Guide to Implementing Universal Publishing in Mexican Publishing Houses

(DRAFT)

Ana María Bermúdez Salomón

Translation by Mindy Shapiro

*Guide to Implementing Universal Publishing in Mexican Publishing Houses*

First Edition in digital format: enero, 2023

Second Edition in digital format: mayo, 2024

© 2023, Ana María Bermúdez Salomón. All rights reserved.

No part of this book may be reproduced or used in any manner without the prior written permission of the copyright owner, except for the use of brief quotations in a book review.

Authorized Entities interested in producing this work in accessible formats, please contact the following email: ana.maria.bermudez@verbatool.com  
  
Published in Mexico.

# Introduction

Throughout its history, the publishing industry has been a great ally for the exposure and dissemination of great ideas that are now part of our daily lives. Every major initiative for social, political, economic and cultural change is preceded by key publications where arguments are presented, reflecting the methodologies to be followed, projects to be developed and the results obtained. We can proudly say that we have published and continue to publish books on climate change and sustainability, feminism, class struggle, human rights, development and priority groups. Through the written word we have given voice to minorities and priority groups. We have opened spaces for exchange and sparked key conversations.

However, there is one community that has remained invisible in our industry up to now: people with disabilities (PWD). We have not given space in our publishing plans pertaining to them, their concerns and their voices, since only a minuscule part of the editorial offer in each country corresponds to titles about and authored by this community. In fact, due to their invisibility, we have no numbers to show here as no one has compiled any statistics on them as part of the publishing world.

Nor have we thought of including them among our readers. While there are *accessible formats*, which consist of media that allow access to the content of books to certain users with disabilities — for example, Braille books for those living with blindness, books in large print or audiobooks for the visually impaired, sign language video-books for people who are deaf, accessible digital books for various disabilities— they only make up a very small part of the publishing production. The Accessible Books Consortium (ABC) estimates that less than 10% of all books published worldwide are readable by people with visual impairments and print disabilities, with the percentage varying between 1 and 7 per cent, depending on whether the country is developing or developed.

In Mexico, the NPO Discapacitados Visuales calculates that the percentage of books published in accessible formats barely reaches 1%. According to director Camerina Robles, by 2020 there were only 200 works of this nature (Hernández, 2020). The scarcity of accessible books for PWD and the difficulty of accessing printed text have aspects that should also be analysed, since the low supply also suggests significant biases, such as the lack of diversity in topics. Although 60% of PWD are adults, most of the editorial offer is focused on children's literature as they act as a literacy tool, while adults lean towards audiobooks (Conapred 2013). However, the implications of this lack of books in accessible formats go beyond their underrepresentation in the publishing offer, having serious consequences for this community.

Let's consider the following chain of situations. According to the report “Disability and the right to education in Mexico” by the National Commission for the Continuous Improvement of Education (Mejoredu, 2022), in Mexico only 24% of children with disabilities between 5 and 17 years of age are enrolled in school; a proportion that decreases as educational levels advance. In fact, one of the main reasons schools do not accept PWD in their enrolment is that they do not have teaching-learning materials in formats that allow students with disabilities to access their content. Only 12.3% of primary schools, $12.1% of secondary schools and 1.5% of high schools have adapted materials (Mejoredu, 2022). But the barriers do not end there, because even within the educational system it is difficult for this community to keep up with the pace of study. For example, if they do not find books in accessible formats, they must request adaptations, which in the best of cases is cost-free, but takes more time to acquire than the standard formats. This implies that they cannot keep up with the pace of the class and experience a lag with respect to their peers (María Concepción Hernández in Bermúdez, 2023). To this must be added many other challenges that make dropping out of school the norm until only 5% of this community manages to reach university (Anuies, 2020), which are an indication of immense perseverance and family support, but also of the uphill road they must climb to access their right to education.

This inevitably has consequences for the very low rate of labour inclusion of PWD. Only 2% are economically active (Inegi, 2020), which implies that the rest, to a greater extent, are economically dependent on a third party, usually a relative. On top of that, Mexican government support only delivers a monthly amount of $6,200 MXN — almost impossible to support anyone on, not to mention the extra expenses in care and health that PWD require. Finally, without access to education and a source of income, it is then not surprising that poverty and disability are mutually entwined. In Mexico, 1 out of 2 people in this community live in poverty (Coneval, 2020). These numbers may change among each country, but the variable correlation remains.

Taking into consideration the above, if the number of books in accessible formats were to increase, we would eliminate at least one of the barriers for PWD to access education, facilitate their stay in school and subsequently conclude their training period. This would improve their chances of being included in the working world, at least with better working conditions. In this way, we would help more members of this community to achieve economic independence and, consequently, lower poverty rates and improve their quality of life.

And that's only one of the paths to well-being, because access to reading is not only an educational issue, but also touches on the right to access information. Publications are vehicles of ideas, information, and valuable content for various types of readers, not to mention the leisure and entertainment function that books also serve, which is no less important. Think of the millions of people who miss out on the pleasure of reading a novel or getting excited about a collection of poems because they only have a handful of classic works that are copyright free but difficult to access.

Faced with such a panorama, the role that books play with respect to the right to access information, and reading becomes a necessity that scandalously leaves out 16% of the population, in which publishers play a key role. We have a "responsibility to ensure that their publications are available to everyone. For ethical reasons, we cannot exclude people because of their disability. It is, therefore, a matter of doing the right thing (...) This is part of our broader social responsibility" (Kolman, in Jewell 2018). However, there is a silent resistance to seeing this group in the national publishing offer.

In the case of publishers, the main factors that cause this resistance are the pressure of national and international regulations, the lack of training on the subject, the fear of loss of income and the paralysis by analysis in the face of such an overwhelming challenge. In the first place, the legal framework imposes accessibility as an obligation, a series of risks to the sector andcrippling deadlines, but little clarity in the application of its provisions. Such is the case of the Marrakesh Treaty or the European Accessibility Act, in particular European Directive 882/2019.

The Marrakesh Treaty is considered the first intellectual property treaty worldwide with a focus on human rights (SRE 2013 in Escutia 2021). It establishes limitations and exceptions to copyright in order to promote the reproduction, distribution and availability to the public of works in accessible formats, for the benefit of people with visual or print disabilities, through the figure of *authorized entities* (Robles, 2020). Mexico was one of the main signatories (Fuentes, 2019); however, it was not until 2020 that the Federal Copyright Law was reformed to harmonize with the Marrakech principles and the Indautor (National Copyright Institute) designated the NPO Discapacitados Visuales as the first authorized entity to produce accessible formats with the exceptions and limitations to copyright, and allowed their cross-border exchange (Robles 2020). However, there is no public policy aligned with this reform that brings these initiatives to reality, so progress has been very modest.

Such limitations on the exploitation of works often give rise to unfounded fears as they are associated with losses in already low income within the industry. Nothing could be further from the truth. "Sales will not plummet because publishers make books available to a limited group of people with print disabilities in accessible formats, such as EPUB 3 for e-books or html for magazines (Jewell, 2018)." What's more, quite the opposite of a financial threat, accessibility could be the door to a new market. "People who are blind or visually impaired don't want publishers to give them anything for free, they want to buy the books, but in the formats appropriate to their needs" (Setzer, in Jewell 2018).

Perhaps the international regulation that currently most worries publishers is the European Directive 882/2019, as it is possibly the strictest and with the clearest and closest deadline: by July 2025 all e-books that are published must be accessible or it will not be possible to market them in the European Union. This provision is aligned with the European Accessibility Act, which establishes a series of directives that seek to eliminate barriers for PWDs to access products and services, including digital content, such as e-books. 2025 is already breathing down our necks and national public policies that determine the requirements for compliance, and the consequences of non-compliance, are just beginning to emerge. The amount of tweaks and investment that publishers need to make in a short amount of time is putting a lot of stress on the industry.

Looking at readers with disabilities from an inclusion perspective implies discovering the barriers to accessing our books, thus opening the debate on accessibility within an organization. It is a change of vision that affects not only editorial production, but also distribution, commercialization, marketing, etc., since the focus must be 360 degrees. Consequently, the stress of the sector to meet the deadlineleads to desperate decisions seeking to create a minimum viable product that complies with the regulation, usually through outsourcing. For example, there is an unfortunate practice of thinking that passing the automatic accessibility validators of e-books is enough, because currently, producing an EPUB3 with accessibility metadata and "something" in the image descriptions will get rid of the audits. This is not sustainable in the long term, nor does it achieve the goal of facilitating access to information and reading for PWD.

Along these lines, adopting an accessibility approach and betting on the inclusion of PWD in our vision as an organization is necessarily a business decision, but it is not a commitment that must be implemented overnight and in such a short time as indicated in the Directive, but rather one that has a start date and that triggers a transition process at the pace that each publisher designates for themselves. To pretend to cast all publishers in the same mould is to fail to understand the nature of the sector itself.

In addition, regulations are not necessarily accompanied by local financial support or training that guides publishers to make profound changes in a short time and without investment resources. While there are some international initiatives that provide valuable tools such as the EDRLab developments, Accessible Publishing website, Canada's online trainings and the ABC guides, there is a long way to go in teaching more publishers to navigate these waters with more confidence.

Particularly in Latin America, where many survival challenges are faced in the sector, accessibility is not a priority, and training is needed for many other issues before this one. In many cases, it is thought that the adaptation of traditional formats indicates the production of several editions of the same title, which implies extraordinary costs, difficult distribution and a low return on investment. An apparent solution is the publication of an audiobook so that the requirement is met. However, though it helps to improve access for the blind and visually impaired, it does not facilitate the navigation of content and ignores other disabilities apart from the visual (Setzer en Jewell 2018). Another important point is that the lack of expertise in accessible publications from standard editors often results in publications with readable, but incomprehensible, texts. The level of intervention in adapting the work should not be superficial or a mere translation of code, but a truly *universal edition*. To this must be added the resistance and lack of knowledge of Latin American publishers at present to consider digital formats seriously within their offer of titles.

## So how do we find the “how to” with so many barriers?

The reason for the pressure on editors is due to a matter of efficiency of effort. If the works are born in accessible formats or edited with an accessibility perspective and rectify their editorial base, the rest of the actors in the supply chain will work on more fertile ground instead of patching up each of its links. Hence the importance of the origin of the work where the virtual circle begins and where publishers are encouraged – and in some cases forced – to heed the call.

In this regard, some international organizations such as the World Intellectual Property Organization (WIPO), the International Publishers Association (IPA) and the Accessible Books Consortium (ABC), have developed accessibility guides for publishers, in which they dictate the guidelines to be followed to understand and comply with the provisions of the Marrakesh Treaty in the production of accessible formats, especially digital ones. However, none of them have focused on the national context that Mexican publishers (and by extension, Latin American publishers) are experiencing, nor howto make the initiatives a reality step by step. They also tend to focus solely on the production of the accessible format, specifically the conversion of digital books, ignoring or not developing the rest of the editorial process before and after this stage. None of them contemplate a key point for publishers in any country, but even more complex in developing countries: investment.

Thus, this guide proposes a roadmap to guide the publisher in the implementation of accessibility in their publishing house throughout their internal and external supply chain so that native accessible novelties are produced and distributed and the editorial background is adapted. It will show each step of the way, with low investment, controlled risks, a corresponding marketing and communication plan, diagnostic and evaluation tools, all hand in hand with key allies and stakeholders. The aim is to accompany the editor through each stage in this transition so that their efforts produce results in daily practice, eliminating the need to depend on outsourced services, as such efforts become part of the editorial work in the organization and, by extension, in the industry. Thus, the proposal is not only low-risk but also sustainable in the medium and long term.

The plan is phased to move publishers towards accessibility regardless of their size, nature, budget, and degree of progress on the issue. Its structure makes it possible to diagnose the status of the catalogues and, based on the needs detected and the objectives set, follow the actions required to move on to the next phase. Each will be accompanied by a moderate, low, or zero investment strategy with low-cost and even cost-free vendor proposals. Thus, each publisher, according to their size and needs, will be able to choose the plan that best suits them and the lack of budget will not be an argument for not moving forward. The intention is also to involve civil associations that serve people with disabilities as key allies both to gage market interest and to encourage sales. This paves the way for the inclusion of accessibility in all facets of publishing.

The concept of *universal publishing* is an application of the guidelines of universal design to publishing, understood in its broadest sense, which touches different areas from beginning to end of the book supply chain and not only the editorial processes *per se*. With this comprehensive and transversal approach, an editing protocol is presented, where it sets out the new functions of each role and stage of the editorial process. To achieve the objectives of this concept, the most suitable vehicle is the digital book, as it allows us to get closer to equitable access and to meet a large variety of needs of people with disabilities. It also presents the lowest and least risky levels of investment and its scope is worldwide. Hence, this guide will be useful for publishers who already have a catalogue of works in digital format and basic notions of digital publications. However, it is necessary to mention the barriers to entering this format, such as socio-economic factors and the large digital divide.

As a legal framework, the development of this work is built on both international agreements (such as the Marrakesh Treaty and the European Directive 2019/2024 882) and national agreements (the Mexican Federal Copyright Law (LFDA)5. It is also based on the existing guidelines provided by international organizations and grounded in the editorial context of Mexico, from the ABC, the *Accessible Publishing Charter*, the *IPA Guide to the Marrakesh Treaty* (2013), the *Accessible e-book Guidelines for Serf-Publishing Author* (2016) and the *A Starter Kit for Accessible Publishing in Developing and Least Developed Countries* (Manocha *et al*.). Pertinent recommendations for making a digital book accessible are included from *Accessible ePUB 3 (2012)*, *Top Tips for Creating Accessible EPUB 3 Files* (Benetech) and W3Schools.com. Also taken into consideration are the principles and objectives of *universal design* by Ronald Mace (1997) and the universal design guidelines for learning in the article “Diseño Universal para el Aprendizaje: un modelo teóricopráctico para una educación inclusiva de calidad” (Pastor, 2019) y de *The UDL Guidelines* (Cast, 2018), as well as Kotter's (2012) organizational change methodologies. Finally, we include the testimony of expert Hugo Setzer (2023), president of Caniem, two-time former president of the IPA and main promoter of accessibility among Mexican publishers.

