in particular in the EMEA and North America markets, but also in the Far East. In addition to national legislation in various countries aiming at increasing the accessibility of mainstream ICTs, the EU is pursuing ever higher inclusion of people with disabilities, as stated for example in the 2005 Communication on eAccessibility² and in the i2010 initiative on e-Inclusion³. Similarly, the United Nations Convention on

¹ The WHO estimates that in 2002 there were 161 million visually impaired people in the world (about 2.6% of the total population). Of this number 124 million (about 2%) had low vision and 37 million (about 0.6%) were blind.

² COM(2005)425 FINAL on "eAccessibility", Brussels, 13 September 2005

³ See http://ec.europa.eu/information_society/activities/einclusion/bepartofit/overview/index_en.htm



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the Rights of People with Disabilities makes specific reference to television access in addition to its formulation of a general accessibility duty⁴. Increasingly, legislation and regulation refers to specific requirements and the USA's Twenty-First Century Communications and Video Accessibility Act covers TTS in television equipment explicitly.

Apart from the need to provide industry with a suitable, harmonised, framework to meet the existing and emerging legislative requirements, such standardisation can also reduce the need for regulatory intervention by demonstrating to policy makers that voluntary action is taken to meet disabled users' needs.

In conclusion: the TTS spec is highly relevant to TC 100. There is a clear user need in combination with a requirement for interoperability that by itself would warrant this activity taking place. Additionally, public policies and wider corporate social responsibility strategies further increase the relevance and significance of the work. Because of its close involvement in the TTS spec development process so far, its authority as a representative organisation for the main target audience for such functionality and its technical competence in this area, the European Blind Union considers itself well placed to participate in the TC 100 effort in the form of Category D liaison. We also commit to undertaking such liaison on the basis of a collaborative, consensus based approach.

In order to be able to contribute to the TC 100 work on the Text-to-Speech specification submitted to it by Digital Europe last January, we would be most grateful if our application could be considered at the next TC 100 meeting taking place in Madrid on 25-28 April. Should it be helpful, we would be more than happy to make a presentation in Madrid.

In anticipation of your response, I remain, in the meantime,

Yours sincerely

Colin Low
(Lord Low of Dalston, CBE)
EBU President

Replies to: Mr Raheel Mallick, Digital Media Development Officer, RNIB
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⁴ See Article 30 <http://www.un.org/disabilities/default.asp?navid=13&pid=150>