



OFFICE OF INSPECTOR GENERAL

MEMORANDUM

DATE: March 7, 2003

TO: Chairman

FROM: Inspector General

SUBJECT: Report on the Follow-up Special Review of Web Page Accessibility

The Office of Inspector General (OIG) has completed a Follow-up Special Review of Web Page Accessibility. A copy of our report, No. 02-AUD-02-05, and entitled "Report on Follow-Up Special Review of Web Accessibility" is attached.

The objective of this review was to determine how effective the Federal Communications Commission (FCC) has been in providing access by the disabled to its Internet web sites. We accomplished this in three ways by: (1) re-examining the FCC web accessibility program; (2) determining whether management corrected the deficiencies reported in the OIG's report entitled "Special Review of Web Page Accessibility," dated January 19, 2001; and (3) reviewing other Commission web sites to evaluate accessibility.

In our opinion, the Commission has a proactive and effective web accessibility program supported by the Disabilities Rights Office (DRO) within the Consumer and Governmental Affairs Bureau (CGB), the Office of Media Relations (OMR), and the Information Technology Center (ITC) within the Office of Managing Director (OMD).

During the review, the International Bureau (IB) asked us to expand the scope of the audit to include an accessibility review of the web pages International Bureau Application Filing and Reporting System (IBFS). At the Bureau's request, we reviewed sixty two (62) unique IBFS web pages for accessibility issues. Of these sixty two (62) web pages, sixty one (61) had accessibility problems. To address these accessibility issues, we recommend IBFS be redesigned to comply with Federal accessibility standards.

In a response dated February 14, 2003, the Office of Managing Director (OMD) and the Chief, International Bureau (IB) indicated concurrence with the review finding and recommendation. OMD and IB outlined the corrective action taken and provided a milestone schedule for implementation of corrective action. We have included a copy of this response in its entirety as Appendix 4 to this report.

If you have any questions, please contact Thomas Bennett, Assistant Inspector General for Audits at (202) 418-0477.

A handwritten signature in black ink, appearing to read "Walker", with a long horizontal flourish extending to the right.

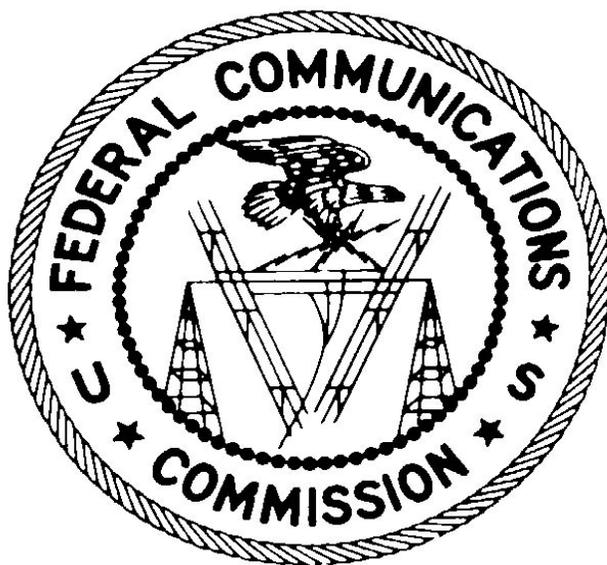
H. Walker Feaster III

Attachment

cc: Chief of Staff
Managing Director
Chief, International Bureau
Chief, Consumer and Governmental Affairs Bureau
Chief, Wireless Telecommunications Bureau
Director, Office of Media Relations
Chief Information Officer
AMD – PERM

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF INSPECTOR GENERAL



Report on Follow-Up Special Review of Web Page Accessibility

Audit Report No. 02-AUD-02-05

March 7, 2003

Follow-up on the Special Review of Web Page Accessibility

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EXECUTIVE SUMMARY

One of the major initiatives of the Federal Communications Commission (FCC) is Universal Access. Among its goals are to increase access to advanced telecommunications services throughout the Nation and advance the availability of such services to all. This includes accessibility to the FCC's web pages.

The objective of this follow-up special review of web page accessibility was to determine how effective the FCC has been in providing access by the disabled to its Internet web sites. We accomplished this objective in three ways by (1) re-examining the FCC web accessibility program; (2) determining whether management corrected the deficiencies reported in the OIG's, report entitled "Special Review of Web Page Accessibility," dated, January 19, 2001; and (3) reviewing other Commission web sites to evaluate accessibility.

Web accessibility refers to the ability of individuals with disabilities to have access to and use of information and data that is comparable to the access to and use of information by those without disabilities. In 1998, Congress amended the Rehabilitation Act of 1973 to strengthen provisions covering access to information in the Federal sector for people with disabilities. The amendment, Section 508 of the Rehabilitation Act, requires that all federal agencies ensure that electronic and information technology is accessible to employees and the public. The Section 508 regulations were published on December 21, 2000.