To begin with, this guide is aimed primarily at Mexican publishers interested in including people with disabilities among their readers, democratizing their content, and contributing to social justice, regardless of their size, nature, or specialty. In particular, the target reader is the person who has shown interest in this topic and seeks to promote its application in the organization; that is, the *champion of accessibility*, the trigger and ambassador of this movement. However, it would be ideal if it also reached the leaders of the publishing industry, since it is the decision-makers who listen to the *champion*, provide the necessary tools and allow the implementation of *universal publishing* in their organizations. Finally, it is important to note that, although the focus is on the Mexican publishing context and the main solutions are offered in pesos and Spanish, the methodology can be used by publishers in other countries and linguistic regions.

# 1. Universal Publishing

"Good design empowers, bad design disables"

Stockholm Declaration, May 2004

Before describing universal publishing, it is useful to review a series of basic concepts in order to understand the terminology from which the proposed new editorial approach has been developed. A first block includes accessibility, usability, inclusive design and universal design, while the second takes up the concepts of person with disabilities, person with print disabilities and disabling environments.

The first two refer to qualities of a product, service, or space. According to the Pan-Hispanic Dictionary of Legal Spanish, *accessibility* is the “condición que deben cumplir los entornos, productos y servicios para que sean comprensibles, utilizables y practicables por todos los ciudadanos, incluidas las personas con discapacidad” (In English, "condition that environments, products and services must meet in order for them to be understandable, usable and practical for all citizens, including people with disabilities"). On the other hand, *usability*, according to the Observatory of Accessibility and Independent Living, “es la destreza con que las personas pueden utilizar una herramienta particular o cualquier otro objeto fabricado por humanos con el fin de alcanzar un objetivo concreto. La usabilidad también puede referirse al estudio de los principios que hay tras la eficacia percibida de un objeto” ("is the dexterity with which people can use a particular tool or any other object made by humans in order to achieve a specific goal. Usability can also refer to the study of the principles behind an object's perceived effectiveness"). In that sense, the former includes the latter; In other words, an accessible product must take into account the entire level and diversity of skills to make it suitable for use by anyone. To achieve this, a series of standards and regulations evaluate and govern the degree of accessibility of products or services.

On the other hand, the remaining two concepts correspond to methodologies that address the diversity of users from different approaches. For the Inclusive Design Research Centre (OCAD University), *inclusive design* "considers the full range of human diversity with respect to ability, language, culture, gender, age and other forms of human difference". Thus, a product or service is designed with a focus on including the needs of certain groups of human diversity in its use, with different versions of the same experience being designed and made for each particular group. This approach is particularly feasible and useful in the case of digital content, where production costs are low and the environment facilitates offering different versions of the same product.

The concept of *universal design* was coined by the Center for Excellence in Universal Design at North Carolina State University in 1997 by a group of architects led by Ronald Mace. As an architect who uses a wheelchair, he proposed a new way of designing products and spaces whose use included as many people as possible:

Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability. An environment (or any building, product, or service in that environment) should be designed to meet the needs of all people who wish to use it. This is not a special requirement, for the benefit of only a minority of the population. It is a fundamental condition of good design. If an environment is accessible, usable, convenient and a pleasure to use, everyone benefits. By considering the diverse needs and abilities of all throughout the design process, universal design creates products, services and environments that meet peoples' needs. Simply put, universal design is good design.

This refers to the "design of products, environments and services to be used by all people, to the maximum extent possible, without adaptations or the need for specialized design, that is, the same design for all without distinction of people with or without disabilities" (Conadis, 2016). The seven principles that Mace established can be summed up in the first five goals of Steinfeld and Maisel (in Ciudad Accesible, 2022), who expanded the vision of the former to add health and social participation:

Objetivo 1: Cuerpo en forma, el diseño se adapta a una amplia gama de tamaños y capacidades corporales.

Objetivo 2: Comodidad, considera los límites deseables de la funcionalidad y la percepción del cuerpo.

Objetivo 3: Conciencia, asegura que la información para su uso se perciba fácilmente.

Objetivo 4: Comprensión, hace que los métodos y formas de operación y uso sean intuitivos, claros minimizando las posibilidades de error.

Objetivo 5: Bienestar, contribuye a la salud, prevención de enfermedades y lesiones.

Objetivo 6: Inclusión social. Tratar a todos los grupos con dignidad y respeto.

Objetivo 7: Personalización. Incorporar oportunidades de elección y preferencias individuales. Aun cuando se trate de pequeños grupos de usuarios se deben incorporar soluciones específicas para ampliar el grado de uso y comprensión (braille, bucle magnético, etc.).

Objetivo 8: Propiedad cultural. Respetar y reforzar los valores culturales, el contexto social y ambiental de cualquier proyecto de diseño.

(In English, Objective 1: Body fit, design accommodates a wide range of body sizes and abilities. Objective 2: Comfort, considers the desirable limits of body functionality and perception. Objective 3: Awareness, ensures that useful information is easily perceived. Objective 4: Comprehension, makes the methods and methods of operation and use intuitive and clear, minimizing the chances of error. Objective 5: Well-being, contributes to health, prevention of disease and injury. Objective 6: Social inclusion. Treats all groups with dignity and respect. Objective 7: Personalization. Incorporates opportunities for choice and individual preferences. Even in the case of small groups of users, specific solutions must be incorporated to increase the degree of use and comprehension (braille, magnetic loop, etc.). Objective 8: Cultural property. Respects and reinforces the cultural values, social and environmental context of any design project (Ciudad Accesible, 2022).

In this way, “es un proceso de diseño que habilita y empodera a una población diversa al mejorar el desempeño humano, la salud y el bienestar, y la participación social” (in English, "it is a design process that enables and empowers a diverse population by improving human performance, health and well-being, and social participation") (Ciudad Accesible, 2022).

Thus, accessible products are the result of their creation through inclusive or universal design. Both methodologies aim for the same goal, accessibility, but the first designs different versions of the same object for each type of user and the second aspires to the claim *one size fits all*, where a product is designed to be used by as many people as possible, if not for all. Universal design may be criticized for its idealistic nature and that it will always exclude someone; inclusive design, on the other hand, may seem more feasible, but each effort brings us only slightly closer to the goal.

Ideally, the world should already be attuned to the concept of universal design, but the truth is that this is not the case and we are far from achieving it. However, with the help of adaptations, it is possible to remove many of the barriers to equitable access and even reduce the need for assistance and care or increase the autonomy and security of multigenerational able-bodied users through solutions offered by inclusive design. In fact, up to now, national and international organizations have promoted regulations and minimum accessibility requirements all along the way. By producing specific designs for excluded groups, a better experience is offered to both them and the able-bodied user, so the new functionalities are adopted in the standard product (Ciudad Accesible, 2022), which takes it a step further to fulfilling the mission of universal design. In that sense, May (2018) uses the metaphor of a mountain where Mace's proposal is placed at the top and IDRC's represents the ascent to it; every summit seems impossible, yet it is reached one step at a time.

The second group of concepts is directly related to those we have already described, since the latter ones seek the inclusion of people with disabilities, on which the aforementioned proposals were based and developed.

The term *persons with disabilities*, according to the Pan American Health Organization, are “aquellas que tienen deficiencias físicas, mentales, intelectuales o sensoriales a largo plazo que, en interacción con diversas barreras, pueden obstaculizar su participación plena y efectiva en la sociedad en igualdad de condiciones con los demás” (in English, "those who have long-term physical, mental, intellectual or sensory impairments that, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others"). Each of these types of deficiencies manifests itself in different ways to limit conditions for the person to interact with the world. However, only some of them represent an impediment to reading a printed book. That's where the term *print disabilities*:

those who cannot obtain access to information in a print format because they: 1. Are blind or vision impaired. 2. Have physical disabilities which limit their ability to hold or manipulate information in a printed form. 3. Have perceptual or other disabilities which limit their ability to follow a line of print or which affect their concentration (Round table on Information Access for People with Print Disabilities Inc.).

In fact, the Marrakesh Treaty is focused on giving access to reading to persons with print disabilities.

However, a new term has recently been proposed that eliminates the negative undertone of *disability*: *women or men with functional diversity*. The Foro de Vida Independiente (Independent Living Forum) proposed both the creation of the term and its definition: “Mujeres y hombres que por motivos de la diferencia de funcionamiento de su cuerpo realizan las tareas habituales, (desplazarse, leer, agarrar, vestirse, ir al baño, comunicarse, etc.) de manera diferente. (Podríamos decir, mujeres y hombres que funcionan de otra manera)” (in English, "Women and men who, because of the difference in the functioning of their bodies, perform their usual tasks (moving, reading, grasping, dressing, going to the bathroom, communicating, etc.) differently. (We could say, women and men who function differently)") (Romañach y Lobato, 2007). It considers disability as something relative; if we start from the fact that all bodies are diverse, it is the conditions of the environment that cause certain bodies to face restrictions on access to products, services, spaces and even rights. In this sense, it is the world as we have designed it that, upon interaction with it, causes a diverse body to acquire or not the condition and degree of disability (Ciudad Accesible, 2022). Thus, a person may have an able body in certain spaces and a functional diversity in others, or it may be that at one stage of their life they were able-bodied, but later, due to age, an illness or accident, acquired a functional diversity.

## 1.1 From accessible to universal publishing

Accessibility, as a pervasive mission, has also reached book publishing. However, it has acquired some particular nuances as it has landed mainly at the level of formats as opposed to content.

For Benito (2021), “una obra accesible es aquella que el lector puede consumir en braille, con sonido… y que, además, permite la navegación completa. Esto significa que el lector puede avanzar o retroceder páginas, párrafos, líneas, así como generar anotaciones con total autonomía” (in English, "An accessible work is one that the reader can consume in Braille, with sound... and that, in addition, allows complete navigation. This means that the reader can move forward or backward pages, paragraphs, lines, as well as generate annotations with complete autonomy”). For Manocha *et al*., it consists of a “libro que puede ser usado por una persona con pérdida de la vista o una discapacidad que le impide acceder al texto impreso, para leer todo su contenido” (in English, "book that can be used by a person with vision loss or a disability that prevents him or her from accessing the printed text, to read all of its contents"). With a more universal vision, Hilderley (2013) emphasizes the maximum flexibility that a "fully accessible" book must have in order to offer the same possibilities of accessing and manipulating the content by any type of user. To do this, she lists four aspects that must be met: the technical characteristics of the book, the possibilities offered by assistive technologies, the knowledge of how to use or interact with the work and the simplicity of the interfaces.

These definitions address three central elements: a multiplicity of formats, the inclusion of readers with disabilities, and equity of access. The accessible formats available are: braille, large type, easy reading, LSM videobooks, pictograms, and the different formats of digital books ⸺PDF, EPUB, DAISY, among others⸺ (Manocha, *et al*., Hernández, 2020). Although the reader of an accessible book usually identifies with a person with blindness, the truth is that there is a whole spectrum of physical or psychological conditions that limit access to a book, each with needs as diverse as they are specific and that do not always correspond to a disability when they may be non-permanent or even accidental conditions. In fact, two people with the same type of disability may need different formats to access text from different abilities (Scollo, 2013). This is where intersectionality, interests, reading moments and even age come into play ⸺a reader that we tend to overlook is the older adult.

Consequently, international organizations have resolved this debate with the concept of *print disabilities*, which only reinforces the dominance of the printed format as the center of the publishing world and the rest of the media as "other formats". However, it goes unnoticed that the difficulty of access to printed text makes it a *disabling object*. Finally, *equity of access consists of* publishing a book with the possibility of accessing any of its formats by offering the same content, at the same time and at the same price (Scollo, 2013).

Although the methodologies of inclusive and universal design have not been consciously used in publishing, there have been efforts to encourage publishers to enter the path of accessibility by the former. The conversation so far has reached the concern for accessibility in the sense of producing books in accessible formats, and in this regard an entire regulatory mechanism has been developed at the international level (*Marrakesh Treaty*), and in many cases also within national legislatures (such as the LFDA or the European Directive 2019/882), along with efforts to facilitate and dissolve the barriers of the sector.

However, the inclusive design approach presents financial, operational and commercial challenges. The production of an inclusive format implies high costs that can hardly be covered by the vulnerable niche it addresses, requires considerable specialization to achieve the appropriate quality of the product and would ultimately involve developing points of sale and particular alliances to make the works available to the specific community. As a result, all eyes are on the digital book, as the most viable format to meet the accessibility agenda.

Conversely, if we look at editorial production through the lens of universal design, we find a more efficient way to resolve this huge area of opportunity by building on the advances that have already been made towards editorial accessibility through inclusive design. On the one hand, the ideal would be to have a single format that has enough flexibility to adopt the form that meets the needs of any type of user, which would considerably simplify publishers’ production and distribution of works. On the other hand, if we go back to the definition, we are talking not merely about products, services and spaces but about ecosystems. In this sense, it would be necessary to consider publishing in its broadest scope, where it is not only attuned to the creation of value based on the preparation of the work, but is shown as an interdisciplinary activity where various actors intervene both internally and externally. Hence, an accessibility approach is needed throughout the entire book supply chain (Hilderley, 2013).

## 1.2 Universal is digital

For Hilderley (2013), “no existe el ʻclienteʼ típico” (in English, "there is no such thing as a 'typical customer'"); therefore it is necessary for content to have the same access options. The digital product provides a good solution for such, as it can be adapted to individual needs regardless of the device, which solves the vast majority of the problems experienced by PWD and print disabiliites. Gunn (2016) points out that “the adage of ʻno one size fits allʼ is particularly true of people with print disabilities accessing eBooks or any reading material and one of the strengths of eBook technologies is to allow users to quickly and easily customise the way the content is presented to suit their requirements” (in English, "the adage of 'no one size fits all' is particularly true of people with print disabilities, accessing e-books or any reading material, and one of the strengths of e-book technologies is to allow users to quickly and easily customise the way the content is presented to suit their requirements"). In fact, “quizá sea más conveniente manejar un dispositivo de lectura o una computadora que un libro de tamaño grande” (in English, "it may be more convenient to handle a reading device or a computer than a large book") (Hilderley, 2013).

