



**Date: 24 January 2018**

**Voluntary Accessibility Template (VPAT)**

This Voluntary Product Accessibility Template (VPAT) describes accessibility of Polycom's Unified Conference Station PC Admin Application 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® Business IP Phones (V VX150, V VX250, V VX350, V VX450, Expansion Module EM50) and UC Software (version UCS 5.8.0)

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

**Note:** This document uses the accessibility criteria described in the Revised Section 255 Guidelines of January 2017.

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## Appendix C to Part 1194 – Functional Performance Criteria and Technical Requirements

### Chapter 3: Functional Performance Criteria

#### 301 General

301.1 Scope. The requirements of Chapter 3 shall apply to ICT where required by 508 Chapter 2 (Scoping Requirements), 255 Chapter 2 (Scoping Requirements), and where otherwise referenced in any other chapter of the Revised 508 Standards or Revised 255 Guidelines.

#### 302 Functional Performance Criteria

#	Criteria	Supports	Comments
<b>302.1</b>	<b>Without Vision.</b>		
	Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that does not require user vision.	Supports with Exception	Audible ring and alert tones. 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.
<b>302.2</b>	<b>With Limited Vision.</b>		
	Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.	Supports	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.
<b>302.3</b>	<b>Without Perception of Color.</b>		
	Where a visual mode of operation is provided, ICT	Supports	Icons are used to provide indication of state (such as DND) as well as color.

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	shall provide at least one visual mode of operation that does not require user perception of color.		Skype for Business Presence state is given both textually and via color.
<b>302.4</b>	<b>Without Hearing.</b>		
	Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that does not require user hearing.	Not Applicable	

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<b>302.5</b>	<b>With Limited Hearing.</b>		
	Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited hearing.	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. 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.
<b>302.6</b>	<b>Without Speech.</b>		
	Where speech is used for input, control, or operation, ICT shall provide at least one mode of operation that does not require user speech.	Not Applicable	
<b>302.7</b>	<b>With Limited Manipulation.</b>		
	Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that does not require fine motor control or simultaneous manual operations.	Supports	Physical operation does not require fine motor control or simultaneous actions.
<b>302.8</b>	<b>With Limited Reach and Strength.</b>		
	Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that is operable with limited reach and limited strength.	Supports	The unit can be moved to a position where limited reach will not be a restriction. Limited strength is also not a restriction.
<b>302.9</b>	<b>With Limited Language, Cognitive, and Learning Abilities.</b>		
	ICT shall provide features making its use by individuals with limited cognitive, language, and learning abilities simpler and easier.	Supports	Iconography on the display and on the keys enable the ICT to be more intuitive to operate when compared with text strings.

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**CHAPTER 4: HARDWARE****401 General**

401.1 Scope. The requirements of Chapter 4 shall apply to ICT that is hardware where required by 508 Chapter 2 (Scoping Requirements), 255 Chapter 2 (Scoping Requirements), and where otherwise referenced in any other chapter of the Revised 508 Standards or Revised 255 Guidelines.

**402 Closed Functionality**

#	Criteria	Supports	Comments
<b>402.1 General.</b>			
	ICT with closed functionality shall be operable without requiring the user to attach or install assistive technology other than personal headsets or other audio couplers, and shall conform to 402.	Not Applicable	
<b>402.2 Speech-Output Enabled.</b>			
	<p>ICT with a display screen shall be speech-output enabled for full and independent use by individuals with vision impairments.</p> <p><b>EXCEPTIONS:</b></p> <ol style="list-style-type: none"> <li>1. Variable message signs conforming to 402.5 shall not be required to be speech-output enabled.</li> <li>2. Speech output shall not be required where ICT display screens only provide status indicators and those indicators conform to 409.</li> <li>3. Where speech output cannot be supported due to constraints in available memory or processor capability, ICT shall be permitted to conform to 409 in lieu of 402.2.</li> <li>4. Audible tones shall be permitted instead of speech output where the content of user input is not displayed as entered for security purposes, including, but not limited to, asterisks representing personal identification numbers.</li> </ol>	Not applicable	

