



May 28, 2015

Office of Technical and Information
Services, Access Board
1331 F Street NW., Suite 1000
Washington, DC 20004-1111

RE: Docket No. ATBCB-2015-0002

Dear Docket Clerk:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the Architectural and Transportation Barriers Compliance Board (ATBCB) request for comments on the notice of proposed rulemaking (NPRM) on Information and Communication Technology (ICT) Standards and Guidelines Revised Guidance on the Environmental Review Process, published on February 27, 2015 at 80 FR 10880.

About APTA

APTA is a non-profit international trade association of more than 1,500 public and private member organizations, including public transit systems; high-speed intercity passenger rail agencies; planning, design, construction and finance firms; product and service providers; academic institutions; and state associations and departments of transportation. More than ninety percent of Americans who use public transportation are served by APTA member transit systems.

General Comments

APTA fully supports improvements to the accessibility of information for both our riders and employees with disabilities. Our members continuously strive to improve that accessibility whether required by law and regulation or not. We have reviewed the Access Board's draft requirements and guidance and offer the following comments and questions to assist the Board in finalizing the draft.

Our members, as non-Federal agencies, would typically be subject to the draft as guidance. We would find it helpful if the Board could assist in setting priorities for non-Federal actors. As a general rule, we recommend that prospective application be prioritized over historical application and that public-facing documents be prioritized over internal documents. Additionally, we believe the Board should discuss application to third party documents uploaded to an agency's internet pages.

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While we recognize the Board has limited resources, we believe it appropriate for the Board to provide training on the final guidance to technical personnel of public agencies. By providing this training directly to agencies, we believe those agencies would be more able to complete upgrades internally and thus bring their internet sites into compliance in a more expeditious manner.

One aspect of technical guidance we have identified is related to internet video. When would audio descriptions of video be necessary? Would text-only versions of the content be compliant? Are other alternatives available that could provide the necessary content to persons with disabilities without delay and in an economic manner?

We look forward to working with the Board in this and other matters to provide the best possible access for our riders and employees with disabilities. For additional information, please contact James LaRusch, APTA's chief counsel and vice president corporate affairs, at (202) 496-4808 or jlarsch@apta.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael P. Melaniphy". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael P. Melaniphy
President & CEO

MPM/jpl:jr