Assistive technology allows people with print disabilities to listen to an audio recorded by a person reading aloud or by an artificial voice, as well as adapt the content according to the reader's needs, and even convert texts into Braille lines with Braille digital readers (Manocha *et al*.). Indeed, these technologies are already included in commercial and economic devices such as smartphones, tablets and computers, as well as in digital reading software and platforms, as basic functions, so it is not necessary to develop implementations of other technologies or encode content with very specific characteristics, much less acquire an ultra-specialized device. It is simply a matter of knowing how to activate the features designed for people with print disabilities (Gunn, 2016). However, in order to do this, the book files must be crafted in a way that the devices can read these functions (Manocha, *et al.*).

The former have the advantage that they can be stored on different devices, such as CDs, DVDs, computers, memory cards, reading devices, websites, tablets, smartphones (Manocha *et al*.). Also, digital platforms make them available to anyone with an internet connection and an active account.

In any case, from an economic viewpoint, the price of an accessible book, whether printed or not, will always represent a challenge in terms of its affordability, especially considering the vulnerable position of the target population. In the case of e-books, although their cost is lower than that of printed books, they do require an electronic device to be read and training for its use (Manocha *et al*.). For this, it will be necessary to build public and private partnerships that provide both and financing.

One feature that is a must for accessible editing is fairness of access. However, this requirement seems feasible only in an ideal world or perhaps in a publishing ecosystem with a very high degree of commitment, experience and infrastructure in accessibility, which is our target though it is far removed from the current reality of the Mexican publishing landscape. Let’s remember that producing a book in an accessible format requires an investment and specialization that Mexican publishers don’t always have. In that sense, as mentioned earlier, seeking to withhold the publication of a book until all available accessible formats are produced or compromising the viability of the project by maintaining the same price for all formats is a virtually impossible task. Thus, there is a single format with a low production cost, flexibility of reading for the user and no delay in the release of the work to the market. In addition, in the case of the e-book, it does not depend on collaboration with third parties. So, the publisher is a little closer to the ideal of equity of access (Gunn 2016).

However, it is necessary to mention the drawbacks that may appear. The wide variety of e-book formats means a complexity connected to the type of distributor, aggregator, and marketing platform. The resulting files can only be read on devices that are themselves accessible. At the same time, technical barriers to protect copyright and prevent piracy sometimes prevent assistive technology from working (European Blind Union, 2017). In addition, although the international standards for digital books indicate the accessibility features in their good practices, the truth is that many publishers are unaware of them and produce e-books with visually similar characteristics to the printed book but ignore the internal semantic structure that would contribute to improving the reading experience of the standard user and allow navigability of the content for people with functional diversity.

Nevertheless, these problems can be solved in different ways. The EPUB format has long been seen as the international standard for digital books. Among its technical benefits it is the fact that it could be read on the largest number of devices and reading applications. Its reflowable text allows the content to be adapted to the size of the screen in question and to the needs of any reader, including print disabiliites (Manocha *et al*.), which can range from adjusting the background colour and font type to using the device's text-to-speech technology. In particular, version 3, the most recent, has incorporated, in addition to features that allow interactivity and multimedia files, accessibility functions. "The result is an e-book format which has the potential to contain and deliver complex content in a completely accessible way and, as a result, the format has been endorsed by publishing and disability organisations globally as the best way to publish" (Gunn, 2016).

It should also be added that it is a free and open format. In addition, version 3 incorporates a number of substantial improvements in terms of accessibility. Even Amazon, the platform with the largest market share globally in the sale of e-books, recently abandoned its private formats to adopt the EPUB. Other notable accessibility features include the ability to synchronize a voice file with text, add accessible videos, interactivities, specific semantic markup, and mathematical formulas readable with assistive technologies (Hilderley, 2013). It should also be noted that such a file is accepted by most e-book distribution platforms and may be easily adapted to other accessible formats, such as audio, braille on an electronic device and even be printed (Manocha *et al.*). Technology has advanced considerably and good practices for the development of electronic devices also include accessibility, so it is rare that a smartphone, a tablet or a computer does not have any of these functions. Moreover, a reflowable e-book that allows reading to be personalized and contains accessibility features solves almost all of the conditions that *people with print disabilities* experience (table 1). Hence, the ABC considers it the *gold standard* (ABC).[[1]](#footnote-49)

However, it is important to mention that there are other types of disabilities that can present difficulties in accessing information in a printed text, as in cases of monolingual speakers of LSM or an intellectual or learning disability. In these instances, a single format would be unable to satisfy the needs of absolutely all readers, and would require specialized treatment of the content for translation into LSM or easy read. Its production would be difficult for a standard Mexican publisher, since it would imply a much higher level of investment, training and difficulties for its commercialization in the distribution of digital books. The suggested solution is to open the possibility for the country's Authorized Entities to be in charge of producing these formats (Scollo, 2013). In such case, an accessible e-book could include the invitation to these organizations to request access to the publisher's archives.

**Table 1.** Types of print, access difficulties and their needs

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Condition** | **Type of disability** | **Barriers** | **Needs** | **Recommended Book Format** |
| Reduced vision | Visual | The content size cannot be adjusted.  Inconsistent navigation.  Pixelated images when enlarged.  Low contrast.  Unexpected actions. | Enlarge the font size according to eye strain.  Change the font type.  Increase the contrast between the text and the background. | Reflowable e-book.  Large-print printed book. |
| Blindness | Visual | Media without alternate text or audio.  Functions that can't be controlled with the keyboard.  Overly complex content.  Impossibility or inconsistency in content navigation.  Unstructured content.  Unexpected actions. | Ability to read the text aloud.  Change functions and buttons to gestures on touchscreens.  Convert text to braille.  Navigate the document. | Reflowable e-book with text-to-speech feature.  Audiobook\*  Book in Braille. |
| Dyslexia | Learning | Text with complex language.  Inconsistency in the spacing between words and lines.  Fonts not recommended for dyslexics.  Time limits.  Unstructured and very complex content. | Use a font optimized for dyslexia.  Modify size, kerning, line spacing, background.  Text-to-speech or audio-text synchronization. | Reflowable e-book with accessibility features. |
| Difficulty manipulating a book or reader | Motor | Very small areas to click.  Functions that can't be controlled with the keyboard.  Time limits. | Control of the device by means of gestures, switches, and eye movements. | Reflowable E-book |
| Deafness | Auditive | Media content without transcription or subtitles.  Lack of sign language interpretation. | Translation to sign language. | Videobook in sign language. |
| Other | Intellectual.  Learning.  Auditive. | Overly complex content and language.  Inconsistent navigation.  Unstructured content.  Unexpected actions.  Inconsistency in spaces between words or lines.  Text images or math equations.  Media without description. | Book in easy easy read. | Book in easy read. |

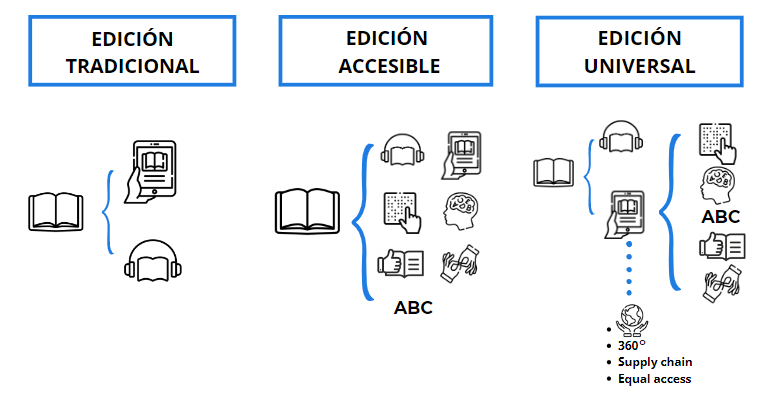
**Source:** Gunn (2016) and Gay (2022).

As for the specialization required for the production of digital books, the truth is that the vast majority of Mexican publishers already produce their own e-books. In the case of those who have adopted the EPUB, rather than specialization, a refresher or corrective training through an EPUB accessibility course could provide a relatively simple, low investment solution. In the case of those who continue to publish their works in PDF ready to print —the simplest to produce though the least accessible of all— training from scratch should be considered. However, the benefit will be greater since they would be able to distribute their books on practically all platforms and offer a much better reading experience to their readers. Such migration is already a necessary issue in commercial terms at this point.

Given the conditions of operational and financial feasibility, and of flexibility and accessibility features, we consider the reflowable EPUB e-book, version 3 ideally, as the format with the greatest potential for universality that exists to date. For this reason, we dedicate this guide to helping Mexican publishers adopt the format and adapt its production processes to move closer to universal publishing and achieve accessibility as a result.

Finally, it is worth considering that the accessible digital book has a more universal format in relation to the printed text. It is always seen as a derivative of the paper book, despite the many barriers to access of the latter. If, on the contrary, we manage to apply the universal design approach, then the e-book would be at the center as the one most likely to reach the most users. In consequence, would we dare to then see print books in the periphery as a very commercial format for users but limited in the geographical scope of distribution, and even *disabling*? Could Mexican publishers adopt a ‘digital first’ approach, meaning a second place to printed and other books formats? Shall this recall the apocalyptic scenario in which the end of printed books was proposed in 2010 and terrified the book world? If it seems to the reader that this idea would immediately be rejected by publishers, it is worth questioning whether the weight of tradition is greater than that of values such as inclusion, diversity, accessibility, equal opportunities, equal access to information? In the meantime, the impact of accessibility efforts will have to be proven to convince publishers that doing the right thing will always be more important, that it's not necessarily more expensive, and that it's also a good business decision.

**Figura**. Differences between traditional, accessible and universal edition



## 1.3 Towards a universal publishing ecosystem

Practically all editorial accessibility guides list a series of technical characteristics that a book must meet in order to be accessible. Most of them concern the content itself, its structure and its design based on programming code. It would seem that this task only concerns to the digital book converter. However, accessible content is the starting point of universal publishing, so all areas of the publishing house should be involved in it.

That is, the author must produce a text that includes the largest number of readers, reflecting on the relevance of the use of graphic elements and how to display them. The editor must ensure that the author has submitted an accessible manuscript and oversee the entire process. The designer must be able to propose a design that focuses not only on the visual level but also includes a layout that considers both fixed (for print books) and flexible content (for e-books). The proofreader or e-book reader, the last filter before closing the files, must also validate the accessibility of the publication. The IT technician will tag the file correctly, provide the appropriate metadata, record its level of accessibility, secure storage, and prepare it for export to the aggregator, distributor, or platform. In the same way, the commercial area must investigate how accessible the e-book sales platforms are and validate that the accessibility functions are not lost as the file travels from the publisher to the end customer. The marketing and communication area will focus on making communication accessible and ensuring that titles are made public in communities of people with functional diversity.

Likewise, the success of implementing universal publishing depends not only on its execution at the internal level of each Mexican publisher, but also requires a network of actors involved throughout the entire book supply chain working in the same direction. This means that, although the trigger and cornerstone is the production of accessible content in the appropriate format, the development of assistive technologies, the creation and availability of reading devices, training readers for their use and publishers must go hand in hand, in alignment with the current legal framework, collaboration between organizations, communication and promotion of solutions, and financing (Manocha *et al*.). Otherwise, regardless of whether a text is accessible, it may be invisible, impossible to discover or distribute, or unavailable.

In other words, the entire supply chain and the discoverability of a piece of content must be accessible. This includes all elements of the chain, from authors and publishers to booksellers, software providers, civil society organizations, schools, libraries and other private actors, as well as society at large.

One must also consider the infrastructure of different countries, as the conditions may not be as equitable. For example, there are platforms, such as Amazon, that do not have local operations in some regions of the world, so the availability of devices and their features can vary considerably (Manocha *et al*.). Sometimes the assistive technology used does not provide the option of text-to-speech in the local language. Fortunately, Mexico’s distribution options, devices, and infrastructure are very favourable, which fuels the growth of the digital book market and further justifies the responsibility of Mexican publishers towards accessibility.

# 2. Phases of Implementation

Because of its idealistic nature, implementing the universal publishing approach at first glance may seem daunting. An editor might not know where to start upon finding so much to do and no roadmap to show the way. The guides talk about preparing an accessibility policy, a file supply process, designating a project manager, incorporating accessibility into editorial processes to create accessible native works, and adapting digital catalogues. However, little is said about *how* and what to do first or what to do next. Nor is there any mention of the important cultural change in the organization that it entails or the resistance that must be faced.

Below is an implementation proposal. The enormous task of making a publishing house 360º accessible is divided into five stages from which each of the actions are developed in a gradual, simultaneous and orderly manner, so that the publisher can identify what stage they are in, based on a diagnosis, which we will also present, and focus attention on achieving the objectives of that stage before moving on to the next. There are no strict times to move from one to the other, but there is a recommended estimate to encourage people to put their shoulder to the wheel. Another interesting feature is that, if a publisher stays only in the initial phase and decides not to continue, the plan is designed to ensure that at least the minimum requirements and alliances are achieved. So, while it may not radically modify the internal workflow, it does open the door for authorized third party organizations to adapt the works to accessible formats. By opening the way towards inclusive publishing, the first step towards universal publishing would then be taken.

However, the scope of this guide will only cover the first two stages due to the development time involved in each of the proposed stages. In fact, except for exceptional cases, publishing houses in Mexico have not considered accessibility a priority issue on which much effort must be made, so most of them will be in the first stage, with some perhaps in the second stage.

