The Global Accessibility Reporting Initiative (GARI):

Device compliance under the EAA and accessible information

9 April 2024
The Mobile & Wireless Forum (MWF)

The international association of companies with an interest in mobile and wireless communications including the evolution to 5G and the Internet of Things.
Find Accessible Devices & Apps

Learn about Mobile Accessibility

We help consumers to find a device with the accessibility features that work best for them.

What do you want to find?

Phones
Narrow down and compare options from different manufacturers.

Tablets
Compare the accessibility features you need.

Mobile Apps
Which devices support the accessibility apps you love?

Connected Wearables
Compare options from different manufacturers.

Smart TV
Compare the features from different manufacturers.
Accessibility regulations around the world

- **Australia**
  - C625:2020 requires manufacturers to provide accessibility information on a device – and provision via GARI is accepted for compliance purposes

- **Latin America**
  - GARI reports required by network operators
  - GARI underpins Mexican regulator IFT’s accessibility website

- **North America**
  - GARI reports required by network operators
  - GARI underpins the FCC’s Accessibility Clearinghouse

- **Europe**
  - pending implementation of the EAA with strong information obligations to consumers about accessibility features
  - several of the features listed in GARI relate to requirements under the Audiovisual Media Services Directive (AVMSD)
Device compliance under the EAA

The Directive applies i.a. to the following products placed on the market after 28 June 2025:

- consumer terminal equipment with interactive computing capability, used for electronic communications services;
- consumer terminal equipment with interactive computing capability, used for accessing audiovisual media services;

Accessibility requirements are laid out in Annex I, with non-binding examples in Annex II.

But,
- details on implementation of some requirements missing
- harmonised standards delayed
- product life-cycle 18 months!
Open questions

- Where are the gaps in EN 301 549?
  - Requirements on the provision of information
    - the information on the use of the product provided on the product itself (labelling, instructions and warning)
    - the instructions for use of a product, where not provided on the product itself but made available through the use of the product or through other means such as a website, including the accessibility functions of the product, how to activate them and their interoperability with assistive solutions shall be publicly available when the product is placed on the market
  - Real-time text (RTT) and Total conversation (TC)
  - shall avoid interferences with assistive devices
An interim solution

Section 1: General accessibility requirements related to all products covered by this directive in accordance with Article 2 (1)

Products must be designed and produced in such a way as to maximise their foreseeable use by persons with disabilities and shall be accompanied where possible in or on the product by accessible information on their functioning and on their accessibility features.

<table>
<thead>
<tr>
<th>Annex 1 EAA</th>
<th>EN 301 549 v3.2.1</th>
<th>Related GARI feature</th>
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<tbody>
<tr>
<td><strong>1. Requirements on the provision of information:</strong></td>
<td><strong>EN 301 549 Features:</strong> 12.1.1 Accessibility and compatibility features</td>
<td>Related GARI feature: Link to GARI profile of the device and to the GARI feature videos and resource page</td>
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</table>
| (a) the information on the use of the product provided on the product itself (labelling, instructions and warning) shall be: | not covered | Example link to Motorola RAZR 4G: https://www.gari.info/findphones-detail.cfm?productid=8772&iframelm=
| (i) made available via more than one sensory channel; | not covered | Link to GARI feature videos: https://www.youtube.com/channel/UCwTMEEqvWD3BWx2tmxYG0UA?ciid=1 |
| | | Related GARI feature: |
| | | • Alternative Format User Manual; |
| | | • Link to electronic user manual; |
| | | ➔ if web document, satisfying WCAG 2.1 Level AA; if not web document, satisfying clause 10 and 11 of EN; |
Accessible information

GARI Feature Guide

Which features can help you better see, hear, speak, understand or use the device?

Accessibility features are designed to support you to better fulfill the actions you want to carry out. While many features can help in different situations, there are also specific features that can help you better see, hear, speak, understand, or just operate the device.
Invitation for open exchange

• The aim:
  – ensure the accessibility of products and services for consumers
  – provide accessible information on accessibility features

• Current status:
  – details on the implementation of some of the accessibility requirements missing

• Our goal:
  – agree on a practical way for device compliance until the harmonised standards are in place
  – accept GARI reports as interim solution
Thank you!

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