

Enterprise Infrastructure Solutions (EIS)

Contract Number GS00Q17NSD3000

CDRL 33 Section 508 Conformance Audit - Voluntary Product Accessibility Template (VPAT) – Dark Fiber Service

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Section 508 Conformance Audit - Voluntary Product Accessibility Template®

The information contained within this Voluntary Product Accessibility Template (VPAT) is the result of a third-party, SSB Bart Group (SSB), performing an audit. The audit tested the compliance of the AT&T Government Platform (via the Business Center Portal), and Business Support Systems (BSS) applications in the AT&T Government Center-EIS. The Government Center Portal and all applications were assessed against the applicable requirements of Section 508 of the Rehabilitation Act of 1973 as Amended 1998 and the Web Content Accessibility Guidelines (WCAG) 2.0. The content assessed in the audit (at the direction of AT&T) represents the full features available via the Government Center-EIS application for Dark Fiber Service users.

The testing methodology included manual testing techniques such as keyboard-only testing, color contrast evaluation, and testing using the high contrast setting for users who have low vision. It also included assistive technology testing with ZoomText 10.0, a screen magnification software application for people with low vision; Dragon NaturallySpeaking (Dragon) 12.5, a voice recognition/speech to text software for users with limited mobility; and JAWS 17.0, which is a screen reading software used by people who are visually-impaired.

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 subsequent 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 reader 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.

Table 1. Summary Table - Voluntary Product Accessibility Template

Criteria	Supported
Section 1194.21 Software Applications and Operating Systems	Not Applicable
Section 1194.22 Web-based internet information and applications	Supports
Section 1194.23 Telecommunications Products	Not Applicable
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
Section 1194.41 Information, Documentation and Support	Supports

Table 2. Section 1194.22 Web-based Internet Information and Applications – Detail

508 Clause	Criteria	Support Level	Remarks and Explanations
1194.22(a)	A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Supports	Text equivalents are provided for all non-text elements within the AT&T Government Center-EIS. Alt attributes are provided to all image elements and all complex images, charts and graphs are accompanied with meaningful textual alternatives.
1194.22(b)	Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Supports	Information communicated by multimedia content within the AT&T Government Center-EIS is displayed with synchronized captions for users that cannot discern information conveyed through audio, and by audio descriptions for users that cannot discern visual information conveyed within the video content.
1194.22(c)	Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Supports	Color is not used as the sole means of conveying information, indicating an action, prompting a response, or distinguishing a visual element within the AT&T Government Center-EIS.
1194.22(d)	Documents shall be organized so they are readable without requiring an associated style sheet.	Supports	The AT&T Government Center-EIS does not require an associated style sheet. The focus order and reading order of content is meaningful without reliance on CSS positioning.
1194.22(e)	Redundant text links shall be provided for each active region of a server-side image map.	Supports	Redundant text links are provided for server-side image maps within the AT&T Government Center-EIS.
1194.22(f)	Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.	Supports	Meaningful textual alternatives are provided for client-side image map regions within the AT&T Government Center-EIS.
1194.22(g)	Row and column headers shall be identified for data tables.	Supports	Simple data tables within the AT&T Government Center-EIS structure row and column headers with HTML data table markup and associate cells via the scope attribute.
1194.22(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.	Supports	Complex data tables within the AT&T Government Center-EIS use data table markup to structure row and column headers. The headers implement id and headers attributes to associate the row and column headers to cells within the complex tables.
1194.22(i)	Frames shall be titled with text that facilitates frame identification and navigation.	Supports	Frames within the AT&T Government Center-EIS provide users meaningful textual descriptions via the HTML title attribute.
1194.22(j)	Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Supports	The AT&T Government Center-EIS does not present any blinking or flashing content with a frequency greater than 2 Hz and lower than 55 Hz.

