Accessibility Must Follow the Transaction

Extended discussion brief - Rev4

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Purpose. Educate and inform the U.S. Access Board about the direction TIG/KMA is pursuing, and ask the Board to pressure-test the accessibility layer while the broader global framework is still being developed. This is not a request for endorsement of a certification program or review of the entire regulatory platform.

> **Accessibility should follow the customer transaction - not the product category or device label.**

Executive summary

The larger TIG/KMA initiative is a practical **global regulations framework** for customer-operated and unattended transactions. The problem manufacturers face is not one checklist. A single transaction can trigger different accessibility, safety, communications, privacy, identity, payment, sector and security obligations depending on what the system does and where it is deployed.

The framework therefore has two dimensions: **regulatory domain x jurisdiction.** Accessibility is one foundational layer. The Access Board is being asked to help pressure-test that layer - not to validate the entire framework.

1. Transaction-based accessibility

The working model remains functional: **Arrive - Reach - Identify - Operate - Pay - Receive Service - Get Help - Complete Privately.** A transaction can move across physical equipment, software, mobile apps, voice, payment and human assistance. The practical test is whether the customer can finish.

2. EV charging - physical/digital proof case

EV charging makes the overlap visible. The customer must get to the charger, reach and operate it, handle the cable and connector, understand the interface, authenticate and pay, perhaps use an app or QR code, obtain help, and encounter equipment that actually works. One customer transaction crosses physical access, ICT, communications, payment, safety and operations.

3. AI changes the development point

Drive-thru / conversational AI. The menu board, microphone, speaker, conversational AI, computer vision, loyalty system, payment system and employee can all be part of one transaction. There may no longer be one obvious device to make accessible.

Voice is an accessibility tool. It becomes an accessibility failure when it is the only path through the transaction. The same principle applies to app-only, QR-only and other single-path designs.

Government services / design and procurement. Government services provide a useful proving ground because the transaction, accessibility requirements and procurement responsibilities are easier to identify. Forms, eligibility, instructions, appointments and service routing are good examples. AI can reduce friction and handle routine preparation before the customer reaches staff. It cannot become the only route to service, the only explanation of a decision, or the only recovery path when the system fails.

The customer need is not fundamentally different from private-sector self-service. What changes is the regulatory environment around the transaction.

4. The bigger idea - global regulations framework

Regulatory domains: accessibility; product/electrical safety; communications; privacy and identity; payments and sector-specific rules; cybersecurity and data trust.

Jurisdictions being mapped: North America; Europe/UK; India; Korea; China; broader APAC; and LATAM. The objective is to show applicability, convergence, divergence and gaps - not to imply that these markets share one legal regime.

Layer	Examples / questions to map
Accessibility	ADA/ABA; Section 508; HHS Section 504 where applicable; EN 301 549; physical access; ICT; communication
Safety	UL and other product/electrical safety requirements; installation and operating environment
Communications	FCC/CVAA where applicable; wireless; voice and communications functions
Privacy / identity	Biometrics; identity verification; state, federal, EU and market-specific privacy rules
Payments / sector	Payment requirements; transportation/ACAA-DOT; healthcare; government procurement; other sector rules
Data / trust	HIPAA where applicable; cybersecurity; authentication; machine-to-machine trust; Zero Trust

5. Zero Trust - the connective trust problem

Modern unattended systems depend on trust relationships between people, machines, software, cloud services, identity systems and payment systems. Accessibility, privacy and security can work against each other when designed separately. Authentication, fraud controls, biometric checks, timeouts, CAPTCHAs, app requirements and security prompts can all affect whether a customer can complete the transaction.

Zero Trust is useful here as an organizing security concept: trust between the person, device, software, service and organization should be deliberately established rather than assumed. It is not being presented as an accessibility regulation.

6. What TIG/KMA is asking from the Access Board

The global framework is broader than the Access Board's mandate. We understand that. The request is narrower: help TIG/KMA pressure-test the accessibility layer.

Pressure-test	What we need from USAB
Transaction model	Does the functional customer-journey model capture accessibility better than a device label alone?
Language / terminology	Are we describing physical access, ICT, AI/voice, payment, identity and human support in a useful and accurate way?
Gaps	Where may current guidance or common industry practice fail to capture emerging unattended systems?
Industry role	What field data, manufacturer input or operator experience would be useful to the Board?

