



WorkCentre™ M165 with Xerox Copier Assistant



Voluntary Product Accessibility Template (VPAT)

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Summary Table - Voluntary Product Accessibility Template (VPAT)

Criteria	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems	Supports	Compliant when using the XP PS, PCL5e, and PCL6 enhanced and standard drivers.
Section 1194.22 Web-based internet information and applications	Supports	The WorkCentre™ M165 is compliant with Rule 1194.22.
Section 1194.23 Telecommunications Products	Not applicable	The WorkCentre™ M165 is not a telecommunications product.
Section 1194.24 Video and Multi-media Products	Not applicable	The WorkCentre™ M165 is not a video or multi-media product.
Section 1194.25 Self-Contained, Closed Products	Some limitations exist	Compliant for copy jobs when using the Xerox Copier Assistant, which provides an alternative to the product touch screen using voice guidance, an enlarged user interface, and a standard PC keyboard. Basic and advanced copy jobs can be programmed via a customer-supplied PC copier user interface that can be positioned to any height (for greater accessibility by wheelchair users). Minor exceptions exist with respect to timed responses, and low force and tactilely discernible controls.
Section 1194.26 Desktop and Portable Computers	Not applicable	No computer is sold as part of the product.
Section 1194.31 Functional Performance Criteria	Some limitations exist	Compliant for copy jobs when using the Xerox Copier Assistant, which provides an alternative to the product touch screen using voice guidance, an enlarged user interface, and a standard PC keyboard. Basic and advanced copy jobs can be programmed via a customer-supplied PC copier user interface that can be positioned to any height (for greater accessibility by wheelchair users). Minor exceptions exist with respect to timed responses, and low force and tactilely discernible controls.

<p>Section 1194.41 Information, Documentation, and Support (Added by Xerox) This rule covers accessibility of documentation, training and support for IT products. Xerox includes rule 41 in all its assessments. A detailed table has also been added below.</p>	Supports	The centralization of documentation, training, and support services for most Xerox products allows us to achieve compliance across the corporation.
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Section 1194.21 Software Applications and Operating Systems - Detail Voluntary Product Accessibility Template

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.	Supports	Compliant when using the XP PS, PCL5e, and PCL6 enhanced and standard drivers. In these cases, all commands that can be described textually can be executed from the keyboard.
(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 programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.	Supports	The driver software does not override or disable accessibility features of the host operating system or other software possessing features that have been developed and documented according to industry standards.
(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.	Supports	Compliant when using the XP PS, PCL5e, and PCL6 enhanced and standard drivers. In these cases, a well defined, on-screen indication of the current focus is provided, and the focus is programmatically exposed so that Assistive Technology can track focus and focus changes.

(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 by the image must also be available in text.	Supports	Compliant when using the XP PS, PCL5e, and PCL6 enhanced and standard drivers. In these cases, the driver software makes the appropriate user interface elements available to Assistive Technology.
(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.	Supports	Bitmap image meanings remain consistent throughout the application.
(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.	Supports	All textual information is provided through operating system functions.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	The driver software does not override user-selected contrast and color selections and other individual display attributes.
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Supports	Animation is used for control elements or relevant text, and a non-animated option is available.
(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.	Supports	The driver software does not use color as the only means of conveying information.
(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.	Supports	The driver software permits a user to adjust color and contrast settings, and a variety of color selections are provided to produce a range of contrast levels.
(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.	Supports	The flash rate of any flashing elements does not fall between 2 Hz and 55 Hz.

(l) When electronic forms are used, 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	Electronic forms allow people using Assistive Technology to accurately complete and submit the forms.
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Section 1194.22 Web-based Internet information and applications - Detail Voluntary Product Accessibility Template

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).	Supports	Non-text elements, including audio, that are required for comprehension of content or to facilitate navigation are present, and text equivalents are assigned.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Not applicable	No multimedia presentations are included with the application.
(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	All information conveyed with color is also conveyed by alternative means.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Not applicable	Web pages do not use style sheets.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not applicable	No image maps with active regions are used.
(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.	Not applicable	No image maps with active regions are used.
(g) Row and column headers shall be identified for data tables.	Supports	Row and column headers of data tables use appropriate tags according to the language used.
(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	Data cells and header cells are associated using appropriate tags according to the language used.
(i) Frames shall be titled with text that facilitates frame identification and navigation.	Supports	Frames possess labels that facilitate frame identification and navigation.

(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	Pages do not use (avoid) flashing elements.
(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	Text-only web pages match the content and functionality of primary pages.
(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	Information provided by a scripting language is identified with functional text that can be read by Assistive Technology.
(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	Plug-ins, applets, or other applications are not required to interpret page content.
(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	Electronic forms allow people using Assistive Technology to accurately complete and submit the forms.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	A method is provided that permits users with Assistive Technology to skip repetitive navigation links.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not applicable	No time-out sensitive selections exist.

