

# Avaya DECT Model 3730, 3735 and 3735 Alarm Telephones

## Voluntary Product Accessibility Template (VPAT)

### Support Levels

Support Level	Description
<b>Supports</b>	Avaya DECT Model 3730 and 3735 telephones fully meet the letter and intent of the criterion.
<b>Supports with Exceptions/Minor Exceptions</b>	Avaya DECT Model 3730 and 3735 telephones do not fully meet the letter and intent of the criterion, but provides some level of access relative to the criterion.
<b>Supports through Equivalent Facilitation</b>	Avaya DECT Model 3730 and 3735 telephones provide an alternate way to meet the intent of the criterion.
<b>Supports when combined with Compatible Assistive Technology</b>	Avaya DECT Model 3730 and 3735 telephones fully meet the letter and intent of the criterion when used in combination with compatible assistive technology.
<b>Does Not Support</b>	Avaya DECT Model 3730 and 3735 telephones do not meet the letter or intent of the criterion.
<b>Not Applicable</b>	The criterion does not apply.
<b>Not Applicable – Fundamental Alteration Exception Applies</b>	A fundamental alteration of Avaya DECT Model 3730 and 3735 telephones is required to meet the criterion.

### Compliance Summary

Criteria	Support Levels
Section 1194.21 Software Applications and Operating Systems	Not Applicable
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

## § 1194.23 Telecommunications Products

<i><b>Criteria</b></i>	<i><b>Support Levels</b></i>	<i><b>Remarks and Explanations</b></i>
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.	Does not Support	Avaya DECT Model 3740, 3745 and 3749 telephones do not have a standard non-acoustic connection point for TTYs.
1194.23(b) Telecommunications products, which include voice communication functionality, shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Does not Support	The ability of Avaya DECT Model 3730 and 3735 telephones to support the reliable transmission of TTY signals will vary depending on several factors that may be outside the user's control, including limitations in the corresponding DECT infrastructure components.
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 telecommunication systems. It does not apply to Avaya DECT Model 3730 and 3735 telephones.
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 telecommunication systems. It does not apply to Avaya DECT Model 3730 and 3735 telephones.
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.	Does not Support	Avaya DECT Model 3730 and 3735 telephones do not support users of TTYs, nor is there is non-visual caller identification presentation mode for users who cannot see displays.

<p>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.</p>	<p>Does not Support</p>	<p>Avaya interprets this requirement to mean that there must be at least 20 dB of additional amplitude available <i>above the default level</i>, not that the range of available amplitudes be at least 20 dB when measured from the lowest to the highest settings. Avaya DECT Model 3730 and 3735 telephones allow an additional 6 dB of gain <i>above the default level</i>. Specific characteristics include:</p> <ul style="list-style-type: none"> <li>▪ Adjustable gain of 21 dB between the highest and lowest volume settings.</li> <li>▪ 8 volume levels, 3 dB between steps.</li> <li>▪ Default volume level is 4, but this can be changed with the Portable Device Management tool.</li> </ul>
<p>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.</p>	<p>Supports</p>	<p>The standard behavior of Avaya DECT Model 3730 and 3735 telephones is that the volume level will not return to default value after a call. It remains at the last level set.</p> <p>This can be changed by an administrator via the Portable Device Management tool by following these steps: <i>Parameter Settings &gt; Sound and Alerts &gt; Non persistent volume</i> can be changed to a default volume level (1-8).</p>
<p>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.</p>	<p>Supports</p>	<p>Hearing aid compatibility testing was performed by third party lab (Nemko) commissioned by Ascom.</p> <p>Performed tests:</p> <ul style="list-style-type: none"> <li>▪ Part 68: FCC rules for Registration of Telephone Equipment</li> <li>▪ CS-03 Part V, issue9: Requirements and test methods for magnetic output from handset telephones for Hearing Aid Coupling</li> </ul>
<p>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.</p>	<p>Supports</p>	<p>Hearing aid compatibility testing was performed by third party lab (Nemko) commissioned by Ascom.</p> <p>Performed tests:</p> <ul style="list-style-type: none"> <li>▪ Part 68: FCC rules for Registration of Telephone Equipment</li> <li>▪ CS-03 Part V, issue9: Requirements and test methods for magnetic output from handset telephones for Hearing Aid Coupling</li> </ul>

<p>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.</p>	<p>Does not Support</p>	<p>The ETSI DECT Standard does not include support for the wide range of protocols that are envisioned by this requirement.</p>
<p>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.</p>	<p>Supports with Exceptions</p>	<ul style="list-style-type: none"> <li>▪ The “5” key on the dial pad has one raised nub</li> <li>▪ The navigation key and on/off-hook can be identified by their form. (Note, however, that the functions accessed via the navigation key may not be discernible without vision.)</li> <li>▪ The volume up/down and mute key on the left side of the telephone can be identified by their raised form and position (volume up/down on the top, close to each other and with space to the mute key)</li> </ul>
<p>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.</p>	<p>Supports</p>	
<p>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.</p>	<p>Not Applicable</p>	<p>Avaya DECT Model 3730 and 3735 telephones do not have a key repeat function.</p>
<p>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.</p>	<p>Supports with Exceptions</p>	<p>The status of all locking or toggle controls or keys is visually discernible, but is not discernible through touch or sound.</p>

## § 1194.31 Functional Performance Criteria

<i><b>Criteria</b></i>	<i><b>Support Levels</b></i>	<i><b>Remarks and Explanations</b></i>
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.	Supports with Exceptions	Many keys on Avaya DECT Model 3730 and 3735 telephones, including the keys on the dial pad, are tactilely discernible. Information that is presented by these telephones, such as Caller ID, is not accessible to users without vision.
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.	Supports with Exceptions	Many keys on Avaya DECT Model 3730 and 3735 telephones, including the keys on the dial pad, are tactilely discernible. Information that is presented by these telephones, such as Caller ID, is not accessible to users without vision.
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.	Supports with Exceptions	Avaya DECT Model 3730 and 3735 telephones satisfy the FCC Part 68 requirements for Hearing Aid Compatibility. Support for users of TTYs and support for users who require more than 6 dB of amplification above the “normal” level is not provided.
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	Avaya DECT Model 3730 and 3735 telephones satisfy the FCC Part 68 requirements for Hearing Aid Compatibility. Support for users of TTYs and support for users who require more than 6 dB of amplification above the “normal” level is not provided.
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.	Supports with Exceptions	User speech is not required in order to operate Avaya DECT Model 3730 and 3735 telephones. Note, however, that the lack of TTY support means that these telephones may not be suitable for users who cannot speak.
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.	Supports	The operational characteristics of all controls (e.g., the amount of strength required to press a button) are within the limits specified by paragraph 1194.23(k)(2).

## § 1194.41 Information, Documentation and Support

<i>Criteria</i>	<i>Support Levels</i>	<i>Remarks and Explanations</i>
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	Contact Avaya Support for accessibility-related issues

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