

Avaya Accessibility Conformance Report

VPAT® Version 2.1 – March 2018

Name of Product/Version:

Avaya IX Hospitality Phone (Analog) H200 Series 1.0

Product Description:

The Avaya H209 and Avaya H219 are analog phones only approved for use with Avaya gateways or Avaya IP Office and are suited for use in hotels. The phone supports a variety of telephony operations, including making and answering a call, muting and unmuting a call, transferring a call, redialing a number, placing a call on hold, and accessing voice mail messages. Avaya H209 phone is used in hotel lobbies, common areas, cleaning areas, and hotel rooms as a companion to Avaya H219. Avaya H219 is a desk phone with programmable buttons suitable for use in hotel rooms as the principal phone.

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Notes:

More details on the product can be found at <http://downloads.avaya.com/css/P8/documents/101062764> for H209 and <http://downloads.avaya.com/css/P8/documents/101062766> for H219.

Evaluation Methods Used:

Testing is based on general product knowledge

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0, at http://www.w3.org/TR/2008/REC-WCAG20-20081211/	Level A (Yes) Level AA (Yes) Level AAA (No)
Revised Section 508 standards as published by the U.S. Access Board in the Federal Register on January 18, 2017 Corrections to the ICT Final Rule as published by the US Access Board in the Federal Register on January 22, 2018	(Yes)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Supports with Exceptions:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.0 Report

Tables 1 and 2 also document conformance with:

- EN 301 549: Chapter 9 - Web, Chapter 10 - Non-Web documents, Section 11.2.1- Non-Web Software (excluding closed functionality), and Section 11.2.2 - Non-Web Software (closed functionality).
- Revised Section 508: Chapter 5 – 501.1 Scope, 504.2 Content Creation or Editing, and Chapter 6 – 602.3 Electronic Support Documentation.

Note: When reporting on conformance with the WCAG 2.0 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.0 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Notes: Only 602.3 (Support Docs) might be applicable. No Web, Software running on the product. No Authoring tool available. For Support docs there is an admin guide available by the following link - <https://downloads.avaya.com/css/P8/documents/101062768>

Criteria	Conformance Level	Remarks and Explanations
<p>1.1.1 Non-text Content (Level A) Also applies to: 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Supports with Exceptions</p>	<p>Applicable for 602.3 (Support Docs). Accessible documents can be provided upon request and handle it on a case by case basis.</p>
<p>1.2.1 Audio-only and Video-only (Prerecorded) (Level A) 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Not Applicable</p>	<p>No prerecorded Audio or Video for this product</p>
<p>1.2.2 Captions (Prerecorded) (Level A) 2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	<p>Not Applicable</p>	<p>No prerecorded Audio for this product</p>

Criteria	Conformance Level	Remarks and Explanations
<p>1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No prerecorded Audio or Video for this product
<p>1.3.1 Info and Relationships (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports with Exceptions	Accessible documents can be provided upon request and handle it on a case by case basis.
<p>1.3.2 Meaningful Sequence (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports with Exceptions	Applicable for 602.3 (Support Docs). Accessible documents can be provided upon request and handle it on a case by case basis.
<p>1.3.3 Sensory Characteristics (Level A)</p> <p>Also applies to:</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No use of sensory characteristics in Support docs.
<p>1.4.1 Use of Color (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No use of color in Support docs
<p>1.4.2 Audio Control (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No usage of Audio in Support Docs

Criteria	Conformance Level	Remarks and Explanations
<p>2.1.1 Keyboard (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Links within the document are accessible via keyboard. (Tab Key)
<p>2.1.2 No Keyboard Trap (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No component in Support docs to take a keyboard focus.
<p>2.2.1 Timing Adjustable (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No time limit can be set within Support Docs
<p>2.2.2 Pause, Stop, Hide (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No moving, blinking, scrolling information or auto-updating information is present in Support Docs
<p>2.3.1 Three Flashes or Below Threshold (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No flashing is present in Support Docs
<p>2.4.1 Bypass Blocks (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	The table of contents is linked and allows people to navigate to specific sections.