## 2.1 Change management

Gay (2022) highlights that the implementation of the proposed actions will lead to an intrinsic change in the corporate culture, as it will transversally affect the way in which day-to-day tasks are completed and it is highly likely that some resistance will be aroused. For this reason, it will be key to communicate internally and continuously the reason for this project, how it will affect each one and the benefits it will bring to everyone, as well as the progress that is being achieved. In addition, providing employees with the tools in knowledge and skills will be a need when facing the changes. For this reason, the author suggests applying Kotter's (2012) eight steps leading to change:

1. **Create urgency**. Make clear the risks and opportunities the company confronts in the face of accessibility: market opportunities and losses, possible lawsuits, better sales, visibility and positioning of books in search engines, increase in the life span of books.
2. **Form a powerful coalition**. The creation of an accessibility committee will help to form cross-cutting alliances for accessibility.
3. **Create a vision for change**. The committee must configure the vision that the publisher wants or needs regarding this issue and must reflect it in the accessibility policy.
4. **Communicate the vision**. The committee will have to build an internal and external communication strategy for the project in favour of accessibility.
5. **Remove obstacles**. Collect internal and external feedback on the publisher's areas of opportunity regarding accessibility.
6. **Create short-term wins**. The committee should communicate the victories and progress of the project continuously as well as celebrate them and maintain motivation to continue taking the next steps.
7. **Build on change**. Leave a record of the changes implemented and make them available to the entire organization. Maintain a spirit of continuous improvement for the sake of accessibility.
8. **Anchor changes in corporate culture**. Ensure that the changes introduced are normalized until they become routine as the values and mission of the company.

## 2.2 Diagnostic evaluation

From Hilderley (2013), Manocha *et al.* and the checklist proposed by Gunn (2016), we have developed three diagnostic evaluations (see development in Appendix 1) to recognize the stage the publisher is at:

* Evaluation of the awareness of the publisher's collaborators regarding accessibility.
* Evaluation of the degree of accessibility of the product and editorial processes.
* Overall accessibility assessment.

Evaluations must be carried out in the order presented, since it is from the analysis of the results of the first two stages that will make it possible to specify the third with greater precision and fidelity. The result of the latter will show the stage the publisher is at according to each criterion and finally reach a general result. Likewise, we recommended applying this questionnaire periodically or whenever the actions corresponding to any of the stages have presumably been completed, to check if indeed they have or if there is still work to be done.

Although it may be that we are more advanced in some areas than in others, the recommendation is still to focus firstly on meeting the objectives of the less advanced stage in order to standardize the general stage of the publishing house, and secondly, to revisit the objectives of the criteria that have already been met, since requirements may have changed if they were implemented long ago. For example, if an accessible EPUB 2 is already being used but version 3 is now being recommended, migrating to the most up-to-date format with more accessibility features should ideally be considered.

## 2.3 Phased plan

The result of the diagnostic evaluations coincides with the criteria for determining the different stages to implement universal publishing. Table 2 shows these along with the status of the phase and the specific objective to be pursued for this criterion.

**Table 2**. Phased plan

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | | Stage 1  Preparation | Stage 2  Implementation | Stage 3: Consolidation | Stage 4  Link | Stage 5  Acceleration |
| Overall Objective | | Prepare the publisher for accessibility and inclusive publishing. | Implement the main tasks towards universal publishing. | Consolidate the main tasks in the publishing house. | Link accessibility actions with third parties. | Accelerate the migration to universal publishing. |
| Criterion | |
| Accessibility Policy | Status | No policies. | Signed Charter from ABC. |  | Accessibility Policy. | Public Accessibility Policy. |
| Objective | Signed Charter from the ABC. |  | Development of the accessibility policy. | Publication of the policy. | Updating and publishing the policy. |
| Adaptation of the backlist | Status |  | 0% | +10% | +30% | +50% |
| Objective |  | 10% | 30% | 50% | 100% |
| Production of native accessible novelties | Status |  | Does not produce accessible novelties. | Protocol for universal publishing active. | 10% of the publishing plan is accessible. | 30% of the publishing plan is accessible. |
| Objective |  | Adopts the protocol for universal publishing. | Production of first accessible novelties (10% of the publishing plan). | 30% of the publishing plan is accessible. | 100% of the publishing plan is accessible. |
| Intellectual Property & TM Compliance | Status |  |  | File provisioning and licensing process with active EAs. | Accessibility clause in publishing contracts. |  |
| Objective |  | Develop file provisioning and licensing process with EA. | Include accessibility clauses in publishing contracts. |  |  |
| Committed and trained human capital | Status |  | Designated Accessibility Officer. | Acting Accessibility Committee. | Sensitized internal actors. | Sensitized stakeholders. |
| Objective | Appoint and train the accessibility officer. | Create and train an accessibility committee. | Raise awareness about accessibility for contributors and authors. | Raise awareness among key stakeholders. | Continuous training in accessibility for employees and stakeholders. |
| Marketing & Communication | Status |  | Audience knows the commitment to accessibility. | Audience is aware of publisher's actions on accessibility. | Permanent campaign on accessible titles. | Audience knows about the NPOs alliance. |
| Objective | Spread commitment to accessibility. | Disseminate accessibility actions on the website and social media. | Develop an ongoing campaign to promote accessible titles. | Disseminate a call for collaboration with NPOs. | Disseminate collaborative actions with NPOs. |
| IT | Status |  | Accessible website. | Tagged accessible files. |  |  |
| Objective | Make the website accessible. | Ensure proper storage and tagging of metadata for accessible files. | Ensure the maintenance of accessibility functions in the transit of files to distributors/aggregators. | Make the buying process accessible. |  |
| Commercial |  |  |  |  | Identified problems and solutions. | Actors undertake accessibility actions. |
|  |  |  | Review accessibility of main players in the supply chain and main problems and solutions. | Negotiation with stakeholders to promote accessibility in their services. | Make the book ecosystem accessible. |
| Third-Party Partnerships | Status |  |  |  | NPOs identified. | Proposal for collaboration with NPOs. |
| Objective |  |  | Scouting of NPOs. | Development of the collaboration proposal with NPOs. | Collaboration with NPOs. |

# 3. Stage 1 – Preparation

The first stage of the project is the start-up of the plan towards universal publishing. As it is a long and upward road, it is best to start with the actions that will be the basis for the next stages, but also those that can be executed relatively quickly, simply and with a very low investment, in order to kick off the business cultural change in the publishing house.

## 3.1 Signing the ABC Charter

The first step on the path to accessibility is for the publisher to express its commitment to this end, and signing the ABC charter is the best way to do that. Although it expresses the main tasks that will be carried out in this and the next stage, there is no monitoring mechanism or time requirement, so the publisher can declare the start of the initiative without necessarily being pressured for a certain period of time (Jewell, 2018). However, the signature will be made public in the catalogue of publishers committed to accessibility by the Consortium, so it will be available to those interested in adapting works to accessible formats.

The decision of the firm must be made by the editorial board with the awareness that at some point the commitments acquired must be fulfilled. So, it will be very useful to accompany such decision with the preparation and implementation plan in order to be ready when a request for access to the archives is received.

## 3.2 The Accessibility Champion

In order to comply with the commitments of the ABC charter, it is necessary to appoint a person responsible for accessibility within the publishing house. It is recommended that this person be a manager or executive, since the hierarchy and vision of such a person would be useful for the application of the tasks to be performed. However, the intrinsic motivation or link to the mission of one of the collaborators may be even better, if they do not hold a leadership position, in which case the steering committee should give them the required authority to promote the necessary changes to be executed.

According to Manocha *et al*. and Hilderley (2013), the functions that the champion must perform are the following:

* Act as the internal spokesperson for the accessibility policy and work to ensure compliance with such.
* Communicate their role internally and externally.
* Oversee accessibility efforts across the organization.
* Fully understand the legal framework and guidelines of the sector.
* Create awareness among all employees and levels of the organization; sensitize.
* Conduct accessibility audits regularly.
* Conduct internal surveys on what goes into making products accessible.
* Provide accessibility training.
* Promote the company's accessibility policy, ensure that it is implemented consistently and effectively, and communicate it both in the company's information and on the website.
* Respond to external requests and provide requested content and information.
* Influence decision-making at all levels and in all departments.
* Review production and distribution processes and consolidate the incorporation of internal changes in favour of accessibility.
* Create a network of internal and external partners to foster accessibility throughout the supply chain.
* Verify accessibility in e-book distributors and marketers.
* Establish an accessibility team or committee with regular meetings.

In choosing the responsible party, Hilderley (2013) and Gay (2022) deem advisable the following characteristics:

* Senior manager or someone sufficiently recognized in the hierarchy or in seniority,who can represent and direct the project transversally within the publishing house.
* True passion and commitment to the cause.
* Leadership and influence.
* Change management skills.
* Overview of the publishing house.
* Excellent communication and persuasiveness.
* Ability to motivate employees.
* Creativity.
* Knowledge of all the publisher's products, the type of files, level of accessibility, storage, availability of files.
* Provide internal and external advice.
* In-depth knowledge of accessibility, disability, inclusion, assistive technologies, inclusive and universal design.
* Proactive practices to drive change in the organization.
* Someone familiar with disabilities or related to a PWD.

## 3.3 Initial training

The training of human capital, both internal and external, will be a criterion to be replicated at all stages and its scope will increase according to the objective of each phase. The first of these will involve the designated accessibility champion and the steering committee, as they are the only actors with roles at this point. They will be key agents in leading the way towards universal publishing through their guidance, influence and hierarchy. In that sense, the number of people involved in this first round of training will depend on the structure of the publishing house. The program should cover all the issues, challenges and solutions of applying accessibility in a publishing house in a general way. The aim is to sensitize participants to the importance of including as many readers as possible, but also to present a realistic scenario of the panorama they are about to face in the coming years. Table 3 shows some providers of free and low-cost training.

**Table 3**. Free Training Providers

|  |  |  |  |
| --- | --- | --- | --- |
| **Supplier** | **Course** | **Type of training** | **Cost per person** |
| ABC and Daisy Learning | [ABC Course on Accessible Publishing Concepts](https://learning.daisy.org/?course=abc-course-on-accessible-book-publishing). | Online, free, in English. | $ 0 |
| LinkedIn Learning | [Understand and integrate functional diversity](https://www.linkedin.com/learning/comprender-e-integrar-la-diversidad-funcional). | Online, subscription, Spanish. | $ 749.14 MXN |
| Discapacitados Visuales | Accessibility in EPUB 3. | Face-to-face, Spanish. | $1 500.00 MXN |

**Source**: Authors' own creation

## 3.4 Accessible website

If a publisher has decided to take the first step towards accessibility and sign the ABC Charter, the minimum coherence would require that the most important institutional media outlet for its digital presence internationally should also be accessible: the website. In addition, if a person with functional diversity is looking for accessible content or an authorized entity is interested in adapting a book to an accessible format, it is likely that they will arrive on the publisher's website through the lists of publishers who have signed the ABC Charter before they even know any title in its catalogue. If this space has not been created in accordance with good practices for digital content, the user will not be able to activate the accessibility features and therefore access the content. Also the lack of consistency in the public commitment of the publisher in terms of accessibility will be noted.

Therefore, it is advisable to talk to the IT technician who manages the website about accessibility and request the necessary adjustments within no more than a month of delivery time. The adaptation can be carried out in one of two ways: internally, or externally through a third party. In the first case, the technician should ideally consult the principles, requirements, techniques, tutorials and guides available for free online. On the W3C website there is even an introductory online development course. One necessary step will be to request validation of the work done by a specialist. Automated tools fail to identify all barriers and sometimes a human and critical assessment is needed (Gay, 2022). In the second case, it will be advisable to negotiate the cost of the adaptation with the technology provider or request the service from a provider specialized in accessibility, such as Inklusión and Todo Accessible. Table 4 shows some providers of free and low-cost digital accessibility courses and services.

**Table 4.** Accessibility Courses & Service Providers

|  |  |  |  |
| --- | --- | --- | --- |
| **Supplier** | **Service** | **Type of service** | **Cost** |
| W3C | [Digital Accessibility Foundations](https://www.w3.org/WAI/courses/foundations-course/)  [Free Online Course](https://www.w3.org/WAI/courses/foundations-course/). | Free online course in English. | $ 0 |
| [Test & Evaluate](https://www.w3.org/WAI/test-evaluate/). | Web Accessibility Assessment Guide, free, in English. | $ 0 |
| Udemy | [Learn Web Accessibility step by step](https://www.udemy.com/course/aprende-accesibilidad-web-paso-a-paso/?utm_source=adwords&utm_medium=udemyads&utm_campaign=DSA-WebIndex_la.ES_cc.MX&utm_content=deal4584&utm_term=_._ag_124787779331_._ad_504973666492_._kw__._de_c_._dm__._pl__._ti_dsa-402817370585_._li_9047082_._pd__._&matchtype=&gclid=CjwKCAiAzKqdBhAnEiwAePEjknOgq5P2QoWLstNWzWAUi20EZTXjU0SuE37Bln3pvmWBBbRrXIqPzxoCb-IQAvD_BwE). | Free online course in Spanish. | $ 0 |
| Learn UX | [Diploma in Accessibility and Inclusive Design](https://aprendeux.com.mx/diplomado-accesibilidad-diseno-inclusivo/). | Online diploma, in Spanish. | $ 199 USD |
| LinkedIn Learning | [Essential accessible web development](https://www.linkedin.com/learning/desarrollo-web-accesible-esencial). | Online course, in Spanish. | $ 637 MXN |
| Institute of Accessibility | [Online course on digital accessibility](https://institutodeaccesibilidad.com/cursos-accesibilidad/curso-online-de-accesibilidad-digital/). | Online course, in Spanish. | $187 USD |
| Siteimprove.com | [Website Accessibility Checker](https://www.siteimprove.com/toolkit/accessibility-checker?utm_campaign=es_ppc_accessibility&utm_medium=ppc&utm_source=google&utm_term=sitio-web-accesible&keyword=web%20accesible&campaign_id=10952890035&ad_group_id=110579248954&ad_id=459528003541&match_type=b&target=kwd-355326002087&gclid=CjwKCAiAzKqdBhAnEiwAePEjkutALYzydtZppQzkBOaOyUNoB2At8up2DKYbYI7G_CVk1wwD6OqDMBoCAwMQAvD_BwE). | Free online web accessibility validator. | $ 0 |
| [The Must-Have Accessibility Handbook](https://hello.siteimprove.com/en/the-must-have-web-accessibility-handook/download?utm_campaign=es_ppc_accessibility&utm_medium=ppc&utm_source=google). | Web Accessibility Manual, free, digital. | $ 0 |
| [Web Accessibility Checklist for Content Editors/Creators](https://hello.siteimprove.com/en/whitepaper/accessible-blogging-checklist/download?utm_campaign=es_ppc_accessibility&utm_medium=ppc&utm_source=google). | Accessibility checklist, free, online. | $ 0 |
| [Web accessibility](https://www.siteimprove.com/get-in-touch/?utm_campaign=es_ppc_accessibility&utm_medium=ppc&utm_source=google). | Adaptation of web pages. | Quote |
| WAVE | [Web accessibility](https://wave.webaim.org/). | Accessibility diagnosis. | $ 0 |
| Inklusion | Web accessibility. | Adaptation of web pages. | Quote |
| Everything Accessible | Digital accessibility. | Adaptation of web pages. | Quote |

**Source:** Authors' own creation

## 3.5 Marketing and communication plan

As these are the first steps towards accessibility, with the publisher having already expressed their commitment to signing the ABC Charter, it is important for their audience to know about it. At this stage the focus will be only on awareness, as the new approach is not yet fully implemented. Since the investment level at the moment will be low, the communication and marketing strategy should correspond.

