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Voluntary Accessibility Template (VPAT)

This Voluntary Product Accessibility Template (VPAT) describes accessibility of **Polycom's CX300 Phone for Microsoft® Lync™** 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.

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

SUMMARY TABLE

VOLUNTARY PRODUCT ACCESSIBILITY TEMPLATE

Category	Applicability
Section 1194.21 Software applications and operating systems	Not Applicable
Section 1194.22 Web-based Internet Information and Applications	Not Applicable
Section 1194.23 Telecommunications Products	See Below
Section 1194.24 Video and Multi-Media Products	Not Applicable
Section 1194.25 Self-Contained, Closed Products	Not Applicable
Section 1194.26 Desktop and Portable Computers	Not Applicable
Section 1194.31 Functional Performance Criteria	See Below
Section 1194.41 Information, Documentation, and Support	See Below

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Section 1194.23 Telecommunications Products – Detail Voluntary Product Accessibility Template

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 on and off to allow the user to intermix speech with TTY use.	Supports when combined with compatible assistive technology.	Polycom CX300 is a USB connected telephone and must be used with a computer. This means that any one of the commonly available instant messenger services could be used to provide simultaneous voices and text without need for additional equipment. If required a standard ATA (Analog Telephone Adapter) connected to the computer's LAN port enabling for connection of RJ-11 POTS interface common on TTY devices. The standard headset connection jack provides another standard alternative for direct non-acoustic coupling.
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Supports	The standard G.711 codec reliably supports the transport of normal Baudot code signals
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Not Applicable	This applies only to interactive voice response, voicemail, and auto-attendant systems which are not provided by the CX300 product.
(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	This applies only to interactive voice response, voicemail, and auto-attendant systems which are not provided by the CX300 product.
(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 Applicable	These functions are supported by the network that hosts the VoIP telephone, rather than by the telephone itself. Access to the network is provided to the TTY by the means described in 1194.23(a).
(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 when combined with compatible assistive technology.	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.
(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	The device is shipped in this mode. Automatic reset can also be disabled, when desired, via a user-accessible menu.
(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.
(i) Interference to hearing technologies (including hearing aids, cochlear	Supports	Polycom's CX300 meets FCC Class B requirements for



<p>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.</p>		<p>radio frequency emissions ensuring minimal interference with hearing technologies.</p>
<p>(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.</p>	<p>Supports</p>	<p>Polycom phones are fully compliant with open standards, including the G.711 codec that provides excellent performance with standard Baudot audio-band data encoding algorithms</p>
<p>(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.</p>	<p>Supports</p>	<p>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.</p>
<p>(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.</p>	<p>Supports</p>	<p>The keys and buttons on Polycom IP phones comply with the requirements of this section.</p>
<p>(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.</p>	<p>Supports</p>	<p>There is no auto-repeat function for buttons used in conventional telephony features.</p>
<p>(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.</p>	<p>Supports when combined with compatible assistive technology</p>	<p>Within the conventional telephony function set, only the microphone mute, headset, and speaker buttons have a locking function. The headset and speaker state is signaled both by an LED and by the audible performance of the device. The mute button state is signaled by a large LED which can be transformed into an audible signal using commonly available assistive technology such as a light probe or light detector available from MaxiAids.com and other sources.</p>

Section 1194.31 Functional Performance Criteria - Detail Voluntary Product Accessibility Template

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	Primary telephone functionality is supported using means other than vision as described in 1194.23(a)-(k)
(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	Usage of the device is compatible with visual acuity of 20/70 and less. The device is also compatible with optical and electro-optical assistive technology such as magnifying glasses and image magnification systems.
(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	The device can be controlled visually, without auditory interaction.
(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	Enhanced audio is supported as described in 1194.23(f) and 1194.23(h)
(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	The device can be controlled and operated without the use of speech, as described in 1194.23(a), (b), (c)
(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	None of the subject devices require two or more simultaneous button presses. The buttons on Polycom IP phones conform with the requirements of 1194.23((k)(2).



Section 1194.41 Information, Documentation and Support – Detail Voluntary Product Accessibility Template

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	Polycom will supply documentation in accessible format upon request
(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	Polycom will supply documentation in accessible format upon request
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	Users can reach Polycom support via telephone, email, or fax.