Criteria	Conformance Level	Remarks and Explanations
<p>2.4.2 Page Titled (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	The Support Docs have page titled throughout the document.
<p>2.4.3 Focus Order (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Support	Navigating the document using the embedded links is in a logical order.
<p>2.4.4 Link Purpose (In Context) (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	All links in the Support Docs have meaningful text.
<p>3.1.1 Language of Page (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	
<p>3.2.1 On Focus (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports with Exceptions	Accessible documents can be provided upon request and handle it on a case by case basis.
<p>3.2.2 On Input (Level A)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No changing of user interface applicable for PDF document.

Criteria	Conformance Level	Remarks and Explanations
<u>3.3.1 Error Identification</u> (Level A) 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No input available in PDF document.
<u>3.3.2 Labels or Instructions</u> (Level A) 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No input available in PDF document.
<u>4.1.1 Parsing</u> (Level A) 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	Support docs are PDF and not web based
<u>4.1.2 Name, Role, Value</u> (Level A) 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No user interface components available in PDF document.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
<u>1.2.4 Captions (Live)</u> (Level AA) 2017 Section 508 <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No live audio content in Support Docs

Criteria	Conformance Level	Remarks and Explanations
<p>1.2.5 Audio Description (Prerecorded) (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No prerecorded video content in Support Docs
<p>1.4.3 Contrast (Minimum) (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Color contrast is supported with black text and white background.
<p>1.4.4 Resize text (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Can be achieved by built-in mechanism of Adobe Acrobat
<p>1.4.5 Images of Text (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No use of Images of Text in Support Docs
<p>2.4.5 Multiple Ways (Level AA)</p> <p>Also applies to:</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Not Applicable	Support Docs is PDF and not web-based
<p>2.4.6 Headings and Labels (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Descriptive headings and labels are provided across the document.

Criteria	Conformance Level	Remarks and Explanations
<p>2.4.7 Focus Visible (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports	Visual focus is supported when user tab to linked content.
<p>3.1.2 Language of Parts (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Supports with Exceptions	Accessible documents can be provided upon request and handle it on a case by case basis.
<p>3.2.3 Consistent Navigation (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Supports	Running headers and footers are provided throughout the document. Page numbering is specified.
<p>3.2.4 Consistent Identification (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 	Not Applicable	Support Docs is PDF and not web-based
<p>3.3.3 Error Suggestion (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No user input available in Support Docs
<p>3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)</p> <p>2017 Section 508</p> <ul style="list-style-type: none"> • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs) 	Not Applicable	No user input available in Support Docs

2017 Section 508 Report

Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
<p>302.1 Without Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that does not require user vision.</p>	<p>Supports with Exceptions</p>	<p>All controls and keys on Avaya H200 Series analog telephones are tactilely discernible. The dial pad is arranged in a standard manner, with a raised nub on the 5-key. The layout of the alphabetic overlay on the numeric keys conforms to ITU-T Recommendation E.161.</p> <p>Nonvisual notification of an incoming call is provided by audible ringing. An option that can be enabled on the telephone system provides sound-based notification that there is a message waiting, presented as an audible tone when the user picks up the handset or activates the H219 speakerphone.</p> <p>The status of the mute and hold modes is not conveniently discernible without vision.</p>
<p>302.2 With Limited Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.</p>	<p>Supports</p>	<p>The characters and symbols on the dial pads and keys of Avaya H200 Series analog telephones contrast visually from the background. Specifically, the H209 has dark characters on a light background and the H219 has light characters on a dark background.</p> <p>Status information and notifications are provided by light emitting diodes (LEDs) in a manner that is discernible with limited vision.</p>
<p>302.3 Without Perception of Color. Where a visual mode of operation is provided, ICT shall provide at least one visual mode of operation that does not require user perception of color.</p>	<p>Supports</p>	<p>The Avaya H209 analog telephone does not have different-color LEDs. The Avaya H219 analog phone has red and green LEDs, but they are physically separated and easily identifiable based on location</p>
<p>302.4 Without Hearing. Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that does not require user hearing.</p>	<p>Supports</p>	<p>On Avaya H200 Series analog telephones, all signals and cues are presented visually, including those that are also presented audibly.</p> <p>For information about TTY compatibility, please refer to the Criterion 412.8.1 response.</p>

