

# Kurmi Accessibility Conformance Report

VPAT® Version 2.1 – March 2018

**Name of Product/Version:** Kurmi Software Suite, release 7.3.0

**Product Description:** Software to streamline and optimize the day-to-day management of users (moves, adds, changes and deletes) on Unified and Contact Center Communications Systems.

**Date:** November 2020

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**Notes:** Starting with release 7.0.0, Kurmi Software introduced WCAG 2.1 testing for the interface and decided to progressively update the interface in order to be compliant with WCAG Level AA.

Thanks to release 7.0.0, login page, menu, homepage are now compliant.

Thanks to release 7.1 & 7.2 & 7.3, Kurmi Software continues to update others pages, and it's still a work in progress for futures releases.

This Kurmi Accessibility Conformance Report focus on Day 2 features (MACDs), for Departements & Selfcare levels, and in an Avaya environment.

# Evaluation Methods Used: Home-made software to automate accessibility testing based on AXE

## Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0, at <a href="http://www.w3.org/TR/2008/REC-WCAG20-20081211/">http://www.w3.org/TR/2008/REC-WCAG20-20081211/</a>	Level A (Yes / No ) Level AA (Yes / No ) Level AAA (Yes / No )
<a href="#">Revised Section 508 standards</a> as published by the U.S. Access Board in the Federal Register on January 18, 2017 <a href="#">Corrections to the ICT Final Rule</a> as published by the US Access Board in the Federal Register on January 22, 2018	(Yes / No )

## Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Supports with Exceptions:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

## WCAG 2.0 Report

Tables 1 and 2 also document conformance with:

- EN 301 549: Chapter 9 - Web, Chapter 10 - Non-Web documents, Section 11.2.1- Non-Web Software (excluding closed functionality), and Section 11.2.2 - Non-Web Software (closed functionality).
- Revised Section 508: Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing, and Chapter 6 – 602.3 Electronic Support Documentation.

Note: When reporting on conformance with the WCAG 2.0 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.0 Conformance Requirements](#).

## Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
<p><b>1.1.1 Non-text Content</b> (Level A)</p> <p>Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Supports with Exceptions</b>	Non-text content are not critical for the use of the product as most of the application is a form..
<p><b>1.2.1 Audio-only and Video-only (Prerecorded)</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Not Applicable</b>	No audio or video content in the application
<p><b>1.2.2 Captions (Prerecorded)</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Not Applicable</b>	No audio or video content in the application
<p><b>1.2.3 Audio Description or Media Alternative (Prerecorded)</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Not Applicable</b>	No audio or video content in the application
<p><b>1.3.1 Info and Relationships</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Does Not Support</b>	Info and relationship are not yet fully supported but is part of Kurmi Software strategy for future releases.
<p><b>1.3.2 Meaningful Sequence</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Does Not Support</b>	Most of the interface and most relevant features provided by Kurmi Software are based on forms. Layout is based on HTML table and so is not compliant with this requirement. However, when reading the “form” block, it’s mostly compliant.

Criteria	Conformance Level	Remarks and Explanations
		Improving the layout to be fully compliant is part of Kurmi Software strategy for future releases.
<p><b>1.3.3 Sensory Characteristics</b> (Level A)</p> <p>Also applies to:</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Not Applicable</b>	Kurmi Interface doesn't use sensory characteristics.
<p><b>1.4.1 Use of Color</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Supports with Exceptions</b>	<p>Kurmi Interface doesn't use colors as a key information except for:</p> <ul style="list-style-type: none"> <li>- Notification messages: which the content of the message is enough self-explanatory</li> <li>- Allocations dashboard: which percentage information is clearly displayed without colors</li> <li>- Pop-up to select a free number: which color is used to show if a number is available or not. A workaround is possible with the ability to automatically find a free number (and so, no use of the color identification). A roadmap improvement is also plan in order to improve the pop-up.</li> </ul>
<p><b>1.4.2 Audio Control</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Not Applicable</b>	No audio or video content in the application
<p><b>2.1.1 Keyboard</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><b>2.1.2 No Keyboard Trap</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> </ul>	<b>Supports</b>	

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> <li>602.3 (Support Docs)</li> </ul>		
<p><b>2.2.1 Timing Adjustable</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Not Applicable</b>	
<p><b>2.2.2 Pause, Stop, Hide</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><b>2.3.1 Three Flashes or Below Threshold</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><b>2.4.1 Bypass Blocks</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software) – Does not apply to non-web software</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs) – Does not apply to non-web docs</li> </ul>	<b>Not Applicable</b>	Kurmi Interface don't have repetitive navigation..
<p><b>2.4.2 Page Titled</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Does Not Support</b>	Page titled are static but is part of Kurmi Software strategy for future releases to be compliant with this requirement.
<p><b>2.4.3 Focus Order</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><b>2.4.4 Link Purpose (In Context)</b> (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> </ul>	<b>Supports</b>	

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>		
<p><a href="#">3.1.1 Language of Page</a> (Level A) 2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><a href="#">3.2.1 On Focus</a> (Level A) 2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><a href="#">3.2.2 On Input</a> (Level A) 2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><a href="#">3.3.1 Error Identification</a> (Level A) 2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports with Exceptions</b>	Exception: depending of the configuration of the interface, in some rare cases, if a field is hidden to the administrator but throw an issue, this field could be mentioned in the error message (even if the field is not displayed within the form).
<p><a href="#">3.3.2 Labels or Instructions</a> (Level A) 2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports with Exceptions</b>	Most of the inputs are compliant, but there are still a few that are not yet as: <ul style="list-style-type: none"> <li>- DateTime</li> <li>- FreeList</li> <li>- Selector</li> <li>- ToggleOneZero</li> <li>- QuickButtonSubmit</li> <li>- ComponentSelector</li> <li>- BinaryContentUpload</li> <li>- Url</li> </ul>
<p><a href="#">4.1.1 Parsing</a> (Level A) 2017 Section 508</p>	<b>Does Not Support</b>	Our legacy based HTML template is not compliant with parsing.

Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>		Improving the layout to be fully compliant is part of Kurmi Software strategy for future releases.
<b>4.1.2 Name, Role, Value</b> (Level A) 2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports with Exceptions</b>	Most of the inputs are compliant, but there are still a few that are not yet. Improving the inputs to be fully compliant is part of Kurmi Software strategy for future releases.

## Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
<b>1.2.4 Captions (Live)</b> (Level AA) 2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Not Applicable</b>	No audio or video content in the application
<b>1.2.5 Audio Description (Prerecorded)</b> (Level AA) 2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Not Applicable</b>	No audio or video content in the application
<b>1.4.3 Contrast (Minimum)</b> (Level AA) 2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<b>1.4.4 Resize text</b> (Level AA) 2017 Section 508 <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> </ul>	<b>Supports</b>	



Criteria	Conformance Level	Remarks and Explanations
<ul style="list-style-type: none"> <li>602.3 (Support Docs)</li> </ul>		
<p><a href="#">1.4.5 Images of Text</a> (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><a href="#">2.4.5 Multiple Ways</a> (Level AA)</p> <p>Also applies to:</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software) – Does not apply to non-web software</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs) – Does not apply to non-web docs</li> </ul>	<b>Does Not Support</b>	Multiple Ways are not yet supported but is part of Kurmi Software strategy for future releases to be compliant with this requirement.
<p><a href="#">2.4.6 Headings and Labels</a> (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports with Exceptions</b>	<p>Exceptions are:</p> <ul style="list-style-type: none"> <li>- Browser title is fixed</li> <li>- Based on the navigation, the title of the page is kept from a page to another one</li> <li>- Confirmations pages may have not title but a text is display to explain the purpose of the page</li> </ul>
<p><a href="#">2.4.7 Focus Visible</a> (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><a href="#">3.1.2 Language of Parts</a> (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software)</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs)</li> </ul>	<b>Supports</b>	
<p><a href="#">3.2.3 Consistent Navigation</a> (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> <li>501 (Web)(Software) – Does not apply to non-web software</li> <li>504.2 (Authoring Tool)</li> <li>602.3 (Support Docs) – Does not apply to non-web docs</li> </ul>	<b>Supports</b>	
<p><a href="#">3.2.4 Consistent Identification</a> (Level AA)</p>	<b>Supports</b>	

Criteria	Conformance Level	Remarks and Explanations
2017 Section 508 <ul style="list-style-type: none"> <li>• 501 (Web)(Software) – Does not apply to non-web software</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs) – Does not apply to non-web docs</li> </ul>		
<b>3.3.3 Error Suggestion</b> (Level AA) <ul style="list-style-type: none"> <li>• 2017 Section 508               <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> </li> </ul>	<b>Supports with Exceptions</b>	Most of the time, this is managed. But the complexity of the combinations of configurations relative to technical functionals may be considered as exceptions.
<b>3.3.4 Error Prevention (Legal, Financial, Data)</b> (Level AA) <ul style="list-style-type: none"> <li>• 2017 Section 508               <ul style="list-style-type: none"> <li>• 501 (Web)(Software)</li> <li>• 504.2 (Authoring Tool)</li> <li>• 602.3 (Support Docs)</li> </ul> </li> </ul>	<b>Supports</b>	

## 2017 Section 508 Report

Notes:

### Chapter 3: Functional Performance Criteria (FPC)

Notes:

Criteria	Conformance Level	Remarks and Explanations
<b>302.1 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.	<b>Supports with Exceptions</b>	Most of the features/interfaces are forms. The GUI is based on browsers interfaces (web-interfaces) and relies on standards to be used by people without vision. Some exceptions are listed within Table 1 and Table 2.
<b>302.2 With Limited Vision.</b> Where a visual mode of operation is	<b>Supports</b>	

Criteria	Conformance Level	Remarks and Explanations
provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.		
<b>302.3 Without Perception of Color.</b> Where a visual mode of operation is provided, ICT shall provide at least one visual mode of operation that does not require user perception of color.	<b>Supports with Exceptions</b>	Kurmi Interface doesn't use colors as a key information except for: <ul style="list-style-type: none"> <li>- Notification messages: which the content of the message is enough self-explanatory</li> <li>- Allocations dashboard: which percentage information is clearly displayed without colors</li> </ul> Pop-up to select a free number: which color is used to show if a number is available or not. A workaround is possible with the ability to automatically find a free number (and so, no use of the color identification). A roadmap improvement is also plan in order to improve the pop-up.
<b>302.4 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.	<b>Supports</b>	Audible mode of operation is not provided.
<b>302.5 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.	<b>Supports</b>	Audio mode of operation is not provided.
<b>302.6 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.	<b>Supports</b>	Speech is not used for input, control or operation.
<b>302.7 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.	<b>Supports</b>	Web interfaces using simple keyboard inputs
<b>302.8 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.	<b>Supports</b>	Web interfaces using simple keyboard inputs
<b>302.9 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.	<b>Supports with Exceptions</b>	Main features, as fill-in a form to create a new end-user (main purpose of the software), are based on a non-technical

Criteria	Conformance Level	Remarks and Explanations
		and simple form, as asking for first name, last name... Depending of the configuration done and the level of rights of the administrator, technical options can be displayed and may required higher abilities.

## Chapter 4: Hardware

Notes: Kurmi Solution is a software solution . This chapter is non application to Kurmi Solutions.

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality	Heading cell – no response required	Heading cell – no response required
<b>402.1 General</b>	Heading cell – no response required	Heading cell – no response required
<b>402.2 Speech-Output Enabled</b>	Heading cell – no response required	Heading cell – no response required
<b>402.2.1 Information Displayed On-Screen.</b> Speech output shall be provided for all information displayed on-screen.	Not Applicable	Software Solution
<b>402.2.2 Transactional Outputs.</b> Where transactional outputs are provided, the speech output shall audibly provide all information necessary to verify a transaction.	Not Applicable	Software Solution
<b>402.2.3 Speech Delivery Type and Coordination.</b> 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.	Not Applicable	Software Solution
<b>402.2.4 User Control.</b> 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.	Not Applicable	Software Solution
<b>402.2.5 Braille Instructions.</b> Where speech output is required by 402.2, braille instructions for 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.  EXCEPTION: Devices for personal use shall not be required to conform to 402.2.5.	Not Applicable	Software Solution
<b>402.3 Volume</b>	Heading cell – no response required	Heading cell – no response required
<b>402.3.1 Private Listening.</b> 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.	Not Applicable	Software Solution
<b>402.3.2 Non-private Listening.</b> 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	Not Applicable	Software Solution

Criteria	Conformance Level	Remarks and Explanations
to automatically reset the volume to the default level after every use.		
<b>402.4 Characters on Display Screens.</b> At least one mode of characters displayed on the screen shall be in a sans serif font. Where ICT does 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.	Not Applicable	Software Solution
<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	Software Solution
<b>403 Biometrics</b>	Heading cell – no response required	Heading cell – no response required
<b>403.1 General.</b> Where provided, biometrics shall not be the only means for user identification or control.  EXCEPTION: 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	Software Solution
<b>404 Preservation of Information Provided for Accessibility</b>	Heading cell – no response required	Heading cell – no response required
<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.	Not Applicable	Software Solution
<b>405 Privacy</b>	Heading cell – no response required	Heading cell – no response required
<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.	Not Applicable	Software Solution
<b>406 Standard Connections</b>	Heading cell – no response required	Heading cell – no response required
<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.	Not Applicable	Software Solution
<b>407 Operable Parts</b>	Heading cell – no response required	Heading cell – no response required
<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.	Not Applicable	Software Solution

Criteria	Conformance Level	Remarks and Explanations
<b>407.3 Input Controls</b>	Heading cell – no response required	Heading cell – no response required
<b>407.3.1 Tactilely Discernible.</b> Input controls shall be operable by touch and tactilely discernible without activation.	Not Applicable	Software Solution
<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	Software Solution
<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).	Not Applicable	Software Solution
<b>407.4 Key Repeat.</b> Where a keyboard with key repeat is provided, the delay before the key repeat feature is activated shall be fixed at, or adjustable to, 2 seconds minimum.	Not Applicable	Software Solution
<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	Software Solution
<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.	Not Applicable	Software Solution
<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	Software Solution
<b>407.8 Reach Height and Depth</b>	Heading cell – no response required	Heading cell – no response required
<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 vertical reference plane shall be located in conformance to 407.8.2 or 407.8.3.	Not Applicable	Software Solution
<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.	Not Applicable	Software Solution
<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.	Not Applicable	Software Solution

Criteria	Conformance Level	Remarks and Explanations
<p><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.</p>	Not Applicable	Software Solution
<p><b>407.8.2.1 Unobstructed Side Reach.</b> Where the operable part is located 10 inches (255 mm) or less beyond the vertical reference plane, the operable part shall be 48 inches (1220 mm) high maximum and 15 inches (380 mm) high minimum above the floor.</p>	Not Applicable	Software Solution
<p><b>407.8.2.2 Obstructed Side Reach.</b> 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>	Not Applicable	Software Solution
<p><b>407.8.3 Forward Reach.</b> 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>	Not Applicable	Software Solution
<p><b>407.8.3.1 Unobstructed Forward Reach.</b> 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>	Not Applicable	Software Solution
<p><b>407.8.3.2 Obstructed Forward Reach.</b> 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>	Not Applicable	Software Solution
<p><b>407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach.</b> If the reach depth is less than 20 inches (510 mm), the operable part height shall be 48 inches (1220 mm) maximum. If the reach depth is 20 inches (510 mm) to 25 inches (635 mm), the operable part height shall be 44 inches (1120 mm) maximum.</p>	Not Applicable	Software Solution



Criteria	Conformance Level	Remarks and Explanations
<p><b>407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach.</b> 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>EXCEPTIONS:</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 (685 mm) 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	Software Solution
<b>408 Display Screens</b>	Heading cell – no response required	Heading cell – no response required
<p><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.</p>	Not Applicable	Software Solution
<p><b>408.3 Flashing.</b> Where ICT emits lights in flashes, there shall be no more than three flashes in any one-second period.</p> <p>EXCEPTION: 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	Software Solution
<b>409 Status Indicators</b>	Heading cell – no response required	Heading cell – no response required
<p><b>409.1 General.</b> Where provided, status indicators shall be discernible visually and by touch or sound.</p>		
<b>410 Color Coding</b>	Heading cell – no response required	Heading cell – no response required
<p><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.</p>	Not Applicable	Software Solution
<b>411 Audible Signals</b>	Heading cell – no response required	Heading cell – no response required
<p><b>411.1 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</p>	Not Applicable	Software Solution

Criteria	Conformance Level	Remarks and Explanations
<b>412 ICT with Two-Way Voice Communication</b>	Heading cell – no response required	Heading cell – no response required
<b>412.2 Volume Gain</b>	Heading cell – no response required	Heading cell – no response required
<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.	Not Applicable	Software Solution
<b>412.2.2 Volume Gain for Non-Wireline ICT.</b> A method for increasing volume shall be provided for non-wireline ICT.	Not Applicable	Software Solution
<b>412.3 Interference Reduction and Magnetic Coupling</b>	Heading cell – no response required	Heading cell – no response required
<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	Software Solution
<b>412.3.2 Wireline Handsets.</b> ICT in the form of wireline handsets, including cordless handsets, shall conform to TIA-1083-B (incorporated by reference, see 702.9.1).	Not Applicable	Software Solution
<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).	Not Applicable	Software Solution
<b>412.5 Real-Time Text Functionality.</b> [Reserved].	Reserved for future	Reserved for future
<b>412.6 Caller ID.</b> Where provided, caller identification and similar telecommunications functions shall be visible and audible.	Not Applicable	Software Solution
<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	Software Solution
<b>412.8 Legacy TTY Support</b>	Heading cell – no response required	Heading cell – no response required
<b>412.8.1 TTY Connectability.</b> ICT shall include a standard non-acoustic connection point for TTYs.	Not Applicable	Software Solution
<b>412.8.2 Voice and Hearing Carry Over.</b> ICT shall provide a microphone capable of being turned on and off to allow the user to intermix speech with TTY use.	Not Applicable	Software Solution
<b>412.8.3 Signal Compatibility.</b> ICT shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols where the system interoperates with the Public Switched Telephone Network (PSTN).	Not Applicable	Software Solution
<b>412.8.4 Voice Mail and Other Messaging Systems.</b> Where provided,	Not Applicable	Software Solution

Criteria	Conformance Level	Remarks and Explanations
voice mail, auto-attendant, interactive voice response, and caller identification systems shall be usable with a TTY.		
<b>413 Closed Caption Processing Technologies</b>	Heading cell – no response required	Heading cell – no response required
<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	Software Solution
<b>413.1.2 Pass-Through of Closed Caption Data.</b> Cabling and ancillary equipment shall pass through caption data.	Not Applicable	Software Solution
<b>414 Audio Description Processing Technologies</b>	Heading cell – no response required	Heading cell – no response required
<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	Software Solution
<b>414.1.2 Other ICT.</b> ICT other than digital television tuners shall provide audio description processing.	Not Applicable	Software Solution
<b>415 User Controls for Captions and Audio Descriptions</b>	Heading cell – no response required	Heading cell – no response required
<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	Software Solution
<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	Software Solution

## Chapter 5: Software

Notes: Kurmi Solution Interfaces are browser-based interfaces (web interfaces). This chapter is not applicable to Kurmi Solutions.

Criteria	Conformance Level	Remarks and Explanations
<b>501.1 Scope</b> – Incorporation of WCAG 2.0 AA	See <a href="#">WCAG 2.0</a> section	See information in WCAG section
<b>502 Interoperability with Assistive Technology</b>	Heading cell – no response required	Heading cell – no response required
<b>502.2.1 User Control of Accessibility Features.</b> Platform software shall provide user control over platform features that are defined in the platform documentation as accessibility features.	Not Applicable	Browser-based interfaces (web interfaces)

Criteria	Conformance Level	Remarks and Explanations
<b>502.2.2 No Disruption of Accessibility Features.</b> Software shall not disrupt platform features that are defined in the platform documentation as accessibility features.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3 Accessibility Services</b>	Heading cell – no response required	Heading cell – no response required
<b>502.3.1 Object Information.</b> The object role, state(s), properties, boundary, name, and description shall be programmatically determinable.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.2 Modification of Object Information.</b> States and properties that can be set by the user shall be capable of being set programmatically, including through assistive technology.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.3 Row, Column, and Headers.</b> If an object is in a data table, the occupied rows and columns, and any headers associated with those rows or columns, shall be programmatically determinable.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.4 Values.</b> Any current value(s), and any set or range of allowable values associated with an object, shall be programmatically determinable.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.5 Modification of Values.</b> Values that can be set by the user shall be capable of being set programmatically, including through assistive technology.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.6 Label Relationships.</b> Any relationship that a component has as a label for another component, or of being labeled by another component, shall be programmatically determinable.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.7 Hierarchical Relationships.</b> Any hierarchical (parent-child) relationship that a component has as a container for, or being contained by, another component shall be programmatically determinable.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.8 Text.</b> The content of text objects, text attributes, and the boundary of text rendered to the screen, shall be programmatically determinable.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.9 Modification of Text.</b> Text that can be set by the user shall be capable of being set programmatically, including through assistive technology.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.10 List of Actions.</b> A list of all actions that can be executed on an object shall be programmatically determinable.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.11 Actions on Objects.</b> Applications shall allow assistive technology to programmatically execute available actions on objects.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.12 Focus Cursor.</b> Applications shall expose information and	Not Applicable	Browser-based interfaces (web interfaces)

Criteria	Conformance Level	Remarks and Explanations
mechanisms necessary to track focus, text insertion point, and selection attributes of user interface components.		
<b>502.3.13 Modification of Focus Cursor.</b> Focus, text insertion point, and selection attributes that can be set by the user shall be capable of being set programmatically, including through the use of assistive technology.	Not Applicable	Browser-based interfaces (web interfaces)
<b>502.3.14 Event Notification.</b> Notification of events relevant to user interactions, including but not limited to, changes in the component's state(s), value, name, description, or boundary, shall be available to assistive technology.	Not Applicable	Browser-based interfaces (web interfaces)
<p><b>502.4 Platform Accessibility Features.</b> Platforms and platform software shall conform to the requirements in ANSI/HFES 200.2, Human Factors Engineering of Software User Interfaces — Part 2: Accessibility (2008) (incorporated by reference, see 702.4.1) listed below:</p> <ul style="list-style-type: none"> <li>A. Section 9.3.3 Enable sequential entry of multiple (chorded) keystrokes;</li> <li>B. Section 9.3.4 Provide adjustment of delay before key acceptance;</li> <li>C. Section 9.3.5 Provide adjustment of same-key double-strike acceptance;</li> <li>D. Section 10.6.7 Allow users to choose visual alternative for audio output;</li> <li>E. Section 10.6.8 Synchronize audio equivalents for visual events;</li> <li>F. Section 10.6.9 Provide speech output services; and</li> <li>G. Section 10.7.1 Display any captions provided.</li> </ul>	Not Applicable	Browser-based interfaces (web interfaces)
<b>503 Applications</b>	Heading cell – no response required	Heading cell – no response required
<b>503.2 User Preferences.</b> Applications shall permit user preferences from platform settings for color, contrast, font type, font size, and focus cursor.	Not Applicable	Browser-based interfaces (web interfaces)
<b>503.3 Alternative User Interfaces.</b> Where an application provides an alternative user interface that functions as assistive technology, the application shall use platform and other industry standard accessibility services.	Not Applicable	Browser-based interfaces (web interfaces)
<b>503.4 User Controls for Captions and Audio Description</b>	Heading cell – no response required	Heading cell – no response required
<b>503.4.1 Caption Controls.</b> Where user controls are provided for volume adjustment, ICT shall provide user controls for the selection of	Not Applicable	Browser-based interfaces (web interfaces)

Criteria	Conformance Level	Remarks and Explanations
captions at the same menu level as the user controls for volume or program selection.		
<b>503.4.2 Audio Description Controls.</b> Where user controls are provided for program selection, ICT shall provide user controls for the selection of audio descriptions at the same menu level as the user controls for volume or program selection.	Not Applicable	Browser-based interfaces (web interfaces)
<b>504 Authoring Tools</b>	Heading cell – no response required	Heading cell – no response required
<p><b>504.2 Content Creation or Editing.</b> Authoring tools shall provide a mode of operation to create or edit content that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1) for all supported features and, as applicable, to file formats supported by the authoring tool. Authoring tools shall permit authors the option of overriding information required for accessibility.</p> <p>EXCEPTION: Authoring tools shall not be required to conform to 504.2 when used to directly edit plain text source code.</p> <p>(NOTE: If the product is not an authoring tool, enter “not applicable”)</p>	See <a href="#">WCAG 2.0</a> section	See information in WCAG section
<b>504.2.1 Preservation of Information Provided for Accessibility in Format Conversion.</b> Authoring tools shall, when converting content from one format to another or saving content in multiple formats, preserve the information required for accessibility to the extent that the information is supported by the destination format.	Not Applicable	Browser-based interfaces (web interfaces)
<b>504.2.2 PDF Export.</b> Authoring tools capable of exporting PDF files that conform to ISO 32000-1:2008 (PDF 1.7) shall also be capable of exporting PDF files that conform to ANSI/AIIM/ISO 14289-1:2016 (PDF/UA-1) (incorporated by reference, see 702.3.1).	Not Applicable	Browser-based interfaces (web interfaces)
<b>504.3 Prompts.</b> Authoring tools shall provide a mode of operation that prompts authors to create content that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1) for supported features and, as applicable, to file formats supported by the authoring tool.	Not Applicable	Browser-based interfaces (web interfaces)
<b>504.4 Templates.</b> Where templates are provided, templates allowing content creation that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1) shall be provided for a range of template uses for supported features and, as applicable, to file formats supported by	Not Applicable	Browser-based interfaces (web interfaces)

Criteria	Conformance Level	Remarks and Explanations
the authoring tool.		

## Chapter 6: Support Documentation and Services

Notes:

Criteria	Conformance Level	Remarks and Explanations
<b>601.1 Scope</b>	Heading cell – no response required	Heading cell – no response required
<b>602 Support Documentation</b>	Heading cell – no response required	Heading cell – no response required
<b>602.2 Accessibility and Compatibility Features.</b> Documentation shall list and explain how to use the accessibility and compatibility features required by Chapters 4 and 5. Documentation shall include accessibility features that are built-in and accessibility features that provide compatibility with assistive technology.	Not Applicable	Don't need specific features
<b>602.3 Electronic Support Documentation.</b> Documentation in electronic format, including Web-based self-service support, shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1).	See <a href="#">WCAG 2.0</a> section	See information in WCAG section
<b>602.4 Alternate Formats for Non-Electronic Support Documentation.</b> Where support documentation is only provided in non-electronic formats, alternate formats usable by individuals with disabilities shall be provided upon request.	Not Applicable	Only electronic documentation is provided
<b>603 Support Services</b>	Heading cell – no response required	Heading cell – no response required
<b>603.2 Information on Accessibility and Compatibility Features.</b> ICT support services shall include information on the accessibility and compatibility features required by 602.2.	Not Applicable	Partner (Avaya) support services
<b>603.3 Accommodation of Communication Needs.</b> Support services shall be provided directly to the user or through a referral to a point of contact. Such ICT support services shall accommodate the communication needs of individuals with disabilities.	Not Applicable	Partner (Avaya) support services

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