

## FORMATO PARA PARTICIPAR EN LA CONSULTA PÚBLICA

Instrucciones para su llenado y participación:

- I. Las opiniones, comentarios y propuestas deberán ser remitidas a la siguiente dirección de correo electrónico: [lineamientos.accesibilidad@ift.org.mx](mailto:lineamientos.accesibilidad@ift.org.mx).
- II. Proporcione su nombre completo, razón social o denominación social, o bien, el nombre completo del representante legal. Para este último caso, deberá elegir la opción de documento con la que se acredita dicha representación, así como adjuntar –a la misma dirección de correo electrónico- copia electrónica legible de tal documento.
- III. Elija la opción acorde con su consentimiento para que el IFT divulgue sus datos personales contenidos en el presente formato, así como lo relacionado con las opiniones, comentarios y propuestas que le sean remitidas.
- IV. Lea minuciosamente el Aviso.
- V. Vierta sus comentarios al Anteproyecto, ordenados por Lineamiento, fracción, inciso, párrafo o artículo transitorio.
- VI. De contar con observaciones generales o alguna aportación adicional proporciónelos en el último recuadro.
- VII. Recuerde adjuntar –a su correo electrónico- la documentación que considere conveniente.
- VIII. El período de consulta pública será del 14 de agosto al 25 de septiembre de 2015. Una vez concluido se podrá continuar visualizando los comentarios vertidos, así como los documentos adjuntos en la siguiente dirección electrónica: [www.ift.org.mx](http://www.ift.org.mx).
- IX. Para cualquier duda o comentario sobre la presente consulta pública, favor de contactar a: Lic. Ileana Gisela San Juan Rivera, Directora de Información y Accesibilidad del IFT, a través de los siguientes datos: [gisela.sanjuan@ift.org.mx](mailto:gisela.sanjuan@ift.org.mx), teléfono 55 5015-4000, extensión: 4736.

<b>I. Datos del participante</b>	
<b>Nombre, razón social o denominación social:</b>	
<b>En su caso, nombre del representante legal:</b>	
<b>Documento para la acreditación de la representación:</b> (En caso de contar con representante legal, adjuntar copia digitalizada del documento que acredite dicha representación, vía correo electrónico).	
En términos de lo dispuesto en el artículo 21 de la Ley Federal de Transparencia y Acceso a la Información Pública Gubernamental, y los artículos 68, último párrafo y 120 de la Ley General de Transparencia y Acceso a la Información Pública, doy mi consentimiento expreso al Instituto Federal de Telecomunicaciones (IFT) para la divulgación de mis datos personales contenidos en el presente formato.	
<b>AVISO IMPORTANTE</b>	
Los comentarios, opiniones y aportaciones presentadas durante la vigencia de la presente consulta pública, serán divulgados íntegramente en el portal electrónico del IFT y en ese sentido, serán considerados invariablemente públicos. En caso de que los comentarios, opiniones y aportaciones contengan información que pueda ser considerada como confidencial o reservada, se entenderá que, quien participa en este ejercicio, otorga su consentimiento expreso para la difusión de la misma, cuando menos en el portal del IFT. Ello, toda vez que la naturaleza de las consultas públicas consiste en transparentar el proceso de elaboración de nuevas regulaciones, así como generar un espacio de intercambio de información, opiniones y puntos de vista sobre un anteproyecto regulatorio o situación específica que este órgano constitucional autónomo somete a la consideración del escrutinio público, en términos de lo dispuesto por la fracción I del artículo 120 de la Ley General de Transparencia y Acceso a la Información Pública.	

