Accessibility Must Follow the Transaction

Five-minute oral remarks - Rev4

Craig Allen Keefner | The Industry Group (TIG) / Kiosk Manufacturer Association (KMA) | U.S. Access Board discussion

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.