Web accessibility is a part of the Commission's Disability Issues Major Initiative. A Major Initiative is an item that the Commission considers critical. An item is classified as a Major Initiative because of the politics involved, a complicated regulatory history, or its affect on a potentially large number of people. The FCC has included the Disabilities Rights Office, including web accessibility, as a Major Initiative because the FCC has an obligation to ensure that telecommunications are accessible and usable to the 54 million Americans with disabilities.

In the original review, we found that thirty-one (31) Commission web pages had some accessibility problems. During this review, we have determined that, of the original thirty-one web pages, identified by Uniform Resource Locators, (URLs), none had accessibility problems. We then examined the home pages of selected Bureaus and Offices. None of these other websites we examined had accessibility issues.

During the review, the International Bureau (IB) asked us to expand the scope of the audit to include an accessibility review of the web pages International Bureau Application Filing and Reporting System (IBFS). To comply with IB's request, we reviewed sixty two (62) unique IBFS web pages for accessibility issues. Of these sixty two (62) URLs, sixty one (61) had accessibility problems, indicating that the entire IBFS application had significant accessibility problems. To address these significant accessibility issues, we have recommended IBFS be redesigned to comply with accessibility standards.

In a response dated February 14, 2003, the Office of Managing Director (OMD) and the Chief, International Bureau (IB) indicated concurrence with the finding and recommendation. OMD and IB outlined the corrective action taken and provided a milestone schedule for implementation of corrective action. We have included a copy of this response in its entirety as Appendix 4 to this report.

REVIEW OBJECTIVE

The objective of this review was to determine whether FCC web sites are accessible to disabled users. We sought to determine the extent that the Commission implemented the Section 508 standards as related to web accessibility.

To accomplish this objective, we performed the following steps. First we re-examined the FCC web accessibility program in order to determine whether management corrected the deficiencies reported in the OIG's, report entitled "Special Review of Web Page Accessibility," Report No. 00-AUD-10-55, and dated January 19, 2001. In that report, the OIG recommended that the Commission enhance its existing information systems and web accessibility program by:

1. Fixing the thirty one (31) identified accessibility problems in the Commission's web pages.
2. Integrating web accessibility into the Commission's Systems Development Life Cycle (SDLC).

To analyze the web sites with previously identified accessibility issues, we used a commonly used accessibility analysis tool called Bobby. Bobby is a web-based automated tool that analyzes web pages for their accessibility to people with disabilities.¹ Bobby was created to help Web page authors identify and repair significant barriers to access by individuals with disabilities. Bobby now has an option to analyze sites using the Section 508 Guidelines. Using Bobby, we were able to analyze FCC web pages to determine accessibility.

In addition to our follow-up work, we examined a selection of other Commission web sites with Bobby. The purpose of this examination was to determine if these sites had any accessibility issues. The sites reviewed included such Commission Web pages as the FCC Home Page, the Consumer and Governmental Bureau (CGB), the Office of Inspector General (OIG) home page, the FCC Intranet Home Page², and the Disability Rights Office (DRO) web page. No accessibility problems were found in the examination of these web pages.

1 The Bobby analysis tool was obtained from the Center for Applied Special Technology (CAST) on their web page located at <http://bobby.cast.org>.

2 The FCC Intranet Web site was not tested by Bobby. Instead, a text-only Web page was available as a substitute. As the Scope section of this report states, we considered text-only pages as acceptable alternatives.

REVIEW SCOPE

The scope of this audit was limited to web pages on the FCC's Internet and Intranet web sites. No sites using Secure Socket Layer (SSL) security technology were reviewed. SSL is a web security technology used to encrypt transmissions. In the FCC, web pages using SSL are commonly found on e-filing sites using a unique password. Bobby was unable to analyze sites using SSL for web accessibility.

Another scope issue included the use of text-only pages. If a web page provided a link to an alternative, text-only, page, we did not review the web page. We considered the text-only page an acceptable alternative method of providing access to Commission information on the Internet.

Our procedures were designed to comply with applicable auditing standards and guidelines. Specifically, our audit approach conforms to Generally Accepted Government Auditing Standards (GAGAS).

During the audit, the International Bureau (IB) asked us to expand the scope of the audit to include an accessibility review of the web pages International Bureau Application Filing and Reporting System (IBFS). IB wanted the OIG to determine if IBFS had accessibility problems that would prevent it from being utilized by disabled users. To comply with request of IB, we reviewed sixty one (61) unique IBFS web pages for accessibility issues.

The review was conducted at the Commission headquarters facility located at 445 12th Street, Southwest, Washington, DC. Fieldwork on this audit was conducted from January 25, 2002 through January 23, 2003.

