NewTek Video Products

Compliance Statement Federal Acquisition Regulation Section 508 For Video and Multi Media Products Category

(Subpart B, §1194.24.)

PRODUCT: NEWTEK TRICASTERTM LINE

This is to confirm compliance as follows of the above Product in the <u>Video and Multi Media Products Category</u> as that category is defined in Section 508, Subpart B, §1194.24.

The Technical Standards for Video and Multimedia Products call for the following:

(a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.

Not applicable. This particular requirement is designed so that end user display devices ("analog television displays", "analog television receiver", "computer that includes display circuitry", "DTV receivers") have the ability to display caption data that might be included in a broadcast that they receive.

The TriCaster is not, and does not include a tuner, display device or display circuitry. It is designed not to be a device that receives broadcast data but rather is used as a primary step in the creation of it. The TriCaster itself is not a device that creates caption data.

However it will pass this data through the system and might commonly be used with a separate device that is designed for the creation and integration of caption data.

TriCaster may also be used with industry standard "caption authoring" tools to add captions to broadcasts.

(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.

This requirement is designed so that tuner devices that may be used with computers have the ability to play back secondary audio signals.

The TriCaster is not a tuner and does not include a tuner device. It is used for the creation of broadcast signal and additionally includes the ability to create secondary audio sources if they are needed for Broadcast.

The TriCaster is capable of generating secondary source audio signals.

(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.

Not applicable. NewTek is not producing a video or multimedia production for any state or government agency; the TriCaster is not a training or informational video for any federal or state agency. The TriCaster is a standalone portable device for switching and production of video. It has a complete set of written instructions in PDF format.

(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.

Not applicable. The product is not a video or multimedia production for the agency; the TriCaster is not a training or informational video for any federal or state agency. The TriCaster is a device primarily for creating, not primarily for displaying, of video that has a complete set of written instructions in PDF format.

(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.

Not applicable. See above. It is an intermediate broadcast device for delivering, not receiving broadcast signals, and is not an informational video or multimedia device. There is no alternate text presentation required, and thus it an audio descriptions do not need user selection. It is permanent.

NEWTEK, INC. VPAT™

Voluntary Product Accessibility Template®

Version 1.3

The purpose of the **Voluntary Product Accessibility Template**, or **VPAT**[™], is to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of commercial "Electronic and Information Technology" products and services with features that support accessibility. It is assumed and recommended that offerers will provide additional contact information to facilitate more detailed inquiries.

The first table of the Template provides a summary view of the Section 508 Standards. The subsequent tables provide more detailed views of each subsection. There are three columns in each table. Column one of the Summary Table describes the subsections of subparts B and C of the Standards. The second column describes the supporting features of the product or refers you to the corresponding detailed table, e.g., "equivalent facilitation." The third column contains any additional remarks and explanations regarding the product. In the subsequent tables, the first column contains the lettered paragraphs of the subsections. The second column describes the supporting features of the product with regard to that paragraph. The third column contains any additional remarks and explanations regarding the product.

Date: 4/2/2014 Name of Product: TriCaster Line Contact for more Information (name/phone/email): 8000/sbowie@newtek.com	Steve Bowie/1-210-370

Summary Table VPAT™

Voluntary Product Accessibility Template[®]

Criteria	Supporting Features	Remarks and explanations
Section 1194.21 <u>Software</u> <u>Applications and Operating Systems</u>	Supported	See remarks below
Section 1194.22 Web-based Internet Information and Applications	Not applicable	
Section 1194.23 <u>Telecommunications Products</u>	Not applicable	
Section 1194.24 <u>Video and Multi-media Products</u>	Not applicable	See remarks below
Section 1194.25 <u>Self-Contained</u> , <u>Closed Products</u>	Not applicable	
Section 1194.26 <u>Desktop and</u> <u>Portable Computers</u>	Not applicable, but supported in part	See remarks below
Section 1194.31 <u>Functional</u> <u>Performance Criteria</u>	Supported in part	See remarks below
Section 1194.41 <u>Information</u> , <u>Documentation and Support</u>	Supported	

