



Date: 29 Jun 2017

Voluntary Accessibility Template (VPAT)

This Voluntary Product Accessibility Template (VPAT) describes accessibility of Polycom’s VVX Business Media Phones, SoundStructure VoIP Interface Card and UC Software against the criteria described in Section 508 of the United States Rehabilitation Act of 1973, as amended (29 U.S.C. 794d). The template format is intended to permit easy evaluation of conformance to Section 508

Name of Product: Polycom VVX Business Media Phones (VVX101, VVX201, VVX300/301/310/311, VVX400/401/410/411, VVX500/501, VVX600/601, VVX1500), Polycom SoundStructure VoIP Interface Card and UC Software v5.7.0

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Note: This document describes normal operational functionality. It does not include maintenance and troubleshooting procedures.

SUMMARY TABLE

VOLUNTARY PRODUCT ACCESSIBILITY SUMMARY

Criteria	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems	Partial. Some aspects are not applicable to this product.	The products contain embedded software, but there is no independent application
Section 1194.22 Web-based internet information and applications	Partial	The product is not a web based application, but does have a web config utility as a secondary method of configuration.
Section 1194.23 Telecommunications Products	Yes	
Section 1194.24 Video and Multi-media Products	No	The products are not Video and/or Multi-media Products
Section 1194.25 Self-Contained, Closed Products	No	The products are not self-contained closed products
Section 1194.26 Desktop and Portable Computers	No	The products are not desktop or portable computers
** Section 1194.31 Functional Performance Criteria	Yes	
** Section 1194.41 Information, documentation, and support.	Yes	

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Section 1194.21 Software Applications and Operating Systems

Criteria	Supporting Features	Remarks and explanations
(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.	Supports with exceptions	There is no full keyboard as such, but phones do have a numeric keypads that provide feedback to either the screen or an illuminated LED when a key is pressed.
(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.	Not Applicable	VVX phone is stand-alone, embedded application and therefore are not susceptible to application interference
(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.	Supports	
(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.	Supports	
(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.	Supports	
(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.	Supports	Text is available for appropriate text based functions
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	Screen contrast and backlight intensity can be controlled by the user. There is no automatic screen brightness/contrast feature.
(h) When animation is displayed, the information shall be displayable in at least one non-animated	Not Applicable	There is no animation on the VVX

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presentation mode at the option of the user.		
(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.	Supports	Examples: Presence states are given both by color and by text. Phone state (registered etc) is given by symbol and text
(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.	Supports with exceptions	Polycom VVX devices are not designed to allow users to change display colors. Thus selecting colors is not supported. Backlight Intensity and Contrast control is supported.
(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.	Supports	
(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.	Not Applicable	The phone does not use electronic forms.

Section 1194.22 Web-based Internet information and applications

Criteria	Supporting Features	Remarks and explanations
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Supports	The phone web config UI is all text based.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not Applicable	There is no multimedia used with the phone web UI
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Not Applicable	Color is not used in the phone web config UI
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Not Applicable	
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not Applicable	Do not use image maps
(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.	Not Applicable	Do not use image maps
(g) Row and column headers shall be identified for data tables.	Not Applicable	Do not use data tables
(h) Markup shall be used to associate data cells and header cells for data tables that have two or more	Not Applicable	Do not use data tables

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logical levels of row or column headers.		
(i) Frames shall be titled with text that facilitates frame identification and navigation	Supports	
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Supports	
(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.	Not Applicable	The web config UI is primarily text based.
(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.	Not Supported	Java script is utilized to construct some page elements. Work will need to be done to ensure that the appropriate text is included for use 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).	Not Applicable	No plugins are required
(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.	Not Supported	This is a secondary method of configuration, primarily used by administrators. In many instances, the web config utility will be disabled and the end user will not have access to it. Making the changes to support this would be of minimal benefit.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Supports	

Section 1194.23 Telecommunications Products

Criteria	Supporting Features	Remarks and explanations
(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	Supports	All Polycom handsets support acoustic TTY coupling

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on and off to allow the user to intermix speech with TTY use.		
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Supports	
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Supports	The functionality of auto-attendant and IVR is on a call server partner. The phone itself will support TTY in this scenario
(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.	Supports	A flashing red LED indicator as well as on screen icon is provided
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	Not supported	This feature has not been implemented but is under consideration for implementation in 2018.
(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.	Supports	Ringer and speaker/headset volume controls are provided. Gain can also be adjustable in excess of 20 dB. More than one intermediate step is provided
(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.	Supports	By default, audio levels are reset after each call
(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.	Supports	All Polycom handsets have primary inductive coils that interface with conventional hearing aid pickup, and meet FCC Part 68 requirements for Hearing Aid Compatibility. Polycom VoIP phones meet the FCC Part 68 requirement of a minimum of 12 dB gain range. Additional gain is available via assistive technology amplifiers, such as the Walker Clarity, the Ameriphone HA-40, and the Plantronics EC-225
(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.	Supports	Interference levels comply with FCC Class B levels or better.

