## **Konftel 300Mx**

### **Voluntary Product Accessibility Template (VPAT)**

The Konftel 300Mx is a sophisticated speakerphone, intended for use by groups of up to ten people in conference room and meeting room environments.

#### **Support Levels**

Support Level	Description
Supports	The Konftel 300Mx fully meets the letter and intent of the criterion.
Supports with Exceptions/Minor Exceptions	The Konftel 300Mx does not fully meet the letter and intent of the criterion, but provides some level of access relative to the criterion.
Supports through Equivalent Facilitation	The Konftel 300Mx provides an alternate way to meet the intent of the criterion.
Supports when combined with Compatible Assistive Technology	The Konftel 300Mx fully meets the letter and intent of the criterion when used in combination with compatible assistive technology.
Does Not Support	The Konftel 300Mx does not meet the letter or intent of the criterion.
Not Applicable	The criterion does not apply.
Not Applicable – Fundamental Alteration Exception Applies	A fundamental alteration of the Konftel 300Mx is required to meet the criterion.

#### **Compliance Summary**

Criteria	Support Levels
Section 1194.21 Software Applications and Operating Systems	Not Applicable
Section 1194.22 Web-based Intranet and Internet Information and Applications	Not Applicable
Section 1194.23 Telecommunications Products	Supports with Exceptions
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	Supports with Exceptions
Section 1194.41 Information, Documentation and Support	Supports

Konftel 300Mx Page 1 of 6

# § 1194.23 Telecommunications Products

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Criteria	Support Levels	Remarks and Explanations
1194.23(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.	Not Applicable Fundamental alteration exception applies	The Konftel 300Mx is intended to be used as a shared resource by people in a conference room who are engaged in a voice teleconference. It would be inappropriate to include a TTY in the type of teleconference for which a Konftel 300Mx would be employed, chiefly because the inclusion of a non-voice modem-based device in a voice-based teleconference would be impractical.
1194.23(b) Telecommunications products, which include voice communication functionality, shall support all commonly used crossmanufacturer non-proprietary standard TTY signal protocols.	Not Applicable Fundamental alteration exception applies	The Konftel 300Mx is intended to be used as a shared resource by people in a conference room who are engaged in a voice teleconference.
<b>1194.23(c)</b> Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Not Applicable	There is no aspect of the Konftel 300Mx that would interfere with the operation or compliance of voice mail, auto-attendant, or interactive voice response systems.
1194.23(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	There is no aspect of the Konftel 300Mx that would interfere with the operation or compliance of voice mail, auto-attendant, or interactive voice response systems.
1194.23(e) Where provided, caller identification and similar telecommunications functions shall	For users of TTYs: Supports	For users of TTYs: The Konftel 300Mx has an LCD display that satisfies this requirement.
also be available for users of TTYs, and for users who cannot see displays.	For users who cannot see displays: Supports when combined with compatible assistive technology	For users who cannot see displays: Caller ID may be presented by voice when the Konftel 300Mx is used in conjunction with an industry-standard voice-output caller ID adjunct of the sort commonly used in residential telephony.
1194.23(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	

Konftel 300Mx Page 2 of 6

1194.23(g) If the telecommunication	Not Applicable	The US Access Board guidance indicates that this
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.	Not Applicable	requirement is based on an Americans with Disabilities Act guideline that applies only to telephone handsets.
1194.23(h) Where a telecommunication 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.	Not Applicable	The Konftel 300Mx does not have an audio transducer that is held up to the ear.
1194.23(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	The Konftel 300Mx meets FCC standards for electromagnetic shielding.
1194.23(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.	Not Applicable  Fundamental alteration exception applies	The Konftel 300Mx is intended to be used as a shared resource by people in a conference room who are engaged in a voice teleconference.
1194.23(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 with Exceptions	The dial pad on the Konftel 300Mx is arranged in a standard twelve-button layout with the conventional raised area on the "5" button. Other tactilely discernible buttons include off hook / flash, on hook, mute, hold, volume up, and volume down.  The Konftel 300Mx functions that are controlled by soft keys (e.g., via selection from a menu presented on the telephone's LCD display) do not satisfy this requirement. Examples include call recording functions and management of the phonebook.
1194.23(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	

Konftel 300Mx Page 3 of 6

1194.23(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	The Konftel 300Mx has no key repeat functions.
1194.23(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	The status of all locking or toggle controls or keys is visually discernible, but not discernible through touch or sound.

Konftel 300Mx Page 4 of 6

# § 1194.31 Functional Performance Criteria

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Criteria (104 24/2) At least an analysis (1	Support Levels	Remarks and Explanations
1194.31(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 features that support access by people who are blind or visually impaired, and the areas in which support is not provided, are described in the responses to 1194.23(e), 1194.23(k)(1), and 1194.23(k)(4).
1194.31(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	Some information, such as "mute" status, is conveyed by large bi-color Light Emitting Diodes (LEDs).  The text and icons presented on the LCD display are unlikely to be readable or identifiable by users with 20/70 visual acuity who are viewing the display from a distance that is typical for conference telephones that are being used by a group.
1194.31(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	User hearing is not required to operate the Konftel 300Mx.  For users who require a TTY for communication, please note that the Konftel 300Mx is intended to be used as a shared resource by people in a conference room who are engaged in a voice conference. The manner in which TTY users can be supported is discussed in the 1194.23(a) Remarks and Explanations.
1194.31(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	User hearing is not required to operate the Konftel 300Mx.  Although not addressed by the requirements in § 1194.23, please note that the extended audio frequency range of the Konftel 300Mx speakers, from 200 Hz to 7000 Hz, can be of significant benefit to users with certain types of hearing loss.
1194.31(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	User speech is not required to operate the Konftel 300Mx.  For users who require a TTY for communication, please note that the Konftel 300Mx is intended to be used as a shared resource by people in a conference room who are engaged in a voice conference. The manner in which TTY users can be supported is discussed in the 1194.23(a) Remarks and Explanations.
1194.31(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 (e.g., the amount of strength required to press a button) are within the limits specified by paragraph 1194.23(k)(2).

Konftel 300Mx Page 5 of 6

### § 1194.41 Information, Documentation and Support

Criteria	Support Levels	Remarks and Explanations
1194.41(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.	Supports	Will provide upon request.
1194.41(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	Will provide upon request.
1194.41(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	The point-of-contact for accessibility-related issues is:  Dr. Paul R. Michaelis Voice: 303-538-4101 TTY: 303-538-3740  prmichaelis@avaya.com

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This market information is provided, pursuant to FAR Part 39.2, to be used by Requiring Officers. It is not intended to represent a certification for compliance. Any statement of compliance or conformance indicated on this document is an indication that the product shall be capable, at the time of its delivery, when used in accordance with Konftel's associated documents, and other written information provided to the government, of providing comparable access to individuals with disabilities consistent with the designated provision of the Standards, provided that any assistive technologies used with the product properly interoperates with it and other assistive technologies.

Updated September 16, 2015

Konftel 300Mx Page 6 of 6