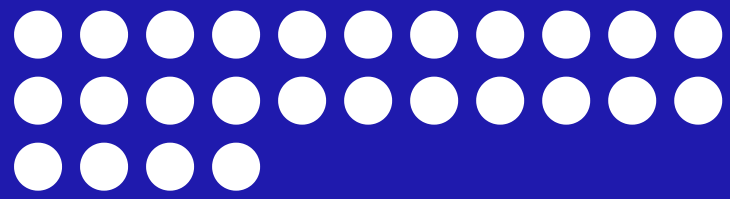
CORPOWID RESEARCH REPORT

EEA Telecom Sector Digital Accessibility Report

26 telecom operator homepages · WCAG 2.2 · November 2026

Accessibility barriers were detected on **all 26** telecom operator websites.



● Site with barriers detected ○ Site with no barriers detected

Data is based on operator homepages only · Scan date: 5 November 2026

02

What is digital accessibility?

Digital accessibility means websites, mobile apps and digital documents can be used by everyone, including people with visual, hearing, motor or cognitive differences.

According to the World Health Organization, 16% of the world's population, about 1.3 billion people, experience significant disability. Add age-related vision and mobility limits, and temporary situations such as a broken arm or a screen unreadable in sunlight, and accessibility becomes a matter for a large share of customers, not a minority.

The common yardstick is the Web Content Accessibility Guidelines (WCAG), published by the W3C. The current version, WCAG 2.2, groups its success criteria into three levels: A, AA and AAA. Most regulations require A and AA.

Across the EU, the European Accessibility Act has applied since 28 June 2025 and names electronic communications services, such as internet access, calls and messaging, explicitly. Operators were already bound by the European Electronic Communications Code to give disabled users equivalent access. In Norway, Iceland and Liechtenstein the EAA is not yet part of the EEA Agreement, but national rules apply.

Vision	Hearing	Motor	Cognitive
Screen readers, magnification, high contrast	Captions, text alternatives	Keyboard, voice control, large touch areas	Plain language, consistent navigation, clear errors

Source: WHO, Disability and health, March 2023

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Executive summary

HOMEPAGE ONLY

Every one of the 26 telecom homepages has at least one accessibility barrier. Most are buttons and links that a screen reader cannot name, and group corporate sites carry far more barriers than the consumer sites customers use to buy and manage services.

26/26
sites with at least one A/AA barrier

591
automatically detected barriers

69%
of barriers are unnamed buttons and links

84%
of barriers sit on group corporate sites

1 **Every operator has barriers.**
All 26 homepages have at least one A/AA barrier; half of them have 7 or more.

2 **Screen reader users get stuck on 17 of 26 sites.**
Unnamed buttons and links account for 410 barriers, 69% of the total.

3 **Group corporate sites fare worse than consumer sites.**
The 14 group sites hold 499 barriers (84%); their median site has 10.5 barriers against 5 on the 12 consumer sites.

4 **88% of barriers are the same error repeated.**
On 20 of 26 sites, a single error type makes up at least half of the barriers; one fix goes a long way.

5 **One site holds 44% of all barriers.**
260 barriers sit on a single homepage, and the 7 sites with the most barriers hold 81% of the total.

SCOPE NOTE

The accessibility data in this report is calculated from the homepage of each company operating in the sector only. Pages behind login, subpages, mobile apps and documents are out of scope; results do not represent a company's digital channels as a whole.

Methodology

1

Select

26 telecom operators across the European Economic Area: 14 group corporate sites and 12 consumer sites.

2

Scan

Each homepage was scanned automatically against WCAG 2.2 on 5 November 2026, with the same tool version.

3

Classify

Each barrier was tagged by criterion, principle and level; error density was calculated.

4

Analyse

Barriers were grouped by topic, site type and sector. No company is named.

SCOPE NOTE

The accessibility data in this report is calculated from the homepage of each company operating in the sector only. Pages behind login, subpages, mobile apps and documents are out of scope; results do not represent a company's digital channels as a whole.

What we measured

- Text alternatives for images
- Coded page structure
- Colour contrast
- Touch target size
- Names of buttons and links
- Page language and title

Not measured in this report

- Pages behind login (internet banking)
- Subpages, mobile apps and PDF documents
- Keyboard navigation and screen reader behaviour
- Clarity of content (requires manual review)

Independence and transparency

Independent
Prepared on our own initiative; no organisation requests, pays for or approves it.