Criteria	Conformance Level	Remarks and Explanations
<p>302.5 With Limited Hearing. Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited hearing.</p>	<p>Supports</p>	<p>Avaya H200 Series analog telephones comply with the hearing aid compatibility requirements specified by 47 CFR § 68.316 and the volume control requirements specified by 47 CFR § 68.317.</p>
<p>302.6 Without Speech. Where speech is used for input, control, or operation, ICT shall provide at least one mode of operation that does not require user speech.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones do not use speech for input, control, or operation. For information about TTY compatibility, please refer to the Criterion 412.8.1 response.</p>
<p>302.7 With Limited Manipulation. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that does not require fine motor control or simultaneous manual operations.</p>	<p>Supports</p>	<p>Avaya H200 Series analog telephones have no operations that require fine motor control or simultaneous manual operations.</p>
<p>302.8 With Limited Reach and Strength. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that is operable with limited reach and limited strength.</p>	<p>Supports</p>	<p>All controls on Avaya H200 Series analog telephones are operable with limited reach and strength.</p>
<p>302.9 With Limited Language, Cognitive, and Learning Abilities. ICT shall provide features making its use by individuals with limited cognitive, language, and learning abilities simpler and easier.</p>	<p>Supports</p>	<p>Avaya H200 Series analog telephones do not have visual displays. The dial pad is arranged in a standard manner (four rows by three columns). The layout of the alphabetic overlay on the numeric keys conforms to ITU-T Recommendation E.161. There are no operations or procedures more complex than those commonly provided by standard residential telephones.</p>

Chapter 4: Hardware

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality	Heading cell – no response required	Heading cell – no response required
402.1 General	Heading cell – no response required	Heading cell – no response required
402.2 Speech-Output Enabled	Heading cell – no response required	Heading cell – no response required
402.2.1 Information Displayed On-Screen. Speech output shall be provided for all information displayed on-screen.	Not Applicable	Avaya H200 Series analog telephones do not have display screens.
402.2.2 Transactional Outputs. Where transactional outputs are provided, the speech output shall audibly provide all information necessary to verify a transaction.	Not Applicable	Avaya H200 Series analog telephones do not have transactional outputs.
402.2.3 Speech Delivery Type and Coordination. Speech output shall be delivered through a mechanism that is readily available to all users, including, but not limited to, an industry standard connector or a telephone handset. Speech shall be recorded or digitized human or synthesized. Speech output shall be coordinated with information displayed on the screen.	Not Applicable	Avaya H200 Series analog telephones do not provide control or status information via speech output.
402.2.4 User Control. Speech output for any single function shall be automatically interrupted when a transaction is selected. Speech output shall be capable of being repeated and paused.	Not Applicable	Avaya H200 Series analog telephones do not provide control or status information via speech output.

Criteria	Conformance Level	Remarks and Explanations
<p>402.2.5 Braille Instructions. Where speech output is required by 402.2, braille instructions for initiating the speech mode of operation shall be provided. Braille shall be contracted and shall conform to 36 CFR Part 1191, Appendix D, Section 703.3.1.</p> <p>EXCEPTION: Devices for personal use shall not be required to conform to 402.2.5.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones do not provide control or status information via speech output.</p>
<p>402.3 Volume</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>
<p>402.3.1 Private Listening. Where ICT provides private listening, it shall provide a mode of operation for controlling the volume. Where ICT delivers output by an audio transducer typically held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.</p>	<p>Supports</p>	<p>The volume level of Avaya H200 Series analog telephones can be adjusted via volume up and down buttons. All Avaya handsets have FCC-compliant primary inductive coils, permitting the phones to be used with inductively coupled assistive hearing devices, such as hearing aids and cochlear implants.</p>
<p>402.3.2 Non-private Listening. Where ICT provides non-private listening, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. A function shall be provided to automatically reset the volume to the default level after every use.</p>	<p>Supports with Exceptions</p>	<p>Incremental volume control is provided by Avaya H200 Series analog telephones. The output amplification is adjustable above a level of 65 dB.</p> <p>The phones do not automatically reset the volume to the default level after every use.</p>

