Buffalo Americas Accessibility Conformance Report

Revised Section 508 Edition

(Based on VPAT[®] Version 2.4Rev)

Name of Product/Version: BRXL-PUS6U3B-TU

Report Date: April 11, 2023

Product Description: Portable optical disc drive

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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	Level A (Yes)
	Level AA (Yes)
	Level AAA (Yes)
Revised Section 508 standards published January 18, 2017 and corrected 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.

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- **Partially Supports**: 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 Revised Section 508:

- Chapter 5 501.1 Scope, 504.2 Content Creation or Editing
- 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 <u>WCAG 2.0 Conformance Requirements</u>.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
<u>1.1.1 Non-text Content</u> (Level A) Also applies to:		This product is a portable optical drive and is not an Internet-based application.
Revised Section 508 • 501 (Web)(Software)	Not Applicable	
504.2 (Authoring Tool)602.3 (Support Docs)		
 1.2.1 Audio-only and Video-only (Prerecorded) (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 1.2.2 Captions (Prerecorded) (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 1.3.1 Info and Relationships (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.

Criteria	Conformance Level	Remarks and Explanations
 1.3.2 Meaningful Sequence (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 1.3.3 Sensory Characteristics (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
1.4.1 Use of Color (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
1.4.2 Audio Control (Level A)Also applies to:Revised Section 508501 (Web)(Software)504.2 (Authoring Tool)602.3 (Support Docs)	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
2.1.1 Keyboard (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
2.1.2 No Keyboard Trap (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software)	Not Applicable	This product is a portable optical drive and is not an Internet-based application.

Criteria	Conformance Level	Remarks and Explanations
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		
2.2.1 Timing Adjustable (Level A)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
• 501 (Web)(Software)	Not Applicable	
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		
2.2.2 Pause, Stop, Hide (Level A)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
• 501 (Web)(Software)	Not Applicable	
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
2.3.1 Three Flashes or Below Threshold (Level A)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
2.4.1 Bypass Blocks (Level A)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
 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		
2.4.2 Page Titled (Level A)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
2.4.3 Focus Order (Level A)	Not Applicable	This product is a portable optical drive and is not an
Also applies to:		Internet-based application.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		
 2.4.4 Link Purpose (In Context) (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 3.1.1 Language of Page (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 3.2.1 On Focus (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 3.2.2 On Input (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 3.3.1 Error Identification (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.

Criteria	Conformance Level	Remarks and Explanations
 3.3.2 Labels or Instructions (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 4.1.1 Parsing (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 4.1.2 Name, Role, Value (Level A) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
 1.2.4 Captions (Live) (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 602.3 (Support Docs) <u>1.2.5 Audio Description (Prerecorded)</u> (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.

Criteria	Conformance Level	Remarks and Explanations
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		
1.4.3 Contrast (Minimum) (Level AA)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
 501 (Web)(Software) 	Not Applicable	
• 504.2 (Authoring Tool)		
• 602.3 (Support Docs)		
<u>1.4.4 Resize text</u> (Level AA)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
 501 (Web)(Software) 		
 504.2 (Authoring Tool) 		
602.3 (Support Docs)		
1.4.5 Images of Text (Level AA)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
2.4.5 Multiple Ways (Level AA)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
 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		
2.4.6 Headings and Labels (Level AA)		This product is a portable optical drive and is not an
Also applies to:		Internet-based application.
Revised Section 508	Not Applicable	
• 501 (Web)(Software)		
• 504.2 (Authoring Tool)		
602.3 (Support Docs)		
2.4.7 Focus Visible (Level AA)	Not Applicable	This product is a portable optical drive and is not an
Also applies to:		Internet-based application.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		
 3.1.2 Language of Parts (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 3.2.3 Consistent Navigation (Level AA) Also applies to: Revised Section 508 501 (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	This product is a portable optical drive and is not an Internet-based application.
 3.2.4 Consistent Identification (Level AA) Also applies to: Revised Section 508 501 (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	This product is a portable optical drive and is not an Internet-based application.
 3.3.3 Error Suggestion (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.
 3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Not Applicable	This product is a portable optical drive and is not an Internet-based application.