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 1194.25 Self-Contained, Closed Products - Detail Voluntary Product Accessibility Template

Criteria	Supporting Features	Remarks and explanations
(a) Self contained products shall be usable by people with disabilities without requiring an end-user to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.	Supports	Compliant for copy jobs when using the Xerox Copier Assistant, which provides an alternative to the product touch screen using voice guidance, an enlarged user interface, and a standard PC keyboard. Basic and advanced copy jobs can be programmed via a customer-supplied PC copier user interface.
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Some limitations exist	A time-out alert feature is present and controllable, but no time-out alert is given.
(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).	Some limitations exist	Compliant for copy jobs when using the Xerox Copier Assistant, which provides an alternative to the touch screen user interface for copy jobs. Minor exceptions occur with respect to low force controls (i.e., the side guide adjustment force is greater than the specified force) and tactilely discernible controls (i.e., the On/Off button depresses but
(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 biological characteristics, shall also be provided.	Not applicable	Biometric forms are not used.
(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	There is no auditory output.
(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	There is no voice output.

<p>(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.</p>	<p>Not applicable</p>	<p>The product does not use color coding.</p>
<p>(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.</p>	<p>Not applicable</p>	<p>There are no color contrast settings.</p>
<p>(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.</p>	<p>Supports</p>	<p>The flash rate of any flashing elements does not fall between 2 Hz and 55 Hz.</p>
<p>(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.</p>	<p>Supports</p>	<p>All position measurements were performed against the specified vertical plane.</p> <p>Wheelchair users can program jobs and make copies using the Xerox Copier Assistant and the customer-supplied PC and keyboard that can be positioned to any height.</p>
<p>(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.</p>	<p>Supports</p>	<p>All operable controls are within specification.</p> <p>Wheelchair users can program jobs and make copies using the Xerox Copier Assistant and the customer-supplied PC and keyboard that can be positioned to any height.</p>
<p>(j) (3) 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 more than 10 inches and not more than 24</p>	<p>Supports</p>	<p>All operable controls are within specification.</p>

inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.		Wheelchair users can program jobs and make copies using the Xerox Copier Assistant and the customer-supplied PC and keyboard that can be positioned to any height.
(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.	Supports	All operable controls are within specification. Wheelchair users can program jobs and make copies using the Xerox Copier Assistant and the customer-supplied PC and keyboard that can be positioned to any height.

Section 1194.31 Functional Performance Criteria - Detail Voluntary Product Accessibility Template

Criteria	Supporting Features	Remarks and explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.	Some limitations exist	Compliant for copy jobs when using the Xerox Copier Assistant, which provides an alternative to the product touch screen using voice guidance, an enlarged user interface, and a standard PC keyboard. Basic and advanced copy jobs can be programmed via a customer-supplied PC copier user interface. Minor exceptions exist with respect to timed responses, and low force and tactilely discernible controls.
(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	All areas requiring visual user interaction with visual acuity better than 20/70 support screen enlargement and voice output or Assistive Technology.
(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	No operations require user hearing.
(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.	Not applicable	No audio information is required for use of the product.

(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	No operations require speech.
(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.	Some limitations exist	Compliant for copy jobs when using the Xerox Copier Assistant, which provides an alternative to the product touch screen using voice guidance, an enlarged user interface, and a standard PC keyboard. Basic and advanced copy jobs can be programmed via a customer-supplied PC copier user interface that can be positioned to any height (for greater accessibility by wheelchair users). A minor exception exists concerning the adjustment of paper guides when loading documents (i.e., the side guide adjustment force is greater than the specified force).

Section 1194.41 Information, Documentation and Support - Detail Xerox Addition to the Voluntary Product Accessibility Template

Criteria	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats.	Supports	Product support documentation is available in alternate format.
(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	Accessibility and compatibility information is available at www.xerox.com/section508 .
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	Xerox provides support services that accommodate the communication needs of end-users with disabilities.

What is the Voluntary Product Accessibility Template (VPAT)?

The purpose of the Voluntary Product Accessibility Template is to assist Federal contracting officials in making preliminary assessments regarding the availability of commercial Electronic and Information Technology products and services with features that support accessibility. It is assumed 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.

User Tasks Assessed

For the WorkCentre™ M165, general user tasks were assumed to be programming and running jobs, and unloading jobs. According to the Federal Access Board, tasks such as clearing jams, loading supplies, and adding paper are considered maintenance tasks and are not included in this summary.