508 Clause	Criteria	Support Level	Remarks and Explanations
1194.22(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.	Supports	The AT&T Government Center-EIS provides users a text-only alternative that is equivalent in functionality and updates consistently and promptly as the primary pages within the application changes.
1194.22(l)	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.	Supports	The AT&T Government Center-EIS allows users to navigate and interact with all interface elements using the keyboard. The use of JavaScript does not prohibit navigation with the keyboard and the use of JavaScript on keyboard focusable objects within the solution does not result in obtrusive focus redirection unless explicitly invoked by the user.
1194.22(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	The AT&T Government Center-EIS does not require an applet, plug-in or other application be present or installed on the client system to interpret page content.
1194.22(n)	When electronic forms are designed to be completed on-line, 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.	Supports through Equivalent Facilitation	<p>Many electronic form elements within the AT&T Government Center-EIS expose MSAA (Microsoft Active Accessibility) API information to assistive technologies. Accessibility information such as the name, state, role, and value of objects is exposed via ARIA or explicit HTML label markup, providing pertinent directions and cues as a user navigates through and interacts with active form elements.</p> <p>The Network Map is an interactive screen control that presents business data including ticket and alarm counts that is layered over a world map to provide visual location references. These data points are linked to alarm and ticket detail screens within the application. The Network Map is keyboard accessible but the position of data point in the map and the location information inferred by the map is not available or discoverable for screen readers.</p> <p>However, equivalent access and information retrieval can be gained via the following:</p> <p>The Network Map menu control enables users to bypass the Map UI and access data points for ticket and alarm counts and detail information directly via the Inventory and Ticket display screens. A skip link is provided to enable keyboard-only users to bypass the</p>

508 Clause	Criteria	Support Level	Remarks and Explanations
			Map Control and directly access other content on the Dashboard screen.
1194.22(o)	A method shall be provided that permits users to skip repetitive navigation links.	Supports	The AT&T Government Center-EIS provides users the ability to skip repetitive navigation content via an off-screen link. This “skip navigation” link is positioned off-screen but is visible when focused with the keyboard. When the user activates the Skip link programmatic focus is set to the main content area of the application.
1194.22(p)	When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not Applicable	The AT&T Government Center-EIS does not require a time-based response and does not sign-out the user due to inactivity.

Table 3. Section 1194.31: Functional Performance Criteria – Detail

508 Clause	Criteria	Support Level	Comments
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 through Equivalent Facilitation	<p>The AT&T Government Center-EIS is mostly operable by users with visual impairments and provides functional support for text-to-speech assistive technologies. The Network Map displays map locations that have Ticket, Inventory or Alarm information associated with them. While map’s data points are accessible to the screen reader, the position of the data points on the map and the location they represent are not communicated to or discoverable by the screen reader.</p> <p>However, equivalent access and information retrieval can be gained via the following:</p> <p>The Network Map menu control enables users to bypass the Map GUI and access the data points for inventory, ticket and alarm counts directly. This menu also provides direct links to ticket, inventory and alarm details. A skip link is provided to enable keyboard-only users to bypass the Network Map GUI and directly access other content on the Dashboard screen.</p> <ul style="list-style-type: none"> ▪ §1194.22 (a) - §1194.22 (c) -Text equivalents are provided for all non-text elements within the AT&T Government Center-EIS except for the Network Map where location information is provided visually but not programmatically. Alternative access to the information communicated by the Network Map is provided via static links.