Table 5 shows a campaign proposal based on three strategies, five concrete actions and an indicative KPI. Each publisher will have to adjust the strategy based on their active media and resources. The duration of the campaign can also be adjusted, but it should not exceed one week.

**Table 5.** Marketing & Communication Campaign, Stage 1

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Phase | Strategy | Tactic | Actions | KPIs |
| *Awareness* | SEO | Web Contents | 1. Enable the "Social Responsibility" tab.  2. Copy on the signature.  3. Copy on web accessibility.  4. Initial banner on Accessibility. | 0.5% CTR on the new tab. |
| Social Media | Posts on Fb, Ig, and Lin | 1. About the signature: 1 post and 3 stories per social network, 1 video (reel).  2. About the accessibility of the website: 1 post and 5 stories per social network, 1 video tutorial (reel).  3. On the "Social Responsibility" tab: 1 post, 1 story (in Ig, story with swipe up). | 500 gradual impressions per post/story. |
| Email | Newsletter | 1. Thematic newsletter announcing the new tab, signature, and web accessibility. | 2% CTO. |

**Source:** Authors' own creation

## 3.6 Investment

**Table 6.** Investment Amounts for Stage 1

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Type of investment** | **Training** | **Accessible website** | **Marketing** | **Total** |
| Zero Investment | Free online training | Internal adaptation.  Free online course.  Free validation. | Social media posts.  In-house content development. | $ 0.00 MXN |
| Low investment | NPO Training:  $ 1,500.00 MXN, per person  Total: $7,500.00 MXN, for 5 people | Adaptation and validation:  $ 15,000.00 MXN | Outsource content development:  $ 1,200.00 MXN, per content | $ 30,000.00 MXN, approx. |

**Source:** Authors' own creation

# 4. Stage 2 - Implementation

## 4.1 Accessibility Committee

The accessibility champion will be the committee leader, who is responsible for deciding on the members and managing their entrances and exits (Gay, 2022). Maybe along the way the champio will feel the need to involve an area that did not seem to be directly related to accessibility before, or perhaps the tasks to be developed in the current stage require its involvement.

At the very least, the most senior manager in the publishing house or at least one member of the steering committee should be included because of their hierarchical level, an editor because of their transversal nature and the head of IT. However, it is also advisable to include at least one person from each area of the company. A possible non-exhaustive list might be: web developers and editors, marketing and communications staff, sales, human resources, logistics, administrative support (Gay, 2022), commercial area leaders of both physical and digital channels, finance, desktop editors, translators, designers, layout designers, test readers. Collaborators with a disabilites should also invited to join; their perspective will be of great help in validating decisions. Finally, it is recommended to include stakeholders in the supply chain, such as printers, key customers, distributors, literary agents, etc.

For Gay (2022), the committee's approach should be proactive, so that solutions to the accessibility barriers faced by clients are reached before they have to be addressed as complaints. In this sense, their responsibilities (Gay, 2022) would be as follows:

* Raising awareness about accessibility.
* Encouraging feedback to share problems and solutions.
* Implementing quality assurance procedures.
* Advice on legal issues related to accessibility.
* Web and digital accessibility support.
* Development of internal accessibility standards.
* Representation of the organization in public issues related to accessibility.

Once the accessibility committee team is established, at least in the initial stage, the next step would be to train all members on the subject. To do this, it will be necessary to consider, in accordance with the possibilities of the publisher, the available training options shown above.

The next step will be to communicate to the entire organization the existence of such a committee and its members so that collaborators know who to turn to when a complaint or concern arises in their respective areas, and so that the cultural change that is coming begins to be understood and people are ready to support the project. After that, it's a good idea to schedule monthly one-hour sessions to follow up on tasks and their progress.

## 4.2 Providing Files to Authorized Entities

It is equally worth discussing internally how requests from a NPO that is not necessarily an authorized entity will be addressed. Let´s remember that in such case the Marrakesh Treaty and the LFDA neither obligate the publisher to share files nor protect the procedure. However, at the time of this writing, there is only one organization in Mexico validated by the *Indautor*, but there are others that could produce books in accessible formats, so the publisher might consider the possibility of providing their files under a stricter license. Thus, it would be a voluntary social responsibility act that should be stipulated in the company's policy on accessibility. This should also include how to validate the legitimacy of the organization in question, its target audience, the risk it would pose, and how to enforce the security of the files.

Next, it will be necessary to understand the storage system of the publisher's files, the processes established for extracting files and safeguarding their security. The means by which the files will be shared with the authorized entity and what will be required to prevent them from being shared illegally should also be stipulated here.

The next step is to establish a process for providing files to the organization in question when a request comes in. A suggestion follows:

1. The person in charge gathers a series of data on the requesting institution. On the person who will serve as an interlocutor between the organization and the publishing house: name, company name, address, RFC and contact details, as well as on the requested work(s): title, author, edition, ISBN, source format, accessible format to be produced, target population and their needs. Then, the publishing house should communicate the procedure to be followed, the times, costs and the general conditions of the license to be granted.
2. With the information provided, this person will go to the file storage software and search for the corresponding work, subsequently evaluating the status of the files found, their degree of accessibility, and whether they already meet the needs of the target population (Hilderley, 2013). To this end, if there is to be a digital edition, the accessibility audit for digital products must be carried out (see Appendix 1).
3. The author of the requested work should be notified about the terms and conditions of the license. If the publishing contract does not have an accessibility clause, it will be necessary to meet with the author, explain the obligation faced by the publisher under national and international regulations and make them aware of the mission of the authorized entity and any royalty payments from which the publication will be exempt.
4. The person in charge will inform the organization of the status of the files and negotiate the level of collaboration that can be offered in order to deliver them in the best possible condition. If the work in question has already been produced in an accessible format that meets the needs of the target population, the publisher is not obligated to supply such to the authorized entity, as this is not covered by the Marrakesh Treaty.
5. Finally, the publishing house should draft the license, share the requested files, and the notify the author of the publication of their work in the corresponding accessible format.

## 4.3 Copyright licenses for Authorized Entities

A Mexican publisher endeavouring to open the possibility for a third party to produce its books in accessible formats must be in alignment with the provisions of both the Marrakesh Treaty and the National Copyright Law. This involves considering the development of copyright licenses for authorized national and international organizations, thus the accessibility champion will need to be in contact with the legal team and define the terms of the license. Manocha *et al*. propose a list of terms and conditions that may be useful in writing one’s own license and also to get an idea of the potential requirements to be faced. Such are translated in Appendix 2.

The next step, once the license and file supply process are established, is to communicate this to the community the publisher serves. The copyright notice would be a good communication vehicle: adding a legend that contains the contact to write to when producing other accessible formats, does not require any type of investment. An example of such text might be as follows:

For accessible format copyright license, exclusively to Authorized Entities,

contact us at the following email: \_\_@\_\_\_. \_\_

## 4.4 Universal Publishing Protocol

In order to implement universal publishing in publishing houses, it will be necessary to establish a new process for the production of novelties and make them accessible from the source. Although other guides have established the guidelines that e-book files must follow in order to be accessible, this guide considers the importance of converting them from mere instructions to tasks to be covered by the main actors in the content creation supply chain: author – editor – designer – converter. This will incorporate each player into the new workflow, where everyone knows who is in charge of what. This aims to meet an understanding that the accessibility of the resulting book is not only the responsibility of the last to intervene in the file (converter), but from the true origin of the work (author), regardless of its final format.

Although Manocha *et al*. suggest implementing an XML-based workflow from the manuscript submission stage to training, modifying the practices of Mexican publishers in such a way would involve a structural change in the processes. This would alter the status quo of the way of working in a century-old industry with high resistance to change. Consequently, it would lead to even greater rejection and discomfort among managers and collaborators, which would distance Mexican publishers from the mission of accessibility.

For this reason, we reiterate instead the recommendation to distribute the burden of modifications to the production process through tasks that ensure accessibility at all stages and facilitate the work of the converter and the test reader, on whom most of the responsibilities fall. Another advise would be, at least in these early stages, to leave the production of XML files to the e-book conversion stage, since these types of collaborator already have the pertinent technical training, whereas traditional publishers do not. In this way, investment in specialized training is minimized and the publisher can start working with the new process as soon as they receive general awareness training.

In the event that the conversion stage from print to digital format is outsourced to a third-party provider, the publisher will have to negotiate the fee for including accessibility in the service. Let´s remember that this is already an international standard that the provider´s work should already be compliant. In consequence, requesting that they deliver a quality file for the same price is not unreasonable. However, the publishing house could agree to increase the fee, between 5 and 10%; this would certainly help the provider to be more willing to accept, train and update their processes. A *win-win*.

### 4.4.1 New process for native accessible novelties

The path to universal publishing requires incorporating the accessibility approach into every part of the process, and the inclusion of at least two new elements in the workflow. The first consists of writing and validating the descriptions of the graphic resources of each work, because although both the author and the editor can produce the descriptive text, it will be important to request validation of such from an expert in this different type of text. An ideal requirement would be to have a person visually impaired from birth confirm the usefulness of the description and detect biases invisible to the able-bodied. Of course, the expert could produce a suitable source text, but most likely the cost of this service will be higher than simply validating and correcting a description that has already been worked on previously and internally within the publishing house. As this is a very specialized service, hiring a third-party provider is recommended. Table 7 provides some indicative rates consulted with an editor specializing in accessibility for the visually impaired and Scribely, an expert provider of accessible descriptions.

**Table 7**. Providers of accessible image descriptions

|  |  |  |
| --- | --- | --- |
| **Service** | **Scribely** | **Specialized Editor** |
| Image Description | $ 3-5.00 USD | $ 85.00 MXN |
| Image Validation | $1-3.00 USD | $ 45.00 MXN |

**Source:** Authors' own creation

The second element to incorporate into the workflow is proofreading the digital edition. Although that should ideally be part of the day-to-day life of Mexican publishers, the reality is that only a few do so. The reasons can range from a lack of time, resources, or training, to simply not considering it necessary. Considering that the path to universal publishing aims to generate e-books for any type of reader, we would recommend that publishers adopt this good practice. With it, a recommendation would be to check if the file complies with the accessibility standards. It will depend on the organization and their possibilities whether they prefer to hire a reader of digital editions due to the large volume of digital books they publish or outsource this process.

**Figure 1**. Traditional Editorial Process *vs*. Accessible Editorial Process

Source: Authors' own creation

According to Gay (2022), software such as DAISY's Ace is so accurate that it does not require a human eye to detect technical accessibility errors. However, other guides recommend performing a user test to validate the quality and functionality of the file. Such a reader should be aware of and use assistive technologies regularly in order to provide useful feedback on the content and not be biased in their evaluation due to their inexperience (Gay, 2022). If it is feasible for the publisher to add this process, it would be ideal; if not, running Ace's assessment will suffice and deliver a minimum viable product. The editorial process of producing accessible print and digital books is summarized in Figure 1 above.

### 4.4.2 New Tasks by Role

Next is to condense the guidelines proposed by Gay (2002), The Chang School (2015), Benetech, Gunn (2016), Manocha *et al.*, Scollo (2013), Hilderley (2013) and Fuentes (2019) for the creation of accessible archives for digital books.

#### Author:

* Write with the reader with functional diversity in mind.
* Submit a manuscript in an editable file, in Word 2010 or higher.
* Use Word styles to format and structure text, especially to identify the hierarchy of headings and indicate reading order.
* Ponder the need to include graphic or multimedia resources and how to make them understandable for people with functional diversity.
* Ponder the need to use italics or bold, as they make it difficult to read and it will be difficult to maintain their functionality in readers with assistive technology.
* Ponder table usage. If it is possible to avoid them, all the better. If this is not possible, keep them as simple as possible, avoid empty cells, never present tables as an image and provide a description of them.
* Avoid using colour to give meaning. If necessary, provide a description of your use in text.
* Avoid the use of images or multimedia content. Include descriptions of graphic assets. If there are multimedia resources, the subtitles of the videos or transcription of the audio must be included. Do not overlay text on images.

#### Editor:

* Check that the author has submitted a file with the characteristics listed above.
* Deliver the manuscript for layout design with a clear order and structure, as well as sequenced or numbered headers. Provide a table of contents or index that is consistent with the structure of the text.
* Review the quality of the descriptions and transcriptions of graphic or multimedia resources and the relevance of their inclusion in the book. The text should not exceed 125 characters, as this is the limit read by assistive technologies. If it is longer, it should incorporate the full description in the surrounding text and only a short version in the alternative text. Validate the relevance of the descriptions with an external provider who is an expert in this type of text, one who is preferably blind.
* Ponder the need for the use of colour to give meaning, as well as the use of italics or bold.
* When including internal and external links, provide a description of the destination.
* Clearly identify secondary content such as footnotes, references and figures, among others.
* Ideally, deliver a text with semantic markup.