Criteria	Conformance Level	Remarks and Explanations
<p>402.4 Characters on Display Screens. At least one mode of characters displayed on the screen shall be in a sans serif font. Where ICT does not provide a screen enlargement feature, characters shall be 3/16 inch (4.8 mm) high minimum based on the uppercase letter "I". Characters shall contrast with their background with either light characters on a dark background or dark characters on a light background.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones do not have display screens.</p>
<p>402.5 Characters on Variable Message Signs. Characters on variable message signs shall conform to section 703.7 Variable Message Signs of ICC A117.1-2009 (incorporated by reference, see 702.6.1).</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones do not have variable message signs.</p>
<p>403 Biometrics</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>
<p>403.1 General. Where provided, biometrics shall not be the only means for user identification or control.</p> <p>EXCEPTION: Where at least two biometric options that use different biological characteristics are provided, ICT shall be permitted to use biometrics as the only means for user identification or control.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones do not utilize biometrics.</p>
<p>404 Preservation of Information Provided for Accessibility</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>

Criteria	Conformance Level	Remarks and Explanations
404.1 General. ICT that transmits or converts information or communication shall not remove non-proprietary information provided for accessibility or shall restore it upon delivery.	Supports	Avaya H200 Series analog telephones do not convert or remove any transmitted information.
405 Privacy	Heading cell – no response required	Heading cell – no response required
405.1 General. The same degree of privacy of input and output shall be provided to all individuals. When speech output required by 402.2 is enabled, the screen shall not blank automatically.	Supports	For input and output functions, Avaya H200 Series analog telephones provide the same degree of privacy to all individuals.
406 Standard Connections	Heading cell – no response required	Heading cell – no response required
406.1 General. Where data connections used for input and output are provided, at least one of each type of connection shall conform to industry standard non-proprietary formats.	Model H209: Not Applicable	Avaya Model H209 analog telephones do not have an auxiliary data connection.
	Model H219: Supports	Avaya Model H219 analog telephones have an industry standard analog RJ-11 data jack.
407 Operable Parts	Heading cell – no response required	Heading cell – no response required
407.2 Contrast. Where provided, keys and controls shall contrast visually from background surfaces. Characters and symbols shall contrast visually from background surfaces with either light characters or symbols on a dark background or dark characters or symbols on a light background.	Supports	The characters and symbols on the dial pads and keys of Avaya H200 Series analog telephones contrast visually from the background in the required manner. Specifically, the H209 has dark characters on a light background and the H219 has light characters on a dark background.
407.3 Input Controls	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
407.3.1 Tactilely Discernible. Input controls shall be operable by touch and tactilely discernible without activation.	Supports	The dial pad on Avaya H200 Series analog phones is arranged in a standard manner, with a raised nub on the 5-key, thereby making "tactile navigation" easier for visually impaired users.
407.3.2 Alphabetic Keys. Where provided, individual alphabetic keys shall be arranged in a QWERTY-based keyboard layout and the "F" and "J" keys shall be tactilely distinct from the other keys.	Not Applicable	Avaya H200 Series analog telephones do not have individual alphabetic keys.
407.3.3 Numeric Keys. Where provided, numeric keys shall be arranged in a 12-key ascending or descending keypad layout. The number five key shall be tactilely distinct from the other keys. Where the ICT provides an alphabetic overlay on numeric keys, the relationships between letters and digits shall conform to ITU-T Recommendation E.161 (incorporated by reference, see 702.7.1).	Supports	The dial pad on Avaya H200 Series analog phones is arranged in a standard manner, with a raised nub on the 5-key. The layout of the alphabetic overlay on the numeric keys conforms to ITU-T Recommendation E.161.
407.4 Key Repeat. Where a keyboard with key repeat is provided, the delay before the key repeat feature is activated shall be fixed at, or adjustable to, 2 seconds minimum.	Not Applicable	Avaya H200 Series analog telephones do not have a keyboard and do not have a repeat feature.
407.5 Timed Response. Where a timed response is required, the user shall be alerted visually, as well as by touch or sound, and shall be given the opportunity to indicate that more time is needed.	Not Applicable	None of the functions on Avaya H200 Series analog telephones require a timed response.
407.6 Operation. At least one mode of operation shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum.	Supports	The buttons on Avaya H200 Series analog telephones are operable with one hand and do not require tight grasping, pinching, or twisting of the wrist. The force required to activate the buttons is less than 5 lbs. (22.2N).