508 Clause	Criteria	Support Level	Comments
			<ul style="list-style-type: none"> ▪ §1194.22 (d) - the AT&T Government Center-EIS does not require an associated style sheet. The focus order and reading order of content is meaningful without reliance on CSS positioning.. ▪ §1194.22 (l) - the AT&T Government Center-EIS allows screen reader users to navigate and interact with all interface elements using the keyboard. The use of JavaScript does not prohibit navigation with the keyboard and the use of JavaScript on keyboard focusable objects within the solution does not result in obtrusive focus redirection unless explicitly invoked by the user.
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	<p>The AT&T Government Center-EIS is operable by users with low vision and color perception disabilities. The application supports operating system vision enhancement features such as high contrast display, screen resolution and magnification features. the AT&T Government Center-EIS provides functional support with screen magnification assistive technologies such as Zoom Text.</p> <ul style="list-style-type: none"> ▪ §1194.22 (c) - Color is not used as the sole means of conveying information, indicating an action, prompting a response, or distinguishing a visual element within the AT&T Government Center-EIS. ▪ §1194.22 (l) - the AT&T Government Center-EIS allows users to navigate and interact with all interface elements using the keyboard. The use of JavaScript does not prohibit navigation with the keyboard and the use of JavaScript on keyboard focusable objects within the solution does not result in obtrusive focus redirection unless explicitly invoked by the user. ▪ §1194.22 (n) - Electronic form elements within the AT&T Government Center-EIS support users with low vision and color perception disabilities.
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	<p>The AT&T Government Center-EIS does not convey information solely through audio cues and is operable by users with limited or no hearing.</p> <ul style="list-style-type: none"> ▪ §1194.22 (b) - Multimedia content within the AT&T Government Center-EIS provide synchronized captions for users that cannot discern information conveyed through audio and audio descriptions for users that cannot

508 Clause	Criteria	Support Level	Comments
			<p>discern visual information conveyed within the video content.</p> <ul style="list-style-type: none"> ▪ §1194.22 (n) - Electronic form elements within the AT&T Government Center-EIS can be accessed and used by people who are deaf or have hearing impairments.
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	<p>The AT&T Government Center-EIS does not convey information solely through audio cues and is operable by users with limited or no hearing.</p> <ul style="list-style-type: none"> ▪ §1194.22 (b) - Multimedia content within the AT&T Government Center-EIS provide synchronized captions for users that cannot discern information conveyed through audio and audio descriptions for users that cannot discern visual information conveyed within the video content. ▪ §1194.22 (n) – User hearing is not required to access or use information communicated via the AT&T Government Center-EIS forms.
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	<p>The AT&T Government Center-EIS does not require speech as the sole means of operation and information retrieval.</p> <ul style="list-style-type: none"> ▪ §1194.22 (l) - the AT&T Government Center-EIS allows users to navigate and interact with all interface elements using the keyboard. The use of JavaScript does not prohibit navigation with the keyboard and the use of JavaScript on keyboard focusable objects within the solution does not result in obtrusive focus redirection unless explicitly invoked by the user.
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	<p>The AT&T Government Center-EIS is operable by users with limited mobility and provides functional support with voice recognition software assistive technology as well as with the keyboard as a primary input device.</p> <ul style="list-style-type: none"> ▪ §1194.22 (l) - the AT&T Government Center-EIS allows users to navigate and interact with all interface elements using the keyboard. The use of JavaScript does not prohibit navigation with the keyboard and the use of JavaScript on keyboard focusable objects within the solution does not result in obtrusive focus redirection unless explicitly invoked by the user. ▪ §1194.22 (n) - Electronic form elements within the AT&T Government Center-EIS expose MSAA (Microsoft Active Accessibility) API information to assistive technologies. Accessibility

508 Clause	Criteria	Support Level	Comments
			information such as the name, state, role and value of objects is exposed via ARIA or explicit HTML label markup, providing pertinent directions and cues as a user navigates through and interacts with active form elements.

Table 4. Section 1194.41: Information, Documentation and Support

508 Clause	Criteria	Supporting Features	Remarks and Explanations
1194.41(a)	Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supports	AT&T will provide alternative documentation formats to users on request, free of charge
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	AT&T will provide an overview of the accessibility features present in the product, optimal assistive technology configurations for use, means of requesting alternate formats, and known accessibility issues with the product.
1194.41(c)	Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	AT&T support services will provide support for users with hearing impairments via relay services and web chat.