



White Paper: Providing Customer Choice

Consumer choice is table stakes in today's competitive business environment. It has become the standard of the digital age for many people, but when it comes to information access for your blind and low vision customers, they are often underserved.

In this whitepaper, we'll explore accessibility of online statement and document solutions for banks, credit card, wealth management, telecommunication companies, and government agencies. We'll review how offering choice for your blind, low vision, and print-disabled customers not only provides a rich and inclusive online experience, but also saves money, significantly strengthens compliance to accessibility legislation, and supports the shift towards paperless operations.

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285 Million Reasons to Provide Customer Choice.

According to the World Health Organization, 285 million people are visually impaired worldwide; 39 million are blind; with the remainder considered to be low vision. Within the North American market, there are 12.8 million blind and low vision consumers in similar proportions, and these numbers are increasing (American Foundation for the Blind, and Statistics Canada).

Because of our longer life expectancy, we are experiencing loss of physical and sensory ability and as the population ages, it is reasonable to expect that the group of older individuals who have low vision will rise.

In 2001, Statistics Canada identified 610,950 Canadians as having difficulty seeing ordinary newsprint or clearly seeing the face of someone from just four meters away.

According to Statistics Canada, seniors will make up 21 per cent of the Canadian population by 2026, compared to 13 per cent in 2000. Demographic trends in the United States are following a similar pattern.

What does all this mean? Simply stated, organizations must consider, and offer, a wide range of communication methods to fully meet the needs of their diverse customer base.

Providing Customer Choice Online

Converting your documents into PDF format and making them available online does not necessarily mean that everyone is able to read them. In fact, many PDFs online are virtually unusable by blind, low vision and print disabled users. The chart below outlines the basic differences between standard image-based and text-based PDFs compared to Accessible PDFs.

Image-based PDF	Text-based PDF	Accessible PDF
<p>Not accessible</p> <p>Image based: only accessible for fully sighted</p>	<p>Not fully accessible</p> <p>Text based: only partially accessible to people using adaptive technology.</p>	<p>Contains tagging and some structuring</p> <p>Can support access by sound;</p> <p>Accessible for blind users;</p> <p>Charts and graphs are identified.</p>

Image-based and text-based PDFs (standard PDFs) are not compatible with assistive technology like screen readers, which means that your blind and low vision customers cannot access the information properly, if at all. When a standard PDF is accessed by screen readers, the technology may not process anything, process only parts of the content, may process text out of order, or process tables improperly, thus making readability and usability very low, or even nil.

Accessible PDFs make use of accessibility features built into the standard (PDF/UA or ISO 14289) that function properly with assistive technology, and take the needs of blind, low vision and print disabled users fully into account. Amongst other things, an accessible PDF is structured for the proper and logical reading order for your document, which is one of the most fundamental steps towards accessibility.

Choice Comes from all Touch Points, through all Access Methods and in all Formats.

Is offering an accessible PDF good enough? The definitive answer is... "No, it's not."

Offering documents and statements online as a fully accessible PDF is a very progressive and inclusive step – but it is simply not enough. In fact, accessibility legislation mandates that customers are offered access in their preferred format – and it just makes good business sense.

What consumers want is choice, and a standard PDF made with accessibility software solutions does not fully provide it. Financial, telecommunication companies and the government must resist the temptation to impose a single approach to accessibility; to do so would be poorly viewed by their customers, and could be classified as a failure to offer reasonable accommodation to a customer's needs, and thus non-compliant to applicable legislation.

For instance, a customer who reads braille may occasionally value listening to the content of their statement or document through online audio access via assistive technology, but will generally require access to Braille, either electronically or in physical form. Additionally, a low vision customer who is able to read braille might prefer large print formatting using style guidelines that are adopted worldwide.

AccessOne combines all the features of T-Base's industry leading large print format with the standard PDF accessibility features to create a universally accessible PDF that is favoured by large format print users worldwide.

Designed with screen reader support in mind, statements and documents rendered as AccessOne are tagged and structured for sensible reading order, navigability and guidance for tables.

It is fully tested with NVDA, Apple's VoiceOver, JAWS, Windows Reader and Access Firefox.

Low vision customers can print their statements and/or documents for their files, or save them to their computers for future reference.