Anonymous
No organisation, brand, domain or sample list is published.

Point in time
Results reflect each homepage at the time of scanning.

Repeatable
Same period, same page type, same tool version.

Conflict of interest
Corpowid provides accessibility solutions; the report contains no product promotion.

Scanned by
Corpowid's digital resources and scanning infrastructure.

STANDARD DISCLOSURE

Automated testing in this study detects only a subset of WCAG 2.2 failures. A clean automated result does not mean a site is accessible or conformant. Barriers under the Understandable principle, such as unclear instructions or unhelpful error messages, and the real behaviour of interactive components can only be assessed through manual review, which is outside the scope of this report. Findings describe detectable barriers, not legal compliance.

05

Overall results

Barriers were detected on all 26 sites. A typical telecom homepage has 6.5 barriers across 2.5 WCAG criteria; 83% of all barriers are Level A.

26/26
sites with at least one barrier

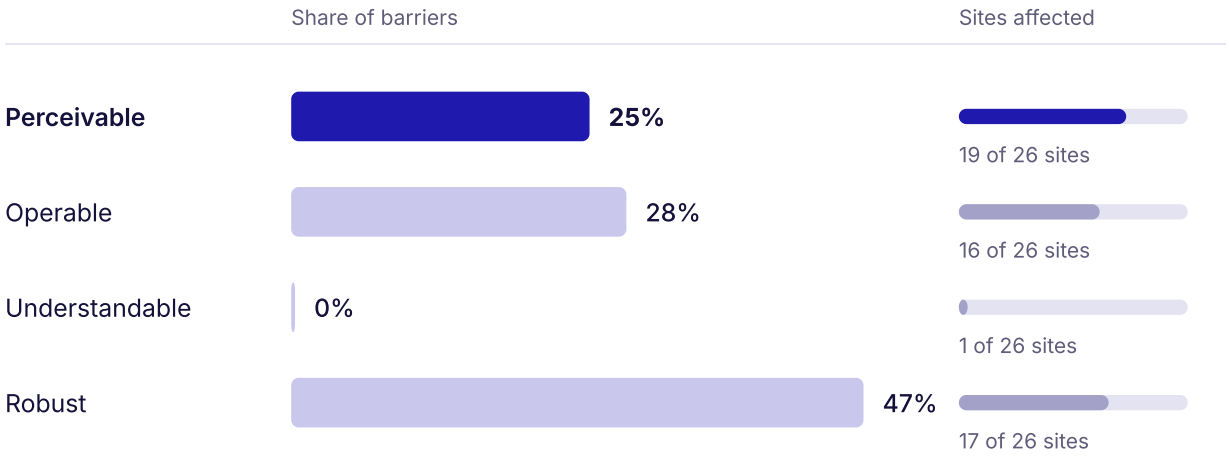
591
barriers in total

6.5
median barriers per site

2.5
median criteria per site

Robust holds nearly half of all barriers

Distribution of 591 barriers across principles, and number of sites affected



83% of barriers are Level A



493 of 591 barriers sit at the most basic level. All 98 AA barriers are contrast (70) and touch targets (28).

Group sites carry 84% of barriers

499 of 591

14 group corporate sites have a median of 10.5 barriers; 12 consumer sites have 5. Without the largest outlier, group sites still hold 239 barriers against 92.

> One Understandable barrier was found (a missing page language). This principle largely requires manual review, so automated testing understates it.

06

Findings by topic

Two in three operators have screen reader barriers

Sites failing the criterion, rounded to a 10-site unit

Topic · WCAG	How many in 10		Exact count
Name, role, value (screen reader) 4.1.2	●●●●●●●○○○	**7/10**	17 / 26
Contrast 1.4.3	●●●●●○○○○○	**5/10**	12 / 26
Page structure 1.3.1	●●●●○○○○○○	**4/10**	11 / 26
Unnamed link 2.4.4	●●●●○○○○○○	**4/10**	11 / 26
Alt text 1.1.1	●●●○○○○○○○	**3/10**	7 / 26
Bypass blocks 2.4.1	●●○○○○○○○○	**2/10**	6 / 26
Touch targets 2.5.8	●●○○○○○○○○	**2/10**	5 / 26
Use of colour 1.4.1	○○○○○○○○○○	**0/10**	1 / 26
Page language 3.1.1	○○○○○○○○○○	**0/10**	1 / 26

Screen reader

410 barriers on 17 sites: buttons and links without an accessible name, and empty links. A screen reader announces them only as "button" or "link".