Table 3: Success Criteria, Level AAA

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
1.2.8 Media Alternative (Prerecorded) (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
1.2.9 Audio-only (Live) (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
1.4.6 Contrast (Enhanced) (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
1.4.7 Low or No Background Audio (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
1.4.8 Visual Presentation (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
1.4.9 Images of Text (No Exception) (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
2.1.3 Keyboard (No Exception) (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
2.2.3 No Timing (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
2.2.4 Interruptions (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
2.2.5 Re-authenticating (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
2.3.2 Three Flashes (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.
2.4.8 Location (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply		Internet-based application.

Criteria	Conformance Level	Remarks and Explanations
2.4.9 Link Purpose (Link Only) (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
2.4.10 Section Headings (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
3.1.3 Unusual Words (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
3.1.4 Abbreviations (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
3.1.5 Reading Level (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
3.1.6 Pronunciation (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
3.2.5 Change on Request (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
3.3.5 Help (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.
3.3.6 Error Prevention (All) (Level AAA)	Not Applicable	This product is a portable optical drive and is not an
Revised Section 508 – Does not apply	Not Applicable	Internet-based application.

Revised Section 508 Report

Notes:

Chapter 3: <u>Functional Performance Criteria</u> (FPC)

Criteria	Conformance Level	Remarks and Explanations
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.	Does Not Support	
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.	Partially Supports	With a single physical eject button, users with limited vision will be able to operate hardware.
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.	Partially Supports	Power LED on hardware enables users with limited vision to operate hardware.
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.	Supports	Devices does not require user hearing to operate or for information retrieval.
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.	Supports	Device does not convey information or require actuation of controls using audio information.
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.	Supports	Device does not require user speech to operate or retrieve information.
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.	Does Not Support	
302.8 With Limited Reach and Strength	Does Not Support	

Criteria	Conformance Level	Remarks and Explanations
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.		
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.	Does Not Support	

Chapter 4: <u>Hardware</u>

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.	Does Not Support	
402.2.2 Transactional Outputs Where transactional outputs are provided, the speech output shall audibly provide all information necessary to verify a transaction.	Does Not Support	
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.	Does Not Support	
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.	Does Not Support	
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.	Does Not Support	

Criteria	Conformance Level	Remarks and Explanations
EXCEPTION: Devices for personal use shall not be required to conform to 402.2.5.		
402.3 Volume	Heading cell – no response required	Heading cell – no response required
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.	Does Not Support	
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.	Does Not Support	
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.	Does Not Support	
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).	Does Not Support	
<u>403 Biometrics</u>	Heading cell – no response required	Heading cell – no response required
403.1 General Where provided, biometrics shall not be the only means for user identification or control. 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.	Does Not Support	
404 Preservation of Information Provided for Accessibility	Heading cell – no response required	Heading cell – no response required
404.1 General	Does Not Support	

Criteria	Conformance Level	Remarks and Explanations
ICT that transmits or converts information or communication shall not remove non-proprietary information provided for accessibility or shall restore it upon delivery.		
<u>405 Privacy</u>	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.	Does Not Support	
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.	Supports	Product includes standard microUSB and DC power ports.
<u>407 Operable Parts</u>	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.	Not Applicable	Product only has one physical power button.
407.3 Input Controls	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible Input controls shall be operable by touch and tactilely discernible without activation.	t Supports	
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	
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).	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
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.		
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	
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	Product can be operated with one hand.
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.	Not Applicable	
407.8 Reach Height and Depth	Heading cell – no response required	Heading cell – no response required
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.	Not Applicable	
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.	Not Applicable	
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.	Not Applicable	
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.		

Criteria	Conformance Level	Remarks and Explanations
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	Not Applicable	
mm) high maximum and 15 inches (380 mm) high minimum above the floor.		
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	Not Applicable	
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.		
407.8.3 Forward 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	Not Applicable	
the vertical reference plane. 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.		
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	Not Applicable	
operable part shall be 48 inches (1220 mm) high maximum and 15 inches	Not Applicable	
(380 mm) high minimum above the floor.		
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,	Not Applicable	
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).		
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach	AL-1 A - 11 - 11	
The height of the operable part shall conform to Table 407.8.3.2.1.	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
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.	Not Applicable	
408 Display Screens	Heading cell – no response required	Heading cell – no response required
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.	Not Applicable	
408.3 Flashing Where ICT emits lights in flashes, there shall be no more than three flashes in any one-second period. 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.	Not Applicable	
409 Status Indicators	Heading cell – no response required	Heading cell – no response required
409.1 General Where provided, status indicators shall be discernible visually and by touch or sound.	Supports	Product LED displays generates patterns that can inform user of current device status.
<u>410 Color Coding</u>	Heading cell – no response required	Heading cell – no response required
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	Partially Supports	Product LED displays generates patterns that can inform user of current device status.
distinguishing a visual element.		
distinguishing a visual element. <u>411 Audible Signals</u>	Heading cell – no response required	Heading cell – no response required
	Heading cell – no response required Supports	Heading cell – no response required
411 Audible Signals 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		Heading cell – no response required Heading cell – no response required
411 Audible Signals 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	Supports	