Simply increasing the size of a PDF online using the browsers' zoom features does not make the document accessible, in fact it only amplifies readability and usability issues; columnar design, inconsistent margin definition, emphasis on key content, orientation and justification, are just a few of the issues that can, and will arise as a result. Needless to say, offering statements and documents only as a standard accessible PDF will not do these customers justice.

AccessOne. One Document. More Choice.

Rated by consumers and advocates as the most comprehensive accessible PDF document on the market, AccessOne is a unique online accessible statement option (based entirely on the PDF/UA ISO 14289 standard) for financial, telecom and government that adds the value of choice, for both our customers, and their blind and low vision end users. More than Accessible PDF, not only does AccessOne meet requirements expected by blind consumers, but unlike Accessible PDF, it is universally designed to enable use by those with partial sight.

AccessOne PDF is a versatile document supporting the needs of blind and low vision users alike. Regardless of your customers' preferred access format, method or device, your customers are provided with choice by incorporating the senses of sight & sound into one single document type.

More options for Choice

It is essential that organizations concern themselves with ALL ASPECTS of communication with blind and low vision customers.

Secure (one to one) vs. non secure (one to many)

Secure (one to one) accessible communications from T-Base involves the transformation of private documents using highly secure processing, ensuring the highest quality production and timely delivery of alternative format statements and bills for banks, credit card companies, telecommunications providers and wealth management companies.

Non secure (one to many) communications involves the transformation of documents into alternative formats to provide general communication to many recipients. These types of documents include marketing brochures, standard terms and conditions, information guides, mortgage and loan documents. Another significant aspect of one-to-many is the conversion of educational materials (textbooks, tests, exams, reports) from elementary to post-secondary, into alternate formats.

Online Choices

Technology has become a large part of how organizations communicate with their customers, and there are a number of accessible online options for blind and low vision consumers. It has not only enabled blind and low vision consumers to participate via the online option that is best fitted to their needs, but it has also facilitated choice in terms of the organization they would like to have a relationship with. When an organization offers a customer a solution that meets their specific access preference they directly drive customer satisfaction – increasing consumer loyalty as a result.

AccessOne is a fully tagged PDF, compliant with ISO 14289 that provides online audio access for all, as well as full support for a range of dynamic Braille displays used by some of your blind customers.

This, plus support for low vision users via T-Base industry leading large print design offers your customers choice, and fully supports the drive towards paperless operation. Savings include elimination of paper & envelopes, binding and postage.

Web Accessibility

Offering online communications that are accessible is of tremendous importance for organizations in order for them to communicate with their blind, low vision and print disabled customers. By making your online properties accessible (ensuring full compliance with web accessibility guidelines outlined in WCAG 2.0 published by the World Wide Web Consortium, or W3C), you're ensure all visitors receive company messaging and can take full advantage of any opportunities online.

Mobile Sites and Apps

Mobile technologies are improving in terms of accessibility, but like websites, mobile sites and apps must also be rendered accessibly to ensure you're maximizing usability features for blind and low vision users. By ensuring mobile applications are accessible, you're ensuring customers can access a rich, accessible online experience on Android, iOS, and Windows Phone platforms for both mobile and tablet devices.

Traditional Choices

While technology has certainly evolved how consumers access information, not all consumers are, or choose to be, online. There are other important accessible formats that must be considered and offered:

Braille

Braille continues to be a fundamental and underpinning ingredient of independent living for blind consumers and students alike. There are two types of braille - *uncontracted braille* and *contracted braille*. Uncontracted is the most basic representation of letters, numbers, and punctuation while contracted braille, combines approximately 300 contractions and is the most commonly used as it is more efficient for the reader.

Large Print

Large format documents, correctly produced, follow a set of guidelines that improve readability beyond standard design and formatting. This includes a larger point size for characters, plus the use of sans-serif fonts, increased spacing and improved contrast, amongst many other key features. As the population ages, it is reasonable to expect that the group of older individuals who are blind or have low vision will grow; it is crucial for organizations to provide communication materials to partially sighted customers in properly designed large format print in order to ensure their continued business.

