NOVARA
CONSULTING GROUP

This document was translated from English by machine and may contain mistakes. The English original is at https://www.novaracg.com/2026/07/12/the-fifth-parameter-issue-010-conformance-is-not-comprehension/.

第五参数 | 第010期 | 合规不等于理解

Heather Grizzle · 2026年7月12日

A signing avatar can pass every procurement check and still be incomprehensible to Deaf viewers. Why conformance is not comprehension.

目录

1. 评估结果揭示了什么
2. 这种缺失是结构性的
3. 一项严肃的要求应当是什么样子
4. 本刊立场

A procurement officer evaluating a signing avatar system has instruments for nearly everything except the thing that matters. There are established questions for encryption at rest and in transit, for data residency, for subprocessor disclosure, for uptime guarantees, for indemnification, for conflict minerals. There is a Voluntary Product Accessibility Template, and the vendor will supply one. There is a Section 508 checklist, and the vendor will satisfy it. At the end of this process the file is complete, the scoring rubric is filled, the award is defensible on audit, and no one at any point has asked whether a Deaf person watching the system's output understands what it is saying.

这并非个别采购人员的疏忽——他们通常尽职尽责，只是在既有工具的框架内工作。这是工具本身的属性所致。无障碍合规文件所认证的，是替代渠道的存在，而非该渠道是否承载了意义。VPAT可以准确记录手语内容是与语音内容同步提供的，这一记录属实，但它丝毫不能说明这种手语表达对其本应服务的群体而言是否可以理解。表格上有一栏用来填写是否提供了替代方案，却没有一栏用来填写这一方案是否奏效。

其后果是一种悄然的倒置。凡有评估工具存在之处，证据的缺失会被记录为缺陷并遭到标记。凡无评估工具存在之处，证据的缺失则完全不留痕迹。语言层面的问题不是被草

率地回答了，而是根本没有被提出，而这种“未被提出”在档案中不会留下任何痕迹。于是，沉默在下游被解读为满意，因为一份没有发现不利结果的完整评估，与一份根本无法记录不利结果的完整评估，看起来毫无二致。

评估结果显示了什么

Novara Consulting Group目前已依据SLAT框架，对七家手语人工智能供应商——Kara Technologies、SignAvatar、ChatSign、Silence Speaks、Sign-Speak、Signvrse以及GoSign.AI——进行了结构化评估。这些产品并不等同。它们在架构、成熟度、与聋人群体接触的认真程度，以及坦诚程度上都存在差异。有些企业的治理明显优于其他企业。数家企业聘用了聋人员工，还有少数企业由聋人拥有，或在生产环节中配备了认证聋人译员，这是一项真实的区别，也因此获得了相应评分。但没有一家达到“高度信任”等级。

The binding constraint was the same in every case, and it was not any of the things a procurement file would have caught. In no instance was there independent validation of signed output with Deaf users: no comprehension testing conducted by a party without a commercial interest in the result, reported with its failure conditions intact, across the range of dialect, age, register, and language fluency that any public deployment will actually encounter. Vendors publish accuracy figures. Accuracy figures are generated by the vendor, against the vendor's reference data, on the vendor's terms, and they measure the distance between an output and a target rather than the distance between an output and understanding. The two are not the same quantity and no amount of the first substitutes for the second.

表格中有一栏询问是否提供了替代方案，却没有一栏询问该方案是否有效。

A related pattern recurs across the snapshots. The marketing surface consistently outruns the stated technical maturity, and the divergence is visible in the vendors' own documentation if one reads it against itself. Deployment-speed claims appear without the conditions under which they were achieved. Systems that in fact operate along two distinct paths, one heavily human-mediated and one substantially automated, are described publicly in language that collapses the distinction. This is unremarkable behavior for a company raising capital. It is disqualifying as an evidentiary basis for a

public contract, and the reason it survives contact with procurement is that nothing in the process is designed to test it.

这种缺失是结构性的

若将此解读为对供应商的指控，那将是一种错误的、也无益的解读。供应商提供的是采购方所要求的证据。采购要求SOC 2认证，SOC 2认证便应运而生。采购要求渗透测试摘要，渗透测试摘要便应运而生。而本刊在能够找到的任何评估工具中，从未发现有采购方要求手语人工智能供应商证明，在接近实际部署的条件下，聋人用户能够理解其手语输出。因此，这样的证据并不存在。市场恰恰提供了它被要求提供的东西。

This locates the lever on the buyer's side of the transaction, which is the argument this publication has been making since its founding and which is worth stating without hedging. An RFP is not an administrative document. It is a specification for an evidence base. Whatever the RFP requires, the sector will build; whatever it omits, the sector will not build, not out of bad faith but because unfunded evidence does not get produced. Every requirement an institution declines to write is a study that will never be conducted. Procurement is the mechanism by which an institution's tolerance for uncertainty becomes the field's research agenda.

严肃要求应有的样子

The requirement is not complicated to state, though it is expensive to satisfy, and the expense is the point. Comprehension of signed output should be evaluated with Deaf participants who were not involved in building the system, spanning regional variation, age, and the range of language fluency the deployment will meet in practice, including the users who most need the system to work and are least equipped to compensate for its failures. The evaluation should be conducted by a party with no financial stake in its outcome. It should report where the system fails, under what conditions, and with what consequences for the user, because a system's failure modes are more informative for a buyer than its aggregate performance and are the first thing omitted from a vendor deck.

> **未达标且未评估**
>
> 这是两种不同的结论。将它们混为一谈，会惩罚那些如实说明自身成熟度的供应商，而奖励那些并不诚实的供应商。

并且，各机构需要在表格与评分体系中，为“尚不存在的证据”设立一个专门类别。“未满足”与“未评估”是两种不同的结论。将二者混为一谈，对各方都不利：它惩罚了那些对自身成熟度坦诚相告的供应商，却奖励了那些并不坦诚的供应商；同时，它使采购机构无法在书面文件中写下它所能给出的最准确的一句话——即：从未有人核实过。

立场

以上论述并非要反对手语人工智能，若有读者抱着这样的期待前来，恐怕要失望了。这项技术尚处于早期阶段，其中一些确实做得认真，未来也有可能适合公开部署。本文提出的论点更为具体、也更难回避：目前，尚不存在任何普遍使用的采购工具，能够区分一个聋人能够理解的系统与一个聋人无法理解的系统；供应商从未被要求提供这方面的证据，因而也确实没有提供；而各机构正在签署的合同中，这笔交易的核心问题，在档案里根本无迹可寻。

一项从未接受过检验的技术，不能被认为已经通过了检验。只要表格上没有为这一结论设立一栏，它就将持续不被记录，而记录也将持续显示一切正常。

The Fifth Parameter 是一份由 *Novara Consulting Group* 出版的、关于手语人工智能的独立评论刊物。

> **TIPS**
>
> Know something about a sign language AI system that the public should know? Send it to tips@novaracg.com. Every tip is read by me and kept confidential. If you work in the UK, writing to us is not by itself a protected disclosure under the Public Interest Disclosure Act 1998, so before you share employer information, check your options with Protect (protect-advice.org.uk), the free whistleblowing advice line.

SUPPORT NCG

NCG does this work without vendor money, so our findings stay ours. If it has been useful to you, you can support NCG's independent work here. NCG is a for-profit company, not a charity. Contributions are not tax-deductible and buy no service or influence.

引用方式

Grizzle, H. M. (2026, July 12). 第五参数 | 第010期 | 合规不等于理解. Novara Consulting Group. https://www.novaracg.com/zh/2026/07/12/the-fifth-parameter-issue-010-conformance-is-not-comprehension/