#### Designer:

* Provide the layout design with a CSS template that can isolate the appearance of the content: one that can both follow international standards for digital content and maintaining the main design lines of the printed book.
* Use Unicode fonts.
* The layout of the body of the text should be left-aligned; it must be clear, simple and consistent; Always present the same page orientation. Avoid arranging text in two columns; if such is necessary, ensure there is enough space between them to distinguish the blocks of text clearly.
* Avoid using colour to represent meaning. If such is necessary, choose a colour palette with sufficient contrast (minimum 5:1 for small text and 3:1 for large text) and legible for people with colour blindness.
* The graphic design of headings should be visually meaningful, but should also correspond to the semantic structure of the content (code).
* Avoid decorative or text images. In the first case, declare them as such, and in the second, convert them to real text characters.
* Consider the appearance and content layout of the table of contents to provide clear and accessible navigation.

#### Converter:

* Export Indesign (or similar) files to EPUB 3 and use HTML5. Produce clean code with proper use of spaces and useful comments that can be accessed by coders with functional diversity.
* Respect and replicate the order and structure of the file provided by the editor. Tag the different parts of the book using the *section tag and the* epub:type *attribute*. For example: <section epub:type="preface" role="doc-preface">. Always include an internal and an external index with active hyperlinks.
* Apply the semantic tags, roles, and ARIA attributes to identify the content type of each part of the text. E.g. use *the li* tag to mark lists, *h1* or *h2* for titles, *cite* for citations.
* Use *epub:type="pagebreak"* and *role="doc-pagebreak"* to include the reference page of the printed book.
* Update metadata and include accessibility metadata to improve book discovery in search engines.
* Include at the beginning of the book a description of the accessibility features active in the file settings and include a link to a how-to for activating the device's assistive technology.
* Include in all images, their respective *img*  tag and their description in the alt text attribute *alt text*: <img src="gato\_negro.jpg" alt="A black cat perched on a fence" />. If it is a decorative image, the empty attribute should appear as *alt="".* Use accessible SVG so that images can be played on touch-enabled devices. Avoid overlaying text on images.
* Tables should be coded at both the format level and the code level, never as images, with the appropriate labels to identify cell types. For example, use *th* for headers and *td* for data cells. Also include descriptions, titles, roles.
* Include instructions for all functional elements of the file that are not commonly used or whose operation is obvious, and a description of the destination of external links.
* Use MathML to encode mathematical formulas.
* Include the language of the work and accessibility properties in [metadata](https://schema.org/Book) to increase visibility and communicate the accessibility level of the file.
* Replace embedded fonts with Unicode fonts.
* Correct colour usage. If it doesn't have enough contrast, correct it.
* Use the Ace by DAISY software to check the accessibility of the file. Fix errors identified by Ace.

#### Digital Edition Care:

* Use the Ace by DAISY software to check the accessibility of the file. Request correction of errors identified by Ace.
* Use the checklist (see Appendix) to validate that all standards have been met.

## 4.5 Adaptation of 10% of the backlist

Regardless of whether the new editorial process has been or is being implemented and native accessible novelties are already or will soon be produced, there is an editorial fund that requires simultaneous attention. Existing editorial accessibility guidelines do not mention how to approach this enormous task. On the other hand, what they do warn is that while in novelties the investment is focused on training and process adjustments, for the fund, a significant monetary investment is required, even more so when it comes to publishers with a robust catalogue. In this sense, the challenge lies in defining the amount of the annual investment, what type of production there will be ⸺internal or external⸺, the selection of titles and the process to follow.

As the existing literature did not address the subject, we spoke with Hugo Setzer, president of Caniem and CEO of Manual Moderno, a renowned academic publishing house focused on medicine and one of the few examples of editorial accessibility in Mexico, about how he has been converting his catalogue into an accessible digital format and what best practices he can share with us from his experience. One of the most interesting was in relation to the selection of titles to be made accessible: taking as a priority criterion to concentrate first on works of low difficulty; that is, those in which the content that predominates is the running text, since there is a much lower required adjustments level. In this way, they could move faster with books that were relatively simple to convert, contribute more works to the fight against the famine of accessible content, learn along the way, and keep the team motivated. However, the nature of some of their books, such as those dedicated to medical topics, presents more complex challenges, such as describing images of highly specialized surgeries, so they continue to work on the most viable and efficient solutions.

### 4.5.1 Annual Investment Amount

The first decision that the publisher must make is the amount of investment that will be allocated annually to this project. At first glance it would seem that accessibility alone is not enough of a motivator to spend money on the publishing fund, which in itself offers the majority of the catalogue residual profits and only some titles constant profits, which often happens when there is a focus on the printed book while the digital version is produced *and left alone* without making any kind of sales effort. However, if this project were seen as a necessary update of digital books, as digital content subject to technological changes, in order to increase quality and bring archives to the present by complying with current international standards, the result would undoubtedly be reflected in better positioning and visibility in search engines and it is highly likely that sales would also rise. It should be noted that in digital marketplaces, the editorial fund shows a better performance because the algorithm favours the sales history over the novelties and the quality of the archive to offer a better user experience. Such is the case of Amazon, the competitor with the largest market share in digital books. As a result, the publisher would have an up-to-date digital catalogue with greater commercial possibilities to compete with the low quality of the competition's offer.

Conversely, there is no ideal or recommended investment amount. Instead, the accessibility committee is invited to work on a project where they ask the steering committee for a reasonable figure accompanied by a work plan and a short-term sales projection. Each publisher must weigh their finances and set a target according to their possibilities, without harming the production of novelties. Along these lines, we can consider three types of investment:

* Low investment. Less than $10 000.00 MXN per year. Absorption of tasks such as structural expenses.
* Average investment. Between $10,001.00 and $29,999.00 MXN per year. Hybrid expenses.
* High investment. More than $30 000.00 MXN per year. Outsourcing.

### 4.5.2 In-house production or outsourcing

The second step will be to decide how and where the update will be carried out; that is, whether books will be made accessible internally or externally to the organization, although it may also be done in a hybrid way. As we have mentioned, the decision will depend on the amount of annual investment, the internal policies of the publisher regarding the outsourcing and hiring of external collaborators, whether the production of digital novelties is internal or external, and the level of training they have been able to offer to their internal collaborators.

If there is an IT professional or a digital publisher who does the conversion in-house from print book to e-book, a good alternative could be to lean towards *in-house* production. Likewise, it will be advisable to have at least one in-house and trained professional to carry out the testing of the accessible digital edition to ensure the quality control of the resulting file. At this point, how fast the goal of adapting 10% of the editorial fund can be reached will depend on the workload. However, the training that both collaborators will have already received for the production of accessible novelties will also serve to adapt the fund; hence, it will be the only monetary investment, together with time and human capital, and it would be a structural expenditure and not one directly applicable to the expenditure of the book in question. While the learning curve and the fact that employees would not be able to dedicate themselves exclusively to these tasks might mean a greater amount of time invested per title in this first stage, compromising progress towards achieving the objective, in later stages it would be reduced.

If the publisher has a considerable workload and cannot afford to adapt the backlist as an internal project or decides not to invest time in such, they will be forced to entrust this activity to a third party. As a result, their investment would rise considerably and, depending on the number of securities that make up 10% of the fund, might result in a medium to high investment. The fees for the updating or adaptation service would then be associated with the book in question, so the pressure to make such expense profitable would be greater. It would also depend on the amount of investment and the number of titles to be worked on, as well as how fast and how long it would take to meet the objective. Another disadvantage might be that, although this task implies a financial burden for the publisher, it might go unnoticed by internal collaborators, who assume that, since it is not their responsibility, their involvement is not required.

Finally, a hybrid production is a fairly affordable alternative that allows faster progress in achieving the objective while providing simultaneous learning that remains in the publisher's *know-how*, because while an external provider is ideally working on the most difficult titles, internal collaborators are putting into practice the knowledge and skills obtained from the initial training with simple books. Alternatively, the majority of the adaptation could be done in-house, outsourcing only the most complex or time-consuming tasks; for example, the subtitling and transcription of multimedia content or the solution of non-obvious errors in code flagged by Ace.

We know that the issue of adaptation fees with external providers can be somewhat complicated because there are no reference tabulators. The publisher will have to negotiate how much they are willing to pay for this service and the provider will weigh the investment in time and resources in training, as well as the possibility of offering a low cost in exchange for a high volume of projects. Ideally, the two should approach the issue together and collaboratively reach the halfway point where the *win-win* is reached, which will most likely coincide with convincing the provider to train and agree on a fair price for the adaptation service.

**Table 8.** Types of production and investment, and their implications

|  |  |  |
| --- | --- | --- |
| **Type of production** | **Investment** | **Implications** |
| Internal | Low | Prior investment in quality training.  Implementation of a quality control process.  Structural spending.  Investment in time and learning curve. |
| Hybrid | Medium | Structural and book-related expenditure.  Learning on par with reaching the goal.  Shared responsibility. |
| External | High | Expense associated with the book.  Pressure to make the project profitable.  Increased speed without impairing internal operation. |

**Source**: Own creation

One recommendation might be to follow a difficulty level criterion to establish the tabulators themselves. Table 9 shows an example.

**Table 9.** Proposal of tabulators by level of difficulty

|  |  |  |
| --- | --- | --- |
| **Low difficulty** | **Difficulty: medium** | **High Difficulty** |
| The file is an EPUB3. | The file is an EPUB2. | The file is not EPUB. |
| Well-structured archive. | File with basic structure and areas of opportunity. | Unstructured file. |
| It has no images or multimedia content. | Some images (less than 15) and little or no multimedia content. | Lots of images and multimedia content. |
| Mockup design requires few changes. | The design of the mockup requires correcting some fields. | The model needs to be redesigned. |
| Uses some semantic tags. | It requires correcting and incorporating semantic labels. | There is no semantic markup. |
| Accessibility metadata needs to be incorporated. | Metadata needs to be corrected, updated, and added. | It has no metadata. |
| Ace's recommendations are easy and few. | Ace's recommendations involve having a code expert solve them. | Ace recommends too many settings and they are complex in nature. |

**Source**: Authors' own creation

### 4.5.3 Title selection

Once the investment amount has been defined to make 10% of the catalogue accessible, the dilemma of working order in terms of titles arises. While each publisher may have different motivations and priorities, here are a number of criteria that could be useful in deciding the selection of titles to adapt at first. One or more of them can be chosen and combined as desired.

* **Rule 80:20**. Use the Pareto principle to identify the 20% of catalogue titles that account for 80% of sales, and then choose the top half of the catalogue that sells the most across all formats. This criterion will help accessibility spending to have less impact on the financial result of the book and be accrued from constant or assured sales, so the publisher can afford a higher level of investment. In this way, the profitability of the titles will help the publisher feel that these are investments with results and thus continue following the work plan in stages.
* **Sales Territory**. Given that Directive 2019/882 will enter into force in 2025 in the European Union, it is worth reviewing which books have significant sales in the European territory. If there are any, they should be placed on the list with the highest priority.
* **Level of difficulty**. Hugo Setzer used this criterion for the adaptation of the *Manual Moderno* catalogue: they identified the titles that indicated a less complicated challenge and started with them. The table in the previous section also serves as a reference to identify the level of difficulty in the title selection process.
* **Level of investment**. Associated with the difficulty and the internal or external way of working, the level of investment, which we have already discussed at the title level, will be added to that of the rest of the list of selected books to compare with the amount of annual investment and decide if it is necessary to make cuts, add more titles or outsource more to advance faster.
* **On-demand selection**. Select different local public assistance institutions and approach them with the proposal to launch a survey among their beneficiaries including a strategic pre-selection of titles, and ask about their interest in adapting them to accessible e-books. As a recommendation, this criterion could be used in all cases, since the market input ends up confirming that there is interest in the adaptation of the selected titles and also acts as a first audience that could become the first readers, who would contribute to making the investment profitable.

### 4.5.4 Process

Adapting a title in order to make it accessible, which implies changing the focus from traditional publishing to universal publishing, means going backwards through the logical order of the editorial process, as the converter (internal or external) will be the most involved role and the leader of the project, in charge of correcting the flaws in terms of accessibility of the selected titles. Hence, the adaptation process might follow the following sequence:

1. **Ace diagnosis**. The converter will need to run the Ace diagnostics with the title file in question.
2. **Analyse errors**. The converter will look at the list of accessibility errors and note which ones can be worked out on their own and which ones will involve knocking on the door of the editor or designer.
3. **Bug fixes**. With the help of the editor and designer, as well as validated descriptions of images and media, the converter will correct errors.
4. **Ace validation**. Finally, they will once again run Ace's validation to confirm that all bugs have been fixed. If this is not the case, steps 2 and 3 will need to be repeated until everything has been resolved.

## 4.6 Ensure storage and tagging of metadata for accessible files

Once the final file has been validated by Ace, it is important to ensure that it is correctly labelled in the storage system used by the publisher. The metadata will need to identify the new format and describe the accessibility features validated by Ace. To do this, the IT team may have to open new registration fields and modify the storage protocol.

## 4.7 Marketing and communication plan

As in the accessibility implementation stage, the publisher is in the middle of learning and adapting their internal processes, which is why it is advisable to keep a low profile in external communication but continue talking internally about the work that is being done. For this reason, and given that sales are not yet the focus, things will remain in the awareness phase with corresponding marketing and communication actions.

Table 10 shows a campaign proposal based on three strategies, concrete actions and an indicative KPI. Each publisher will need to adjust the strategy based on their active media and resources. The duration of the campaign can also be adjusted, but one week is the best recommendation, and it should coincide if possible with an *ad hoc* anniversary, such as the International Day of Persons with Disabilities on December 3.

