

To: Joint Steering Committee for Development of RDA

From: Kevin Marsh, ACOC Representative

Subject: 3.11.4 Layout of tactile text and 3.13 Font Size

ACOC thanks BL for this proposal to generalize the exceptions at RDA 3.11 Layout, and revise the instruction for Jumbo Braille at RDA 3.11.4. ACOC has some reservations about the proposed changes.

We understand Jumbo Braille to differ from normal Braille in terms of the horizontal spacing between the dots, i.e., in terms of the layout, and not in terms of the size of the dot. Jumbo Braille was specifically invented for those blind people who have less sensitivity in their fingertips (e.g., those with diabetes) and cannot accurately feel the dots as traditional Braille lays them out (cf. <http://www.wisegeek.com/what-is-jumbo-braille.htm> and <http://www.perkins.org/community-programs/btbl/services/jumbo.html>). It is not clear to us that that Jumbo Braille is a tactile text equivalent of large or giant print. The size of the dots is unaffected in Jumbo Braille, but is made clearer to 'read' (i.e., feel) by being spaced more widely apart. ACOC is not altogether comfortable with moving Jumbo Braille from RDA 3.11.4.3 to 3.13.1.3.

ACOC also notes that Jumbo Braille is not specifically 'designed for persons with visual impairments' as the first sentence of RDA 3.13.1.3 says, but rather for persons with an impaired sense of touch. If the JSC determine that Jumbo Braille should be moved, this first sentence would need to be rewritten.

If the JSC determine that Jumbo Braille should not be moved the proposed second change will be affected. And the proposed generalization of the exceptions would need to be reconsidered.