BACKGROUND

The Commission's direction and efforts with regard to web accessibility are based on federal laws that require that agency's web pages be accessible to all. Federal web accessibility requirements originated from Section 508 of the Rehabilitation Act of 1973 (Section 508). In 1998, Congress amended the Rehabilitation Act and strengthened provisions covering access to information in the Federal sector for people with disabilities. Section 508 requires that the Federal government's electronic and information technology is accessible to employees and the public. The law applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology.

The scope of Section 508 is expansive. "Electronic and information technology" potentially includes any technology that is used in the "automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information."³ This broad definition potentially

3 40 U.S.C. §1401(3) (definition of "information technology").

includes all telecommunications devices (including telephones, voice-mail systems, pagers, facsimile machines, and related technology) and any technology used to convey, transmit, or receive any kind of information. Section 508 also includes the web sites of federal agencies. This amendment requires that all facets of information technology must be made accessible to persons with disabilities. Section 508 became effective the day it was enacted, August 7, 1998. Federal agencies are required to ensure that their electronic and information technology is accessible to persons with disabilities.

To clarify the regulations, the statute designated the Architectural and Transportation Barriers Compliance Board (Access Board) to develop standards for complying with Section 508. The Access Board issued its final regulations on December 21, 2000.

Section 508 imposes important duties on Federal agencies. The guidelines of the Access Board require Federal agencies to make their current information and electronic technologies accessible to employees with disabilities and members of the public with disabilities. Furthermore, Federal agencies must incorporate the needs of persons with disabilities when they make any changes to current information and electronic technologies.

Section 508 also includes remedies to insure compliance. This amendment permits any individual or government employee with a disability may file a complaint alleging that a Federal department or agency fails to comply with Section 508. If a Federal agency obtains electronic and information technology that does not comply with the standards developed by the Access Board, it is subject to administrative complaints and private lawsuits by employees and members of the public.

The private lawsuits allow for both private rights of action in court and for reasonable attorneys' fees. Although compensatory or punitive damages will not be available to prevailing plaintiffs, equitable remedies, such as declaratory and injunctive relief, are available.

OBSERVATIONS

This audit focused on two aspects of the FCC's web accessibility program. First, we re-examined the Commission's formal disability rights program, especially as it relates to web accessibility. Next, we tested a selection of FCC web pages to determine the extent that the Commission has met accessibility guidelines.

The objective of this follow-up review on web accessibility was to determine how effective the FCC has been in providing access by the disabled to its Internet web sites. We accomplished this in three ways by (1) re-examining the FCC web accessibility program; (2) determining whether management corrected the deficiencies reported in the OIG's, report entitled "Special Review of Web Page Accessibility," Report No. 00-AUD-10-55, and dated January 19, 2001; and (3) reviewing other Commission web sites to determine if they are accessible.

The FCC's Accessibility Program

The FCC has an active accessibility program. It is one of the Commission's Major Initiatives. The FCC has a dedicated office, the Disability Rights Office (DRO), which is part of Consumer & Governmental Affairs Bureau (CGB) that is dedicated to accessibility issues. CGB also has a web page dedicated solely to Section 508.

The Information Technology Center (ITC) also has a major role in Web accessibility. The ITC Customer Service Representative (CSR) for accessibility is the focal point for these issues. The ITC also plays a part in the determining that web sites comply with accessibility laws. The ITC performs the required accessibility assessments. In 1999, the ITC completed the FCC Web Site Accessibility Report, which we reviewed. This report met the Department of Justice (DOJ) Section 508 accessibility requirement. We reviewed this self-evaluation and found it satisfactory.

A third key participant in the Commission's accessibility program is the Office of Media Relations (OMR). The Webmaster is part of OMR and is responsible for the maintenance of those FCC Web pages that do not belong to an e-filing application.

The Commission has taken a number of positive steps since our last review to enhance its web accessibility program. The Commission purchased and developed the tools necessary to analyze web pages for accessibility problems. For example, the ITC purchased a Web accessibility analysis tool, PageScreamer, from Crunchy Technologies. This tool allows FCC developers to not only to test Web pages during development, but also to fix some of the problems, and allows developers to author code that will produce accessible pages.

A second major step was the development of a standardized FCC web page template. The template is used for most heavily accessed Commission web pages. Not only does the template provide a standardized web interface for the Commission, it reduces the likelihood that accessibility errors would occur because the template is used on all major FCC web pages. Its widespread use effectively minimizes the likelihood that accessibility problems will occur on these pages.

A third factor is the integration of accessibility into the Commission's SDLC. The Design Phase of the SDLC has a step that requires the developer to prepare design specifications to address federal laws and regulations. This step specifically uses accessibility as an example of the regulations to be addressed. This effectively requires developers and analysts to consider accessibility issues when designing a system.

Finally, the Commission has developed internal guidelines for FCC Web site accessibility. The first is a webpage accessibility design site. This Intranet web page provides Commission employees and contractors with resources on web accessibility. ITC also has an accessibility information plan on the FCC Intranet. This plan outlines how ITC will implement and follow Federal electronic and information technology standards.