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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.	Supports	All Polycom products are designed with interoperability in mind and industry standard audio and video protocols, formats are supported. All audio processing enhancements can be disabled by enabling the MusicMode setting.
(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.	Supports	Allows users to identify which key they are pressing in relation to the "5" key.
(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be operable with one hand and shall not require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.	Supports	Low impact key pad is used as well as touch input on some devices (VVX500, 600 and 1500).
(k)(3) Products which have mechanically operated controls or keys shall comply with the following: 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.	Not Applicable	Key repeat is not supported.
(k)(4) Products which have mechanically operated controls or keys shall comply with the following: The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.	Not Applicable	No locking or toggle controls are used.

Section 1194.24 Video and Multi-media Products

Polycom's VVX products are not Video or Multi-media Products

Criteria	Supporting Features	Remarks and explanations
(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	Not Applicable	Polycom's VVX products are not Video or Multi-media Products

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caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.		
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	Not Applicable	Polycom's VVX products are not Video or Multi-media Products
(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.	Not Applicable	Polycom's VVX products are not Video or Multi-media 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.	Not Applicable	Polycom's VVX products are not Video or Multi-media Products
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	Not Applicable	Polycom's VVX products are not Video or Multi-media Products

Section 1194.25 Self-Contained, Closed Products		
Polycom's VVX products are not Self-Contained, Closed Products		
Criteria	Supporting Features	Remarks and explanations
(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.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(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).	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(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.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(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.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(f) When products deliver voice output in a public area,	Not Applicable	Polycom's VVX products are not

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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.		Self-Contained, Closed Products
(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.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(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.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(j) (1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: 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 on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: 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.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(j)(3) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: 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.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products
(j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.	Not Applicable	Polycom's VVX products are not Self-Contained, Closed Products

Section 1194.26 Desktop and Portable Computers

Polycom's VVX products are not Desktop or Portable Computers

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Criteria	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).	Not Applicable	Polycom's VVX products are not Desktop or Portable Computers
(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).	Not Applicable	Polycom's VVX products are not Desktop or Portable Computers
(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.	Not Applicable	Polycom's VVX products are not Desktop or Portable Computers
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards	Not Applicable	Polycom's VVX products are not Desktop or Portable Computers

Section 1194.31 Functional Performance Criteria		
Criteria	Supporting Features	Remarks and explanations
(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.	Supports	Information can be provided via audio communication
(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.	Supports via equivalent facilitation	All Polycom VVX phones have a level of contrast adjustment to increase the brightness of the display. Dial pads on Polycom phones are arranged in a standard twelve-button layout with the conventional raised area on the "5" button. Buttons follow a consistent arrangement across different phones in the product line, to facilitate navigation by touch. The device is also compatible with optical and electro-optical assistive technology such as magnifying glasses and image magnification systems. VVX1500 phones include a visual ringing indication by flashing the screen orange.
(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	Supports	Additional gain is available via assistive technology amplifiers, such as the Walker Clarity, the Ameriphone HA-

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provided		40, and the Plantronics EC-225
(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.	Supports	Although exchange of information via audio is the primary purpose, audio information is not required to operate the product, other than the ring tone. For alerting calls, a visual display is provided as well as user defined ring tones. All Polycom handsets have primary inductive coils that interface with conventional hearing aid pickup, and meet FCC Part 68 requirements for Hearing Aid Compatibility.
(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.	Supports	TTY support is available enhance the audio required for users who are hard of hearing. Any control action that is required by the phone is handled via keypad or touch screen. Speech control is not required to operate this product. Alternatively the product supports Ethernet pass-through and most deployment include a PC plugged into the phone that would support Email/IM and Presence
(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.	Supports	Physical operation does not require fine motor control or simultaneous actions

Section 1194.41 Information, documentation, and support.

Criteria	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.	Supports	Product documentation will be made available in a screen readable format. Other formats may be made available on request. Contact accessibility@polycom.com
(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.	Supports	Product documentation will be made available in a screen readable format. Other formats may be made available on request. Contact accessibility@polycom.com

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(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	Support is primarily provided by audio, email (text) or video.
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