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<p>5. Speech output shall not be required for: the machine location; date and time of transaction; customer account number; and the machine identifier or label.</p> <p>6. Speech output shall not be required for advertisements and other similar information unless they convey information that can be used for the transaction being conducted.</p>		
<b>402.2.1 Information Displayed On-Screen.</b>		
<p>Speech output shall be provided for all information displayed on-screen.</p>	Not Applicable	
<b>402.2.2 Transactional Outputs.</b>		
<p>Where transactional outputs are provided, the speech output shall audibly provide all information necessary to verify a transaction.</p>	Not Applicable	
<b>402.2.3 Speech Delivery Type and Coordination.</b>		
<p>Speech output shall be delivered through a mechanism that is readily available to all users, including, but not limited to, an industry standard connector or a telephone handset. Speech shall be recorded or digitized human, or synthesized. Speech output shall be coordinated with information displayed on the screen.</p>	Not Applicable	
<b>402.2.4 User Control.</b>		
<p>Speech output for any single function shall be automatically interrupted when a transaction is selected. Speech output shall be capable of being repeated and paused.</p>	Not Applicable	
<b>402.2.5 Braille Instructions.</b>		
<p>Where speech output is required by 402.2, braille instructions for</p>	Not Applicable	

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<p>initiating the speech mode of operation shall be provided. Braille shall be contracted and shall conform to 36 CFR part 1191, Appendix D, Section 703.3.1.</p> <p><b>EXCEPTION:</b> Devices for personal use shall not be required to conform to 402.2.5.</p>		
<b>402.3 Volume.</b>		
<p>ICT that delivers sound, including speech output required by 402.2, shall provide volume control and output amplification conforming to 402.3.</p> <p><b>EXCEPTION:</b> ICT conforming to 412.2 shall not be required to conform to 402.3.</p>	Not Applicable	VVX phones have volume control functionality to control the volume speech output via handset, headset or speaker phone.
<b>402.3.1 Private Listening.</b>		
<p>Where ICT provides private listening, it shall provide a mode of operation for controlling the volume. Where ICT delivers output by an audio transducer typically held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.</p>	Not Applicable	All Polycom handsets are designed to support acoustic TTY coupling. Volume control is provided through a hardware button.
<b>402.3.2 Non-private Listening.</b>		
<p>Where ICT provides non-private listening, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. A function shall be provided to automatically reset the volume to the default level after every use.</p>	Not Applicable	
<b>402.4 Characters on Display Screens.</b>		
<p>At least one mode of characters displayed on the screen shall be in a sans serif font. Where ICT does</p>	Not Applicable	All text on the display will use San Serif fonts.

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not provide a screen enlargement feature, characters shall be 3/16 inch (4.8 mm) high minimum based on the uppercase letter "I". Characters shall contrast with their background with either light characters on a dark background or dark characters on a light background.		
<b>402.5 Characters on Variable Message Signs.</b>		
Characters on variable message signs shall conform to section 703.7 Variable Message Signs of ICC A117.1-2009 (incorporated by reference, see 702.6.1).	Not Applicable	

**403 Biometrics**

#	Criteria	Supports	Comments
<b>403.1 General.</b>			
	Where provided, biometrics shall not be the only means for user identification or control.  <b>EXCEPTION:</b> Where at least two biometric options that use different biological characteristics are provided, ICT shall be permitted to use biometrics as the only means for user identification or control.	Not Applicable	V VX phones will not use biometrics for authentication.

**404 Preservation of Information Provided for Accessibility**

#	Criteria	Supports	Comments
<b>404.1 General.</b>			
	ICT that transmits or converts information or communication shall not remove non-proprietary information provided for accessibility or shall restore it upon delivery.	Supports	V VX phones do not modify or remove any information that is to be sent.

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**405 Privacy**

#	Criteria	Supports	Comments
<b>405.1 General.</b>			
	The same degree of privacy of input and output shall be provided to all individuals. When speech output required by 402.2 is enabled, the screen shall not blank automatically.	Supports	The screen on VVX phones is never blanked during operation.

**406 Standard Connections**

#	Criteria	Supports	Comments
<b>406.1 General.</b>			
	Where data connections used for input and output are provided, at least one of each type of connection shall conform to industry standard non-proprietary formats.	Supports	Phones use RJ9 style connectors for headsets and standard Ethernet for network connectivity. USB ports (where included) are standards based full sized USB ports

**407 Operable Parts**

#	Criteria	Supports	Comments
<b>407.1 General.</b>			
	Where provided, operable parts used in the normal operation of ICT shall conform to 407.	Supports	
<b>407.2 Contrast</b>			
	Where provided, keys and controls shall contrast visually from background surfaces. Characters and symbols shall contrast visually from background surfaces with either light characters or symbols on a dark background or dark characters or symbols on a light background.	Supports	Standard color scheme for the phones is to use white text/images on dark grey/black buttons. On the UI we maintain at least 85% contrast ratio between foreground text and the background color.