II. Comentarios y aportaciones específicas del participante		
Por estructura del anteproyecto regulatorio		
Artículo	Fracción, inciso o párrafo	Comentario y aportaciones
34		<p>We believe that the IFT is taking the right step by requiring that the standard to be applied for this policy be WCAG 2.0. We recommend that the policy also reference the international version of the standard (ISO/IEC 40500:2012) and specifically reference that the policy will follow any of the standards subsequent revisions. We agree with the IFT step to target the AA level of ISO/IEC 40500:2012. The standard itself does not recommended that Level AAA conformance be required as a general policy for an entire site because it is not possible to satisfy all Level AAA success criteria for some content. We recommend that the IFT consider the following additional steps to strengthen the web accessibility aspects of this policy.</p> <p>Consult with persons with disabilities on the further development and refinement of this web accessibility policy;</p> <p>Require carriers to consider user needs as part of implementing their web Accessibility strategies.</p> <p>Ensure that persons with disabilities and organizations of persons with disabilities are made aware of this policy and of the accessible carrier websites;</p> <p>Require that carriers update their procurement policies to ensure all website development service contracts require accessibility;</p> <p>Provide training to web developers on web accessibility;</p> <p>Provide guidance on accessibility testing tools and procedures.</p> <p>Consider requirements for what to do with archived websites.</p>

		<p>Include a specific focus on electronic documents available on carrier websites. Ensuring that electronic documents available on carrier websites are accessible is critical to ensuring that persons with disabilities can access on an equal basis with others. This includes all public information available in electronic documents or any fill-in form required to complete administrative processes. We recommend each carrier must be required to define a process as part of a larger transition plan to ensure that all new documents be created with commonly used office productivity tools described and be accessible at least 12 months following the publication of this policy. Furthermore carriers should be required to check the accessibility of current electronic documents used by the public in the normal course of their interaction with their websites and re-edit them in an accessible format as needed no later than 24 months after the publication of this policy.</p> <p>Carriers should be required to develop their own plans for monitoring and evaluation and a plan for periodic review – due to fast moving technology requirements.</p>
35		<p>The approach taken by this proposed IFT policy correctly applies the current version of the most authoritative international standard, ISO/IEC 40500:2012, and so will avoid "regulatory lag" as well as potential problems for industry and consumers that would result if the IFT were to reference any other distinctive, non-harmonized requirements for web Accessibility.</p>





legacy web content and website architectures as well as their capacity to implement their transition plans

- All carrier web sites and webpages created later than [12 months] after the date of publication of this policy should meet ISO/IEC 40500:2012 Level A compliance.
- The timeline for level A compliance for all public sector web sites shall not exceed [two years] from the publication of the policy.
- The timeline for level AA compliance shall not exceed [four years] from the publication of the policy.

Another example of the phased implementation of a new web accessibility policy can be found in Australia. The execution of a public sector web accessibility policy there comprised three phases (preparation, transition, and implementation) that extended from July 2010 to December 2014.

For additional information on web Accessibility policies, procurement policies, and mobile Accessibility policies, we recommend the compendium of model Accessibility policies developed by G3ict in partnership with the International Telecommunication Union (ITU). [http://g3ict.org/press/press\\_releases/press\\_release/p/id\\_82](http://g3ict.org/press/press_releases/press_release/p/id_82)

G3ict Commends IFT for its leadership on accessibility and digital inclusion policies and programs. We would like to recommend the implementation of an internal IFT accessible technology procurement policy as an additional step that could help IFT continue to extend its leadership on these issues.

We know over the last decade, public procurement processes have gained increased attention as an effective policy tool to promote the accessibility of ICT equipment, software, applications, and services purchased by governments or government-funded programs. These public procurement policies have the added benefit of significant ripple effects into the mainstream consumer ICT market. Today's global interest in the positive effect of public procurement is largely the result of policy activity in two geographies; Section 508 of the Rehabilitation Act in the United States (governing the Federal government purchase of accessible electronic and information technology) and EN 301 549 in the European Union (the new accessibility standard developed to support the public procurement of ICT products and services in all member state countries). It would be encouraging for IFT to consider a similar procurement policy.

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<b>Nota:</b> Favor de añadir cuantas filas se consideren necesarias.
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