Results of the Follow-up

The original report recommended that the Commission enhance its existing information systems and web accessibility program by:

1. Fixing the accessibility problems in the thirty one (31) Commission's web pages identified in the original special review.
- 2 Integrating web accessibility into the Commission's Systems Development Life Cycle.

We will discuss the status of these recommendations below.

Recommendation 1 of 2: Fixing Web Page Accessibility Problems.

The original report identified thirty one (31) FCC Internet web sites with accessibility problems. These web sites are listed in Appendix 1. To insure compliance, we decided to retest all thirty one (31) web pages using the Bobby tool for compliance with the Section 508 Federal Law. This tool, as previously described, is commonly used for accessibility testing.

Twenty (20) of the thirty-one (31) web pages had no accessibility problems. They had been repaired by either the Commission Webmaster or the application owner. They included all of the Bureau and Office home pages that had accessibility issues during our initial review. Eleven (11) of the thirty one (31) pages were no longer found at the original URL and, therefore, not tested. In general, the Commission appears to have taken action on the previously identified accessibility problems.

Again using Bobby, we also tested a selection of FCC Web pages that did not appear on as findings on the original report. Among the web sites we tested were the FCC's home page, Chairman Powell's home page, the home pages from most Bureaus and Offices, selected web pages from the Commission's Major Initiatives, and many of the FCC's public access pages. We chose pages that would provide us with a representative cross section of the FCC's Internet activity. None of the tested pages had accessibility issues.

This finding is closed. The disposition of the accessibility problems with the three web pages that had accessibility problems will be covered in the Recommendation section below.

Recommendation 2: Integrating Web Accessibility into the SDLC

As previously stated in the section describing the FCC's accessibility program, accessibility is a part of the Commission's SDLC. The Design Phase of the SDLC has a step that requires the developer to prepare design specifications to address federal laws and regulations. This step specifically uses accessibility as an example of the regulations

to be addressed. This requires developers and analysts to consider accessibility issues when designing a system.

This finding is closed.

Review of International Bureau Application Filing and Reporting System (IBFS)

During the audit, the International Bureau (IB) asked us to expand the scope of the audit to include an accessibility review of the web pages International Bureau Application Filing and Reporting System (IBFS). To comply with request of IB, we reviewed sixty one (61) unique IBFS web pages for accessibility issues.

We defined an accessibility issue as a Priority 1 accessibility error detected by Bobby. To analyze IBFS, we used the online version of the Bobby tool. A Priority 1 accessibility error is a problem that seriously affecting the page's usability by people with disabilities. Only sites with no Priority 1 accessibility errors can claim a Bobby Approved rating. A website with no Priority 1 errors meets the Bobby 508 Approved standard if the entire website conforms to both the automated and manual checks used by the Section 508 test within Bobby. Our review focused on Priority 1 accessibility errors that were automatically detectable by Bobby.

Of the sixty two (62) URLs tested, sixty one (61) had at least one accessibility issue. Appendix 2 lists these sites. One site, the IBFS home page, had no Priority 1 Bobby errors and had no accessibility issues. This information is listed in Appendix 3.

Only one (1) of the sixty two (62) IBFS URLs tested had no accessibility issues. This equates to less than or two (2) percent cent of all the sites tested. The low compliance rate leads us to conclude that the entire IBFS application has significant accessibility problems.

IBFS was Designed before Accessibility Requirements Existed

IBFS is a system that was developed before Section 508 became effective. IBFS was not designed to conform to the accessibility laws and was not designed with accessibility in mind. As an older legacy system, IBFS does not meet current Federal government accessibility requirements.

Failure to Comply with Accessibility Requirements Introduces the Risk of Legal Action

Section 508 also includes remedies to insure compliance. This amendment permits any individual or government employee with a disability may file a complaint alleging that a Federal department or agency fails to comply with Section 508. If a Federal agency obtains electronic and information technology that does not comply with the standards developed by the Access Board, it is subject to administrative complaints and private lawsuits by employees and members of the public.

The private lawsuits allow for both private rights of action in court and for reasonable attorneys' fees. Although compensatory or punitive damages will not be available to prevailing plaintiffs, equitable remedies, such as declaratory and injunctive relief, are available. To avoid a possible lawsuit, we recommend IBFS be redesigned to comply with accessibility standards.

Recommendation 1: Redesign IBFS to Comply with Accessibility Requirements

We recommend that the Commission enhance its existing information systems and web accessibility program redesigning the IBFS application to comply with accessibility standards. This includes fixing all the sixty one (61) web pages identified in Appendix 2.

If this recommendation cannot be immediately implemented, we request a milestone schedule be developed for the implementation of corrective action.

Management Response

In a response dated February 14, 2003, the Office of Managing Director (OMD) and the Chief, International Bureau (IB) indicated concurrence with the finding and recommendation. OMD and IB outlined the corrective action taken and provided a milestone schedule for implementation of corrective action. We have included a copy of this response in its entirety as Appendix 4 to this report.