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<b>407.3 Input Controls</b>		
At least one input control conforming to 407.3 shall be provided for each function. <b>EXCEPTION:</b> Devices for personal use with input controls that are audibly discernable without activation and operable by touch shall not be required to conform to 407.3.	Supports	
<b>407.3.1 Tactilely Discernable</b>		
Input controls shall be operable by touch and tactilely discernable without activation. 407.3.2	Supports	Polycom VVX products have a distinctive raised pattern on the “5” key that will allow users to identify which key they are pressing in relation to the “5” key along with raised patterns on the navigation keys.
<b>407.3.2 Alphabetic Keys</b>		
Where provided, individual alphabetic keys shall be arranged in a QWERTY-based keyboard layout and the “F” and “J” keys shall be tactilely distinct from the other keys.	Not Applicable	
<b>407.3.3 Numeric Keys</b>		
Where provided, numeric keys shall be arranged in a 12-key ascending or descending keypad layout. The number five key shall be tactilely distinct from the other keys. Where the ICT provides an alphabetic overlay on numeric keys, the relationships between letters and digits shall conform to ITU-T Recommendation E.161 (incorporated by reference, see 702.7.1).	Supports	Polycom VVX products have a distinctive raised pattern on the “5” key that will allow users to identify which key they are pressing in relation to the “5” key. The arrangement of phone keys is in compliance with ITU-T Recommendation E.161 with the exception that two raised dots are provided rather than the single dot as specified in section 3.6 of ITU-T Recommendation E.161.
<b>407.4 Key Repeat</b>		
Where a keyboard with key repeat is provided, the delay before the	Not Applicable	Keyboard does not support key repeat.

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key repeat feature is activated shall be fixed at, or adjustable to, 2 seconds minimum.		
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<b>407.5 Timed Response</b>		
Where a timed response is required, the user shall be alerted visually, as well as by touch or sound, and shall be given the opportunity to indicate that more time is needed.	Not Applicable	
<b>407.6 Operation</b>		
At least one mode of operation shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum.	Supports	No part of the phone weighs 5 pounds or more. All operations may be carried out with a single hand with no tight grasping, pinching or twisting required.
<b>407.7 Tickets, Fare Cards, and Keycards.</b>		
Where tickets, fare cards, or keycards are provided, they shall have an orientation that is tactilely discernible if orientation is important to further use of the ticket, fare card, or keycard.	Not Applicable	
<b>407.8 Reach Height and Depth.</b>		
At least one of each type of operable part of stationary ICT shall be at a height conforming to 407.8.2 or 407.8.3 according to its position established by the vertical reference plane specified in 407.8.1 for a side reach or a forward reach. Operable parts used with speech output required by 402.2 shall not be the only type of operable part complying with 407.8 unless that part is the only operable part of its type.	Supports	VVX phones can be placed on any surface at any position relative to the user.
<b>407.8.1 Vertical Reference Plane.</b>		
Operable parts shall be positioned for a side reach or a forward reach determined with respect to a vertical reference plane. The	Supports	VVX phones can be placed on any surface at any position relative to the user.

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vertical reference plane shall be located in conformance to 407.8.2 or 407.8.3.		
<b>407.8.1.1 Vertical Plane for Side Reach.</b>		
Where a side reach is provided, the vertical reference plane shall be 48 inches (1220 mm) long minimum.	Supports	VVX phones can be placed on any surface at any position relative to the user.
<b>407.8.1.2 Vertical Plane for Forward Reach.</b>		
Where a forward reach is provided, the vertical reference plane shall be 30 inches (760 mm) long minimum.	Supports	VVX phones can be placed on any surface at any position relative to the user.
<b>407.8.2 Side Reach.</b>		
Operable parts of ICT providing a side reach shall conform to 407.8.2.1 or 407.8.2.2. The vertical reference plane shall be centered on the operable part and placed at the leading edge of the maximum protrusion of the ICT within the length of the vertical reference plane. Where a side reach requires a reach over a portion of the ICT, the height of that portion of the ICT shall be 34 inches (865 mm) maximum.	Supports	VVX phones can be placed on any surface at any position relative to the user.
<b>407.8.2.1 Unobstructed Side Reach</b>		
Operable parts of ICT providing a side reach shall conform to 407.8.2.1 or 407.8.2.2. The vertical reference plane shall be centered on the operable part and placed at the leading edge of the maximum protrusion of the ICT within the length of the vertical reference plane. Where a side reach requires a reach over a portion of the ICT, the height of that portion of the ICT shall be 34 inches (865 mm) maximum.	Supports	VVX phones can be placed on any surface at any position relative to the user.
<b>407.8.2.2 Obstructed Side Reach</b>		

