

Plantronics/ Clarity

VPAT-10

Product: Amplified telephones (HAC)

Clarity Models: C320, C510, C2210, W1000, W1100

Ameriphone XL40, XL50, JV35

Summary Table Voluntary Product Accessibility Template		
Criteria	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems	Not Applicable - not a software or operating system product.	
Section 1194.22 Web-based intranet and Internet Information and Applications	Not Applicable - not a web-based application.	
Section 1194.23 Telecommunications Products	Supports	VPAT 10 covers Hearing Aid Compatible (HAC) Telephone sets
Section 1194.24 Video and Multi-media Products	Not Applicable - not a video or multi-media product.	
Section 1194.25 Self-Contained, Closed Products	Not Applicable - not a self-contained, closed product.	
Section 1194.26 Desktop and Portable Computers	Not Applicable - not a desktop or portable computer.	
Section 1194.31 Functional Performance Criteria	Supports	This Class of Phones supports this feature.

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Section 1194.23 Telecommunications Products - Detail Voluntary Product Accessibility Template		
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	This class of Phone is hearing aid compatible and supports voice communication. These Phones can also be Plugged in series with a TTY Phone designed for Voice Carry Over (VCO) and Hearing Carry Over (HCO), where amplifier and User controls allow users to intermix speech with the TTY features.
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Supports	These Phones will not interfere with VCO and HCO TTY's using cross-manufacturer non-proprietary standard TTY signal protocols.
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Supports	These Phones will not interfere with VCO and HCO TTY's providing voice mail, auto-attendant, and interactive voice response functions.
(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.	Supports in Selected products	The C320 includes an answering machine, allows for adequate response times, and does not interfere with these types of systems.
(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 in Selected Products	Caller ID Is Available on some Clarity HAC Phones. Data Pass-through complies with TTY Signaling features. Bright and prominent Lighted Ringers assist persons with impaired vision. A Feature that presents a unique ringing tone pattern for individual received numbers is available on select models.

Revision B

**Section 1194.23 Telecommunications Products - Detail
Voluntary Product Accessibility Template, Continued**

Criteria	Supporting Features	Remarks and explanations
(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	The maximum receive volume on these phones is adjustable from a maximum of 20 dB, up to 50 dB; depending on the model, where the Volume is infinitely variable, not incremental. Where the volume control is incremental, There is an Intermediate step of 12 dB available, A Maximum Boost control button is also available on all models, with an override-able reset function also available.
(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 through Equivalent Facilitation, Supports in Selected Products, Can be bypassed in selected products.	The origin of this rule was to protect multiple users of public payphones who have different needs for increased volume. These Phones tend to be used by a single user. The Clarity / Ameriphone HAC Telephones allow users to adjust volume. Although Boost volume controls for these phones do reset automatically, in some Products, this feature can be bypassed, for which Clarity and Plantronics have <i>an approved FCC Waiver</i> . There is circuitry in each amplifier and handset that will protect users from harmful loud sounds regardless of the volume setting.
(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	This Class of Wireless Phones meets the FCC Hearing Aid Compatibility Act requirements of 47 CFR 68.317 and the Telecommunications Telephone Terminal Equipment Magnetic Field and Acoustic Gain Requirements of ANSI/TIA/EIA 504A Feb 1998.
(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	This class of telephone do not produce interference to hearing technology

**Section 1194.23 Telecommunications Products - Detail
Voluntary Product Accessibility Template, Continued**

Criteria	Supporting Features	Remarks and explanations
(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	These telephones do not interfere with communications and do not remove information.
(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	This Class of telephones supports this feature.
(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	This Class of telephones supports this feature.
(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: This requirement applies to alphanumeric keyboards. VPAT 10 products do not contain or use alphanumeric keyboards.	
(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	The amplifier controls on this Class of telephone's amplifier have visual and tactile status indicators.

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Section 1194.31 Functional Performance Criteria - Detail Voluntary Product Accessibility Template		
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	Support for people who are blind or visually impaired is provided through Phone Handset & Base amplifier controls that are tactilely and audibly discernible.
(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	Support for people who are visually impaired is provided through Handset amplifier controls that are tactilely discernible. Select models provide Programmable Audio feedback on Large Print Labeled Number Dial keys.
(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	Support for people who are deaf or hard of hearing is provided through this class of Phones that are Hearing Aid Compatible (HAC) and are interoperable with VCO and HCO TTY's.
(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	This Class of Phones complies with the FCC Hearing Aid Compatibility Act (HAC).
(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	This Class of Phones is operable with VCO and HCO TTY's.

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Section 1194.31 Telecommunications Products - Detail Voluntary Product Accessibility Template, Continued		
Criteria	Supporting Features	Remarks and explanations
(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	This Class of Phones can be operable with limited reach and strength ability.

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	This Class of Phones has End User info available in alternate formats upon request, at no additional charge.
(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	A description of the accessibility and compatibility features of these products can be obtained upon request via email, fax, web site or telephone.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	Support services for people with speech and hearing disabilities are available through TTY, email, fax and Live Chat.