Criteria	Conformance Level	Remarks and Explanations
<p>407.7 Tickets, Fare Cards, and Keycards. Where tickets, fare cards, or keycards are provided, they shall have an orientation that is tactilely discernible if orientation is important to further use of the ticket, fare card, or keycard.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones are not used in conjunction with tickets, fare cards, or keycards.</p>
<p>407.8 Reach Height and Depth</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>
<p>407.8.1 Vertical Reference Plane. Operable parts shall be positioned for a side reach or a forward reach determined with respect to a vertical reference plane. The vertical reference plane shall be located in conformance to 407.8.2 or 407.8.3.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>
<p>407.8.1.1 Vertical Plane for Side Reach. Where a side reach is provided, the vertical reference plane shall be 48 inches (1220 mm) long minimum.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>
<p>407.8.1.2 Vertical Plane for Forward Reach. Where a forward reach is provided, the vertical reference plane shall be 30 inches (760 mm) long minimum.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>
<p>407.8.2 Side Reach. Operable parts of ICT providing a side reach shall conform to 407.8.2.1 or 407.8.2.2. The vertical reference plane shall be centered on the operable part and placed at the leading edge of the maximum protrusion of the ICT within the length of the vertical reference plane. Where a side reach requires a reach over a portion of the ICT, the height of that portion of the ICT shall be 34 inches (865 mm) maximum.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>

Criteria	Conformance Level	Remarks and Explanations
<p>407.8.2.1 Unobstructed Side Reach. Where the operable part is located 10 inches (255 mm) or less beyond the vertical reference plane, the operable part shall be 48 inches (1220 mm) high maximum and 15 inches (380 mm) high minimum above the floor.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>
<p>407.8.2.2 Obstructed Side Reach. Where the operable part is located more than 10 inches (255 mm), but not more than 24 inches (610 mm), beyond the vertical reference plane, the height of the operable part shall be 46 inches (1170 mm) high maximum and 15 inches (380 mm) high minimum above the floor. The operable part shall not be located more than 24 inches (610 mm) beyond the vertical reference plane.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>
<p>407.8.3 Forward Reach. Operable parts of ICT providing a forward reach shall conform to 407.8.3.1 or 407.8.3.2. The vertical reference plane shall be centered, and intersect with, the operable part. Where a forward reach allows a reach over a portion of the ICT, the height of that portion of the ICT shall be 34 inches (865 mm) maximum.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>
<p>407.8.3.1 Unobstructed Forward Reach. Where the operable part is located at the leading edge of the maximum protrusion within the length of the vertical reference plane of the ICT, the operable part shall be 48 inches (1220 mm) high maximum and 15 inches (380 mm) high minimum above the floor.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>

Criteria	Conformance Level	Remarks and Explanations
<p>407.8.3.2 Obstructed Forward Reach. Where the operable part is located beyond the leading edge of the maximum protrusion within the length of the vertical reference plane, the operable part shall conform to 407.8.3.2. The maximum allowable forward reach to an operable part shall be 25 inches (635 mm).</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>
<p>407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach. If the reach depth is less than 20 inches (510 mm), the operable part height shall be 48 inches (1220 mm) maximum. If the reach depth is 20 inches (510 mm) to 25 inches (635 mm), the operable part height shall be 44 inches (1120 mm) maximum.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>