Contrast

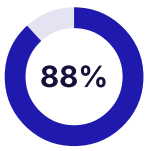
70 low-contrast barriers on 12 sites. Nine of those sites are group corporate sites; only three are consumer sites.

Images

42 barriers on 7 sites: images without a text description, and image links a screen reader cannot name.

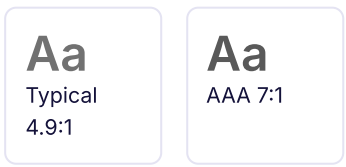
Depth: how close are the fixes?

Repetition effect



88% of barriers repeat an error already on the same site. On 20 of 26 sites, one error type is half or more.

AAA contrast



22 sites have text below the enhanced AAA 7:1 contrast ratio; the median example is 4.9:1.

Touch target



Of 28 targets failing AA, 20 are tiny icons of 8×8 or 12×12 px; the rest are cut down by overlapping controls.

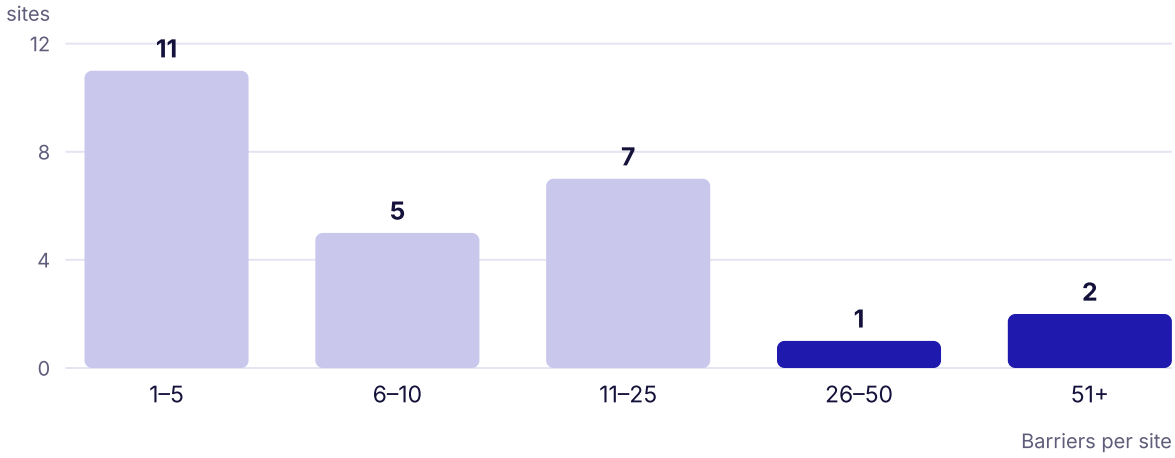
07

Distribution across sites

A sector average alone misleads: one site carries 44% of all barriers, and group corporate sites carry far more than consumer sites.

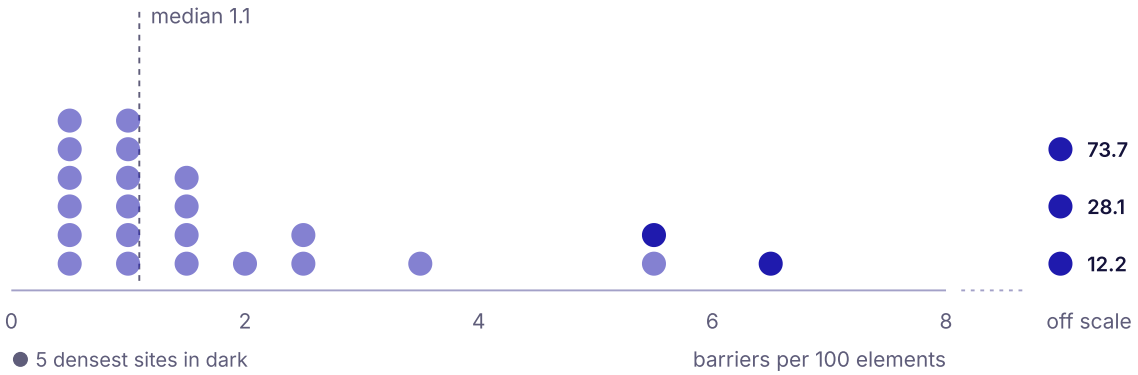
Every site has barriers; three have more than 50

Sites by number of A + AA barriers detected per site



Barrier density ranges from 0.2 to 73.7 per 100 elements

A + AA barriers per 100 elements examined, in steps of 0.5; each dot is an anonymous telecom site



The median telecom homepage has 1.1 barriers per 100 elements across 2.5 WCAG criteria. Most sites sit below 3; five exceed 5, and three are far off the scale.

