Voluntary Product Accessibility Template (VPAT)

Date: January 25th, 2016
Name of Product: Mitel 6730i, 6731i, 6735i, 6737i, 6739i, 6753i, 6755i, 6757i, 6863i, 6865i, 6867i, 6869i, 6873i

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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	Acoustic coupling to commercially available TTY devices together with visual indicators enables basic call control and communication. These models do not provide an RJ-11 analog line where a TTY can be connected. A third party Analog Telephone Adapter (ATA) may be used in conjunction with the IP phone, to provide the RJ-11 analog line. Another way to satisfy this requirement is to associate an analog TTY equipped phone line with the Mitel phone (e.g using call forking, shared call appearance, hunt groups etc). Handset, headset and handsfree speakerphone muting can be achieved by pressing the Mute key.
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Supports	This requirement is satisfied when the telephone is configured in the manner described in 1194.23(a)
(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 only to voice mail, auto-attendant, and interactive voice response systems.
(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	Not Applicable	This requirement applies only to voice mail, auto-attendant, and interactive voice response systems.

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indicate more time is required.		
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	Supports with Exceptions	This requirement is satisfied when the telephone is configured in the manner described in 1194.23(a) If using TTYs as described in 1194.23(a), Caller ID and similar functions will continue to appear appropriately on the terminal's display. For visually impaired who cannot see Message Waiting Indicator light, Mitel SIP phones can provide an audible message waiting tone (stutter tone), which plays at the beginning of the dial tone when the phone goes off-hook.
(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	Mitel notes that this requirement conflicts with the FCC Part 68. In general, Mitel sets provide a volume range of 12-18dB measured between the minimum and maximum volume. These sets have adjustable handset receiver audio gain in approximately 3dB steps with 10 levels. Handsfree speakerphone mode offers an equivalent audio range. Transmitter gain for handset, handsfree speakerphone and headset jack (Not jack available on certain models) can be adjusted via software configuration.
(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	Mitel SIP Phones provides call volume that is adjustable on a per call basis. Volume does not reset to a default level after completion of the

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		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	These models meet FCC Part 68 requirements for Hearing Aid Compatibility (HAC). Mitel 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	These models meet FCC Part 68 requirements for Hearing Aid Compatibility (HAC). These models meet FCC standards for electro-magnetic shielding.
(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	Same as 1194.23(a)
(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	These Mitel models have keys with identifiable outline shapes and edges and require a press to activate.

		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.
(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	All keys on Mitel phones may be operated by one hand. Activation force is significantly less than 5 lbs.
(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	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. Status of the Speaker/Headset key is evident audibly by the basic telephone behavior. These models do not have an option to discern toggle states through touch.

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Section 1194.31 Functional Performance Criteria

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Criteria	Supporting Features	Remarks and explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.	Supports with Exceptions	Dial pads on these models are arranged in a standard manner, with a raised nub on the 5-key, thereby making "tactile navigation" easier for visually impaired users. They also include bright red "line ringing" and bright red or green "line in use" indicators.
(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	A large Off-hook handset icon is displayed on the screen while the phone is in use. Alpha-numeric displays provides call information in large fonts or icons. LED Status indicators are provided for Hold, Mute and Speaker/Headset keys and other functions.
(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	This requirement is satisfied when the telephone is configured in the manner described in 1194.23(a). Also see 1194.31(b).
(d) Where audio information is important for the use of a product, at least one mode of operation and information	Supports	

		These models have HAC handsets. Receive audio gain can also be modified.
retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.		
(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(b)
(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	These models have a standard telephony keypad. All keys on Mitel phones may be operated by one hand. No simultaneous actions (e.g., pressing two buttons at the same time) are required.

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).

Updated: March 16, 2010.

Product Accessibility Features

Mitel SIP phones have many features and built in functionality that promotes accessibility for users with various disabilities. Some features are model specific.

Visually impaired accessibility features:

- Standard numeric keyboard layout and tactile navigation aided by raised nib on centre 5 digit.

- Screen brightness and contrast controls to increase visibility and activate backlight.

- Large buttons with text or symbol printing options combined with color keys.

- Large bright MWI indicator and flashing LED on Line/programmable keys to promote awareness and give bright visual alert.

- Audible features for incoming call (ringing tones, multiple volume settings), call waiting tones, message waiting (stutter dial tone), ring splash with BLF feature. By pressing the speaker key audible indication is given of phone state – dial tone, stutter tone (MWI), active call.

- Adjustable volume for ringing tones, speaker volume, handset speech volume to provide greater audible features for call control and usage.

- Standards based headset interfaces on specific models enables processing calls with limited need to access specific keys on the phone. Giving greater access for some features such as answering and terminating calls.

- Selectable audio preferences to prioritize routing of calls to speaker or headset to provide more audible prompts rather than visual.

- Physical line keys with color LED indicators for call states provide greater visual/audible call control.

- Illuminated function keys. Several keys have LED indicators to enhance the awareness that keys are active or in use.

- Programmable keys and dedicated function keys that promote one touch control rather in defined location rather than multiple key presses in multiple locations.

- Adjustable stand positions to provide optimal viewing angles.

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- SIP phones could be used in conjunction with other devices and applications that could provide additional capabilities – for example parallel ringing to a soft phone with large caller-id display, enabling users to identify callers before answering on the Mitel SIP phone.

Hearing-impaired accessibility features:

- Acoustic coupling to commercially available TTY devices provides compatibility and access. Typically placing handset onto acoustic cups of TTY devices.

- Support of most commercially available handset amplifiers. Replacing the handset with commonly available amplifiers enables a range of volume control and specialized ear piece attachments to facilitate accessibility to hearing impaired. Access via handset cable or BT depending on model.

- Hearing Aid Compatible (HAC) handsets.

- Standards based headset interfaces to commercially available devices that provide greater volume ranges and specialized ear piece attachments.

- Adjustable volume controls providing a wide range of volume control for ringing tone, audio alerts and speech path via headset and speaker.

- Selectable ring tones to best suit personnel preferences.

- Selectable audio preferences to prioritize routing of calls to speaker or headset to provide more audible prompts rather than visual.

- Visual indicators for commonly used features such as: Caller id screen display for incoming calls, message waiting (MWI), Line status LED indictors; programmable keys with LCD or paper labeling for visual indication of function, visual status icons for mute, DND etc.

- Illuminated function keys. Several keys have LED indicators to enhance the awareness that keys are active or in use.

- Specific to models supporting color displays, greater range and use of color indicators and icons promoting easier use.

Mobility impaired accessibility features:

- Visual and audio indicators and information automatically presented without manual intervention, such as ringing tones, caller-id display.

- Auto answer support enabling connectivity with no manual intervention with calls utilizing the phones speaker.

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- Auto answer support enabling connectivity with no manual intervention with calls utilizing the headset.

- One touch call answer and call clearing without the need to pick up the handset either used with headset (EHS support) or speaker phone.

- Dedicated headset (model specific) enabling remote access to call features.

- Selectable audio preferences to prioritize routing of calls to handset, speaker or headset to select more suitable access method.

- One touch pre-programmed keys enabling complex dialing with single key press.

- Touch screen control (model specific) as an additional interface to the traditional keypad.

- Prevention of dual key press activation to help reduce incorrect activation.

- Adjustable stand positions to provide optimal access angles.

- Large well space keys providing easier operation.

Updated: March 16, 2010.