Criteria	Conformance Level	Remarks and Explanations
<p>407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach. Knee and toe space under ICT shall be 27 inches (685 mm) high minimum, 25 inches (635 mm) deep maximum, and 30 inches (760 mm) wide minimum and shall be clear of obstructions.</p> <p>EXCEPTIONS:</p> <ol style="list-style-type: none"> 1. Toe space shall be permitted to provide a clear height of 9 inches (230 mm) minimum above the floor and a clear depth of 6 inches (150 mm) maximum from the vertical reference plane toward the leading edge of the ICT. 2. At a depth of 6 inches (150 mm) maximum from the vertical reference plane toward the leading edge of the ICT, space between 9 inches (230 mm) and 27 inches (685 mm) minimum above the floor shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for every 6 inches (150 mm) in height. 	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones can be positioned wherever necessary to accommodate a user's reach, height, and depth requirements.</p>
<p>408 Display Screens</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>
<p>408.2 Visibility. Where stationary ICT provides one or more display screens, at least one of each type of display screen shall be visible from a point located 40 inches (1015 mm) above the floor space where the display screen is viewed.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones do not have display screens.</p>

Criteria	Conformance Level	Remarks and Explanations
<p>408.3 Flashing. Where ICT emits lights in flashes, there shall be no more than three flashes in any one-second period.</p> <p>EXCEPTION: Flashes that do not exceed the general flash and red flash thresholds defined in WCAG 2.0 (incorporated by reference, see 702.10.1) are not required to conform to 408.3.</p>	<p>Supports</p>	<p>On the Avaya H209 analog telephone, a single red light emitting diode (LED) provides status information in the following manner:</p> <p>When there is an incoming call, the LED turns on and off in synchronization with the audible ringing. When there is not an active phone call, the LED flashes briefly every 1.2 seconds to indicate that a message is waiting.</p> <hr style="border-top: 1px dashed black;"/> <p>On the Avaya H219 analog telephone, a single red light emitting diode (LED) provides status information in the following manner:</p> <p>When there is an active phone call, the LED is illuminated continuously when the phone is muted and flashes at approximately ½ second on and ½ second off when the phone is on hold.</p> <p>When there is an incoming call, the LED turns on and off in synchronization with the audible ringing. When there is not an active phone call, the LED flashes briefly every 1.2 seconds to indicate that a message is waiting.</p>
<p>409 Status Indicators</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>

Criteria	Conformance Level	Remarks and Explanations
<p>409.1 General. Where provided, status indicators shall be discernible visually and by touch or sound.</p>	<p>Supports with Exceptions</p>	<p>On Avaya H200 Series analog telephones, light emitting diodes (LEDs) provide visual notification of an incoming call, notification that there is a message waiting, indication that the phone is on hold, and indication that the microphone is muted. In addition, the H219 has a visual indication that the speakerphone is active.</p> <p>Sound-based notification of an incoming call is provided by audible ringing. An option that can be enabled on the telephone system provides sound-based notification that there is a message waiting, presented as an audible tone when the user picks up the handset or activates the H219 speakerphone. Indication of the speakerphone status is discernible audibly by identifying whether sound is coming from the speakerphone or from the telephone handset.</p> <p>The status of the mute and hold modes is not conveniently discernible by sound. When either is enabled, the user's voice cannot be heard by the other party. When mute is enabled, the user can still hear the other party, but not when hold is enabled.</p>
<p>410 Color Coding</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>
<p>410.1 General. Where provided, color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.</p>	<p>Not Applicable</p>	<p>Color coding is not used by Avaya H200 Series telephones as the only means of conveying information. (The Avaya H219 analog phone has red and green LEDs, but they are physically separated and easily identifiable based on location.)</p>
<p>411 Audible Signals</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>
<p>411.1 General. Where provided, audible signals or cues shall not be used as the only means of conveying information, indicating an action, or prompting a response</p>	<p>Supports</p>	<p>On Avaya H200 Series telephones, all signals and cues are presented visually, including those that are also presented audibly.</p>