Quick wins and their value beyond compliance

Five targeted fixes cover 583 of the 591 detected barriers. The same fixes also pay off in search visibility and user experience.

	Fix	Why first	Who benefits	Beyond compliance
1	**Give buttons and links an accessible name** WCAG 4.1.2 · 2.4.4	410 barriers, 17 sites; most common	Screen reader users	Meaningful names help software tools interpret the page correctly.
2	**Fix weak contrast** WCAG 1.4.3	70 barriers, 12 sites; 9 are group sites	Low vision, older users	No SEO effect; readability improves for everyone in sunlight and at low brightness.
3	**Add text alternatives to images** WCAG 1.1.1	42 barriers, 7 sites	Blind users	Google also understands images from alt text; device and plan images become easier to find.
4	**Code page structure correctly** WCAG 1.3.1	33 barriers, 11 sites	Screen reader users	Heading and list structure helps search engines parse the page; skimming users find things faster.
5	**Make touch targets at least 24 px** WCAG 2.5.8	28 targets, 5 sites; 20 are tiny icons	Mobile, motor impaired	Not a direct ranking signal; it improves mobile page quality and cuts mis-taps.

Situational barriers

Accessibility is not only for permanent disabilities. Every customer using a phone one-handed on a crowded bus, without their glasses, or watching video on mute benefits from the same fixes.

Source: Google Search Central, SEO Starter Guide. Search effects are directional, not measured traffic impact.

Advanced level: AAA

AAA is not required by most regulations, so it is kept out of the main figures. It does answer whether a site that passes AA is truly comfortable to use.

26/26
sites have touch targets below 44×44 px (AAA 2.5.5); 1,204 targets in total.

22
sites have text below the AAA 7:1 contrast ratio (1.4.6).

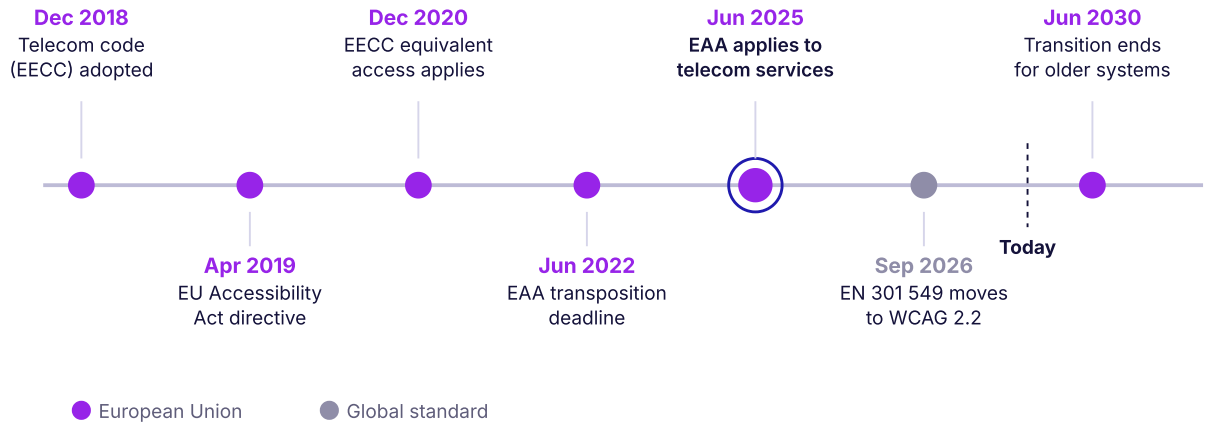
16
sites have links that open a new tab without warning (AAA 3.2.5).

09

Regulatory context

Telecom is one of the services the European Accessibility Act names outright. Since June 2025, operators' websites and apps must be accessible across the EU, on top of the equivalent-access duties they already had under the telecom code.

From equivalent access to accessible services



European Accessibility Act

Directive (EU) 2019/882 · since 28.06.2025

Electronic communications services are in scope by name: internet access and interpersonal communications. Operators' websites and apps must be accessible, and emergency calls to 112 must support real-time text. Penalties are set nationally.

