Statement on overlays and the Classification of Eye-Able

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Introduction and overview

In response to the assessment of the DBSV (https://www.dbsv.org/accessibility-overlays.html) and other bodies, this statement is intended to classify Eye-Able in this regard. In particular, it is intended to show that Eye-Able is not a "classic" overlay, but pursues a sustainable and holistic approach to greater accessibility on the Internet.

Eye-Able comprises a wide range of products and software modules that help to analyze and improve the accessibility of websites in various ways. The most important thing about our approach to overlays is that Eye-Able is much more than just the assistive technology (Assist). Eye-Able primarily sells other modules, such as an automated inspection software called Eye-Able Audit and Report. None of the Eye-Able solutions promise or enable automatic implementation of the technical standards (EN 301549 or WCAG 2.2).

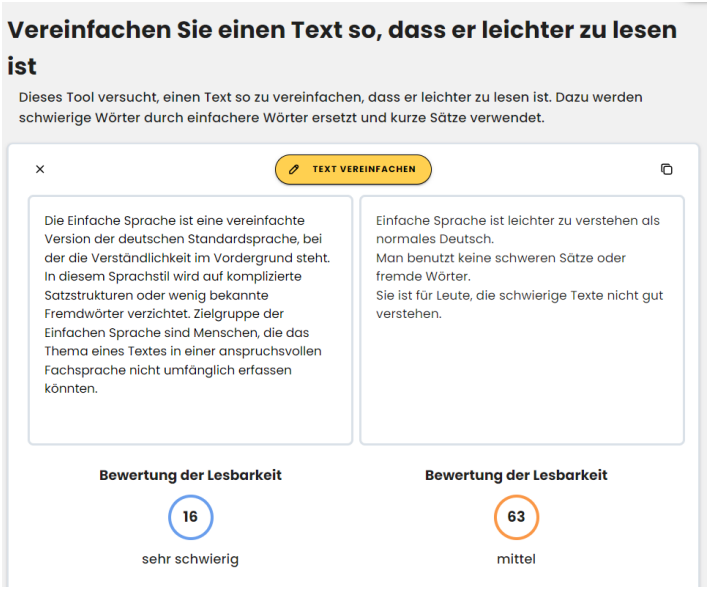
In this respect, we fully agree with the DBSV's statement. Digital accessibility cannot be installed. Accessibility is a process, but there are tools that can support this process. Ultimately, however, accessibility should always be improved by and for people. An important part of Eye-Able is therefore our testing team, which consists of a high proportion (60%) of people with disabilities.

Eye-Able currently consists of the following modules:

- **Audit and Report:** An automatic WCAG audit software that detects errors in the code of websites and gives the user tips for improvement. The entire domain and all subpages are scanned at regular intervals.
- **Assist:** A visual assistance software for websites and as an extension for the browser. Translate: A translation function for the website into any language, such as English, French, ...

- **Plain language:** A translation function for texts in simple language. The module facilitates the creation of content in simple language. The translations can be corrected manually.
- **Service:** Deployment of our team of experts and IAAP-certified testers, many of whom live with a disability themselves. The service includes manual testing of websites against the WCAG, workshops, creation of accessibility statements and advice.

Example view of the Eye-Able Audit Toolbar with 95 errors found with regard to WCAG 2.2



Example of simplifying a text with Eye-Able

The Eye-Able Assist visual assistance software

The assistance technology Eye-Able Assist is the result of a research project in close cooperation with the Berufsförderungswerk Würzburg and the Blindeninstitutsstiftung. The aim is to provide people without their own assistance software with easily accessible help functions on the Internet. The functions include the most important adaptations that emerged from numerous interviews, such as enlarging the font and control elements, various contrast modes, blue filters, read-aloud function, color attenuation filters or functions for reducing page content (e.g. images or animations).