**Table 10**. Marketing & Communication Campaign, Stage 2

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Phase** | **Strategy** | **Tactic** | **Actions** | **KPIs** |
| *Awareness* | SEO | Web Content | 1. Copy on the creation of the accessibility committee.  2. Copy on the process of supplying files to authorized entities.  3. Copy on the implementation of the protocol for universal publishing.  4. Copy on the project to adapt the backlist and survey for the selection of titles. | 0.5% CTR on each post. |
| Social Media | Corresponding posts on Fb, Ig, and Lin | 1. About the creation of the accessibility committee: 1 post and 1 story per social network, 1 video (reel).  2. About the process of supplying files to Authorized Entities: 1 post and 1 story per social network, 1 video tutorial (reel).  3. On the implementation of the protocol for universal publishing: 1 post, 1 story (in Ig, story with swipe up).  4. About the project to adapt the backlist: 1 post, 3 stories (in Ig, story with swipe up for the survey). | 500 corresponding impressions per post/story. |
| Email | Newsletter | 1. Thematic bulletin announcing the actions to implement accessibility in the publishing house.  2. Thematic bulletin announcing the survey for the selection of titles for adaptation of the fund. | 2% CTO. |

**Source**: Authors' own creation

## 4.8 Investment

**Table 11**. Investment Amounts for Stage 2

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Type of investment** | **Accessibility Committee Training** | **Universal publishing Protocol** | **Adaptation of 10% of the backlist** | **Marketing** | **Total** |
| Zero Investment | Free online training. | New internal process.  Free training.  Image descriptions without validation.  Free file validation. | Free online training.  Internal adaptation of all titles. | Corresponding posts.  In-house content development. | $ 0.00 MXN |
| Low investment | NPO Training:  $ 1,500.00 MXN per person.  Total: $10,500.00 MXN, for 7 people | New internal process.  Validation of image descriptions:  $ 45.00 MXN. | Free online training.  Validation of image descriptions: $45.00 MXN per image.  In-house adaptation of simple titles. Outsourcing of high-difficulty degrees:  $1,000.00 MXN per title. | Corresponding posts.  In-house content development. | $ 30,000.00 MXN, approx. |
| High investment | NPO Training  $1,500.00 per person.  Total: $7,500.00, for 5 people | Outsourcing the conversion to an accessible e-book:  10% more on the rate agreed with the supplier. | Outsourcing of the adaptation of all titles, according to level of difficulty.  \*Quote with supplier\*. | Outsource content development:  $ 1,200.00 MXN, per content. | $ 50,000.00 MXN, approx. |

**Source**: Authors' own creation

# 5. Next steps

As mentioned above, the current scope of this guide contemplates only the development of the first two stages of the accessibility plan for publishers, since most publishing houses in Mexico are in these phases. However, below is a brief summary of the following stages:

## 5.1 Consolidation

After having implemented the changes in the processes and initiated the adaptation of the editorial processes for the production and adaptation of accessible works, the publishing house has already taken the first steps towards accessibility and the corporate culture is in transition; now the level of consolidation must reached so that efforts are not abandoned, while results become discernible. At this point, the accessibility committee is in a position to draft an accessibility policy based on the experience of the early stages and a clearer vision of where universal publishing is headed. In addition, the publisher can now produce the first new accessible features to cover the new process from start to finish and make any necessary adjustments. At the same time, the process of adapting the backlist will also be able to allow an increase in the objective to 30% of the fund, while selection of titles can follow the same criteria as in the first stage.

Consequently, in terms of intellectual property, the publisher is ready to include a clause in the publishing contracts, specifying that, in the event of receiving a request for files from an organization authorized for the production of an accessible format focused on an audience with a need not covered by EPUB3, the publisher is obligated to comply with the provision of files and will not receive income or be able to make the corresponding royalty payment.

In the area of human capital, the next step is to raise awareness among all the publisher's collaborators. Although some steps have already been taken in this direction and some areas are already beginning to work on it, it is important that they are all aligned with the new objectives of the organization. Likewise, it is important to involve authors in this training, since with the adjustment in the publishing contracts, doubts and questions will arise that can be resolved with this awareness plan.

For its part, the IT team will have the challenge of ensuring that the transit of accessible files produced by the publisher retains its accessibility properties when it reaches distributors or aggregators, if they are available. At this stage, the transition process will have to be reviewed from start to finish hand in hand with distributors or aggregators, so it will be necessary to have their collaboration. Sometimes this can involve updating systems, resulting in a considerable investment for them, for which they are not necessarily prepared. If so, it will be necessary to sensitize them to the objective and reasons of the accessibility project of the publishing house and try to convince them to migrate together on the basis of a feasible work plan for both organizations.

The same exercise should be carried out simultaneously in the commercial area, but with the main customers. The main accessibility issues of the user journey from start to finish of the purchasing process and also of the publisher's external supply chain will need to be detected. On the basis of this and the collaboration of the third parties involved, solutions and a work plan to implement them will be proposed.

As for the area of marketing and communication, its mission at this stage will be to develop a permanent campaign to promote accessible titles. Merely producing them is not enough; it is essential to communicate their existence to the publisher's audience and encourage sales. This not only serves the purpose of making the project profitable, but also that of building a socially responsible brand image.

Finally, in order to contribute to marketing actions, the publisher must begin looking for public assistance institutions focused on people with functional diversity with whom they share values, mission and audiences, in order to establish relationships with them. The objective is to make them aware of the accessibility project they are working on, the actions carried out and the goals to be met. It is also advisable to start early on exploring some collaborative initiatives to spread the availability of accessible works to the community.

## 5.2 Bonding

With the consolidation of the abovementioned actions, the publishing house can now be considered accessible. However, although most of the challenges have already been solved internally, it is time to link these actions with other important actors in the book ecosystem. In the first place, the accessibility policy that was developed in the previous stage must be made public, as the new guidelines to be followed are based on this. While the guidelines have already been executed, making the policy public will ensure a stronger commitment, as it will be under internal and external scrutiny.

Based on this, the commercial area will be able to negotiate with customers any required actions to ensure that their services adopt accessibility and thus achieve a 100% accessible purchase process. To do this, it will be necessary to sensitize the main stakeholders of the publishing house and go from there to negotiations.

The publishing plan may already be producing at least 30% of the novelties in the original accessible format and the adaptation of the backlist may then increase from 30 to 50%.

The scouting of NPOs that was carried out in stage 3 and the first exploration of possible lines of collaboration will now be reinforced by the consolidation of alliances with these institutions through a first proposal for a collaboration agreement and by launching a call to attract more NPOs interested in a relationship with the publisher. Dissemination of such will be the responsibility of the marketing and communication area, with a proposal for an AIDA campaign.

## 5.3 Acceleration

The last stage of the accessibility plan corresponds to the acceleration of all the actions that have been carried out previously. By this time, the publisher will be accessible and so will their supply chain; now it's time to take the final steps to optimize what has already been worked on or achieve 100% application of accessibility internally or externally.

Although the target percentage of adaptation of the backlist has been gradually increasing throughout the previous stages and half of it is now accessible, this last stage endeavours to achieve 100% of the adapted collection. As we have already worked on the catalogue previously and challenges have been resolved, the remaining 50% should no longer be a major inconvenience. Profitability of the project has been proven and a greater amount of investment can be allowed since there are no more tasks requiring expense. At the same time, 100% of the novelty publishing plan already produces accessible digital books.

Consequently, IT will need to ensure that the purchasing process is 100% accessible. To this end, the commercial area must also execute the action plan hand in hand with its customers to conquer the challenges identified and make the book ecosystem fully accessible.

Once the call for NPOs has been launched and the collaboration agreement has been approved, the publishing house will establish the first formal relationships with these institutions. The dissemination of the resulting actions will be under responsibility of the marketing and communication area.

Finally, and based on the experience acquired throughout the process, it will be advisable to update the accessibility policy and offer continuous training in accessibility to employees as well as key stakeholders.

# Bibliography

ABC. *Charter for Accessible Publishing*. Available at <https://www.accessiblebooksconsortium.org/portal/en/charter.html> [Accessed: 2/11/22]

Accessible Books Consortium (ABC). Available at: [https://www.accessible-booksconsortium.org/](https://www.accessiblebooksconsortium.org/)[Accessed: 2/11/22]

Alba Pastor, Carmen. (2019). “Diseño Universal para el Aprendizaje: un modelo teórico-práctico para una educación inclusiva de calidad”. In *Participación educativa*, vol. 6, n. 9, pp. 55-68.

Anuies. (2020, August 21). *Sólo 5% de mexicanos con alguna discapacidad obtiene grado de licenciatura*. Available at: <http://www.anuies.mx/noticias_ies/slo-5-de-mexicanos-con-alguna-discapacidad-obtiene-grado-de#:~:text=En%20M%C3%A9xico%20s%C3%B3lo%20cinco%20por,que%20participar%C3%A1n%20en%20los%20Foros>

Benetech. *Top Tips for Creating Accessible EPUB 3 Files*. IPA. Available at: <https://www.accessiblebooksconsortium.org/export/abc/en/15_top_tips_for_creating_accessible_epub_3.pdf> [Accessed: 11/11/22]

Benito, Marco Antonio. (2021, April 24). "Literatura accesible: ayer, hoy y mañana". <https://www.universia.net/mx/actualidad/orientacion-academica/literatura-accesible-ayer-hoy-y-manana.html> [Accessed: 8/11/22]

CAST (2018). “The UDL Guidelines”. In *Universal Design for Learning Guideline.* Available at: [http://udlguidelines.cast.org](http://udlguidelines.cast.org/) [Accessed: 9/11/22]

Center for Excellence in Universal Design. *Definition and overview*. Available at: <https://universaldesign.ie/what-is-universal-design/definition-and-overview/> [Accessed: 16/11/22]

Ciudad Accesible (2022). *¿Qué es el Diseño Universal? 7 principios, 8 objetivos*. Available at: <https://www.ciudadaccesible.cl/que-es-el-diseno-universal/>[Accessed: 16/11/22]

Conadis (2016). *Hablemos de diseño universal*. Available at: <https://www.gob.mx/conadis/articulos/diseno-universal> [Accessed: 11/16/22]

Conapred. (2013, December 7). *Presenta por primera vez la FIL Guadalajara libros para personas con discapacidad visual*. Available at: <https://www.conapred.org.mx/index.php?contenido=noticias&id=4540&id_opcion=303&op=448> [Accessed: 11/11/22]

Coneval. (2020). *Medición de pobreza 2020*. Available at: <https://www.coneval.org.mx/Medicion/MP/Paginas/Pobreza_2020.aspx>

Diario Oficial de la Unión Europea. (2019, April 17). *Directiva (UE) 2019/882 del Parlamento europeo y del Consejo*. Available at: <https://www.boe.es/doue/2019/151/L00070-00115.pdf>

DOF. (2020). *Ley Federal del Derecho de Autor*. Available at: <https://www.diputados.gob.mx/LeyesBiblio/pdf/122_010720.pdf> [Accessed: 23/11/22]

Escutia Montelongo, María de los Ángeles. (2021, December 17). *Bibliotecas y personas con discapacidad: discurso, realidad y oportunidades*. Available at: <https://bdcv.hypotheses.org/4110> [Accessed: 15/11/22]

European Blind Union. (2017). *Making Information Accessible for All*. Available at: <https://www.euroblind.org/publications-and-resources/making-information-accessible-all> [Accessed: 11/11/22]

Fuentes, C. (2019): “El Tratado de Marrakech, ¿libros para ciegos?”. In *Revista Española de Discapacidad*, vol. 7, n. I: 251-255. Doi: <https://doi.org/10.5569/2340-5104.07.01.13> [Accessed: 8/11/22]

Garnish, Matt. (2012). *Accessible ePUB 3*. O´Reilly Media. Available at: <https://learning.oreilly.com/library/view/accessible-epub-3/9781449329297/index.html> [Accessed: 23/11/22]

Gay, Greg. (2022). *La accesibilidad digital como práctica de negocios*. Digital Education Strategies-The Chang School. Available at: <https://espanol.libretexts.org/Negocio/Negocios/Negocios_Avanzados/Libro%3A_La_accesibilidad_digital_como_pr%C3%A1ctica_de_negocios> [Accessed: 30/11/22]

Gunn, Dave. (2016). *Accessible e-book Guidelines for Serf-Publishing Authors*. Accessible Books Consortium – International Authors Forum.

Hernandez, Libertad. (2020, July 3). *México avanza en facilitar la producción e intercambio de obras en formatos accesibles*. Available at: <https://dis-capacidad.com/2020/07/03/mexico-avanza-en-facilitar-la-produccion-e-intercambio-de-obras-en-formatos-accesibles/> [Accessed: 13/11/22]

Hilderley, Sarah. (2013). *Publicación en formatos accesibles. Directrices para editoriales: las prácticas más difundidas*. EditEur, WIPO, Daisy Consortium.

Inclusive Design Research Centre (IDRC). *Philosophy*. Available at: <https://idrc.ocadu.ca/about/philosophy/> [Accessed: 16/11/22]

INEGI. (2020). *Censo de Población y vivienda 2020*. Available at: <https://www.inegi.org.mx/programas/ccpv/2020/> [Accessed: 11/11/22]

Jewell, Catherine. (2018, February). "El Consorcio de Libros Accesibles y sus implicaciones para los editores". In *OMPI Revista*. Available at: <https://www.wipo.int/wipo_magazine/es/2018/01/article_0001.html> [Accessed: 1/11/22]

Kotter, John P. (2012). *Leading Change*. Harvard Business Review Press.

Mace, Ronald. (1997) *Principios de diseño universal*. The Centre for Excellence in Universal Design, NC State University.

Manchado Marín, Marcos. (2021, December 16). “Analizando la Directiva 2019/882: ¿Es un hito para la accesibilidad universal?”. In *MTP*. Available at: [https://www.mtp.es/blog/experiencia-de-usuario-blog/analizando-la-directiva-2019-882-es-un-hito-para-la-accesibilidad-universal/#:~:text=La%20Uni%C3%B3n%20Europea%2C%20en%20el,los%20requisitos%20de%20accesibilidad%20exigibles](https://www.mtp.es/blog/experiencia-de-usuario-blog/analizando-la-directiva-2019-882-es-un-hito-para-la-accesibilidad-universal/" \l ":~:text=La%20Uni%C3%B3n%20Europea%2C%20en%20el,los%20requisitos%20de%20accesibilidad%20exigibles). [Accessed: 11/11/22]

Manocha, Dipendra, Prashant Ranjan Verma, Nimita Narashimhan, Siddharth Cadha, Rishika Ragarajan, Nicolaas Faasen. *Books for All. A Starter Kit for Accessible Publishing in Developing and Least Developed Countries*. India: Accessible Books Consortium – DAISY Consortium – Centre for Internet and Society.