Criteria	Conformance Level	Remarks and Explanations
Volume gain conforming to 47 CFR 68.317 shall be provided on analog and digital wireline telephones.		
412.2.2 Volume Gain for Non-Wireline ICT A method for increasing volume shall be provided for non-wireline ICT.	Not Applicable	
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-	Not Applicable	
2011 (incorporated by reference, see 702.5.1).		
412.3.2 Wireline Handsets ICT in the form of wireline handsets, including cordless handsets, shall conform to TIA-1083-B (incorporated by reference, see702.9.1).	Not Applicable	
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	
412.5 Real-Time Text Functionality	Reserved for future	Reserved for future
412.6 Caller ID Where provided, caller identification and similar telecommunications functions shall be visible and audible.	Not Applicable	
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	
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.	Not Applicable	
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.	Not Applicable	
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).	Not Applicable	
412.8.4 Voice Mail and Other Messaging Systems	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
Where provided, voice mail, auto-attendant, interactive voice response,		
and caller identification systems shall be usable with a TTY.		
413 Closed Caption Processing Technologies	Heading cell – no response required	
413.1.1 Decoding and Display of Closed Captions		
Players and displays shall decode closed caption data and support	Not Applicable	
display of captions.		
413.1.2 Pass-Through of Closed Caption Data	Not Applicable	
Cabling and ancillary equipment shall pass through caption data.		
414 Audio Description Processing Technologies	Heading cell – no response required	Heading cell – no response required
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	Not Applicable	
provide processing of audio description when encoded as a Visually	i i i i i i i i i i i i i i i i i i i	
Impaired (VI) associated audio service that is provided as a complete		
program mix containing audio description according to the ATSC A/53		
standard.		1
414.1.2 Other ICT		
ICT other than digital television tuners shall provide audio description	Not Applicable	
processing.		
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	Not Applicable	
provide operable parts for caption selection.		1
415.1.2 Audio Description Controls		
Where ICT provides operable parts for program selection, ICT shall also	Not Applicable	
provide operable parts for the selection of audio description.		