Telecom code (EECC)

Directive (EU) 2018/1972, art. 111

Requires equivalent access and choice for disabled end-users. National telecom regulators supervise these duties, and in some states, such as Ireland, also enforce the EAA for telecom services.

EEA EFTA states

Norway · Iceland · Liechtenstein

The EAA has not yet been incorporated into the EEA Agreement. Norway already requires private-sector websites to meet WCAG under its Equality and Anti-Discrimination Act, supervised by its universal design authority.

HOW THIS REPORT CONNECTS

For telecom, scope is not in doubt: consumer services are named in the EAA. Group corporate sites mainly inform investors and the public and may fall outside the consumer-service scope, yet they are the most visible face of each operator. Every homepage in this report has automatically detected barriers at Levels A and AA. This is not a compliance judgement.

Sources: Directive (EU) 2019/882; Directive (EU) 2018/1972; ComReg 25/39, 27 June 2025; Lov&Data 3/2025; Uutilsynet; AccessibleEU, 7 Sep 2026.

Implications for executives

Accessibility is a management decision, not an IT task. The data points to five areas for decision.

1 Measure the customer journeys in scope

The EAA covers the websites and apps used to sell and support telecom services. Measure plan selection, checkout, account and support pages, not only the homepage, in every country you operate in.

2 Name a single owner

Barriers are spread across design, content and engineering. Without an executive owner and a quarterly target, fixes lose out to the campaign calendar.

3 Fix shared components first

88% of barriers are the same error repeated. Unnamed icon buttons and links in shared navigation and footers carry most of them; fixing those carries into every page and market.

4 Bring the group site up to the same bar

Group corporate sites carry 84% of the barriers in this report. They are often run by a separate team and agency; give them the same WCAG 2.2 AA target and checks as consumer sites.

5 Make measurement continuous

Automated scans on every release and at least one expert audit a year. Two board-level indicators are enough: error density and the completion rate of critical tasks.

The first 90 days

Days 0–30

Measure and own

Independent scan, owner named, priority list

Days 31–60

Fix the templates

Menu, icon button and touch target components

Days 61–90

Verify and embed

Expert test, contract clauses, board indicator

Three questions for the board

1. When did we last measure the accessibility of our digital channels independently?
2. Who owns accessibility, and what is the target?
3. Can a new digital product go live without passing an accessibility test?

Appendix

A · Metric definitions

Barrier	An automatically detected finding that fails a WCAG 2.2 A or AA criterion.
Error density	Barriers ÷ elements examined × 100.
Repetition rate	Barriers from repeats of the same error type on a site ÷ all barriers.
Consumer site	The website customers use to buy and manage telecom services.
Share of sites affected	Sites with at least one barrier on the criterion ÷ 26.
Criteria breadth	Number of distinct WCAG criteria a site fails.
Group corporate site	The holding or group website of an operator, mainly for investors and the public.
Median	The middle value when sites are sorted; unaffected by outliers.

B · WCAG criteria reviewed

Criterion	Name	Level	Principle	Sites	Barriers
1.1.1	Non-text content	A	Perceivable	7 / 26	42
1.3.1	Info and relationships	A	Perceivable	11 / 26	33
1.4.1	Use of colour	A	Perceivable	1 / 26	1
1.4.3	Contrast (minimum)	AA	Perceivable	12 / 26	70
2.4.1	Bypass blocks	A	Operable	6 / 26	6
2.4.4	Link purpose	A	Operable	11 / 26	130
2.5.8	Target size (minimum)	AA	Operable	5 / 26	28
3.1.1	Language of page	A	Understandable	1 / 26	1
4.1.2	Name, role, value	A	Robust	17 / 26	280
	Total				**591**

C · Scan parameters

Scan date	5 November 2026
Page type	Homepage (landing page after redirect)
Sample	26 telecom operators in the EEA: 14 group, 12 consumer sites
Tool	Corpowid scanning infrastructure, version 2.0.2
Level	Barriers: A and AA · warnings: incl. AAA
Language	Local language or English, as served

D · Glossary

Screen reader	Software that reads screen content aloud or sends it to a Braille display.
Touch target	The area of a button or link pressed with a finger.
Assistive technology	Tools such as screen readers, magnifiers and voice control.
Alt text	The text equivalent of an image for users who cannot see it.
Contrast ratio	Luminance difference between text and background; AA needs at least 4.5:1 for normal text.
Component / template	A piece of interface reused across many pages.

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