

Voluntary Product Accessibility Template (VPAT)

Date: January 25th, 20146

Name of Product: 6390/6392 Analog Phones

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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	Supports with Exceptions	See below
Section 1194.24 Video and Multi-media Products	Not applicable	
Section 1194.25 Self-Contained, Closed Products	Not applicable	
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Section 1194.23 Telecommunications Products
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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	<p>The 6390/6392 handsets are designed to support TTY acoustic coupling.</p> <p>The 6390 provides a RJ-11 port which can be used to connect a TTY device that supports analog line interface.</p> <p>Handset, headset and handsfree speakerphone muting can be achieved by pressing the Mute key.</p>
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Supports	<p>This requirement is satisfied when the telephone is configured in the manner described in 1194.23(a)</p>
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Not Applicable	<p>This requirement applies only to voice mail, auto-attendant, and interactive voice response systems.</p>
(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	<p>This requirement applies only to voice mail, auto-attendant, and interactive voice response systems.</p>
(e) Where provided, caller identification and similar telecommunications	Supports with Exceptions	

functions shall also be available for users of TTYs, and for users who cannot see displays.		<p>The 6390 supports direct TTY device connection via secondary RJ-11 analog port. Some TTY devices support talking and visual CallerID.</p> <p>Both 6390/6392 support CallerID display on their LCD displays enabling acoustically coupled TTY device users visibility of the CallerID.</p>
(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	<p>Transmitter gain for handset, handsfree speakerphone and headset can be adjusted via volume controls.</p> <p>Handset volume provides 20dB of gain with 7 levels from minimum to maximum.</p>
(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	6390/6392 phones provides call volume that is adjustable on a per call basis. Volume does not reset to a default level after completion of the call.
(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	6390/6392 models meet FCC Part 68 requirements for Hearing Aid Compatibility (HAC). 6390/6392 handsets have FCC-compliant primary inductive coils, which allow the phones to be used with inductively coupled assistive hearing devices, such as hearing aids and cochlear implants

(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	<p>These models meet FCC Part 68 requirements for Hearing Aid Compatibility (HAC).</p> <p>6390/6392 models meet FCC standards for electro-magnetic shielding.</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.	Supports	<p>6390/6392 has no known characteristic that would interfere with the transmitted and received tones used by standard TTYs</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.	Supports	<p>The 6390/6392 models have keys with identifiable outline shapes and edges and require a press to activate.</p> <p>Dial pads are arranged in a standard manner, with a raised nub on the 5-key, thereby making "tactile navigation" easier for visually impaired users.</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	Supports	<p>6390/6392 phones may be operated by one hand. Activation force is significantly less than 5 lbs.</p>

require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.		
(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.	Supports	These models do not use keys with a repeat feature.
(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	<p>Hold, Mute and Speaker/Headset keys have a toggle function. Status of these functions is visually indicated either by text and/or icons that are displayed on an LCD screen, or by LED lamps.</p> <p>Status of the Speaker/Headset key is evident audibly by the basic telephone behavior.</p> <p>These models do not have an option to discern toggle states through touch.</p>

Section 1194.31 Functional Performance Criteria
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Criteria	Supporting Features	Remarks and explanations
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(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	<p>The 6390/6392 models dial pads are arranged in a standard manner, with a raised nub on the 5-key, thereby making "tactile navigation" easier for visually impaired users.</p> <p>The 6390 also others a secondary RJ-11port for connecting third party assistive devices.</p>
(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	<p>The 6390 also others a secondary RJ-11port for connecting third party assistive devices.</p> <p>6390/6392 models have a level of contrast adjustment to increase the brightness of the display. Dial pads on both models are arranged in a standard twelve-button layout with the conventional raised area on the "5" button.</p> <p>The device is also compatible with optical and electro-optical assistive technology such as magnifying glasses and image magnification systems.</p> <p>LCD icons and LED's are used to indicate many call and feature status, such as MWI LED for ringing and message waiting, LED's next to function keys for Hold, Mute and Speaker/Headset.</p>
(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	<p>Support for third party assistive devices via acoustic coupling or via the secondary RJ-11 port (6390 model) in addition to features described in 1194.31(b).</p>
(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	<p>These models have HAC handsets. Receive audio gain can also be modified. See also 1194.31 (c).</p>

(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	As described in 1194.31(d)
(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	<p>These models have a standard telephony keypad. All keys on 6390/6392 phones may be operated by one hand. No simultaneous actions (e.g., pressing two buttons at the same time) are required.</p> <p>6390/6392 also support programmable softkeys enabling one touch dialing for pre-defined numbers.</p>

Section 1194.41 Information, Documentation and Support
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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 with Exceptions	Electronic documentation is available online, typically in PDF format. Commercially available text to speech applications can make available for hearing impaired users.
(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 with Exceptions	Electronic documentation is available online, typically in PDF format. Commercially available text to speech applications can make available for hearing impaired users.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports with Exceptions	Mitel provides technical support with a number of communications mechanisms including written (e-mail), auditory/speech (real time communications with live support personnel).