Chapter 5: <u>Software</u>

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.x section	See information in WCAG 2.x section
502 Interoperability with Assistive Technology	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
502.2.1 User Control of Accessibility Features		
Platform software shall provide user control over platform features that	Not Applicable	
are defined in the platform documentation as accessibility features.		
502.2.2 No Disruption of Accessibility Features		
Software shall not disrupt platform features that are defined in the	Not Applicable	
platform documentation as accessibility features.		
502.3 Accessibility Services	Heading cell – no response required	
502.3.1 Object Information		
The object role, state(s), properties, boundary, name, and description shall be programmatically determinable.	Not Applicable	
502.3.2 Modification of Object Information		
States and properties that can be set by the user shall be capable of being set programmatically, including through assistive technology.	Not Applicable	
502.3.3 Row, Column, and Headers		
If an object is in a data table, the occupied rows and columns, and any		
headers associated with those rows or columns, shall be	Not Applicable	
programmatically determinable.		
502.3.4 Values		
Any current value(s), and any set or range of allowable values associated	Not Applicable	
with an object, shall be programmatically determinable.		
502.3.5 Modification of Values		
Values that can be set by the user shall be capable of being set	Not Applicable	
programmatically, including through assistive technology.		
502.3.6 Label Relationships		
Any relationship that a component has as a label for another component,	Not Applicable	
or of being labeled by another component, shall be programmatically	Not Applicable	
determinable.		
502.3.7 Hierarchical Relationships		
Any hierarchical (parent-child) relationship that a component has as a	Not Applicable	
container for, or being contained by, another component shall be		
programmatically determinable.	1	
502.3.8 Text		
The content of text objects, text attributes, and the boundary of text	Not Applicable	
rendered to the screen, shall be programmatically determinable.	1	
502.3.9 Modification of Text	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
Text that can be set by the user shall be capable of being set		
programmatically, including through assistive technology.		
502.3.10 List of Actions		
A list of all actions that can be executed on an object shall be	Not Applicable	
programmatically determinable.		
502.3.11 Actions on Objects		
Applications shall allow assistive technology to programmatically execute	Not Applicable	
available actions on objects.		
502.3.12 Focus Cursor		
Applications shall expose information and mechanisms necessary to track	Not Applicable	
focus, text insertion point, and selection attributes of user interface		
components.		
502.3.13 Modification of Focus Cursor		
Focus, text insertion point, and selection attributes that can be set by the	Not Applicable	
user shall be capable of being set programmatically, including through the		
use of assistive technology.		
502.3.14 Event Notification		
Notification of events relevant to user interactions, including but not	Not Applicable	
limited to, changes in the component's state(s), value, name, description,		
or boundary, shall be available to assistive technology.		
502.4 Platform Accessibility Features		
Platforms and platform software shall conform to the requirements in		
ANSI/HFES 200.2, Human Factors Engineering of Software User Interfaces		
 Part 2: Accessibility (2008) (incorporated by reference, see 702.4.1) 		
listed below:		
Section 9.3.3 Enable sequential entry of multiple (chorded) keystrokes;	Not Applicable	
Section 9.3.4 Provide adjustment of delay before key acceptance;		
Section 9.3.5 Provide adjustment of same-key double-strike acceptance;		
Section 10.6.7 Allow users to choose visual alternative for audio output;		
Section 10.6.8 Synchronize audio equivalents for visual events;		
Section 10.6.9 Provide speech output services; and		
Section 10.7.1 Display any captions provided.		
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
Applications shall permit user preferences from platform settings for color, contrast, font type, font size, and focus cursor. EXCEPTION: Applications that are designed to be isolated from their underlying platform software, including Web applications, shall not be required to conform to 503.2.		
503.3 Alternative User Interfaces Where an application provides an alternative user interface that functions as assistive technology, the application shall use platform and other industry standard accessibility services.		
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	
503.4.1 Caption Controls Where user controls are provided for volume adjustment, ICT shall provide user controls for the selection of captions at the same menu level as the user controls for volume or program selection.	Not Applicable	
503.4.2 Audio Description Controls Where user controls are provided for program selection, ICT shall provide user controls for the selection of audio descriptions at the same menu level as the user controls for volume or program selection.	Not Applicable	
504 Authoring Tools	Heading cell – no response required	Heading cell – no response required
504.2 Content Creation or Editing (if not authoring tool, enter "not applicable")	See <u>WCAG 2.x</u> section	See information in WCAG 2.x section
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion Authoring tools shall, when converting content from one format to another or saving content in multiple formats, preserve the information required for accessibility to the extent that the information is supported by the destination format.		
504.2.2 PDF Export Authoring tools capable of exporting PDF files that conform to ISO 32000-1:2008 (PDF 1.7) shall also be capable of exporting PDF files that conform to ANSI/AIIM/ISO 14289-1:2016 (PDF/UA-1) (incorporated by reference, see 702.3.1).	Not Applicable	
504.3 Prompts Authoring tools shall provide a mode of operation that prompts authors to create content that conforms to Level A and Level AA Success Criteria	Not Applicable	

Criteria	Conformance Level	Remarks and Explanations
and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1) for supported features and, as applicable, to file formats supported by the authoring tool.		
504.4 Templates Where templates are provided, templates allowing content creation that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1) shall be provided for a range of template uses for supported features and, as applicable, to file formats supported by the authoring tool.	Not Applicable	

Chapter 6: <u>Support Documentation and Services</u>

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
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.	Partially Supports	Product hardware documentation is available online in an accessible HTML format through: <u>https://d.buffalo.jp/BRXL-</u> <u>PUS6U3/</u> Software documentation is provided by CyberLink.
602.3 Electronic Support Documentation	See <u>WCAG 2.x</u> section	See information in WCAG 2.x 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.	Not Applicable	
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.	Supports	Buffalo Americas Customer Support provides accessibility and compatibility features information as requested.
603.3 Accommodation of Communication Needs	Supports	Support via the Internet is available through the Buffalo Knowledge

Criteria	Conformance Level	Remarks and Explanations
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.		Base at https://www.buffalotech.com/knowledge- base.
		For additional information on support options provided by Buffalo Americas visit <u>https://www.buffalotech.com/support</u> .

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