Section 1194.21 Software Applications and Operating Systems – Detail

VPATTM

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Criteria	Supporting Features	Remarks and explanations
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.	Supported	Every feature is assignable to a keystroke; shortcut keys and human readable labels for all shortcuts are provided (in the Macro Configuration panel.) Default keystrokes are also documented in online guides available within the software
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application	Supported with exceptions	Products do not disrupt/disable accessibility features of other apps, including the OS. All Windows accessibility features work in

programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.		TC Admin (Startup) most survive into Live (e.g., cursor options, incl. size, invert, blinking width, etc.)
(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.	Supported with exceptions	Generally, controls highlight on mouse rollover, or visually indicate keyboard driven operations in some manner. KB focus (such as tab between controls) is not universally supported, esp. in more complex panels. The software is designed however in most common operations that KB focus is not a requirement for use with the primary form of control being a tactile control surface.
(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed	Supported with exceptions	

(I) When electronic forms are used, the form shall allow people using	Not applicable	All common use operations
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	Supported	
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.	Supported	
(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supported	
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Supported with exceptions	Less than 1% of all operations have any level of animation. In other places, alternatives exist.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supported	
(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.	Supported	
(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.	Supported	
by the image must also be available in text.		

Assistive Technology to access the information, field elements, and functionality required for completion	do not require any "forms" to be used by
and submission of the form, including all directions and cues.	design and operate based on simple tactile control
	surface.

Section 1194.22 Web-based Internet information and applications – Detail VPAT™

Criteria	Supporting Features	Remarks and explanations
(a) A text equivalent for every non- text element shall be provided (e.g., via "alt", "longdesc", or in element content).	NOT APPLICABLE	Product is not web based
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	NOT APPLICABLE	Product is not web based
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	NOT APPLICABLE	Product is not web based
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	NOT APPLICABLE	Product is not web based
(e) Redundant text links shall be provided for each active region of a server-side image map.	NOT APPLICABLE	Product is not web based
(f) Client-side image maps shall be	NOT APPLICABLE	Product is not

provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.		web based
(g) Row and column headers shall be identified for data tables.	NOT APPLICABLE	Product is not web based
(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.	NOT APPLICABLE	Product is not web based
(i) Frames shall be titled with text that facilitates frame identification and navigation	NOT APPLICABLE	Product is not web based
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	NOT APPLICABLE	Product is not web based
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.	NOT APPLICABLE	Product is not web based
(I) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.	NOT APPLICABLE	Product is not web based
(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).	NOT APPLICABLE	Product is not web based
(n) When electronic forms are designed to be completed on-line,	NOT APPLICABLE	Product is not web based

the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.		
(o) A method shall be provided that permits users to skip repetitive navigation links.	NOT APPLICABLE	Product is not web based
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	NOT APPLICABLE	Product is not web based

Note to 1194.22: The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium: Paragraph (a) - 1.1, (b) - 1.4, (c) - 2.1, (d) - 6.1, (e) - 1.2, (f) - 9.1, (g) - 5.1, (h) - 5.2, (i) - 12.1, (j) - 7.1, (k) - 11.4.

Section 1194.23 Telecommunications Products

Detail

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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	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT

capable of being turned on and off to allow the user to intermix speech with TTY use.		
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(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	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(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	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(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.	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT

automatically reset the volume to the default level after every use.		
(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	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(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.	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(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.	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT

the controls or keys.		
(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.	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(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	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT
(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.	NOT APPLICABLE	PRODUCT IS NOT TELECOMMUNICATIONS PRODUCT

Section 1194.24 Video and Multi-media Products – Detail VPAT™

Criteria	Supporting Features	Remarks and explanations
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a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically. and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.

NOT APPLICABLE, BUT SUPPORTS WITH EXCEPTIONS

Not applicable. This particular requirement is designed so that end user display ("analog devices television displays". "analog television receiver". "computer that includes display circuitry", "DTV receivers") have the ability to display caption data that might be included in a broadcast that they receive.

The TriCaster is not, and does not include a tuner, display device or display circuitry. It is designed not to be a device that receives broadcast data but rather is used as a primary step in the creation of it. The TriCaster itself is not a device that creates caption data.