Audio

Audio format provides access to printed documents for people who are blind, low vision or print disabled, and is becoming increasingly popular on websites. In addition, audio provides access when reading print is not possible or is cumbersome for a customer. For people who are blind or partially sighted, a properly rendered audio file removes the challenge of interpreting computer files that contain graphics, have multiple columns, and other complicated design components that are unfriendly to screen reading devices.

When listening to audio formats, there are two options available; a synthetic/automated voice, or a human voice. Some blind and low vision customers find synthetic voices to be somewhat dry and hard to get used to, and prefer a human voice which is more pleasant to listen to. Meanwhile, others may prefer a synthetic or automated voice because they are accustomed to it and is more intelligible when sped up. Ultimately, it all comes back down to choice, and what the intended user is more comfortable with.

e-Text

E-Text, or electronic text, refers to publications in which all graphical components, including relevant photographs, charts and illustrations are fully explained in text, augmenting the body text of the document to ensure blind and low vision readers are getting the full picture. Information must be formatted as text-only to ensure compatibility with adaptive technologies such as large print screen display software, voice synthesizers' dynamic braille displays and braille printers.



Accessibility Compliance is Not a Choice.

Offering choice can only strengthen compliance, as your organization will be taking all available steps to accommodate the information access needs of your blind and low vision customers. In fact, in order to be compliant to accessibility legislation, organizations must accommodate a wide range of consumer preferences.

Financial Institutions

We are often asked by our banking, credit card, and wealth management customers to provide them with specific guidance in interpreting accessibility legislation as it relates to their business. In general, we advise our customers that in order to remain compliant, they must consider the marriage of accessibility and human rights legislation with specific banking regulations that apply across their entire customer base.

For example our US based customers must consider the American *Reg Z* <http://www.federalreserve.gov/bankinforeg/regzcg.htm>, which governs the disclosure of fees, and the requirement for periodic statements of credit etc. in conjunction with the requirements of the Americans with Disabilities Act (ADA), which prohibits discrimination against individuals with disabilities by businesses that serve the public.

Among other things, the ADA requires financial institutions, telecom service providers and other public service providers to provide auxiliary aids and services that are necessary for effective communication. In the case of blind and low vision individuals, this makes the written materials provided in alternate formats, such as braille, large print, audio recordings or accessible electronic formats such as e-text or accessible HTML mandatory for these businesses.

T-Base's PDF accessible services are compliant to accessibility standards.

[Section 508](#)

[PDF/UA International Standard \(ISO 14289\)](#)

[The Americans with Disabilities Act \(ADA\)](#)

[W3C WCAG 2.0 Accessibility Standards](#)

[Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#)



For those businesses that operate in Ontario, Canada – where most of the banks and telecom companies are headquartered - the Accessibility Standard for Information and Communications of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) legislation must be – and it too mandates that businesses and organizations make their information fully accessible for people with disabilities.

To be compliant with AODA, the ADA, and Reg Z, information **MUST** be seen by the recipient to be fully accessible (i.e. large print, not photocopy enlargement, braille if that is their preference, and fully accessible online formats to ensure inclusion) and **MUST** provide service at a level equivalent to those without a disability (full range of services, absolute privacy protection, timely delivery of information, etc.).

Case in Point

To help illuminate specifics, it is best to make reference to recent case law that most explicitly demonstrates how the US Department of Justice is applying the ADA laws in the financial services industry, and to specific guidance from the ADA that pertains to the banking sector: http://www.ada.gov/wells_fargo/ In this case, Wells Fargo was found to be offside by virtue of their initial refusal to replace a system that they had in place, and believed to be adequate or “good enough”, with an accommodation preferred by their deaf and hard of hearing customers. This was seen to be a failure to accommodate, and thus discriminatory. A choice to use Photocopy Enlargement, rather than designed large print (which is clearly preferred by the low vision community) could easily be seen in this light. Title III of the ADA is specifically interpreted, in this DOJ judgment, to require that financial institutions accommodate blind and low vision customers with a full range of alternate formats including braille, large print and audio – formats that they find maximally accessible, and that they therefore prefer.



Telecommunications

In addition to over-arching legislation and standards, such as the Canadian Human Rights Act and the Canadian Charter of Rights and Freedoms, Title III of the Americans with Disabilities Act (ADA), WCAG 2.0 and Section 508, there are other telecommunication regulations that require accessibility of information and communication to customers.