We have also noted that the FFC Webmaster has repaired nineteen (19) of the sixty one (61) web pages that had accessibility issues. The repaired sites are marked as 'repaired' in the Comments section of Appendix 2. No additional action is necessary for these web pages.

Summary of Web Accessibility Original Findings

NO.	NAME OF WEB PAGE
1	International Bureau Filing System (IBFS) Login Screen
2	International Bureau Filing System (IBFS) Account Maintenance
3	Children's Educational Television Home Page
4	Office of Engineering and Technology (OET) Search Form
5	International Bureau Home Page
6	OLIA Home Page:
7	Office of General Counsel (OGC) Home Page
8	Commissioner Furchtgott-Roth's Home Page
9	2000 Regulatory Fees Home Page
10	Office of Plans and Policy (OPP) Home Page
11	Office of Managing Director (OMD) Home Page
12	Kennard Development Initiative Home Page
13	International Visitors Program
14	Index of Public Notices
15	Index of News Releases
16	Index of Orders
17	FCC Phonebook
18	FCC Topical Index
19	FCC Communications Commission Jobs Page
20	ARMIS Home Page
21	Children's Educational Television Home Page
22	Consumer Complaint Form for Telephone Related Issues
23	CDBS Public Access
24	MDS/ITFS Data Entry Page
25	Electronic Comment Filing System (ECFS) Alternative Link
26	Electronic Tariff Filing System (ETFS) Home Page
27	FCC Major Initiatives
28	FCC Resources
29	FCC Chairman Wm. Kennard Biography (text only)
30	FCC Chairman Wm. Kennard Column (text only)
31	ULS TIN/Call Sign Registration:

During our review, we found that sixty one (61) IBFS web pages had accessibility observations. For each accessibility observation, we have identified the specific web pages on which problems were identified. The identification includes a brief description (e.g., IBFS Home Page) and the specific URL (e.g., fcc.gov/bureau/).

All web sites were tested with the accessibility tool Bobby. All Bobby observations had at least one Priority 1 accessibility error. The marketers of Bobby, Watchfire, Inc., define Priority 1 accessibility errors as “problems that seriously affect the page's usability by people with disabilities. A Bobby Approved rating can only be granted to a site in which none of the pages have (Priority 1) accessibility errors.” If its Bobby classification is Priority 1, the web page fails the test. We only identified pages with Priority 1 errors.

<u>NO.</u>	<u>IBFS SITE TESTED</u>	<u>URL</u>	<u>COMMENTS</u>
1.	IB FCC ACCOUNTING RATE CURRENT AUTHORIZATION LISTING BY CARRIER REPORT WR019	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr019b.hts?column=ACCOUNTING_CHANGE_carrierC/CARRIER&fstate=1/CURRENT&prepare=.	
2.	IB FCC ACCOUNTING RATE AUTHORIZATION LISTING REPORT WR019	http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr019b.hts?set=.	
3.	IB FCC ACCOUNTING RATE PENDING AUTHORIZATION LISTING BY CARRIER REPORT WR019	http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr019b.hts?column=ACCOUNTING_CHANGE_carrierC/CARRIER&fstate=0/PENDING&prepare=.	
4.	IB FCC ACCOUNTING RATE PENDING AUTHORIZATION LISTING BY ADMINISTRATION REPORT WR019	http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr019b.hts?column=ACCOUNTING_CHANGE_administrationC/ADMINISTRATION&fstate=0/PENDING&prepare=.	
5.	FCC ACCOUNTING RATE CURRENT AUTHORIZATION LISTING BY ADMINISTRATION REPORT WR019	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr019b.hts?column=ACCOUNTING_CHANGE_administrationC/ADMINISTRATION&fstate=1/CURRENT&prepare=.	
6.	PAYMENT INSTRUCTIONS	http://svartifoss2.fcc.gov/prod/ib/forms/payment_instructions.htm	
7.	IB FCC SELECTED APPLICATION LISTING BY FILE NUMBER REPORT WR07	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr031b.hts?q_set=MAIN.file_numberC/File+Number/%3D/IPFLIC2000040300001&prepare=&column=MAIN.file_numberC/File+Number	
8.	IB FCC VSAT AUTHORIZATIONS LIST REPORT WR05	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr05b.hts?vsat=.	
9.	IB FCC LIST REPORT WR04	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr04b.hts?calls=.	
10.	IB FCC IPF CURRENT AUTHORIZATIONS LIST BY FILE NUMBER REPORT WR025	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr025b.hts?as_subsystem_code=IPF/IPF&column=MAIN.file_numberC/FILE+NUMBER&fstate=1/CURRENT&prepare=.	
11.	IB FCC IPF PENDING APPLICATION LIST BY FILE NUMBER REPORT WR024	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr024b.hts?as_subsystem_code=IPF/IPF&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=.	
12.	FCC AUTHORIZATIONS LIST REPORT WR014	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr014b.hts?as_subsystem_code=SAT&fstate=1&column=Callsign&set=.	