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<p>Where the operable part is located more than 10 inches (255 mm), but not more than 24 inches (610 mm), beyond the vertical reference plane, the height of the operable part shall be 46 inches (1170 mm) high maximum and 15 inches (380 mm) high minimum above the floor. The operable part shall not be located more than 24 inches (610 mm) beyond the vertical reference plane.</p>	<p>Supports</p>	<p>VVX phones can be placed on any surface at any position relative to the user.</p>
<p>Operable parts of ICT providing a forward reach shall conform to 407.8.3.1 or 407.8.3.2. The vertical reference plane shall be centered, and intersect with, the operable part. Where a forward reach allows a reach over a portion of the ICT, the height of that portion of the ICT shall be 34 inches (865 mm) maximum.</p>	<p>Supports</p>	<p>VVX phones can be placed on any surface at any position relative to the user.</p>
<p>Where the operable part is located at the leading edge of the maximum protrusion within the length of the vertical reference plane of the ICT, the operable part shall be 48 inches (1220 mm) high maximum and 15 inches (380 mm) high minimum above the floor.</p>	<p>Supports</p>	<p>VVX phones can be placed on any surface at any position relative to the user.</p>
<p>Where the operable part is located beyond the leading edge of the maximum protrusion within the length of the vertical reference plane, the operable part shall conform to 407.8.3.2. The maximum allowable forward reach to an operable part shall be 25 inches (635 mm).</p>	<p>Supports</p>	<p>VVX phones can be placed on any surface at any position relative to the user.</p>
<p>The height of the operable part shall conform to Table 407.8.3.2.1.</p>	<p>Supports</p>	<p>VVX phones can be placed on any surface at any position relative to the user.</p>

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<p>Knee and toe space under ICT shall be 27 inches (685 mm) high minimum, 25 inches (635 mm) deep maximum, and 30 inches (760 mm) wide minimum and shall be clear of obstructions.</p> <p><b>EXCEPTIONS:</b></p> <p>1. Toe space shall be permitted to provide a clear height of 9 inches (230 mm) minimum above the floor and a clear depth of 6 inches (150 mm) maximum from the vertical reference plane toward the leading edge of the ICT.</p> <p>2. At a depth of 6 inches (150 mm) maximum from the vertical reference plane toward the leading edge of the ICT, space between 9 inches (230 mm) and 27 inches (685mm) minimum above the floor shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for every 6 inches (150 mm) in height.</p>	Not Applicable	

#### 408 Display Screens

#	Criteria	Supports	Comments
<b>408.1 General.</b>			
	Where provided, display screens shall conform to 408.	Not Applicable	
<b>408.2 Visibility</b>			
	Where stationary ICT provides one or more display screens, at least one of each type of display screen shall be visible from a point located 40 inches (1015 mm) above the floor space where the display screen is viewed.	Not Applicable	
<b>408.3 Flashing</b>			

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<p>Where ICT emits lights in flashes, there shall be no more than three flashes in any one-second period.</p> <p><b>EXCEPTION:</b> Flashes that do not exceed the general flash and red flash thresholds defined in WCAG 2.0 (incorporated by reference, see 702.10.1) are not required to conform to 408.3.</p>	Not Applicable	
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#### 409 Status Indicators

#	Criteria	Supports	Remarks and comments
<b>409.1 General</b>			
	Where provided, status indicators shall be discernible visually and by touch or sound.	Supports	Visual indicators of status such as ringing, on hold, active call etc are displayed on the user interface and also have audible tones associated with them.

#### 410 Color Coding

#	Criteria	Supports	Remarks and comments
<b>410.1 General</b>			
	Where provided, 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	Icons and wording is provided such that color coding is not required. Eg Active call state is indicated by an icon, presence state is indicated by both a colored icon and a text string.

