



UCD Office of Access and
Lifelong Learning

UCD Access Centre:
Disability Support
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Oifig do Rochtain agus d'Fhoghlaim
Feadh Saoil UCD

Lárionad Rochtana UCD:
Tacaíocht do Dhaoine faoi Mhíchumas
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An Coláiste Ollscoile, Baile Átha Cliath
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8th June 2012

RE: Copyright Review

Dear Copyright Review Committee

UCD Access Centre: Disability Support seeks to create an inclusive learning environment where students who are print impaired have full access to their course materials and textbooks, at the same time as their non-disabled peers.

We are satisfied with the proposed changes to section 104 of the Copyright Act. The ability to retain accessible intermediate copies and to lend / transfer them to other designated bodies is essential as it is both costly and time consuming to create accessible copies as requested by each individual.

Currently the Access Centre produces accessible texts by purchasing a copy of the printed text, dismantling the text, scanning each page, converting and editing these scanned copies to make them accessible and rebinding the text. This is a time consuming and costly process which disadvantages print disabled students who often have to wait a number of weeks to access their core texts. This puts them at a considerable disadvantage to their peers who can buy a copy of the printed text or borrow a copy from the Library when the course begins.

In order to alleviate these substantial costs, and ensure that students with a disability receive their course materials in a timely manner we recommend that publishers are given an anticipatory duty to retain an accessible electronic version of each text which can be supplied on request for the purpose of creating an accessible resource for a person with a disability in accordance with section 104 of the Copyright Act.

It is essential that the version supplied to meet the needs of print impaired students meets an agreed standard that ensures accessibility.

Regardless of the alternative format required by a print impaired students, e.g. Braille, electronic format for use with a screenreader, the first step is always the creation or acquisition of an accessible electronic version of the text, as these can easily be converted to a suitable format.

Without access to such a document UCD and other colleges will continue to waste valuable time and resources on creating texts, in the laborious manner described above. The current method for providing accessible texts puts print-impaired students at a



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substantial disadvantage by not providing them with their course materials at the same time as their peers and often much later.

Thank you for taking the time to read this submission.

Best wishes

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