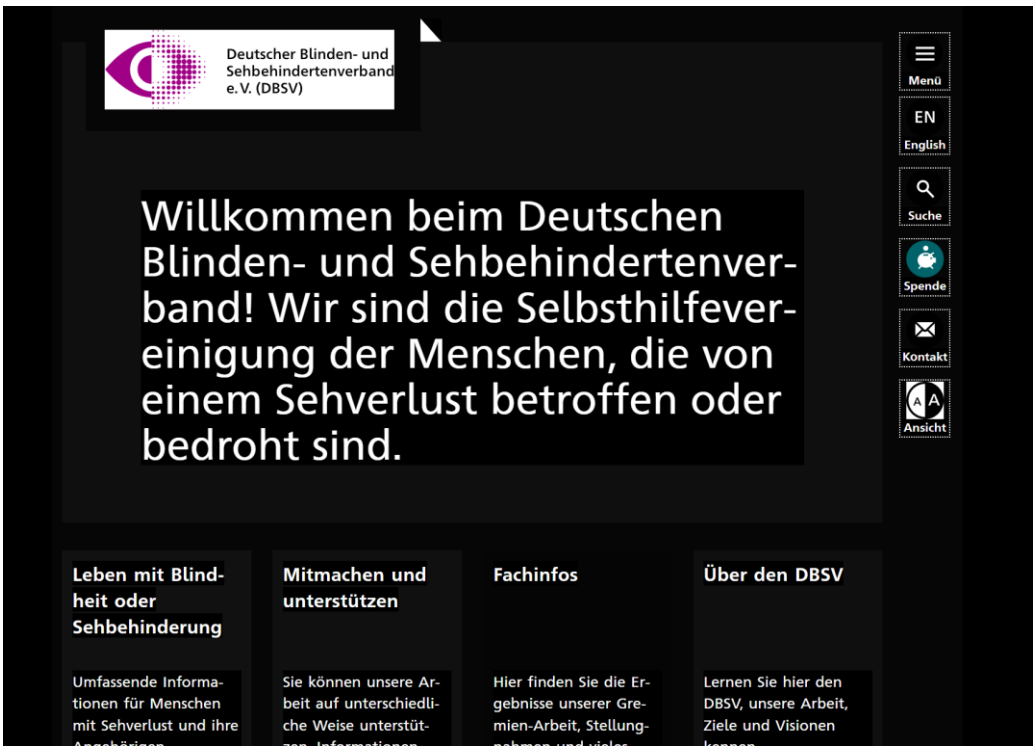
One of the triggers for the development of Eye-Able Assist was that it became apparent that the existing functions in the operating system or browser were still insufficient or incomprehensible for many people. Assist, which can be installed as a website plugin or directly in the browser as an extension, is intended to provide easy access. The software is not aimed at blind people or users of screen readers, but at users without their own assistance software. Tests have ruled out any negative influence of Assist on screen readers.

For example, the DBSV website also offers users an alternative view with different contrasting colors and a read-aloud function (https://www.dbsv.org/ansicht.html).

Eye-Able Assist aims to provide the same added value with additional functions in a simple way on any website. Another important principle is that every installation of Assist is manually adapted to the page and optimized. This solves that are often related to the contrast function of the operating system or

problems browser functions. Below is an example of the difference between the Windows contrast and the contrast with Eye-Able Assist:

Contrast view of the DBSV start page with the Windows contrast mode



Contrast view of the DBSV start page with Eye-Able Assist.

The main benefit lies in the expansion of an already accessible website to include certain WCAG AAA requirements and beyond. We also agree with the conclusion of the BFIT Bund's assessment:

„Overlay tools can improve existing accessibility, for example by fulfilling additional criteria of conformance level AAA of the WCAG."

(as of 22.05.2024 https://www.bfit-bund.de/DE/Publikation/einschaetzung-overlaytools.html)

Accordingly, we consider the DBSV's general conditions for use to be correct and important. Eye-Able Assist therefore implements the following points:

- Every major update is tested externally for BITV conformity. The latest test report can be found at the following link. A new test report is planned for the end of 2025. https://webinclusioneyeable.sharepoint.com/:b:/s/WebInclusionGmbH/EedLJdYixrhOqBZNEexEUvkB21ztAjNLAIbgm20AGiDbww?e=UghegS
- The software itself is used and tested daily by people with disabilities to rule out any influence on other assistance technologies such as screen readers. Regular testing is carried out with JAWS. NVDA, VoiceOver, Dragon, SuperNova, ZoomText and Windows functions such as the Narrator screen reader integrated in Windows. Assist is already active on several thousand websites and we have not received any negative feedback. This also includes the websites of the Institute for the Blind (https://www.blindeninstitut.de/de/startseite/) and the BFW Würzburg (https://www.bfw-wuerzburg.de/). Eye Able itself employs several people with visual impairments who have become active and independent employees thanks to the software.
- Existing keyboard shortcuts or keyboard commands on websites are automatically recognized and not overwritten. In general, there is no known conflict with existing keyboard shortcuts of other assistance software.
- Eye-Able Assist was developed with people with disabilities. This is reflected in the high-contrast color design, the keyboard and screen reader operability and the general structure. All functions are easy to perceive and operate.
- Eye-Able Assist does not attempt to automatically correct errors in the page code, such as missing labels on images/control elements or the structure. The way to correct these errors is via semi-automatic detection with audit and report in combination with manual test and supported manual correction.

- Assist does not collect any user data and can be fully integrated locally on the servers of the websites. No connections to external servers are established. When integrated via Eye-Able's own servers, all data flows remain within the EU. All integration options have been checked for GDPR compliance.

Conclusion

Eye-Able is much more than the visual assistance software Assist and includes automatic testing software (Audit & Report), translation functions, support for the creation of texts in simple language and manual tests with advice. Eye-Able Assist is intended as an extension of a website to provide added value for people without their own assistance software, but does not aim to make it EN 301 549 or WCAG compliant. We firmly believe that accessibility cannot be installed automatically and advise our customers accordingly. Software such as the Eye-Able modules are a great help in removing barriers and improving accessibility. Especially for website operators who are not experts in the field of accessibility themselves.