#### 411 Audible Signals

#	Criteria	Supports	Remarks and comments
<b>410.1 General</b>			
	Where provided, audible signals or cues shall not be used as the only means of conveying information, indicating an action, or prompting a response	Supports	A screen flash shall be provided to indicate an incoming call. Other signals (such as call waiting) are also indicated by UX elements on the display. LEDs built into buttons on the phone also provide information on the state of the phone such as incoming or

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			calls that are on hold
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**412 ICT with Two-Way Voice Communication**

#	Criteria	Supports	Remarks and comments
<b>412.1 General</b>			
	Where provided, audible signals or cues shall not be used as the only means of conveying information, indicating an action, or prompting a response	Supports	Information is provided on the display to indicate that there is a call coming in or that a call has been missed.
<b>412.2 Volume Gain</b>			
	ICT that provides two-way voice communication shall conform to 412.2.1 or 412.2.2.	Supports	
<b>412.2.1 Volume Gain for Wireline Telephones.</b>			
	Volume gain conforming to 47 CFR 68.317 shall be provided on analog and digital wireline telephones.	Supports	Digital wirelines only.
<b>412.2.2 Volume Gain for Non-Wireline Telephones.</b>			
	A method for increasing volume shall be provided for non-wireline ICT.	Not Applicable	
<b>412.3 Interference Reduction and Magnetic Coupling.</b>			
	Where ICT delivers output by a handset or other type of audio transducer that is typically held up to the ear, ICT shall reduce interference with hearing technologies and provide a means for effective magnetic wireless coupling in conformance with 412.3.1 or 412.3.2.	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.
<b>412.3.1 Wireless Handsets.</b>			
	ICT in the form of wireless handsets shall conform to ANSI/IEEE C63.19-2011 (incorporated by reference, see 702.5.1).	Not Applicable	
<b>412.3.2 Wireline Handsets.</b>			
	ICT in the form of wireline handsets, including cordless handsets, shall conform to TIA-1083-B (incorporated	Supports	

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by reference, see 702.9.1).		
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<b>412.4 Digital Encoding of Speech</b>			
	ICT in IP-based networks shall transmit and receive speech that is digitally encoded in the manner specified by ITU-T Recommendation G.722.2 (incorporated by reference, see 702.7.2) or IETF RFC 6716 (incorporated by reference, see 702.8.1).	Supports	
<b>412.5 Real-Time Text Functionality.</b>			
	<b>Reserved – Note that FCC have NOPR for RTT for Wireline IP products.</b> Link		
<b>412.6 Caller ID.</b>			
	Where provided, caller identification and similar telecommunications functions shall be visible and audible.	Supports With Exceptions	Caller ID is provided on a visual display, but not audibly.
<b>412.7 Video Communication.</b>			
	Where ICT provides real-time video functionality, the quality of the video shall be sufficient to support communication using sign language.	Not Applicable	

### 413 Closed Caption Processing Technologies

#	Criteria	Supports	Remarks and comments
<b>413.1 General.</b>			
	Where ICT displays or processes video with synchronized audio, ICT shall provide closed caption processing technology that conforms to 413.1.1 or 413.1.2.	Not Applicable	
<b>413.1.1 Decoding and Display of Closed Captions.</b>			
	Players and displays shall decode closed caption data and support display of captions.	Not Applicable	
<b>413.1.2 Pass-Through of Closed Caption Data.</b>			
	Cabling and ancillary equipment shall pass through caption data.	Not Applicable	

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**414 Audio Description Processing Technologies.**

#	Criteria	Supports	Remarks and comments
<b>414.1 General.</b>			
	Where ICT displays or processes video with synchronized audio, ICT shall provide audio description processing technology conforming to 414.1.1 or 414.1.2.	Not Applicable	
<b>414.1.1 Digital Television Tuners.</b>			
	Digital television tuners shall provide audio description processing that conforms to ATSC A/53 Digital Television Standard, Part 5 (2014) (incorporated by reference, see 702.2.1). Digital television tuners shall provide processing of audio description when encoded as a Visually Impaired (VI) associated audio service that is provided as a complete program mix containing audio description according to the ATSC A/53 standard.	Not Applicable	
<b>414.1.2 Other ICT.</b>			
#	Criteria	Supports	Remarks and comments
	ICT other than digital television tuners shall provide audio description processing.	Not Applicable	

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**415 User Controls for Captions and Audio Descriptions.**

#	Criteria	Supports	Remarks and comments
<b>415.1 General</b>			
	Where ICT displays video with synchronized audio, ICT shall provide user controls for closed captions and audio descriptions conforming to 415.1. EXCEPTION: Devices for personal use shall not be required to conform to 415.1 provided that captions and audio descriptions can be enabled through system-wide platform settings.	Not Applicable	
<b>415.1.1 Caption Controls</b>			
	Where ICT provides operable parts for volume control, ICT shall also provide operable parts for caption selection.	Not Applicable	
<b>415.1.2 Audio Description Controls</b>			
	Where ICT provides operable parts for program selection, ICT shall also provide operable parts for the selection of audio description.	Not Applicable	

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