However it will pass this data through the system and might commonly be used with a separate device that is designed for the creation and integration of caption data.

TriCaster may also be used with industry standard "caption authoring" tools to add captions to

		broadcasts.
	NOT APPLICABLE	This requirement is designed so that tuner devices that may be used with computers have the ability to play back secondary audio signals.
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.		The TriCaster is not a tuner and does not include a tuner device. It is used for the creation of broadcast signal and additionally includes the ability to create secondary audio sources if they are needed for Broadcast. The TriCaster is capable of generating secondary source audio signals.
(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.	NOT APPLICABLE	Not applicable. NewTek is not producing a video or multimedia production for any state or government agency; the TriCaster is not a training or informational video for any federal or state agency. The TriCaster is a standalone portable device for switching and production of video. It has a complete set of written

		instructions in PDF format.
(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.	NOT APPLICABLE	Not applicable. The product is not a video or multimedia production for the agency; the TriCaster is not a training or informational video for any federal or state agency. The TriCaster is a device primarily for creating, not primarily for displaying, of video that has a complete set of written instructions in PDF format.
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	NOT APPLICABLE	Not applicable. See above. It is an intermediate broadcast device for delivering, not receiving broadcast signals, and is not an informational video or multimedia device. There is no alternate text presentation required, and thus it an audio descriptions do not need user selection. It is permanent.

Section 1194.25 Self-Contained, Closed Products – Detail

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Criteria	Supporting Features	Remarks and explanations
(a) Self contained products shall be usable by people with disabilities without requiring an enduser to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT

biological characteristics, shall also be provided.		
(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT
(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT
(g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT
(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT

contrast levels shall be		
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT
(j) (1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT
(j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT
(j)(3) Products which are freestanding, non-	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED,

portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.		CLOSED PRODUCT
(j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.	NOT APPLICABLE	PRODUCT IS NOT A SELF CONTAINED, CLOSED PRODUCT

Section 1194.26 Desktop and Portable Computers – Detail VPAT™

Criteria	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).	NOT APPLICABLE BUT SUPPORTED	Not Applicable, the Product is not a Desktop or Portable Computer. However this criteria is

supported:

(1) Controls and keys shall be tactilely discernible without activating the controls or keys.

Supported, when using control surface.

(2) Controls and keys shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2 N) maximum.

Supported. Keys and controls require much less than 1lb force.

(3) 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.

Supported.

(4) The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or

		sound. Supported
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	NOT APPLICABLE	The Product is not a Desktop or Portable Computer, it also has no touchscreens
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	NOT APPLICABLE	The Product is not a Desktop or Portable Computer; it also uses no Biometric form of ID
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards	NOT APPLICABLE BUT SUPPORTED	The Product is not a Desktop or Portable Computer

Section 1194.31 Functional Performance Criteria – Detail VPAT™

Criteria	Supporting Features	Remarks and explanations
(a) At least one mode of operation and information	NOT APPLICABLE	The product is a video production device that

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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.		requires 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	The product is a video production device that requires user vision.
(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	SUPPORTED	For all visual and video information in editing, switching, etc., no hearing is necessary for operation in most modes. Visual VU meters allow hearing impaired users to manipulate audio without needing to hear it.
(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.	SUPPORTED	External jacks are made available for external audible means for assistive hearing devices. VU Meters and automated sound quality features (such as compressor/limiter and EQ) support audio level and quality control control for hearing impaired users.
(e) At least one mode of operation and information retrieval that does not require user speech shall	SUPPORTED	User speech is not required for any operation.

be provided, or support for Assistive Technology used by people with disabilities shall be provided.		
(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.	SUPPORTED	The product is readily usable from a chair, and the controls are easy to reach for those with limited strength and reach, and without fine motor control, and in fact the product is designed to replace products with more complicated operation.

Section 1194.41 Information, Documentation and Support – Detail VPAT™

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	SUPPORTED	Inline support documentation is provided. It is also provided in PDF format.
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate	SUPPORTED	This information is available at no additional charge.

methods upon request, at no additional charge.		
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	SUPPORTED	Customer Support channels include text (email, snail mail) and telephone, all of which lend themselves to standard assistive technologies.