Under the Broadcasting and Telecommunications Regulatory Policy, (CRTC 2009-430), telecommunications service providers in Canada must promote information on all of their disability-specific services and products, in the accessible manner(s) of their choice; incorporate an easy-to-find home page link to the special needs/disability sections of their websites, and make their general call centres accessible by training their customer service representatives in handling enquiries and familiarizing themselves with the service providers' products and services for persons with disabilities.

In addition, The CTRC Wireless Code establishes standards that all wireless service providers must follow. Under section B, Contracts and related documents -1. Postpaid service contracts: A service provider must give the customer a permanent copy of the contract and related documents at no charge. Part iii of that section, "A service provider must provide a customer with a copy of the contract in an alternative format for people with disabilities upon request, at no charge, at any time during the commitment period."

AccessOne provides a superior level of customer support.

Not only do blind, low vision and print-disabled customers have equal access to online option, your customer service representatives do too.

This unique accessible format, simplified with one single statement type, is a great fit with current architecture (based on Industry Standard ISO14289).

Because your call centers have access to the format, they can view documents and statements with your customers in real time – ensuring your customers and your support teams are always on the same page.



In the United States, Section 255 of the Telecommunications Act of 1996 requires manufacturers of telecommunications equipment and providers of telecommunications services to ensure that such equipment and services are accessible to persons with disabilities. This requirement extends to the provision of important information about call and usage plans, contracts, and of course monthly bills and statements, all of which must be offered to consumers in a range of accessible information formats, including both paper based and online options.

Government

Section 504 of the Rehabilitation Act of 1973 is a national law that protects qualified individuals from discrimination based on their disability. The non-discrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. U.S. Section 504 prohibits organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. It defines the rights of individuals with disabilities to participate in, and have access to, program benefits and services.

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Because there is no software to install and maintain, AccessOne is the easiest solution to implement for online presentment. It is one of the many output format options in our secure alternate formate document transformation service.

T-Base securely downloads customer files via mechanisms already in place for all of our telecom, financial and government customers, accepting the wide range of input file types (i.e. PDF, AFP, XML)

AccessOne is generated by T-Base proprietary transformation software, alongside other formats and returned via secure transfer to be presented on the customer’s website or portal.

Case in Point

<http://dredf.org/SSA/SSA-Judgment-10-20-09.pdf> On October 20, 2009, Judge William Alsup of the US District Court, Northern District of California in San Francisco, granted final judgment in favor of the Plaintiff classes under Section 504 of the Rehabilitation Act of 1973 (Section 504). The Court ruled that by April 15, 2010, the Social Security Administration (SSA) must provide blind and visually impaired SSI recipients, retirement benefits recipients and representative payees a choice of receiving notices and other communications in the alternative formats of Braille, navigable

Microsoft Word CDs, or a telephone call from an SSA representative.

The agency is also required to take steps to notify class members of these alternative format options, as well as class members right under Section 504 to request any other alternative format in accordance with procedures set forth under regulations enacted under Section 504. Again, as in the cases above – the message is clear. Offer your customers, students and citizens a range of accessibility options and you will maximize their satisfaction, save money, and reduce risk.

About T-Base Communications

For over 20 years, T-Base has been helping financial, telecommunication, healthcare, educational and government institutions communicate effectively with those who cannot access information in conventional print or online formats, while at the same time ensuring full compliance with all applicable accessibility legislation. T-Base specializes in secure processing services to transform statements, documents and textbooks into alternate formats such as braille, large print, e-Text, and audio as well as online with web accessibility and our market leading AccessOne accessible PDF.

We are North America's leading full-service provider of accessible communications solutions to large enterprise and government customers, helping them communicate securely with their blind, low vision and print disabled customers through all touch points, all access methods, and in all formats. We are dedicated to provide superior customer service either directly or via our statement provider partners, ensuring that our customers maintain full compliance with all legislative requirements, save money, and reduce corporate risk.

To request a demo of AccessOne contact us at 1-800-563-0668 or via email info@tbase.com.
To learn more about T-Base, visit www.tbase.com