



How Accessible is the EIT Your Company Manufactures?

This template is based on the Voluntary Product Accessibility Template proposed by the Information Technology Industry Council <http://www.itic.org>. It is designed to assist Federal contracting officials in fulfilling their acquisition planning responsibilities as identified in FAR section 10.001 (a)(3)(vii): "(to) (a)ssess the availability of electronic and information technology that meets all or part of the applicable accessibility standards issued by the Architectural and Transportation Barriers Compliance Board at 36 CFR part 1194 (see subpart 39.X).

ITI developed the Template as a voluntary tool that contractors can utilize or modify to provide information regarding their own particular product characteristics. ITI does not intend - and would not support - making use of the Template a mandatory requirement for doing business with the Federal Government. Further, the Template is not intended to serve as the basis for a centralized database of competitive access features for product comparisons. Rather, to optimize market creation, we would urge reliance on competition and innovation. Therefore, we believe that the manufacturer is in the best position to keep the complex and always-evolving information in the Template up to date, and to provide any supporting details necessary to enable government procurement officials to assess a product's accessibility features.

The immixGroup endorses this approach and has reproduced the template in MS Word table format to make it easier for companies to draft their accessibility feature statements. We believe this approach is consistent with the Section 508 related regulations including the latest informal interpretive information on the subject at <http://www.section508.gov/docs/508QandA.html>

Applicable? – The government is required to tell the vendor which standards are applicable for a particular procurement and the manufacturer is only required to address how its offered products or services address those standards. Unfortunately, most government employees are not yet familiar enough with the standards to say which ones apply to a particular procurement. Use of this column could help facilitate a discussion between a contractor and a contracting officer to define the “applicable standards” for a particular procurement.

Supporting Features – Features of each product will evolve. The level of detail in this section may be different depending on the audience. Comparable access can be addressed by proposing “equivalent facilitation” workarounds on a case-by case basis that could be explained here.

Remarks and Explanations – Additional costs to provide something not generally provided or performed, could be noted here to provide the agency with the necessary detail to make an “undue burden” determination.

The Technical Standards – The standards are organized into Subparts B, C & D. If the product cannot meet the technical standards in Subpart B, the government is allowed to use the functional standards in Subpart C. Agencies must also remember the additional considerations of Subpart D regarding product support documentation and support services.



Product Family Analyzed: Polycom Videoconferencing Equipment and web-based interface software. Section 508 Technical Standards (Accessibility Criteria)	Applicable?	Supporting Features	Remarks and Explanations.
Subpart B -- § 1194.21 Software Applications and operating systems			
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.	N		
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.	N		
(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that assistive technology can track focus and focus changes.	N		
(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to assistive technology. When an image represents a program element, the information conveyed by the image must also be available in text.	N		
(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.	N		



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(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.	N		
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	N		
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	N		
(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	N		
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.	N		
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	N		
(l) When electronic forms are used, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	N		



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Subpart B -- § 1194.22 Web-based intranet and internet information and applications <i>Note: The Access Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium: Paragraph (a) - 1.1, (b) - 1.4, (c) - 2.1, (d) - 6.1, (e) - 1.2, (f) - 9.1, (g) - 5.1, (h) - 5.2, (i) - 12.1, (j) - 7.1, (k) - 11.4.</i>			
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Y	Addressed case-by-case currently. Product development is addressing a universal solution for future releases.	
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	N		Polycom's programs do not employ multimedia. Multimedia content delivered via the Polycom system is the responsibility of the content provider.
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Y	All information conveyed with color is also available without color.	
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Y	Documents are readable without requiring an associated style sheet	
(e) Redundant text links shall be provided for each active region of a server-side image map.	Y	Addressed case-by-case currently. Product development plans include this in for the new release	
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.	Y	Addressed case-by-case currently. Product development plans include in the interim of new version release	
(g) Row and column headers shall be identified for data tables.	Y	Headers are identified.	



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(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.	Y	This type of information is not used by a normal user. This is information about the network used by technical personnel to diagnose problems. This information is refreshed every second. It is difficult to imagine how a person using a screen reader would interact with this. Discuss need for accessibility with ordering agency.	
(i) Frames shall be titled with text that facilitates frame identification and navigation.	Y	Addressed case-by-case currently. Use of Frames is being re-evaluated.	
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Y	Flickering images are not used.	
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.	Y	Command line interface (text equivalent) controls are an available option.	
(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by assistive technology.	Y	Content and graphical interface elements are identified with functional text that can be read by assistive technology.	
(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with 1194.21(a) through (l).	Y	Applications launched from this program are Microsoft's NetMeeting and PowerPoint and Apple's QuickTime. To the extent these applications are accessible and the agency has installed requisite assistive devices, the data is accessible.	



