Thomas Smith - Questions re: Section 508 compliance (new Guidance Document)

6/28/07
72 FR 35521
(2)

From: David Austin <david.a.austin@snet.net>
To: "Thomas E. Smith" <tes@nrc.gov>
Date: 07/04/2007 11:30:07 PM
Subject: Questions re: Section 508 compliance (new Guidance Document)

Mr. Smith,
I am forwarding to you some questions that come to mind now that electronic submittals
of PDF files to the NRC are required to be in compliance with Section 508.
The first 14 are:
Q1.
Does Section 508 compliance apply to all three of the acceptable
PDF output file types?
These being:
#1 PDF Formatted Text and Graphics (formerly known as PDF Normal)
#2 PDF Searchable Image (Exact) (formerly known as PDF Original Image with Hidden Text)
#3 PDF Image Only
Q2.
What specific Section 508 Subparts and sections are applicable?
Q3.
Has the NRC performed the requisite "back-fit" to its WP authoring files?
If yes, will the NRC share its "lessons learned"?
Q4.
Has the NRC analyzed the Section 508 requirement in context of "Back-Fit"?
While not an "engineering" issue there will, nevertheless, be a significant
"Back-Fit" impact on submitters.
Q5.
What guidance does the NRC have on providing an "AltText" to PDF Image Only files?
Q6.
As any given PDF Image Only "page" will be made up of multiple "images" (in context of a screen
reader) must *all* be provide with an "AltText" description?
Q7.
The NRC alludes to "tools and plug-ins"...
Has the NRC used these?
Which ones?
How effective are they?
(in context of MS Word, Corel WP, Adobe FrameMaker, Adobe Acrobat, etc.)
Q8.
Is the language specification really needed? After all, most, if not all, submitters are USA based
and the de facto language is US English.

SUNSE Review Complete
Template = ADM-013

E-RIDs = ADM-03
Add = T. Smith (TES)

Q9.

What guidance does the NRC have for processing existing PDF Searchable Image (Exact) files for Section 508 compliance?

Q10.

What is the NRC's position on legacy PDF Image Only and PDF Searchable Image (Exact)? Note that these files, typically, do not change through the years.

Q11.

Adobe's accessibility function provides a "Recognition Report" for analyzed PDFs
Some report content is significant in context of PDF Image Only and PDF Searchable Image (Exact) output files.
- "Add Tags" uses general rules... (they) may not produce the desired result.."
~Q: What, specifically, are the NRC's "desired result"?
- The report identifies that AltText descriptions must be added manually, to each image.
- Several "images" will reside on each page of the PDF file.
- "TouchUp Reading Order" requires manual back-fitting for all files.
In sum, significant, manual "back-fit" of the two PDF output file types will be required.

Q12.

PDF Searchable Image (Exact) output files are, as noted by the NRC, are scanned images of text. A screen reader would be rendering, to speech, the OCR'd text. A visual comparison of OCR'd text and the actual text, via hard copy immediately exposes the problem. However, the global Section 508 compliance requirement in the new, combined guidance document would require the manual incorporation of paragraph tagging to non-speech renderable text.
What is the NRC's position on this?

Q13.

Regarding "language specification": Which is acceptable for submittal PDFs to the NRC; English or English US?

Q14.

Current technology and guidance (from the Adobe Users Community) identify that "For the moment, it is up to the document author or manager to ensure that the file is validated for the intended usage or for the standards it must meet." (Duff Johnson, CEO, Document Solutions, Inc.)
In context of this... what, specifically, are the NRC "standards" for each of the three acceptable PDF file output file types?

Adobe Certified Expert - FrameMaker

Mail Envelope Properties   (468C65B8.D80 : 2 : 7552)

Subject:	Questions re: Section 508 compliance (new Guidance Document)
Creation Date	Wed, Jul 4, 2007 11:29 PM
From:	David Austin <david.a.austin@snet.net>

Created By: david.a.austin@snet.net

Recipients
nrc.gov
  TWGWPO02.HQGWDO01
    TES (Thomas Smith)

Post Office	**Route**
TWGWPO02.HQGWDO01	nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	3457	Wednesday, July 4, 2007 11:29 PM
TEXT.htm	3838	
Mime.822	9188	

Options
Expiration Date:	None
Priority:	Standard
ReplyRequested:	No
Return Notification:	None
Concealed Subject:	No
Security:	Standard

Junk Mail Handling Evaluation Results
Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered
Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled