Avaya E169 Media Station

Voluntary Product Accessibility Template (VPAT)

The E169 Media Station is a desktop telecommunication endpoint. The E169 Media Station base may be operated in a stand-alone mode that provides open, standards-based Session Initiation Protocol (SIP) support for basic telephony features such as conference, transfer, forward, hold, and mute. Alternatively, the E169 Media Station may be paired with and utilized in conjunction with an iOS or Android smart device, such as a cellphone and tablet.   Connectivity between the E169 Media Station and the smart device may be via Bluetooth or USB.

In order to support pairing and synchronization between the E169 Media Station and associated smart device, the device must be running the Avaya E169 client application. This application provides a specialized user interface and an enhanced feature set that greatly expands the capabilities provided by the E169 Media Station when it is operated in stand-alone mode (i.e., when it is not paired with a smart device).

The § 1194.21 "Software Applications and Operating Systems" responses in this document apply only to the E169 smart device application. All other responses are applicable to the application and to the E169 Media Station base when it is operated in stand-alone mode.

Support Levels

Support Level	Description
Supports	The Avaya E169 base and associated smart device applications fully meet the letter and intent of the criterion.
Supports with Exceptions/Minor Exceptions	The Avaya E169 base and associated smart device applications do 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 Avaya E169 base and associated smart device applications provide an alternate way to meet the intent of the criterion.
Supports when combined with Compatible Assistive Technology	The Avaya E169 base and associated smart device applications fully meet the letter and intent of the criterion when used in combination with compatible assistive technology.
Does Not Support	The Avaya E169 base and associated smart device applications do 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 Avaya E169 base and associated smart device applications is required to meet the criterion.

Compliance Summary

Criteria	Support Levels
Section 1194.21 Software Applications and Operating Systems	**Supports with Exceptions**
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**

§ 1194.21 Software Applications and Operating Systems

Criteria	Support Levels	Remarks and Explanations
1194.21(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.	Not Applicable	The E169 smart device applications are not designed to run on a system that has a keyboard.
1194.21(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.	Supports with Exceptions	The E169 smart device applications do not disrupt or disable the software-based accessibility features of the smart device. Note: Bluetooth-based assistive adjuncts that might ordinarily be used in conjunction with the smart device (such as Bluetooth-coupled assistive listening devices) will not be usable because the smart device's Bluetooth function will be paired with the Bluetooth of the E169 Media Station.
1194.21(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that assistive technology can track focus and focus changes.	Does not Support	On-screen indication of focus is not provided, nor is focus programmatically exposed to assistive technology.

1194.21(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to assistive technology. When an image represents a program element, the information conveyed by the image must also be available in text.	Does not Support	Information about the state of user interface elements is not available to assistive technology. Information conveyed by images is not consistently available as text.
1194.21(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.	Supports	The meanings of bitmap images that appear more than once are consistent throughout the application.
1194.21(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.	Supports with Exceptions	Some textual information is presented within bitmap images that do not have underlying text tags (e.g., the text presented on the keys of the dialpad), and is therefore not accessible to assistive technologies such as 'TalkBack'.
1194.21(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports with Exceptions	The E169 smart device applications do not override the contrast and color selections that are made via the operating system options of the smart devices. Some of the other display attributes that may be specified via the device operating system options, such as the size and font of text, are overridden.
1194.21(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Supports	The E169 smart device applications do not use animation to display information.
1194.21(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Does not Support	For many of the status indicators, color coding is the sole means of conveying information.
1194.21(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.	Not Applicable	The E169 smart device applications do not allow colors to be adjusted independent of the settings that may be selected via the smart device operating system options.
1194.21(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	Supports	The E169 smart device applications do not use flashing or blinking text, objects, or other elements that flash or blink.
1194.21(l) When electronic forms are used, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Does not Support	The E169 smart device applications do not provide sufficient direction and cues for a person who is dependent on assistive technology to complete and submit forms.

§ 1194.23 Telecommunications Products

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.	E169 base stand-alone mode: Does not Support	The E169 base does not provide a non-acoustic connection point for TTYs.
	E169 smart device applications: Does not Support	Analog TTYs that are compatible with the smart device, that are connected via the smart device's headphone/microphone jack, will not be usable because the audio capabilities of the smart device are not utilized when the device is paired with the E169. TTY devices that connect via Bluetooth to the smart device will not be usable because the smart device's Bluetooth function will be paired with the Bluetooth of the E169 Media Station.
1194.23(b) Telecommunications products, which include voice communication functionality, shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	E169 base stand-alone mode: Does not Support	The E169 base does not provide a non-acoustic connection point for TTYs.
	E169 smart device applications: Does not support	Analog TTYs that are compatible with the smart device, that are connected via the smart device's headphone/microphone jack, will not be usable because the audio capabilities of the smart device are not utilized when the device is paired with the E169. TTY devices that connect via Bluetooth to the smart device will not be usable because the smart device's Bluetooth function will be paired with the Bluetooth of the E169 Media Station.
1194.23(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Not Applicable	This requirement applies to voice mail, auto-attendant, and interactive voice response systems. It does not apply to the E169.
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	This requirement applies to voice mail, auto-attendant, and interactive voice response systems. It does not apply to the E169.
1194.23(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	E169 base stand-alone mode: Does not Support	The E169 base does not provide a non-acoustic connection point for TTYs. For users who cannot see displays, caller identification is not available in a non-visual format.
	E169 smart device applications: Does not Support	The connection points on smart devices, that might ordinarily be used to support compatible analog TTY devices, are disabled when the smart device is coupled with the E169. For users who cannot see displays, caller identification is not available in a non-visual format.

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 with Exceptions	The E169 handset provides 14 dB of user-adjustable gain above the 'nominal' level. An intermediate step of 12 dB of gain is provided.
1194.23(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.	Does not Support	The E169 handset does not have an automatic post-call amplitude reset function.
1194.23(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	The E169 handset conforms to FCC Part 68 requirements for hearing aid compatibility. Note: Bluetooth-based assistive adjuncts that might ordinarily be used in conjunction with the smart device (such as Bluetooth-coupled assistive listening devices) will not be usable because the smart device's Bluetooth function will be paired with the Bluetooth of the E169 Media Station.
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 E169 handset conforms to FCC Part 68 requirements for hearing aid compatibility.
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.	E169 base stand-alone mode: Supports with Exceptions	The E169 base supports a wide variety of industry-standard audio encoding algorithms. Note: The inability to connect an auxiliary device, such as a TTY or modem, to the base limits the usefulness of the E169's support for those audio algorithms.
	E169 smart device applications: Supports with Exceptions	The E169 smart device applications do not disrupt or disable the ability of the smart device to support cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Note: The inability to connect an auxiliary device, such as a TTY or modem, to the smart device may limit the usefulness of the E169's support for specialized communication codes and protocols.

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.	E169 base stand-alone mode: Supports with Exceptions	The E169 base has a tactilely discernable volume control knob. There is a capacitive touch button on either side of the volume control knob, one for MUTE and the other for voicemail access, which are locatable without vision due to their proximity to the volume control knob. The E169 handset has a tactilely discernible dialpad. The functions assigned to other controls and keys on the handset can vary depending on context, and may therefore be difficult to identify without vision.
	E169 smart device applications: Does not Support	The controls and keys presented by the E169 smart device applications do not support the 'TalkBack' or 'Explore-by-Touch' assistive technologies.
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	Controls and keys are operable with one hand and do not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls and keys is less than 5 lbs (22.2N).
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 E169 base has no key repeat functions. The only key repeat function in the E169 smart device applications is DELETE, the behavior of which is governed by the operating system of the smart device.
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 by touch or sound.

§ 1194.31 Functional Performance Criteria

Criteria	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.	Does not Support	Neither the E169 base nor the E169 smart device applications are able to present status indicators or caller identification information in a non-visual manner. (The E169 smart device applications do not support the assistive technologies that are commonly used by people who are blind, such as 'TalkBack' and 'Explore-by-Touch'.)
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.	E169 base stand-alone mode: Does not Support	The LCD display on the E169 handset is unlikely to be readable at normal working distances by users with a visual acuity less than 20/70.
	E169 smart device applications: Supports with Exceptions	The E169 smart device applications do not override the contrast and color selections that are made via the operating system options of the devices, but they do override some of the other user-selectable options, such as the size and font of text.
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.	E169 base stand-alone mode: Does not Support	The E169 base does not provide a non-acoustic connection point for TTYs.
	E169 smart device applications: Does not Support	Analog TTYs that are compatible with the smart device, that are connected via the smart device's headphone/microphone jack, will not be usable because the audio capabilities of the smart device are not utilized when the device is paired with the E169. TTY devices that connect via Bluetooth to the smart device will not be usable because the smart device's Bluetooth function will be paired with the Bluetooth of the E169 Media Station. Note: User hearing is not required in order to operate the E169 user interfaces for most normal operations. An exception is that audio cues are generated by the base station during initial Bluetooth pairing of smart devices.
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 with Exceptions	The E169 handset conforms to FCC Part 68 requirements for hearing aid compatibility. The handset allows users to adjust the amplitude, but does not provide 20 dB of user-adjustable gain. Note: Bluetooth-based assistive adjuncts that might ordinarily be used in conjunction with the smart device (such as Bluetooth-coupled assistive listening devices) will not be usable because the smart device's Bluetooth function will be paired with the Bluetooth of the E169 Media Station.

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.	E169 base stand-alone mode: Does not Support	The E169 base does not provide a non-acoustic connection point for TTYs.
	E169 smart device applications: Does not Support	Analog TTYs that are compatible with the smart device, that are connected via the smart device's headphone/microphone jack, will not be usable because the audio capabilities of the smart device are not utilized when the device is paired with the E169. TTY devices that connect via Bluetooth to the smart device will not be usable because the smart device's Bluetooth function will be paired with the Bluetooth of the E169 Media Station. Note: User speech is not required in order to operate the E169 user interfaces.
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.	E169 base stand-alone mode: Supports	The controls and keys on the E169 base and handset are operable with one hand and do not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls and keys is less than 5 lbs (22.2N).
	E169 smart device applications: Supports with Exceptions	The E169 smart device applications support some of the user interface preferences commonly employed by people who lack fine motor control, but not all. For example, the ability to magnify the display is supported, but the 'Explore-by-Touch' option is not.

§ 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	Avaya's point-of-contact for accessibility-related issues: Dr. Paul R. Michaelis Voice: 303-538-4101 TTY: 303-538-3740 prmichaelis-at-avaya.com