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(n) When electronic forms are designed to be completed on-line, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	N		No forms are used to interact with the system.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Y	The product allows users to skip repetitive navigation links.	
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	N		No timed responses are required.

Subpart B -- § 1194.23 Telecommunications products.

(a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being turned on and off to allow the user to intermix speech with TTY use.	Y	Supports industry standard connections Microphones are turned off and on using the mute button.	How do we interface with TTY? Polycom to check with Jerry Mayfield on this one
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Y	Supports industry standard protocols	If we don't know how to interface, then will have to ask Jerry on this one too
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Y	Supports all industry standard connections	Ask Jerry on this one. Again, how do we interface with TTY?
(d) Voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems that require a response from a user within a time interval, shall give an alert when the time interval is about to run out, and shall provide sufficient time for the user to indicate more time is required.	Y	Both Visual and Auditor prompts	



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(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	N		Not applicable for videoconferencing
(f) For transmitted voice signals, telecommunications products shall provide a gain adjustable up to a minimum of 20 dB. For incremental volume control, at least one intermediate step of 12 dB of gain shall be provided.	Y	Gain is adjustable in excess of 20 dB. More than one intermediate step is provided. This standard is exceeded.	
(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.	Y	This standard is met.	
(h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.	N		Polycom doesn't have an output device that you normally hold up to your ear. There are third party "headset" devices with independent volume control for hearing impaired users.
(i) Interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) shall be reduced to the lowest possible level that allows a user of hearing technologies to utilize the telecommunications product.	Y	Interference levels comply with FCC Regulations.	



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(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.	Y	All industry standard protocols and formats are supported. Polycom videoconferencing are in compliance with FCC Sec. 15 subpart a. and b., section 68 subpart c.	
(k) Products which have mechanically operated controls or keys, shall comply with the following: <ul style="list-style-type: none"> (1) Controls and keys shall be tactilely discernible without activating the controls or keys. (2) Controls and keys shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2 N) maximum. (3) If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character. (4) The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound. 	Y	<ol style="list-style-type: none"> 1) Keys are tactically discernible based on layout, location, size and shape. 2) Hand Control devices is the most ergonomic in the industry. Force required is well-below the standard. Confirm weight required. 3) Delay adjustable? Rate as slow as 2 seconds per character? Key repeat is recorded but not adjustable at this time. 4) No locking or toggle controls are used. 	Jerry to get back to us on this. New vs. Old keypad issue.



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Subpart B -- § 1194.24 Video and multimedia products.			
(a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.	Y	Monitors sold by Polycom are Sony 13", 20", 27" and 32" which are equipped with close-caption circuitry.	
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	N		This equipment does not have a TV tuner.
(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.	N		Polycom does not sell training and informational video and multimedia products.
(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.	N		Polycom does not sell training and informational video and multimedia products.
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	Y	Alternate text presentation or audio descriptions can be delivered via the Polycom system.	



Subpart B -- § 1194.25 Self contained, closed products.		
(a) Self contained products shall be usable by people with disabilities without requiring an end-user to attach assistive technology to the product. Personal headsets for private listening are not assistive technology.	N	
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	N	
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	N	
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	N	
(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.	N	
(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.	N	
(g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	N	



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(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.	N		
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	N		
(j) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: (1) The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length (see Figure 1 of this part). (2) Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor. (3) Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor. (4) Operable controls shall not be more than 24 inches behind the reference plane (see Figure 2 of this part).	N		



Subpart B -- § 1194.26 Desktop and portable computers.			
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).	N		
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	N		
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	N		
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards.	N		



Subpart C -- § 1194.31 Functional performance criteria

(To be used if item does meet above criteria)

(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for assistive technology used by people who are blind or visually impaired shall be provided.	Y	Information can be communicated via audio for those who cannot see.	
(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for assistive technology used by people who are visually impaired shall be provided.	Y	Information can be communicated via audio for those who cannot see well.	
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for assistive technology used by people who are deaf or hard of hearing shall be provided.	Y	Information can be communicated via text for those who cannot hear.	
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.	Y	Information can be communicated via text for those who cannot hear well.	
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for assistive technology used by people with disabilities shall be provided.	Y	A person can interact via text.	
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.	Y	Physical operation does not require fine motor control or simultaneous actions.	

Subpart D -- Information, Documentation, and Support

(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.	Y	All provided electronically readable by assistive equipment.	
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(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.	Y	All information provided electronically readable by assistive equipment.	
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Y	Support is primarily provided by audio or video, but can be provided by text as needed.	