13. FCC AUTHORIZATIONS LIST REPORT WR013 http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr013b.hts?as_subsystem_code=SAT&fstate=1&column=File+Number&set=,
14. FCC AUTHORIZATIONS LIST REPORT WR012 http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr013b.hts?as_subsystem_code=SAT&fstate=1&column=File+Number&set=,
15. FCC AUTHORIZATIONS LIST REPORT WR08 http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr08b.hts?as_subsystem_code=SES&column=Callsign&fstate=1&set=,
16. FCC AUTHORIZATIONS LIST REPORT WR10 http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr010b.hts?as_subsystem_code=SES&column=Callsign&fstate=1&set=,
17. FCC SELECTED APPLICATION LISTING REPORT WR31 <http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr031b.hts?newfn=,>
18. EARTH STATION APPLICATION - INSTRUCTIONS http://gullfoss2.fcc.gov/prod/ib/forms/ib_earth_station_sta_instructions.htm
19. FCC ISPC ASSIGNMENT LIST BY NETWORK STATE REPORT WR017 http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr017b.hts?as_subsystem_code=SPC/ISPC&column=ISPC.network_stateC/Network+State&operation=qr
20. FCC FOREIGN CARRIER AFFILIATION NOTIFICATION PENDING APPLICATIONS LIST BY FILE NUMBER http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?as_subsystem_code=FCN/FOREIGN+CARRIER+AFFILIATION+NOTIFICATION&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=,
21. GENERAL REPORTS AND QUERY TOOL http://svartifoss2.fcc.gov/prod/ib/forms/oth_reps.htm
22. FCC CONDITION/PROVISION TEXT LISTING REPORT WR011 <http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr011b.hts?cond=,>
23. FCC SELECTED APPLICATION STATUS: FIND BY OLD FILE NO. <http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr023b.hts?oldfn=,>
24. FCC SELECTED APPLICATION STATUS: FIND BY FILE NO. <http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr023b.hts?newfn=,>
25. FCC IPF CURRENT AUTHORIZATIONS LIST BY CALLSIGN http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr025b.hts?as_subsystem_code=IPF/IPF&column=MAIN.callsignC/CALLSIGN&fstate=1/CURRENT&prepare=,
26. FCC DATA NETWORK CODE PENDING APPLICATIONS LIST BY FILE NUMBER http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?as_subsystem_code=DNC/DATA+NETWORK+CODE&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=,
27. FCC FOREIGN CARRIER AFFILIATION NOTIFICATION PENDING APPLICATIONS LIST BY FILE NUMBER http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?as_subsystem_code=FCN/FOREIGN+CARRIER+AFFILIATION+NOTIFICATION&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=,
28. FCC SUBMARINE CABLE LANDING PENDING APPLICATIONS LIST BY FILE NUMBER http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?as_subsystem_code=SCL/SUBMARINE+CABLE+LANDING&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=,

IBFS Web Sites with Accessibility Issues

29.	FCC RECOGNIZED OPERATING AGENCY PENDING APPLICATIONS LIST BY FILE NUMBER	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?as_subsystem_code=ROA/RECOGNIZED+OPERATING+AGENCY&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=_	
30.	FCC ISPC PENDING APPLICATIONS LIST BY FILE NUMBER	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?as_subsystem_code=SPC/ISPC&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=_	
31.	FCC DATA NETWORK CODE PENDING APPLICATIONS LIST BY FILE NUMBER	http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?as_subsystem_code=DNC/DATA+NETWORK+CODE&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=_	
32.	FCC INTERNATIONAL SECTION 214 PENDING APPLICATIONS LIST BY FILE NUMBER	http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?as_subsystem_code=ITC/INTERNATIONAL+SECTION+214&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=_	
33.	FCC APPLICATIONS LIST	http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?	
34.	§214 EARTH STATION STA APPLICATION - INSTRUCTIONS	http://svartifoss2.fcc.gov/prod/ib/forms/ib_earth_station_sta_instructions.htm	
35.	FILING INSTRUCTIONS	http://gullfoss2.fcc.gov/prod/ib/forms/filing_instructions.htm	
36.	FCC 325-C PENDING APPLICATIONS LIST BY FILE NUMBER	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr028b.hts?as_subsystem_code=325/325-C&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=_	
37.	FCC IHF CURRENT AUTHORIZATIONS LIST BY FILE NUMBER	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr025b.hts?as_subsystem_code=IHF/IHF&column=MAIN.file_numberC/FILE+NUMBER&fstate=1/CURRENT&prepare=_	
38.	FCC IHF CURRENT AUTHORIZATIONS LIST BY DATE EXPIRE	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr025b.hts?as_subsystem_code=IHF/IHF&column=MAIN.date_expireD/DATE+EXPIRE&fstate=1/CURRENT&prepare=_	
39.	FCC IHF PENDING APPLICATION LIST BY FILE NUMBER	http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/swr024b.hts?as_subsystem_code=IHF/IHF&column=MAIN.file_numberC/FILE+NUMBER&fstate=0/PENDING&prepare=_	
40.	§214 APPLICATION - INSTRUCTIONS	http://svartifoss2.fcc.gov/prod/ib/forms/ib_214_instructions.htm	
41.	INDEX OF 1995 (Page 7 of 7)	http://www.fcc.gov/Bureaus/International/Public_Notices/1995/index7.html	Repaired 2/6/03
42.	INDEX OF COMMENTS	http://www.fcc.gov/Bureaus/International/Comments/	Removed 2/6/03
43.	INDEX OF DATABASES	http://www.fcc.gov/Bureaus/International/databases/	Repaired 2/6/03
44.	INDEX OF COMMENTS ib97142	http://www.fcc.gov/Bureaus/International/Comments/ib97142/	Removed 2/6/03
45.	INDEX OF INTERNATIONAL	http://www.fcc.gov/Bureaus/International/	Repaired 2/6/03
46.	INDEX OF NEWS 1994	http://www.fcc.gov/Bureaus/International/News_Releases/1994/	Repaired 2/6/03
47.	GETTING STARTED	http://svartifoss2.fcc.gov/prod/ib/forms/getting_started.htm	
48.	INDEX OF REPORTS	http://www.fcc.gov/Bureaus/International/Reports/	Repaired 2/6/03