May, Matt. (2018, April 2). “The Same, But Different: Breaking Down Accessibility, Universality, and Inclusion in Design”. In *Adobe Blog*. Available at: <https://blog.adobe.com/en/publish/2018/04/02/different-breaking-accessibility-universality-inclusion-design> [Accessed: 18/11/22]

Mejoredu. (2022). *Discapacidad y derecho a la educación en México*. Available at <https://www.mejoredu.gob.mx/images/publicaciones/Discapacidad-de-2022.pdf>

Observatorio de accesibilidad y vida independiente. *Definiciones básicas*. Available at: <https://observatoriodelaaccesibilidad.es/archivos/3104> [Accessed: 27/11/22]

OMPI. (2013). *Tratado de Marrakech*. Basilea: OMPI.

Organización Panamericana de la Salud. *Discapacidad*. Available at: [https://www.paho.org/es/temas/discapacidad#:~:text=Las%20personas%20con%20discapacidad%20son,de%20condiciones%20con%20los%20dem%C3%A1s](https://www.paho.org/es/temas/discapacidad" \l ":~:text=Las%20personas%20con%20discapacidad%20son,de%20condiciones%20con%20los%20dem%C3%A1s). [Accessed: 11/16/22]

Real Academia Española. (2022). *Diccionario panhispánico del español jurídico* (DPEJ) [online]. Available at: <https://dpej.rae.es/> [Accessed: 27/11/22]

Robles Cuéllar, Camerina. (2020, August 1). “Un paso para acabar con la ‘hambruna’ de libros para personas con discapacidad”. In *Animal* *Político*. Available at: <https://www.animalpolitico.com/yo-tambien-discapacidad-con-todas-sus-letras/un-paso-para-acabar-con-la-hambruna-de-libros-para-personas-con-discapacidad/> [Accessed: 11/11/22]

Romañach Cabrero, Javier and Manuel Lobato y Lobato. (2007). "Functional Diversity." In *Communication and Disabilities: Proceedings of the International Forum*, pp. 321-330. Available at: <file:///D:/Downloads/Dialnet-DiversidadFuncional-2393402%20(1).pdf> [Accessed: 16/11/22]

*Round table on Information Access for People with Print Disabilities Inc*. Available at: <https://printdisability.org/> [Accessed: 16/11/22]

Scollo Lavizzari, Carlo y Tran, Quy. (2013). *IPA Guide to the Marrakesh Treaty*. Basilea: IPA.

Setzer, Hugo. (2023). Interview.

The Chang School (2015). *Professional Web Accessibility Auditing Made Easy. 10 Key Guidelines*. Ryerson University. Available at: <https://pressbooks.library.torontomu.ca/dabp/wp-content/uploads/sites/35/2018/04/10-Key-Guidelines.pdf> [Accessed: 30/11/22]

University of Guadalajara. (2016, May 9). "Libros poco accesibles" in *Gaceta UDG*, available at: <http://www.gaceta.udg.mx/Libros-poco-accesibles/> [Accessed on 31/10/22]

Wunderman Thompson. (2022, July 12). *La próxima ola de inclusión*. Available at: <https://www.wundermanthompson.com/es/insight/inclusions-next-wave> [Accessed: 27/11/22]

# Appendix 1 – Accessibility Audit

Based on the proposal of Hilderley (2013), Manocha *et al*. and the checklist of Gunn (2016), we have developed the following questionnaires.

## 7.1 Employee´s Sensitivity to Accessibility Questionnaire

Application is recommended to all employees of the company, ideally digitally, to make data management easier.

1. Did you know that there are people who live with difficulties accessing printed text? Who do you imagine they are and what challenges do they face?
2. Do you know what functional diversity is and how many people live with it in Mexico?
3. Do you think people with functional diversity would be interested in reading the books your publishing house produces?
4. Do you know what accessibility is and how it can be applied to books?
5. Does your publisher produce accessible books? What percentage are they of all the books that are published?
6. Do you know what accessible formats exist and how they help the different needs of people with print disabilities?
7. Do you know what opportunities digital books offer in terms of accessibility?
8. What do you think about readers personalizing the text in an e-book? Do you think it's an important feature for people with print disabilities?
9. In your day-to-day tasks, do you take accessibility into consideration? If the answer is no, how do you think you can involve accessibility in your functions?
10. Why is it important to promote the creation of accessible books in publishing houses?
11. If an authorized entity requested the files of a work to convert it to an accessible format without offering payment, how would you react? Do you know of the Marrakesh Treaty?

## 7.2 Product and Editorial Process Evaluation

1. What percentage of novelties is published in an accessible format?
2. What percentage of the backlist was published in an accessible format?
3. Do readers and contributors know about the publication of these books?
4. Does the publisher produce accessible e-books? Why?
5. What types of e-book formats does the publishing house produce?
6. What are the disadvantages of that format for people with print disabilities?
7. Is the e-book reflowable or fixed? If it is fixed, can it become reflowable?
8. Is each part of the book properly identified with the corresponding structural labels and titles? Are the titles consistent and clear?
9. Does the e-book offer a logical reading order?
10. Is each type of content properly labelled?
11. Is it possible to navigate text content using links, indexes, searches, and assistive technology?
12. Is the use of character styles prudent and necessary?
13. Are there any indications of the page number?
14. Is it possible to customize the formatting of the text: fonts, line spacing, size, colour, and contrast?
15. Does the layout design have a universal approach?
16. Does the use of colour offer enough contrast and does it consider people with colour blindness?
17. Do the available fonts offer any options for dyslexic readers?
18. Can all text be read with text-to-speech technology?
19. Are images, charts, tables, or multimedia content properly identified, labelled, transcribed, and described in short alt text, with the appropriate quality for a person with disabilities, and are the headings and captions recognizable by screen readers? Do you have a long descriptive text available for the user who wants it?
20. Have you received assistance from a specialist to ensure the accessibility of multimedia content?
21. Are decorative images marked without alt text?
22. Are charts, cells, tables, diagrams, formulas marked with the proper semantic labels, are details explained in the description, and are headings and footers used correctly?
23. Are texts, charts, tables, diagrams and formulas presented as images?
24. Are formulas coded with MathML?
25. Is the language of the publication indicated?
26. Does the file include metadata that advertises accessibility capabilities?
27. Does the file include other accessibility elements such as synthesized or human voice audio synchronized with reading?
28. Is quality control considered for e-books?
29. Does QA consider Ace by DAISY's accessibility validation?
30. Does QA consider testing the file on more than one reader? And in a braille encoder?
31. Does quality control consider a reading made by a person with functional diversity?
32. What type of assistive technology is supported by the type of e-book files you produce?
33. Does the book production process accommodate the different formats?
34. Are accessible book files easy to find? How so?
35. Is there a person in charge of supplying files for the production of accessible formats?
36. Is there a process for providing files for the production of accessible formats?
37. Does the distributor of the digital formats fulfil the technical requirements to sustain the level of accessibility of the work?
38. Is the user experience offered by digital e-book sales platforms accessible?
39. Is digital rights protection software an accessibility barrier for the sales platform?
40. Are you aware of the latest technological advances in accessibility in the services of sales platforms and reading systems?

## 7.3 Overall Accessibility Assessment

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| 1. Does the publisher have an accessibility policy? | | | | | |
|  | a. No accessibility policy | b. We have signed the Charter from ABC | c. Policy is under development | d. The accessibility policy exists but has not been published | e. Accessibility policy needs to be updated |
| 2. What percentage of the backlist is accessible? | | | | | |
|  | a. 0% | b. Less than 10% | c. Between 10 and 30% | d. Between 30 and 50% | e. More than 50% |
| 3. Does the publishing house produce native accessible novelties? | | | | | |
|  | a. No | b. No, but they're preparing to implement the new process | c. Yes, they recently adopted the protocol for universal publishing | d. Yes, 10% of the new features in the publishing plan are accessible from the outset | e. Yes, 30% of the publishing plan is accessible from the outset |
| 4. Is the publishing house prepared to comply with the Marrakesh Treaty? | | | | | |
|  | a. We don't know what the Marrakesh Treaty is | b. No, but we are preparing the process of provisioning files and licensing with Authorized Entities (AEs) | c. Yes, the process of provisioning files and licensing with AOs is active | d. Yes, the supply of files and license with AOs is active and the publishing contracts mention it. | e. Yes, we have fully adopted the Marrakesh Treaty and put it into practice. |
| 5. Is human capital engaged and trained in accessibility? | | | | | |
|  | a. No | b. An accessibility champion has been appointed and trained | c. The Accessibility Committee has been appointed and trained | d. We have sensitized and trained our collaborators and authors | e. We are raising awareness and training our stakeholders |
| 6. Is there any type of Marketing or Communication action regarding actions in favour of accessibility? | | | | | |
|  | a. No | b. We've spread the word about our commitment to accessibility | c. We have disseminated the actions in favour of accessibility that we are carrying out | d. We develop an ongoing campaign to promote accessible titles | e. We disseminate the call for collaboration with NPOs |
| 7. What IT services are accessible? | | | | | |
|  | a. None | b. The website is accessible | c. Accessibility metadata tagging, and file storage is accessible | d. Accessibility features are maintained in file transit | e. The checkout process is accessible |
| 8. How accessible is the publisher's external supply chain? | | | | | |
|  | a. We haven't considered it | b. At the moment we are focusing on the internal supply chain | c. We review the accessibility of the main players in the supply chain | d. We identify accessibility issues and potential solutions in the supply chain | e. External actors in our supply chain take action for accessibility |
| 9. Has the publisher entered into alliances with third parties to promote sales? | | | | | |
|  | a. No | b. No, we're focusing on internal actions first | c. No, we are looking for the right NPOs | d. We are developing the proposal to collaborate with them | e. Yes, we collaborate with NPOs |

### Results

|  |  |
| --- | --- |
| **Majority of** | **Stage** |
| a. | 1 |
| b. | 2 |
| c. | 3 |
| d. | 4 |
| e. | 5 |

# Appendix 2 – Terms and Conditions of the License for the Production of Accessible Formats by Authorized Entities

In Appendix 5 of *Books For All. A Starter Kit For Accessible Publishing In Developing And Least Developed Countries*, written by Manocha *et al*. and published by the ABC, the following terms and conditions of the copyright license for the production of works in accessible formats are suggested:

Applicant Organization

* 1. In consideration of the Requesting Organization giving the copyright holder the opportunity of undergoing training, free of charge, on how to produce books in accessible formats:
     1. The copyright holder grants to the Requesting Organization, free of charge, the right to adapt and to reproduce the books listed in Appendix 1 to create Accessible Versions of the listed books.
     2. The copyright holder also grants to Requesting Organization, free of charge, the right:
     3. to distribute and make available to Beneficiaries located in [Insert Country] the Accessible Versions of the listed books that have been adapted and reproduced by the Requesting Organization and.
     4. to authorize the ABC Book Service at the World Intellectual Property Organization (WIPO) in Geneva, Switzerland, to distribute and make available to Beneficiaries located anywhere in the world the Accessible Versions of the listed books that have been adapted and reproduced by the Requesting Organization.

1. The copyright holder warrants and confirms to Requesting Organization that it has full title to grant the rights set out in paragraph 1.a.2 to the Requesting Organization.
2. Any limitations to these rights shall be notified by the copyright holder by email communication to the Requesting Organization on acceptance of these terms and conditions and in the event of any limitation in such rights.

The Requesting Organization’s Obligations under these Terms and Conditions

To ensure the appropriate use of the rights granted by the copyright holder, the Requesting Organization agrees only to distribute and make available Accessible Versions of the books listed in Appendix 1 to Beneficiaries under the following conditions:

* 1. The Requesting Organization has adequate security mechanisms in place to prevent unauthorized access to its electronic files of the books. Beneficiaries will be members of the Requesting Organization.
  2. The Requesting Organization does not make a profit through the distribution of the Accessible Versions of the books.
  3. Every Accessible Version has a copyright notice that:
     1. Recognizes the copyright of the original work;
     2. States it is a copy of the original work that has been produced;
     3. States that it is for the personal use of the Beneficiary only and may not be further copied without permission by the copyright holder.
  4. An equivalent Accessible Version of the book is not lawfully and commercially available within (Insert country where Requesting Organization operates) within a reasonable time or price.
  5. If the Requesting Organization becomes aware of any non-compliance of these conditions by Beneficiaries to whom it has distributed Accessible Versions, it shall immediately seek correction of this non-compliance.
  6. The Requesting Organization acknowledges that its own non-compliance of these conditions could constitute a violation of copyright that may subject it to civil and criminal liability.

Duration. This grant of rights shall come into force when the copyright holder confirms that rights have been granted to the Requesting Organization and shall remain in force for a period of one year and shall be automatically renewed each year unless either the copyright holder or the Requesting Organization gives the other party three months’ prior written notice of termination.

Amendment. The copyright holder may amend the rights granted by providing written notice to the Requesting Organization.

Definitions

Requesting Organization. For the purposes of this agreement, (Insert the Name of Requesting Organization) is the Requesting Organization. The Requesting Organization must be able to satisfy the definition of “Authorized Entity” as set out in Article 2 (c) of The Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired, or Otherwise Print Disabled (the Marrakesh VIP Treaty).

Accessible Version. The definition shall be the same as that of “accessible format copy” as set out in Article 2 (b) of the Marrakesh VIP Treaty.

Beneficiary. The definition shall be the same as that of "Beneficiary Person" in Article 3 of the Marrakesh VIP Treaty.

1. Possibly "the most accessible file format that exists" (Hilderley, 2013) and the most specialized is the Digital Accessible Information System (DAISY).

   A DAISY book can be described as a package of digital files that includes: a digital sound file, or more than one, containing a narration, in human voice or synthesized and pre-recorded, of all or part of a text; a marked file containing all or part of the text; a synchronization file that links the marks in the text file to certain points in the sound file; and a navigation control file that allows the user to conveniently move between files, maintaining synchronization between the text and the sound file (Hilderley, 2013).

   However, it is the most unknown by publishers and requires specialized applications to be able to read it and obtain all its benefits. In addition, it is not a format that is usually accepted by e-book sales platforms, so it has significant commercial barriers. Consequently, it is not surprising that the ABC is leaning towards EPUB 3 as the format to replace DAISY as the standard for accessible electronic publications (Hilderley, 2013). [↑](#footnote-ref-49)