Criteria	Conformance Level	Remarks and Explanations
412 ICT with Two-Way Voice Communication	Heading cell – no response required	Heading cell – no response required
412.2 Volume Gain	Heading cell – no response required	Heading cell – no response required
412.2.1 Volume Gain for Wireline Telephones. Volume gain conforming to 47 CFR 68.317 shall be provided on analog and digital wireline telephones.	Supports	Avaya H200 Series analog telephones comply with the hearing aid compatibility requirements specified by 47 CFR § 68.316 and the volume control requirements specified by 47 CFR § 68.317.
412.2.2 Volume Gain for Non-Wireline ICT. A method for increasing volume shall be provided for non-wireline ICT.	Not Applicable	Avaya H200 Series analog telephones are wireline devices.
412.3 Interference Reduction and Magnetic Coupling	Heading cell – no response required	Heading cell – no response required
412.3.1 Wireless Handsets. ICT in the form of wireless handsets shall conform to ANSI/IEEE C63.19-2011 (incorporated by reference, see 702.5.1)	Not Applicable	Avaya H200 Series analog telephones have a wired handset.
412.3.2 Wireline Handsets. ICT in the form of wireline handsets, including cordless handsets, shall conform to TIA-1083-B (incorporated by reference, see 702.9.1).	Does Not Support	All Avaya handsets have FCC-compliant primary inductive coils, permitting the phones to be used with inductively coupled assistive listening devices, such as hearing aids and cochlear implants. NOTE: TIA-1083-B contains criteria that are not included in the FCC requirements for inductive coupling and hearing aid compatibility (47 CFR Part 68.316). The Avaya H200 Series analog phones have not been tested to confirm compliance with the additional requirements of TIA-1083-B.

Criteria	Conformance Level	Remarks and Explanations
412.4 Digital Encoding of Speech. ICT in IP-based networks shall transmit and receive speech that is digitally encoded in the manner specified by ITU-T Recommendation G.722.2 (incorporated by reference, see 702.7.2) or IETF RFC 6716 (incorporated by reference, see 702.8.1).	Not Applicable	Avaya H200 Series analog telephones are not IP-based and do not encode speech digitally.
412.5 Real-Time Text Functionality. [Reserved].	<i>Reserved for future</i>	<i>Reserved for future</i>
412.6 Caller ID. Where provided, caller identification and similar telecommunications functions shall be visible and audible.	Not Applicable	Avaya H200 Series analog telephones do not provide Caller ID.
412.7 Video Communication. Where ICT provides real-time video functionality, the quality of the video shall be sufficient to support communication using sign language.	Not Applicable	Avaya H200 Series analog telephones do not provide video communication.
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required
412.8.1 TTY Connectability. ICT shall include a standard non-acoustic connection point for TTYs.	Model H209: Does Not Support	The Avaya Model H209 telephone does not have an auxiliary analog jack. Please note, however, that the phone connects to the network via an industry-standard analog RJ-11 line. It is recommended that TTY users disconnect the H209 from the phone line and then connect the line directly to the TTY's telephone jack.
	Model H219: Supports	The Avaya Model H219 telephone has an auxiliary analog RJ-11 data jack that allows industry-standard analog telecommunication devices, including TTYs, to be used in conjunction with the phone.
412.8.2 Voice and Hearing Carry Over. ICT shall provide a microphone capable of being turned on and off to allow the user to intermix speech with TTY use.	Model H209: Does Not Support	The Avaya Model H209 telephone does not have an auxiliary analog jack and therefore cannot be used in conjunction with a TTY.
	Model H219: Supports	The Avaya Model H219 telephone has a “mute” button that allows the microphone to be turned on and off.