IBFS Web Sites with Accessibility Issues

Appendix 2

49.	INDEX OF REPORTS, PAGE 2	http://www.fcc.gov/Bureaus/International/Reports/index2.html	Removed 2/6/03
50.	INDEX OF PUBLIC NOTICES	http://www.fcc.gov/Bureaus/International/Public_Notices/	Repaired 2/6/03
51.	INDEX OF ORDERS	http://www.fcc.gov/Bureaus/International/Orders/	Repaired 2/6/03
52.	2001 (PAGE 10 OF 10)	http://www.fcc.gov/Bureaus/International/Orders/2001/index10.html	Repaired 2/6/03
53.	INDEX OF ORDERS 1994	http://www.fcc.gov/Bureaus/International/Orders/1994/	Repaired 2/6/03
54.	INDEX OF NOTICES	http://www.fcc.gov/Bureaus/International/Notices/	Repaired 2/6/03
55.	PUBLIC NOTICES, 2002	http://www.fcc.gov/Bureaus/International/Public_Notices/2002/	Repaired 2/6/03
56.	NOTICES, 2001	http://www.fcc.gov/Bureaus/International/Notices/1995/	Repaired 2/6/03
57.	PUBLIC NOTICE SEARCH	http://svartifoss2.fcc.gov/prod/ib/forms/pubnotsearch.htm	
58.	INDEX OF NEWS, 2002	http://www.fcc.gov/Bureaus/International/News_Releases/2002/	Repaired 2/6/03
59.	INDEX OF NOTICES, 2001	http://www.fcc.gov/Bureaus/International/Notices/2001/	Repaired 2/6/03
60.	INDEX OF NOTICES, 1995	http://www.fcc.gov/Bureaus/International/Notices/1995/	Repaired 2/6/03
61.	INDEX OF NEWS RELEASES	http://www.fcc.gov/Bureaus/International/News_Releases/	Repaired 2/6/03

NO.	IBFS SITE TESTED	URL
1.	WELCOME TO IBFS	http://gullfoss2.fcc.gov/prod/ib/forms/index.html .

APPENDIX 4

Findings and Recommendations – Management Response

UNITED STATES GOVERNMENT

memorandum

DATE: February 14, 2003
TO: Inspector General *A*
FROM: Managing Director *A*
Chief, International Bureau *BFA*
SUBJECT: Response to Draft Report on Follow-Up Special Review of Web Page Accessibility

We are pleased that the two recommendations from the original report on web accessibility have been complied with and the findings are closed. The new recommendation resulted from an expanded review of the International Bureau Application Filing and Reporting System (IBFS) web pages. As stated in the report, IBFS is a system that was in production before Section 508 became effective. We are aware that most of the FCC application systems with an Internet presence have similar problems with respect to accessibility.

A multi-year lifecycle replacement/redesign plan has been developed and submitted to OMB to address this and other issues. This plan evolved from a comprehensive review of all FCC licensing systems that was completed last year by Booz Allen Hamilton (Initiative on Data and Systems Integration). This redesign effort will require a minimum of 36 months and \$11 million. A more detailed milestone schedule will be developed during the next phase of this project that will be contracted this year. Although funding has not yet been fully secured for the entire project, OMB has shown support by providing additional FY03 Auctions funding for this effort.

