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Voluntary Accessibility Template (VPAT)

This Voluntary Product Accessibility Template (VPAT) describes accessibility of Polycom's C100 and CX100 family against the criteria described in Section 508 of the United States Rehabilitation Act of 1973, as amended (29 U.S.C. 794d). The template format is intended to permit easy evaluation of conformance to Section 508.

Name of Product(s): Polycom Communicator C100 and CX100 product range.

Overview: Polycom Communicator is a simple USB connected telephone that includes a microphone, loudspeaker with mute and volume control buttons. This product must be used with a computer.

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Note: This document describes normal operational functionality. It does not include maintenance and troubleshooting procedures.

SUMMARY TABLE

VOLUNTARY PRODUCT ACCESSIBILITY SUMMARY

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**Section 1194.21 Software Applications and Operating Systems
C100 and CX100 products are not Software Applications and Operating Systems**

**Section 1194.22 Web-based Internet information and applications
C100 and CX100 products are not Web-based Internet information and applications**

Section 1194.23 Telecommunications Products

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 when combined with compatible assistive technology.	Polycom CX100 is a USB connected telephone and must be used with a computer. This means that any one of the commonly available instant messenger services could be used to provide simultaneous voices and text without need for additional equipment. If required a standard ATA (Analog Telephone Adapter) connected to the computer's LAN port enabling for connection of RJ-11 POTS interface common on TTY devices. The standard headset connection jack provides another standard alternative for direct non-acoustic coupling.
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Supports	The standard G.711 codec reliably supports the transport of normal Baudot code signals
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Not Applicable	Communicator does not include Voice mail, auto-attendant, and interactive voice response, though it will work with systems that offer this.
(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	Communicator does not include Voice mail, auto-attendant, and interactive voice response, though it will work with systems that offer this.
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	Not Applicable	These functions are supported by the network that hosts the VoIP telephone, rather than by the

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		telephone itself.
(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 when combined with compatible assistive technology.	Polycom VoIP phones meet the FCC Part 68 requirement of a minimum of 12 dB gain range.
(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.	Supports	The device is shipped in this mode. Automatic reset can also be disabled, when desired, via a user-accessible menu.
(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.	Not Applicable	Communicator is a desktop speakerphone with no handset. Communicator has a standard headphone jack which permits use of a headset that offers electromagnetic coupling.
(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	Polycom's Communicator meets FCC Class B requirements for radio frequency emissions ensuring minimal interference with hearing technologies.
(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	Polycom phones are fully compliant with open standards, including G.711
(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	Separate control buttons for answer, hang-up, volume up & down, and mute are designed to tactilely discernible. Dialing is carried out from the connected PC by means of the users own mouse and keyboard.
(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	The keys and buttons on Polycom Communicator comply with the requirements of this section.
(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	There is no auto-repeat function for control buttons.

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(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	Within the conventional telephony function set, only the microphone mute, headset, and speaker buttons have a locking function. Every press of speaker volume buttons is signaled both by an LED flash and by the audible performance of the device. The mute button state is signaled by a large backlit LED.
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**Section 1194.24 Video and Multi-media Products
C100 and CX100 Products are not Video and Multi-media Products**

**Section 1194.25 Self-Contained, Closed Products
C100 and CX100 Products are not Self-Contained, Closed Products**

**Section 1194.26 Desktop and Portable Computers
C100 and CX100 Products are not Desktop and Portable Computers**

Section 1194.31 Functional Performance Criteria

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	Communicator can be operated without user vision.
(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.	Not Applicable	
(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	Does not Support	Communicator is an audio device.
(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	A standard headset socket permits connection of additional amplifiers or other assistive hearing devices.
(e) At least one mode of operation and information	Not Supported	Communicator is a simple audio

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retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.		device.
(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	Communicator does not require fine motor control or simultaneous actions and that is operable with limited reach and strength.

Section 1194.41 Information, documentation, and support.

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	Product documentation will be made available in a screen readable format. Other formats may be made available on request. Contact accessibility@polycom.com
(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	Product documentation will be made available in a screen readable format. Other formats may be made available on request. Contact accessibility@polycom.com
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	Support is primarily provided by audio, email (text) or video.

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