Criteria	Conformance Level	Remarks and Explanations
<p>412.8.3 Signal Compatibility. ICT shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols where the system interoperates with the Public Switched Telephone Network (PSTN).</p>	<p>Supports</p>	<p>Avaya H200 Series analog telephones support all commonly used PSTN-compatible cross-manufacturer non-proprietary TTY signal protocols.</p>
<p>412.8.4 Voice Mail and Other Messaging Systems. Where provided, voice mail, auto-attendant, interactive voice response, and caller identification systems shall be usable with a TTY.</p>	<p>Not Applicable</p>	<p>This criterion applies to voice mail, auto-attendant, and interactive voice response systems. It does not apply to telephones</p>
<p>413 Closed Caption Processing Technologies</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>
<p>413.1.1 Decoding and Display of Closed Captions. Players and displays shall decode closed caption data and support display of captions.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones are not video endpoints. For this reason, closed caption information is neither sent nor received by these phones.</p>
<p>413.1.2 Pass-Through of Closed Caption Data. Cabling and ancillary equipment shall pass through caption data.</p>	<p>Not Applicable</p>	<p>This criterion applies to cabling and ancillary equipment. It does not apply to telephones.</p>
<p>414 Audio Description Processing Technologies</p>	<p>Heading cell – no response required</p>	<p>Heading cell – no response required</p>
<p>414.1.1 Digital Television Tuners. Digital television tuners shall provide audio description processing that conforms to ATSC A/53 Digital Television Standard, Part 5 (2014) (incorporated by reference, see 702.2.1). Digital television tuners shall provide processing of audio description when encoded as a Visually Impaired (VI) associated audio service that is provided as a complete program mix containing audio description according to the ATSC A/53 standard.</p>	<p>Not Applicable</p>	<p>Avaya H200 Series analog telephones do not contain digital television tuners.</p>

Criteria	Conformance Level	Remarks and Explanations
414.1.2 Other ICT. ICT other than digital television tuners shall provide audio description processing.	Not Applicable	Avaya H200 Series analog telephones are not video endpoints
415 User Controls for Captions and Audio Descriptions	Heading cell – no response required	Heading cell – no response required
415.1.1 Caption Controls. Where ICT provides operable parts for volume control, ICT shall also provide operable parts for caption selection.	Not Applicable	Avaya H200 Series analog telephones are not video endpoints. For this reason, captions are neither sent nor received by these phones.
415.1.2 Audio Description Controls. Where ICT provides operable parts for program selection, ICT shall also provide operable parts for the selection of audio description.	Not Applicable	Avaya H200 Series analog telephones are not video endpoints. For this reason, support for program selection and audio descriptive services is not provided.

Chapter 5: Software

Notes: Chapter 5 is not applicable. Avaya H200-Series Analog telephones are hardware devices. The levels of support provided by the user-facing functions of the telephones, including those that are software-controlled, are detailed in the Chapter 4 responses.

Chapter 6: Support Documentation and Services

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
602.2 Accessibility and Compatibility Features. Documentation shall list and explain how to use the accessibility and compatibility features required by Chapters 4 and 5. Documentation shall include accessibility features that are built-in and accessibility features that provide compatibility with assistive technology.	Does Not Support	Documentation that explains how to use the accessibility and compatibility features will be provided upon request
602.3 Electronic Support Documentation. Documentation in electronic format, including Web-based self-service support, shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1).	See WCAG 2.0 section	See information in WCAG section
602.4 Alternate Formats for Non-Electronic Support Documentation. Where support documentation is only provided in non-electronic formats, alternate formats usable by individuals with disabilities shall be provided upon request.	Supports	Will provide upon request. Support is limited to providing PDFs on Avaya Support Site and HTMLs on Avaya Documentation Portal.
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features. ICT support services shall include information on the accessibility and compatibility features required by 602.2.	Does Not Support	Documentation that explains how to use the accessibility and compatibility features will be provided upon request.
603.3 Accommodation of Communication Needs. Support services shall be provided directly to the user or through a referral to a point of contact. Such ICT support services shall accommodate the communication needs of individuals with disabilities.	Does Not Support	Avaya support services may be contacted via WebChat: https://support.avaya.com/contact/#click-to-chat

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