If we get that foundation right, industry can carry it responsibly into POS, EV charging, smart vending, lockers, parking and global markets - without confusing voluntary certification with government approval.

Proposed next step: a technical briefing with the appropriate U.S. Access Board staff or process focused on the accessibility transaction model, terminology and gaps.

Appendix A - Five-minute oral remarks (Rev4)

First, thank you for having us here, and thank you for the work the Access Board does.

I represent The Industry Group and the Kiosk Manufacturer Association. We work with manufacturers, suppliers, operators and accessibility people across self-service.

I am not here with a finished answer. I want to show you where I think the market is going, what we are trying to execute on, and get your suggestions.

The basic idea is simple: accessibility should follow the transaction, not necessarily the device.

EV charging is a good example. It is not enough to have an accessible parking space. You have to get to the charger. You have to reach it. You have to handle the cable and connector. You have to use the screen or another interface, make payment, maybe use an app or QR code, get help if something goes wrong - and the machine has to actually work when the customer gets there.

That is one transaction, but it crosses physical access, digital access, communications, payment and operations. We see the same pattern in POS, vending, lockers, parking, transit and government services.

AI changes the picture again. For years the development point was the kiosk. You could point to the box and say: that is the thing we need to make accessible. That is not always true anymore.

Look at drive-thru. The menu board, microphone, speaker, conversational AI, payment system and employee can all be part of one transaction. So where exactly is the device?

Voice is an accessibility tool. It becomes an accessibility failure when it is the only path through the transaction.

Government services give us a useful proving ground because the transaction, accessibility requirements and procurement responsibilities are easier to identify. Think about forms, eligibility, instructions, appointments and service routing. AI can reduce the gruntwork before somebody gets to a person. But it cannot become the only route to service, the only explanation of a decision, or the only way to recover when the system fails.

That is the same transaction model we see in private-sector self-service. The difference is not the customer's need. The difference is the regulatory environment around the transaction.

And that gets to the bigger project.

We are trying to build a practical global regulations framework around the transaction. Accessibility is one layer. So are product safety and UL, FCC and communications, privacy and biometrics, identity, payments, healthcare and HIPAA where applicable, transportation rules, cybersecurity and other sector requirements.

The second dimension is jurisdiction. We are looking at North America, Europe and the UK, India, Korea, China, broader APAC and LATAM. The requirements are different, but manufacturers increasingly have to understand all of them.

Machines are talking to machines. People are talking to machines. AI is making decisions and moving information between systems. We live in a Zero Trust world. Managing trust between the person, the machine, the software and the organization behind it is becoming just as important as the interface itself.

The global framework is broader than the Access Board's mandate. I understand that. But accessibility is one of its foundational layers, and government services are an immediate proving ground.

What I am asking from the Board is help pressure-testing that layer: the transaction model, the language, and the places where physical access, ICT, AI, payment, identity and human support meet.

If we get that foundation right, industry can carry it responsibly into POS, EV charging, smart vending, lockers, parking and global markets - without confusing voluntary certification with government approval.

We can bring manufacturers, technology suppliers and operators to the table. You have expertise and experience we need.

I would much rather get this right while these systems are being designed than try to fix them after they are everywhere.

Thank you. I am interested in your suggestions.

Appendix B - Guardrails for the framework

USAB boundary. Ask the Board to pressure-test accessibility concepts and terminology, not to approve the global framework or a certification program.

Government AI. Treat it as a design/procurement proving ground. Do not imply that AI should become the only service channel, decision explanation or recovery mechanism.

Global mapping. Separate legal applicability from standards, technical guidance and voluntary certification. A standard's existence does not by itself make it legally binding in every market.

Sector rules. ADA/ABA, Section 508, HHS Section 504, FCC/CVAA, ACAA/DOT, HIPAA, privacy/biometric rules, payment requirements and UL/product-safety standards have different triggers and scopes. Map applicability rather than treating them as universal kiosk rules.

Zero Trust. Use as a security/trust architecture concept connecting people, machines, software, data and organizations. Do not describe it as an accessibility mandate.