We also would like to point out that the 508 regulations do not mandate an immediate response to web page accessibility problems for legacy information systems. Although lawsuits might be possible, the 508 regulations state that immediate corrective action need not be taken if doing so would constitute an "undue burden" for the agency. Although we strongly support universal accessibility, given the cost and complexity of this effort, attempting immediate corrective action would in fact constitute an undue burden. Therefore, our situation reduces the risk of possible lawsuits.

Recommendation:

We recommend that the Commission enhance its existing information systems and web accessibility program redesigning the IBFS application to comply with accessibility standards.

Response:

Concur. To date, 19 of the 61 web pages have been corrected to conform with accessibility standards (# 41 through #61, excluding #47 and #57). These involved relatively minor changes. The remaining pages will involve a substantial redesign effort as indicated in IB's attached memo. We have been working with

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IB on their ongoing efforts to improve IBFS and to address various policy-driven enhancements as part of the software lifecycle replacement plan. IB has been proactively documenting functional requirements for such a redesign that includes accessibility requirements. OMD will present this project to the Chairman's Office as part of the FY03 discretionary funding review.

Please contact Rosalind Singleton (Section 508 Coordinator) 418-2850 if you have any questions about our response.

Attachment

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memorandum

Date: February 6, 2003

To: Inspector General

From: Chief, International Bureau 

Subject: Response to Follow-up Special Review of Web Page Accessibility

Cc: Managing Director
Chief, Information Technology Center ✓

The International Bureau (IB) concurs fully with the Inspector General's (IG) recommendation to redesign the International Bureau Filing System (IBFS) to comply with Federal accessibility standards.

This recommendation dovetails with the Bureau's ongoing efforts to redesign IBFS both in keeping with the Commission's System Development Lifecycle Methodology (SDLC) and software lifecycle replacement plan. IB is also redesigning IBFS as a result of Commission-wide initiatives to streamline its rules, changes in customer- and IB-driven business processes, the obsolescence of IBFS system technology, and the agency's enhanced system security posture in response to the war on terror.

To support the IBFS redesign initiative, IB has requested funding in each fiscal year, since FY2001. The Information Technology Center (ITC), which administers the Commission's Information Technology (IT) budget request and operating plan, has provided sufficient funds to IB to gather and document functional requirements for such a redesign (inclusive of accessibility requirements). It is our understanding that ITC fully supports this redesign initiative and has committed to fund this project, provided Congress appropriates sufficient resources to do so.

In April 2002, as an interim measure, IB sought funds through the Contracting Officer's Technical Representative (COTR) of the Commission's Technical Support Task Order to make and keep the existing IBFS system Section 508 compliant. However, the COTR determined that this request constituted new work, which exceeded the scope of the technical support task, and the request was denied. The COTR advised that accessibility as an issue will be handled as part of future reengineering efforts.

Of the sixty (60) non-Section 508 compliant web pages the IG discovered in IBFS, eighteen (18) pages are International Bureau's website pages, and are not part of IBFS. The Office of Media Relations' Webmaster has agreed to handle the Section 508 compliant issues relating to these pages. These eighteen links are #41-46, 48-56, and 58-60, on Appendix 2. The remaining pages identified in Appendix 2 will be handled in the redesign effort.

IB explored the option of implementing a "short-term fix" to the existing, non-accessible IBFS web pages, had technical support funds been available for this purpose. However, we determined that a short-term solution would not be cost-effective, because of the age of the system and of the frequency with which these web pages must be tweaked to repair problems and to make minor page changes. A short-term fix would require an inordinate amount of human capital, funding,

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and time to continually code for, and test Section 508 compliance. IB believes that Commission resources could be used in more productive ways.

IB will continue to work with the ITC to obtain the funding needed to redesign the IBFS system. Because of the magnitude of this initiative and limits on the amount of funding that is available, the complete redesign of IBFS may need to be undertaken in phases and span multiple fiscal years. The final determination on when and how the IBFS system redesign will be funded will need to be made by the Managing Director, in consultation with the Chairman's Office.

Our recommendation, assuming the agency receives a sufficient appropriation for each of the upcoming fiscal years, is to redesign IBFS along the following milestone schedule:

Phase	Description	Schedule	Funding (estimated)
Phase 1	Buy Infrastructure for redesigned IBFS, and design the earth & space station services portion	03/2003- 10/2003	\$600K
Phase 2	Develop, Test, Train, Implement earth & space station services portion	11/2003- 6/2004	\$900K
Phase 3	Provide 3 months of post-implementation support for earth & space station services portion	6/2004- 8/2004	\$88K
Phase 4	Design, develop, test, train, implement international telecommunications services portion	10/2004- 9/30/2005	\$1.07M
Phase 5	Provide 3 months of post-implementation support for international telecommunications services portion	10/2005- 12/2005	\$92K