



# VPAT™

## Voluntary Product Accessibility Template®

The purpose of the **Voluntary Product Accessibility Template**, or **VPAT™**, is to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of commercial “Electronic and Information Technology” products and services with features that support accessibility. It is assumed and recommended that offerers will provide additional contact information to facilitate more detailed inquiries.

The first table of the Template provides a summary view of the Section 508 Standards. The subsequent tables provide more detailed views of each subsection. There are three columns in each table. Column one of the Summary Table describes the subsections of subparts B and C of the Standards. The second column describes the supporting features of the product or refers you to the corresponding detailed table, e.g., “equivalent facilitation.” The third column contains any additional remarks and explanations regarding the product. In the subsequent tables, the first column contains the lettered paragraphs of the subsections. The second column describes the supporting features of the product with regard to that paragraph. The third column contains any additional remarks and explanations regarding the product.

**Date:** January 1, 2014

**Name of Product:** Tone Commander ISDN Phones, Models 6210, 6220, 8610, 8620, and 8810

**Contact for more Information (name/phone/email):** Teo Technical Support, [helpdesk@teotech.com](mailto:helpdesk@teotech.com), (800) 524-0024

### Summary Table

<i>Criteria</i>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
Section 1194.21 <a href="#">Software Applications and Operating Systems</a>	Not Applicable	
Section 1194.22 <a href="#">Web-based Internet Information and Applications</a>	Not Applicable	
Section 1194.23 <a href="#">Telecommunications Products</a>	Included	
Section 1194.24 <a href="#">Video and Multi-media Products</a>	Not Applicable	
Section 1194.25 <a href="#">Self-Contained, Closed Products</a>	Not Applicable	
Section 1194.26 <a href="#">Desktop and Portable Computers</a>	Not Applicable	
Section 1194.31 <a href="#">Functional Performance Criteria</a>	Included	
Section 1194.41 <a href="#">Information, Documentation and Support</a>	Included	

## Section 1194.23 Telecommunications Products – Detail

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(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.	Supports, with optional Analog Port Terminal Adapter	The optional 6002TA Analog Port Terminal Adapter for the 6210 and 6220 models, and the 8002TA Analog Port Terminal Adapter for the 8610, 8620, and 8810 models provides a standard non-acoustic (POTS) connection point for direct connect TTYs.  The handset microphone can be turned on and off with the Mute key.
(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.	Not applicable	
(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.	Not applicable	
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	Supports, with optional Analog Port Terminal Adapter and talking caller ID unit	For users of TTY devices, this requirement is satisfied when configured in the manner described in the response to 1194.23(a).  For users who cannot see displays, a talking caller ID box, such as the ClassCo VoiceAnnounce Caller ID Model 9900CW, can be connected to the optional Analog Port Terminal Adapter (Tone Commander 6002TA or 8002TA) to provide audible caller ID and audible Message Waiting indication.
(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	Receive volume levels are adjustable over approximately a 21dB range in 8 increments.

(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	Handset audio levels are reset to a user-configurable default level after each call. The speakerphone retains the volume setting from the last 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	Tone Commander handsets meet FCC Part 68 requirements for Hearing Aid Compatibility and include primary inductive coils, permitting the phones to be used with inductively coupled assistive hearing devices, such as hearing aids and cochlear implants.
(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	Tone Commander phones meet FCC requirements for electromagnetic shielding.
(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	Tone Commander phones support industry-standard audio transmission.
(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	Controls and keys are tactilely discernible without activating the controls or keys. The dial pad is arranged in a standard layout, with a raised nib on key 5, making tactile navigation easier for visually impaired users.
(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	
(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.	Supports	Key repeat is not provided.
(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.	Supports with exceptions	Lighted indicators provide visual indication of toggle control status, as well as the activation state of some network features.  The status of some functions is not discernible by touch or sound.

## Section 1194.31 Functional Performance Criteria – Detail

<i>Criteria</i>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(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 with exceptions	The dial pad is arranged in a standard layout, with a raised nib on key 5, making tactile navigation easier for visually impaired users. Navigation and identification of the special function buttons is facilitated by tactilely discernible (differently shaped) keys.  Audible caller ID and audible Message Waiting Indication can be provided as described in the response to 1194.23(e).
(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 with exceptions	6210, 6220, 8610, and 8620 Models provide incoming caller ID displays with dark sans serif font characters on a light background that are larger than 4.8 mm in height. The Model 8810 has dark sans serif font characters on a light background that are 3.8 mm in height.
(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	Supports	This requirement is satisfied when the phone is configured to support TTY operation as described in the response to 1194.23(a).
(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	Features that provide enhanced audio are described in the response 1194.23(f) and 1194.23(g). Support for assistive hearing devices is described in the response to 1194.23(h) and 1194.23(i).
(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	This requirement is satisfied when the phone is configured to support TTY operation as described in the response to 1194.23(a).
(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	The operational characteristics of all controls conform with paragraph 1194.23(k)(2). No simultaneous actions (e.g., pressing two buttons at the same time) are required.

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### **Section 1194.41 Information, Documentation and Support – Detail**

<b>Criteria</b>	<b>Supporting Features</b>	<b>Remarks and explanations</b>
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supports	Documentation is electronically readable by assistive equipment.
(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	Documentation is electronically readable by assistive equipment.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	Support is provided by audio (toll-free number access) and email.

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